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FEFAC contribution to call for evidence Circular Economy Act

FEFAC welcomes the opportunity to contribute to the call for evidence for the impact assessment anticipating the Circular Economy Act. We strongly support the objective of increasing circularity as a key driver for EU Competitiveness Compass objectives on competitiveness, decarbonisation, and reduced strategic dependencies. Minimising waste and reusing residual flows in a way that safely reintroduces these resources into new product lifecycles are fundamental principles of a circular economy.

However, we regret that the current Call for Evidence appears to exclude nutrients from its scope. This omission risks overlooking a vital part of the circular bioeconomy. Including nutrient circularity in the future Circular Economy Act would be highly relevant to stimulate circularity in the EU agrifood system, including the livestock and feed sectors.

The livestock sector both uses and produces biomass. Beyond food, it supplies essential nutrients for crop fertilisation and bio-based raw materials for diverse industries (e.g. clothing, cosmetics, pharmaceuticals). In animal feed production, the feed sector contributes to the circular bioeconomy by upcycling nutrients from by-products from the food industry (e.g. bran from flour milling) and from non-food sectors (e.g. protein meals from ethanol production). These “[circular feed](#)” materials reduce reliance on feed-dedicated crops and improve the environmental footprint of animal production.

The *Strategic Dialogue on the Future of EU Agriculture* (September 2024) called for “innovative circular economy approaches, such as circular feed solutions based on co-products, by-products, and the conversion of waste for food and feed, especially in monogastric systems.” Likewise, the *Vision on Agriculture* (February 2025) highlighted the importance of circularity for food security and sovereignty.

Expanding the use of circular feed can contribute to multiple EU policy goals:

- Ensuring that animal feed production complements, rather than competes with food for human consumption;
- Reduce animal feed import dependency / increase food system autonomy;
- Contribute to the decarbonisation of animal production;
- Achieve the food waste reduction targets;
- Increase the use of alternative feed (protein) materials;
- Closing of nutrient cycles, especially relevant for critical raw materials like phosphates.

FEFAC therefore advocates for maintaining access to existing residual biomass flows currently used as circular feed. Similar to recent developments under the EU Bioeconomy Strategy, there is a growing focus on converting “waste” biomass into bio-based products or bioenergy, often overlooking the higher value of keeping nutrients within the food chain via feed. Feed use typically ranks higher in the bioeconomy hierarchy of nutrient applications.

We are concerned that an excessive emphasis on upgrading waste streams might unintentionally downgrade biomass quality and integrity, merely to improve circularity metrics such as the “circularity rate from upgraded waste.”

The Circular Economy Act should therefore explicitly include maintaining nutrient circularity within the food value chain as a key objective. This includes facilitating feed access to certain safe resources that are currently excluded under existing regulations. Together with seven other EU organisations, FEFAC has published a [Circular Feed Catalogue](#) identifying regulatory obstacles that currently limit feed circularity. One key piece of legislation requiring review is the Animal By-Products Regulation, which was designed in times of crisis and no longer reflects the current urgency of transitioning to a circular bioeconomy.