



FEFANA comments on working document regarding the impact assessment on the modernisation and simplification of the legislation on the circulation of feed

FEFANA supports a wholistic review of legislation on the circulation of feed. It is therefore Fefana's view that the current review should include the simplification of current legislative requirements on labelling and should also provide for the integration of the labelling rules associated with feed additives and premixtures laid down in Article 16 of Regulation No 1831/2003. Indeed, we understand from the proposed options, on which FEFANA comments below, that the proposed review may change the way labelling is regulated and FEFANA feels that the labelling of feed additives and premixtures could also benefit from this.

Block A: Harmonised conditions for competition

Issue 1: legal instrument

FEFANA, representing the feed additive and premixture Industry, considers it of outmost importance that labelling is harmonised across the Europe Union and therefore favours the proposed Option 2 (Harmonisation by means of a Regulation).

Feed additive and premixture business is, in most parts, not local and a harmonisation allows for consistency of approach, enforcement and controls thus ensuring little or no distortion to trade across the European Union. Having said this, it is important that rules are sufficiently defined as not to lead to numerous and or diverse interpretations from a Member State to another.

Issue 2 Existing derogations from the labelling requirements

The derogation currently in place on the labelling of feed materials and compound feedingstuffs does not cover feed additives and premixtures. Therefore, FEFANA is not in a position to comment on this point.

Issue 3: Labelling requirements for feed materials and compound feedingstuffs

FEFANA considers that labelling should incorporate the use of label (stuck on the bags), and other means which aim to provide informed choice such as those as may be provided through product specification(~~information~~) sheets and other documents. In this regard, FEFANA considers that the labelling and use of other documents shall ensure consistency and transparency within the feed chain while protecting the intellectual properties of companies.

Based on this, FEFANA considers that the information on the labels (stuck on the product) should be limited to information to ensure safety in use (including during transportation) and traceability,

while other information which may be useful to the end-user may be better placed elsewhere. In this regard, FEFANA would be in favour of Option 4, which proposes the use of, for example, Codes of Practice to guide and possibly control other additional information that could ideally be provided for the benefit of the end user.

Issue 4: European Union list of feed materials

On the current debate on the classification of products (feed materials and feed additives), for which FEFANA is currently developing a decision tree system, Fefana considers that the establishment of a positive list of feed materials could be useful however, the creation of such a positive list should allow for updates based on latest scientific developments and knowledge. This should allow for example the inclusion of Novel Feeds following assessment (on the basis of the Novel Food Directive)

Issue 5: Provisions for the declaration of analytical constituents

FEFANA considers that the labelling should include the use of label (stuck on the bags), product specification (information) sheets and other similar documents. FEFANA also supports the idea that the labelling and use of other documents should ensure consistency and transparency within the feed chain while protecting the intellectual property of the company.

Based on this, FEFANA considers that the information regarding the analytical constituents should be part of the additional documents to be provided to the purchaser in order for it to make informed choices on the product it intends to use. In order to ensure flexibility of the system and reactivity to possible changes in the marketing of the feed materials and compound feedingstuffs, FEFANA would favour Option3 where provisions of Industry Codes of Practice are being proposed.

Block B: Labelling of feed materials and feed additives

Issue 6: Indication of feed materials used in compound feed for food producing animals

FEFANA considers that the labelling should include the use of label (stuck on the bags), product specification (information) sheets and other similar documents.. FEFANA also supports the idea that the labelling and use of other documents should ensure consistency and transparency within the feed chain while protecting the intellectual property (?) (knowledge) of the company. Based on this, FEFANA considers that the information regarding the analytical constituents should be part of the additional documents to be provided to the purchaser in order for it to make informed choices on the product it intends to use. In order to ensure flexibility of the system and reactivity to possible changes in the marketing of the feed materials and compound feedingstuffs, FEFANA would favour Option 5 where provisions of Industry Codes of Practice are being proposed.

Issue 7: Indication of feed materials used for non-food producing animals

See Issue 6.

Issue 8: Reference to additives on the label or related documents

(FEFANA considers that the labelling issue shall consider the use of label (stuck on the bags), information sheets and other documents in general. FEFANA also supports the idea that the labelling and use of other documents shall ensure proper transparency within the feed chain while protecting the knowledge of the company.

Based on this, FEFANA considers that the information regarding the analytical constituents should be part of the additional documents to be provided to the purchaser for an informed choice of the product to be used. In order to ensure flexibility of the system and reactivity to possible changes in the marketing of the feed materials and compound feedingstuffs, FEFANA would favour the Option 4 with the creation of Codes of Practice from the Industry.

Block C: Provisions for circulation of 'new' feed material

Issue 9: Authorisation procedures for feed other than feed additives

The use of new feed materials, especially by-products of the food Industry, has led to pertinent issues in the past. FEFANA considers that a system similar to that of 'Novel Food' could be put in place to ensure safe (?) introduction of these feed materials in the feed chain. However, the marketing authorisation should be proportionate to the proposed use and or need of the products; enabling rapid introduction in the marketplace where necessary and or required.

Block D: Claims and Advertising of feed

FEFANA favours, in principle, the introduction of clear rules for claims and advertisement of feed as well as the setting of new rules for the labelling of feed.

Issue 10: Claims and advertising of feed

FEFANA supports the application of Regulation No 1831/2003 and the classification of feed additives in functional groups. FEFANA considers that the claims related to an additive function (listed in Annex I of Regulation No 1831/2003) should be limited to the use of the specific additives and or of feed materials containing them.

While marketing of compound feedingstuffs, feed materials and feed additives is evolving quickly and needs some flexibility and reactivity, FEFANA would favour a combination of Option 4, setting the general rules for the presentation and advertising of feed and Option 3 establishing Industry Codes of Practice which will support proper/adequate application of general rules.

Minors issues:

Borderline between premixtures and complementary feeds: FEFANA is currently developing a decision tree approach for the classification of substances and mixture of substances within the Feed Chain