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FEFAC CONTRIBUTION TO THE CALL FOR EVIDENCE REGARDING THE EU LIVESTOCK STRATEGY

FEFAC represents the EU compound feed sector, the largest single input sector for livestock and aquaculture production. It is a key enabler of resilience, profitability and the transition towards more sustainable and climate-neutral production systems.

FEFAC therefore strongly welcomes the European Commission's initiative to develop an EU Livestock Strategy, recognising the livestock sector and its value chain as a strategic asset for EU food security, rural livelihoods and the circular bioeconomy. In our view, coherence between this Livestock Strategy and the evolution of EU agricultural, trade, climate and bioeconomy policies is essential to ensure a stable, predictable framework that rewards sustainable livestock production systems while safeguarding competitiveness and affordability of animal products for EU consumers.

General considerations:

The Strategy should set out a coherent roadmap across policies including practical and operational tools for livestock farmers to increase EU and global food and feed security, enhance resilience and profitability of EU livestock systems, and deliver climate-positive outputs from livestock farming and value chains.

In addition to the elements highlighted in the call for evidence, we wish to underline the central role of animal nutrition and feed-related innovation in delivering both on economic and environmental objectives linked to the transformation of the livestock sector by providing operational tools to livestock farmers. Precision feeding, modern feed additives and advanced formulation tools are key to improving feed efficiency, reducing enteric and manure-related emissions and enhancing animal health and welfare, while feed circularity solutions – including co-products from the food, non-food and biofuel industries, single-cell proteins, processed former foodstuffs and other non-human edible biomass – are key to closing nutrient cycles and mitigating land-use pressure. Robust life-cycle assessment tools and harmonised methodologies (such as [FAO-LEAP](#), [PEF Feed category rules](#) and the [GFLI database](#)) already exist and have been implemented successfully to quantify the environmental footprint of feed and support credible and verifiable [“green feed labelling”](#), thereby facilitating market recognition and targeted policy incentives for lower-impact production.

At the same time, the Strategy should address structural bottlenecks that have so far limited the sector's capacity to invest and adapt, including the outdated and overly burdensome EU feed additives legislation, with a slow and costly authorisation process discouraging innovators to invest in the EU.

A balanced approach to EU trade and reciprocity – including better use of SPS/TBT equivalence and promotion of international convergence on production standards are also necessary to preserve a level playing field while upholding high EU expectations on safety, environment and welfare. Careful implementation of new regulatory measures such as the EUDR or EU policy on pesticides residues in imported feed ingredients should be based on meaningful impact assessments, considering potentially high extra-costs of trade disruption penalizing the EU livestock sector and compromising food and feed security. We therefore call on the Commission to integrate into the Livestock Strategy the joint recommendations submitted by the livestock value chain in the recent Livestock Workstream meetings and surveys, and to build on existing analytical work (for example on circular feed and environmental footprinting) when designing future support and governance arrangements.

FEFAC e proposes also establishing dedicated technical subgroups under the Livestock Workstream. These subgroups could include experts from across the livestock value chain, civil society and the relevant Commission Directorates-General. In particular, a dedicated subgroup on pre-farm gate activities deserves urgent attention. The resilience and the competitiveness of the EU livestock farmers and the entire livestock supply chain depend heavily on the availability in the EU of state-of-the-art feeding, genetics and animal health products, strategies and services. Their development and competitiveness are essential to encourage their uptake by EU farmers.

Food Security and Competitiveness:

The Strategy should acknowledge livestock's central role in providing nutritious, safe, affordable, high-quality animal-source foods to EU consumers and export markets, and embed this in Single Market measures that avoid fragmentation and reduce administrative burden. Strengthening implementation and harmonisation of EU feed and animal product legislation is identified as a priority to prevent trade distortions between Member States and unnecessary obstacles to intra-EU trade.

Competitiveness must be supported by innovation and digitalisation, including investments in precision feeding, digital tools and innovative feed solutions that improve efficiency, reduce production costs and lower the environmental footprint of livestock systems under high EU standards. The Strategy should also back investment in transport, storage and processing infrastructure (especially for feed and protein crops) and simplify administrative & environmental permits for modernising stables and building new sites, as outdated infrastructure cannot deliver the required footprint reductions.

