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### **FEFAC comments on the call for evidence for a simplification of administrative burden in environmental legislation**

FEFAC representing the EU manufacturers of feed for food producing animals welcomes the initiative of the EU Commission to simplify and reduce the administrative burden related to the enforcement of the environmental legislation, in line with the EC “better regulation” principles. We understand that the purpose is not to step back on the objectives of the environmental legislation but on means to enforce it in way that would not undermine its ambition, but can help reduce admin burden to competent control authorities and operators, with use of “smart” control tools including robust private sector verification and certification programmes based on recognized auditing standards (e.g. ISO).

In this sense, FEFAC welcomes the measures listed in the Call for Evidence, in particular as regards the harmonization of the provisions for authorised representatives for extended producer responsibility (EPR) in each Member State where a producer sells a product falling under EPR rules and on facilitation of EPR reporting. We would support the establishment of a centralised EPR platform, interoperable EPR systems and databases as solutions to reduce administrative burden at no cost for the environment, and also as significant steps towards a single market for waste.

We also welcome the ambition to streamline reporting obligations, and promote further digitalisation of reporting in the area of industrial emissions and waste management.

FEFAC expect that the omnibus will also identify and include in its scope certain legal environmental legislative frameworks known for their excessive administrative requirements for control authorities and operators/traders, in particular the EU Deforestation Regulation (EUDR). The implementation of the EUDR continues to be one of the main challenges for our sector. The commitment of FEFAC members to stop deforestation is ongoing, clear and firm, as demonstrated by the work carried out to develop the FEFAC Soy Sourcing Guidelines, jointly with value chain partners and civil society organisations, with independent benchmarking performed by the International Trade Centre (ITC) of robust private sector verification and certification programme for soy products used for feeding purposes (since 2015). The schemes that have been positively passed the benchmarking process against the FEFAC Soy Sourcing Guidelines 2023 (18 schemes as of September 2025) are able to ensure the absence of deforestation in soy production areas used for animal feed and provide verifiable assurances regarding legality requirements in the country of origin.

At this stage, FEFAC is highly concerned about the capacity of the soy value chain to ensure full EU market coverage (approximately 30 Mio tons soybeanmeal equivalent of which 95% have to imported) with a view to EUDR enforcement as from 30 December 2025, leading to potential supply chain disruption as well as significant cost increases, which may jeopardize

the EU policy goals on food security, resilience and competitiveness of EU livestock production (as laid down in the new European Commission Vision on Food & Agriculture). This stems mainly from the EUDR's requirements on traceability and legality provisions in a value chain that is highly complex and globalized.

We strongly recommend the European Commission to investigate the scope for a mass balance-based solution, instead of applying the principle of segregation as the only way to avoid severe disruption of the soy supply chain. There is need for an immediate proposal for postponement of the enforcement of the EUDR, providing time develop operational solutions. According to our information, the readiness of EU enforcement at national level is currently very disparate and fragmented, thereby very likely leading to an unharmonized implementation, which can undermine the functioning of the Single Market.

With only 3 months left until the regulation's implementation, the European compound feed sector (approximately 3000 feed mills) is currently experiencing a repetition of last year's market "freeze" situation, where feed companies are again unable to appropriately close contracts for soy purchases (now for Q1/Q2 2026), due to a lack of market offers resulting from concerns with legal uncertainty, which have not been duly addressed in the most recent versions of the EUDR FAQ and Guidance Document (April 2025).