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FEFAC contribution to the public consultation on the draft Delegated Regulation providing for authorisation to use non-organic protein feed in the nutrition of piglets and young poultry

FEFAC representing the EU manufacturers of feed for food producing animals, including under organic farming conditions, notes that the measure at stake consists in postponing until 31 December 2036 the date of expiration of the current derogation under the same conditions as today, i.e. for young poultry and piglets. The experience gained during the last 4 years made it clear that the organic feed proteins deficit is structural and therefore its re-evaluation every year would not only be useless and administratively burdensome but it would not provide operators with the necessary predictability that is needed to invest in organic farming. Extending the derogation by 10 years is therefore essential.

While FEFAC completely agrees with the diagnosis of the EU Commission that there is not enough supply of organic feed proteins, in particular of feed ingredients high in methionine, to meet the current demand, FEFAC would like to stress that this deficit is not only for young poultry and piglets but also for adult poultry, especially laying hens. **We therefore ask the EU Commission to amend its delegated Regulation to extend the derogation to all poultry irrespective of the age.** This would be in line with the approach agreed at the EU Council level and reflected in its [Mandate for negotiations](#) with the European Parliament on the Revision of the Organic Production Regulation (EU) 2018/848 adopted last May.

Indeed, since the entry into application of Regulation (EC) No 848/2018 in 2022, the deficit in organic feed proteins has not been closed for pigs and poultry. The main reason for this is that these animals do not only need sufficient quantities of proteins in their diets but these proteins must also contain in the right proportion the essential amino acids such as methionine that the animals need. The reality is that there is simply no supply in organic form on the EU market of those methionine-rich protein sources like potato proteins or maize gluten, that are available on the EU market in non-organic form only and are the types of protein sources used today for young poultry only in the framework of the existing derogation to balance the diets and avoid nutritional deficiencies.

Since the entry into application of the restriction of the derogation to piglets and young poultry in 2022, several studies have been performed showing the negative impact not only on zootechnical performances (and therefore the profitability for farmers) but also on animal welfare of adult animals of a 100% organic diet, translating among others into higher mortality and reduced zootechnical performance. These studies have been forwarded to the EU Commission. **Animal welfare is an asset of the organic livestock sector and failing to deliver properly on this may deceive consumers and seriously damage the image of the EU organic poultry sector.**