



## **FEFANA calls for a transition period regarding the use of feed additives in water**

FEFANA is aware of the discussions in the Standing Committee on the Food Chain and Animal Health regarding the use of feed additives in water. There is an important established use and market for additives in this segment. This market is important for the animal performance and welfare, as products fulfill the following objectives:

- Ensuring appropriate animal nutrition
- Securing the quality of animal products

This is especially the case for specific animal needs, and allows a higher level of flexibility for the farmers to face these specific conditions.

The practice is very common on the market and concerns the majority of additives types (except anticoccidials).

Products used in water are in the form of water soluble or water dispersible preparations and mixtures, which may contain other products used as technological additives for this function (e.g. emulsifier in oily products to form an adequate emulsion in water). These latter components shall not be considered as used in water.

This kind of use of additives was previously not harmonised under the 70/524 Regulation, what resulted in several Member States taking formal or de facto attitude for the management and control of these uses of additives (e.g. trough nutritional supplement, complementary feed approaches, scientific testing, etc.). While the new Regulation 1831/2003 provides now a clear harmonisation basis, it missed the need to foresee a proper transition regime, as granted under the Article 10 of the Regulation for additives authorised and additives that were newly incorporated under the additive Regulation (e.g. silage additives). Bearing this in mind, a strict reading of the law would not only be unfair to the concerned operators and induce important market disruption, but also extremely deleterious for animal performance in general.

As there is no possibility (according to Article 13 of Regulation No 1831/2003) to modify the register entry for the non-holder specific authorised feed additives, FEFANA considers it unfeasible to apply from this point of time this principle of this Regulation, i.e. the use of additives in water shall be indicated in the authorisation of the product. The submission of new authorisation dossier for this use was and is still not an option until the new guidelines are published. FEFANA is also not favorable to using as a durable way out “requalification” of these products.

The situation of the use of feed additives in water will only be totally solved at the end of the transition period established by Article 10 of Regulation No 1831/2003, i.e. when all existing additives will have been reviewed and incorporated into the Register of feed additives with specific conditions for use. We fully support the responsible approach opened through the recent discussions of the Standing Committee to formally enter these uses under the transition provisions of Article 10. FEFANA therefore calls for a transition period limited in time (up to the end of the re-registration process foreseen in Article 10).

Should the Commission and Standing Committee consider that such a transition measure should not be applied evenly to all feed additives, we are prepared to work with the Commission on prioritisation or differentiation.

The issue can also not be isolated from the provisions of the Feed Hygiene Regulation. FEFANA sees the need for appropriate control of the use of feed additives in water. Therefore, FEFANA proposes that the manufacture of this product be covered by the Feed Hygiene Regulation, under the transition regime provided by Article 18 of the Regulation. The use by farmers should be accompanied by Good Practice to be developed in a Code of Practice. Since more than one year, FEFANA is working on such a code. When this will be finalised, FEFANA would appreciate an open dialogue with the European Commission and the Member States to evaluate this solution.