In view of the current geopolitical environment and recurrent supply shocks, strategic investments in effective mitigation measures to secure continuous supply of essential feed ingredients, should form part of the recently announced EU Stockpiling Strategy and EU Contingency Plan, to strengthen feed security and the overall resilience of EU livestock production.

Long-term investment and innovation framework:

FEFAC recommends establishing a long-term EU investment plan for livestock and aquaculture farms that increases innovation capacity and accelerates uptake of modern tools at farm and value-chain level, including digital "big data" tools, genetics, sustainable "low footprint" feed technologies and animal health solutions. CAP and other EU financial instruments should explicitly target innovation and transition at livestock and aquaculture farms, ensuring that smaller and less well-resourced livestock producers can adopt precision feeding, circular feed use and sensor-based technologies rather than being left behind.

Support for research and innovation should cover circular feed resources, plant breeding, animal health and welfare solutions, including New Genomic Techniques (NGTs) for oilseeds, protein crops and cereals aimed at reducing antinutrients, increasing biodigestibility and lowering greenhouse gas emissions and other environmental impacts. The Strategy should also promote preventative approaches (for example via vaccines and nutrition solutions) in animal health management at farm level that enhance resilience to pathogenic challenges while improving resource efficiency.

Feed efficiency, precision feeding and feed additives:

Given that feed represents 40–80% of total production costs (with monogastric animals on the high end of the range), the Strategy should prioritise policies that improve feed conversion rates and feed efficiency as a core lever for economic and environmental sustainability. Precision feeding approaches should be scaled up, using data from sensors and fast indicators to customise diets depending on animal health & physiological status, age and production stage.

FEFAC calls for modernisation of EU feed additives legislation to streamline authorisation processes and foster innovation in additives that reduce methane emissions, improve nutrient efficiency, support animal health and reduce the need for veterinary treatments.

Circular Feed:

Livestock is presented as a key driver of circularity by converting non-human-edible biomass and co-products into high-value food, contributing to closing nutrient cycles and producing renewable energy and organic fertilisers. The Strategy should explicitly support scaling up "circular feed" sources, such as co-products from biofuel

processing (e.g. rapeseed meal, DDGS, etc.), single-cell proteins, processed animal proteins (including of marine origin) and processed former foodstuffs, all of which can reduce land-use pressure and carbon footprints compared with primary crops grown mainly for feed.

FEFAC recommends the launch of an EU Circular Feed Roadmap to optimise the regulatory framework for existing and emerging circular feed materials, removing unjustified barriers while safeguarding feed and food safety, building on the Circular Feed Catalogue developed by eight EU organisations of the value chain, including FEFAC. The Strategy should also support the development of an EU-wide biomass balance sheet, using the existing EU feed protein balance sheet and JRC biomass flow work as models, to guide policy decisions on optimal biomass allocation in line with the food waste hierarchy.

CAP:

Member States should be encouraged to develop simplified, tailor-made eco-schemes that reward the uptake of low-emission feed and the implementation of feeding strategies and techniques that contribute to reduce the need for antibiotic use, improve animal welfare and deliver on other aspects of livestock sustainability, with explicit encouragement for more Member States to introduce such schemes beyond “early movers” like Belgium (Flanders), Portugal, Latvia and Slovenia.

Eco-schemes and other CAP measures should be designed to be user-friendly and accessible for all types of livestock producers, avoiding excessive administrative burden that would undermine uptake. The Strategy should further support access to footprint calculation tools at farm and feed-formulation level, including indicators for circular feed use, so that farmers and feed manufacturers can track their progress against sustainability objectives and CAP-linked key performance indicators.

