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POSITION PAPER

EU Commission Regulation providing for the authorisation to feed non-ruminants with ruminant collagen / gelatine and with processed animal proteins from insects, pigs and poultry

Background

The EU Commission adopted on 17 August 2021 Regulation 2021/1372 amending Annex IV of Regulation (EC) No 999/2001 of the European Parliament and of the Council as regards the prohibition to feed non-ruminant farmed animals, other than fur animals, with protein derived from animals. This regulation is the result of a long process of several years dedicated to the establishment of a robust, science-based legal framework including the development of effective methods of analysis for official controls. The legal requirements for the use of porcine Processed Animal Proteins (PAP) in poultry feed and avian PAP in pig feed and insect PAP in pig and poultry feed are comparable to those established in 2013 for the re-authorisation of pig and poultry PAP in fish feed.

FEFAC views on reuse of avian PAP in pig feed and porcine PAP in poultry feed

FEFAC takes note of this decision by the European Commission highlighting the following aspects which could influence and possibly limit its application in practice in the EU feed industry. FEFAC welcomes that:

- **Avian and porcine PAP produced and used according to the legal requirements are safe**: it is important to make clear that this re-authorisation step follows 20 years of implementation of strict measures to control the BSE risk, including intensive surveillance of the EU cattle population and leading to the successful eradication of classical BSE. In parallel, processes for the treatment of processed animal proteins were developed and validated for their ability to eliminate the prion. Finally, EFSA provided its advice ascertaining the safety of these products for feed use in non-ruminant farm animals.
- **PAP are an important source of highly concentrated proteins and can provide a limited contribution to reducing the EU-deficit in proteins for feed use**: From a nutritional perspective, the quality of the protein profile, in terms of its amino-acid composition and its concentration makes porcine and avian PAP a valuable source of highly digestible proteins for certain types of animals like piglets or turkey. However, there should be no false expectations as to the ability of processed animal proteins to replace imports of soybean meal from Third Countries, due to its limited availability and regulatory restrictions limiting its use in dedicated single-species production facilities in compound feed manufacturing of pig and poultry feeds.
- The feed use of avian and porcine PAP as feed contributes to maintaining these bio-resources within the feed & food chain, thus **contributing to the circular bio-economy**.

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However, the **effective reuse** of avian PAP in pig feed and porcine PAP in poultry feed depends on five parameters:

- **The market acceptance by the food value chain partners, from livestock farmers to retailers and consumers**: it is of paramount importance that the prospect of using avian PAP in pig feed and porcine PAP in poultry feed is welcomed by all value chain partners.
- **The ability of operators all along the chain to comply with the legal requirements at an affordable cost**: only those compound feed manufacturers who can specialise production facilities for pig (resp. poultry) feed are authorized to use avian (resp. porcine) PAP. This means the very large majority of compound feed manufacturers operating multi-species feed plants will legally not be authorised to reuse non-ruminant PAP, which can be seen as discriminatory. In addition, operators are bound to implement an effective monitoring programme to verify compliance with the 0-tolerance for the presence of ruminant DNA and with the intra-species recycling ban, which means investing in a costly monitoring programme.
- **The competitiveness of pig and poultry PAP**: a significant proportion of porcine and avian PAP is nowadays already used in petfood and fish feed. The re-authorisation of these products in pig and poultry feed is unlikely to impact the market demand of PAP for these two existing feed destinations. What is available therefore for use in pig and poultry feed is the surplus of PAP, which is today exported to third countries. These PAP will compete with sources of proteins of vegetable origin such as soybean meal. The effective reuse of PAP in animal feed in the EU will therefore to a large extent depend on its competitiveness with soybean meal.
- **The limitations to incorporation of PAP due to high phosphorous content**: feed manufacturers are expected to minimize nutrient losses. This in the case of a feed material like non-ruminant PAP with high phosphorous content means that feed formulators will have to limit the incorporation rates in compound feed.
- **The fitness of analytical control tools and interpretation of test results**: the methods that have been developed are based on the detection of DNA (i.e. ruminant DNA for the general ban and pig DNA and poultry DNA for the intraspecies recycling ban). These methods detect the presence of DNA, irrespective of whether the DNA is carried by an authorized or prohibited feed material of animal origin. For example, the detection of porcine DNA in pig feed may come from gelatine or blood plasma, which are legally permitted in pig feed and whose presence therefore does not constitute non-compliance.

For the reasons mentioned above, FEFAC favours a stepwise and prudent reuse of non-ruminant PAP in pig and poultry feed, leaving time to operators to validate their quality control procedures and to authorities to assess the performance of their official controls. Frequent exchanges between operators and competent control authorities on the experience in analyses and their interpretation would be useful in that regard.

In any case, the decision to use avian PAP in pig feed and porcine PAP in poultry feed remains a decision of individual operators, which should also be agreed with other value chain partners.

FEFAC views on reuse of former foodstuffs containing ruminant gelatine and the use of insect PAP in pig and poultry feed

We **welcome the lifting of restrictions to the use of former foodstuffs containing ruminant gelatine and the use of insect PAP in pig and poultry feed.** Feed manufacturers have already a long experience of the use of former foodstuffs in particular in pig feed. They will have no difficulty to absorb the expected 100,000 t of additional former foodstuffs that were not available to the feed market because of the ban on ruminant gelatine in feed for food-producing animals. We also welcome insect PAP as an additional source of highly concentrated proteins, which are already used in fishfeed production.