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## **FEFAC contribution to the Call for Evidence regarding the EU Biotech Act II**

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 II and would like herewith to share its perspectives.

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

- 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;
- 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.

FEFAC agrees that, at present, the EU biotech industry is not exploiting its full market potential, not only regarding innovative substances, but primarily for already existing substances like vitamins or amino-acids for which the demand exists already but exceeds dramatically the EU production. 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 issued in 2025 a detailed [vulnerability assessment](#) regarding access to these substances. 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 substances.

FEFAC holds the view that the main reason for the EU deficit of competitiveness of the EU biotech industry vs. third countries competitors lays primarily in 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, as requested in the [FEFAC recommendations for mitigation measures](#).

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 costly and disproportionate bureaucratic procedures; an enabling legal framework would be essential to allow EU feed manufacturers and livestock farmers to get access to innovative solutions in the transition to more sustainable livestock systems; pre-submission advice delivered by EFSA to applicants would be of immediate benefit;
- Burdensome requirements for the authorization of biomass from genetically-modified micro-organisms as this deprive 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 is available to provide additional input via targeted consultations on this strategic topic.