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FEFAC contribution to the Call for Evidence regarding the EU Biotech Act

FEFAC representing the European manufacturers of premixtures and compound feed for food producing animals would like to welcome the EU Commission initiative to publish a biotech act and would like herewith to share its perspectives.

The EU feed industry has a legitimate interest in biotech applications in three main areas

- Improvement of plant breeding via genetic modifications or via new breeding techniques, to allow increasing the supply of vegetable resources for use as food or as feed, either directly or via co-products of the food processing industry
- Access to essential feed additives, in particular nutritional feed additives like vitamins or amino-acids, a number of which being produced nowadays by fermentation;
- Innovative feed solutions, including use of feed additives with functions related to the minimization of the environmental of livestock production or to support animal health and welfare.

FEFAC agrees that, at present, the EU biotech industry is not exploiting its full market potential, not only regarding innovative substances, but primarily for large markets like vitamins or amino-acids. The level of dependency of the EU upon third countries may be estimated around 70% for these additives overall, with 100% for certain substances. Furthermore, the main and often only supplier worldwide is China, preventing any mitigation of the vulnerability via sourcing from other origins. FEFAC is performing a detailed vulnerability assessment regarding access to these substances and will make the results available to the EU Commission services. Vitamins and amino acids have a critical importance for the EU food security, as a means in particular to support animal welfare, to lower EU imports of protein-rich feed materials like soya and to support food security, via the optimisation of the zootechnical performance and output of food of animal origin. FEFAC is therefore advocating for the recognition of the status of vitamins and amino acids produced by fermentation as critical chemicals.

FEFAC also agrees with the EU Commission that the main reason for the EU deficit of competitiveness vs. third countries relates to the production costs, in particular feedstocks (carbohydrates) and energy. FEFAC strongly believes that these two competitiveness parameters must be addressed as a matter of priority and urgently.

FEFAC is of the view that certain regulatory constraints also weigh on the competitiveness of the EU biotech industry:

- Access to the market for innovative feed additives is hampered by bureaucratic procedures and requests for evidence of efficacy, which in certain cases is costly and disproportionate.
- 0-tolerance for the safe presence of residual fragments of recombinant DNA in feed additives produced by fermentation involving GM micro-organisms is putting suppliers of such additives at risk of non-compliance and therefore legal insecurity;

- Burdensome requirements for the authorization of biomass from genetically-modified micro-organisms as feed, depriving the EU fermentation industry from a local outlet for such biomass and the EU feed industry from access to a highly digestible protein source.

FEFAC would also like to take the occasion of this call for evidence to encourage EU legislators to adopt a legal framework for plants produced by new genetic techniques that favours their uptake by EU farmers to the benefit of the feed and food chain, from producers to consumers.

FEFAC is available to provide additional input via targeted consultations on this strategic topic.