Alignment on methodologies and metrics:

The Strategy should promote wider international uptake of harmonised methodologies for environmental assessment of livestock and feed, notably the FAO Livestock Environmental Assessment and Performance (LEAP) guidelines and the EU Product Environmental Footprint (PEF) approach. FAO LEAP has already developed guidance for feed supply chains, nutrient flows, feed additives and circular bioeconomy aspects, while the EU has applied LEAP methods in developing feed PEF category rules and its own feed LCA database. We highlight the Global Feed LCA Institute (GFLI) database, developed jointly by FEFAC and other feed industry organisations, which provides more than a thousand LCA datasets for major feed ingredients and underpins both corporate footprinting and the updated joint FEFAC/COPA-COGECA guidance on “green feed labelling” endorsed by EU Member States in December 2024. The Strategy should promote these methodologies as global benchmarks in relevant

international fora and in EU / FTA sustainable development chapters, reinforcing EU leadership on evidence-based environmental metrics.

Resilience: Animal health, welfare, biosecurity and food safety:

Risk-based management of food safety, biosecurity and animal health and welfare is presented as a foundational layer of the long-term livestock strategy, contributing simultaneously to food security, resilience and lower use of natural resources. The Strategy should promote integration of existing biosecurity "best practice" guidance for farms and other value-chain operators into a coherent framework that reduces the impact of zoonotic diseases and supports climate-efficient production.

From a resilience and profitability perspective, it is essential that feed safety and feed hygiene – including control of contaminants – is recognised as a key component of feed security and, ultimately, food security.

At international level, the EU should take a leadership role in increasing acceptance of products from vaccinated animals (preventive vaccination) among trade partners and work towards a future status of "disease-free with vaccination" to avoid trade disruptions while maintaining high animal health standards. Continued alignment with Codex Alimentarius and WOAHA standards on feed safety and animal health is also recommended as a basis for international convergence and fair competition.

A successful EU Livestock Strategy requires a fit-for-purpose and holistic approach in which animal welfare, environmental sustainability, and the economic viability of farmers are addressed and achieved simultaneously. Furthermore, a future-proof EU animal welfare system will benefit from an outcome-based framework, using scientifically validated welfare indicators, and encouraging continuous improvement through training and exchange of best practices. The Livestock Strategy should recognise the importance of supporting farmers in their transition through training, innovation, and digitalisation, and providing transitional support for infrastructure upgrades and digital adoption.

Implementation:

FEFAC supports the development of a comprehensive governance framework for the Strategy that ensures coherence across CAP, trade, climate, animal health and food safety policies and involves key livestock value-chain stakeholders (farmer organisations, processors, feed industry, animal health, breeders, dairy, meat and trade). Regular monitoring, based on harmonised indicators (including feed-related metrics and circularity indicators), should guide implementation and allow timely adjustments in response to emerging challenges.

Implementation should focus on simplification wherever possible, avoiding overlapping or conflicting requirements that generate administrative burden without

environmental or economic benefits. A stable and predictable regulatory environment, combined with targeted incentives, is presented as essential to unlock the investments needed for a competitive, resilient and climate-efficient EU livestock sector.

Call for targeted actions in the feed value chain:

- Develop an EU Circular Feed Roadmap
- Development of a Biomass balance sheet
- Establish a long-term EU investment plan for livestock and its value chain
- Targeted action plan to enhance EU feed supply chain security (protein, additives)
- Develop simplified, tailor-made eco-schemes
- Modernisation and simplification of EU feed legislation
- Simplify administrative and environmental permitting for farms and related infrastructure.
- Maintain existing EU production sites and support competitiveness of domestic additive producers
- Promote FAO LEAP, PEF and GFLI as common reference methodologies
- Support nutrition-based prevention, vaccination and better disease-resistance tools.
- Create dedicated technical subgroups under the Workstream, including one on pre-farm gate activities.

Annex – Useful FEFAC publications/reports

[Soy Sourcing Guidelines 2023](#)

[Progress Report 2024](#)

[Circular Feed Publication 2022](#)

[Circular Feed Catalogue 2025](#)

[FEFAC Charter 2030](#)

[Code of Practice of Compound Feed Labelling \(including Green Feed Labelling\)](#)

[Sustainable Animal Feeding Strategies](#)

[Biosecurity Guidance](#)

[European Feed Manufacturing Code](#)