



FEFANA supports a revamping of the current labelling approach in the feed chain

In the light of the review of the labelling rules within the context of the revision of Directive 79/373, FEFANA would like to have an in-depth discussion with the European Commission regarding the review of the labelling rules in the feed chain.

In particular, FEFANA supports the view shared by the European Commission on the labelling of foodstuffs, that labelling is not the only appropriate way to inform customers and that other ways of informing customers and users of our products should be encouraged.

FEFANA emphasises that the feed chain is composed of responsible and knowledgeable actors from the feed additive production down to the farmer producing animals. Contrary to food, in the feed chain the purchasing act is rarely done in front of the product but rather some time in advance of delivery. This is the reason why FEFANA promotes the distinction between the information that:

- is relevant to the traceability and safe handling of the product
- is necessary to make an informed choice.

While the first information is linked to a certain batch of product or linked to the use of the product, only this information should be linked to the product (the label affixed on the bags or the document accompanying the goods in case of bulk delivery).

The second information (including reference to the functions) should be given instead via other means (e.g. product specification sheet, brochure, websites).

For consistency with the views of the European Commission in the food segment, FEFANA would see a benefit for the whole chain and for the control authorities to revamp the concept of labelling in the feed chain, from the additive (Regulation No 1831/2003) to the feedingstuffs (revision of Directive 79/373).

This revamping should lead to the assurance that the information is transparently conveyed to the operators including farmers, while preserving the know how of the companies and the availability of the relevant information at the place of use.

Therefore, FEFANA supports a review of the labelling rules within the revision of Directive 79/373 also for feed additives and premixtures (Article 16 of Regulation No 1831/2003).

Background

The implementation of Article 16 of Regulation No 1831/2003 on additives in animal nutrition leads to some diverging interpretations from the Member States and some difficulties in implementation at the level of the feed additives and premixtures operators.

Amongst the main concern for the operators is the level of information to be placed on the market in an increasing number of languages (22 languages so far), for products which are aimed to be sold on the European market.

While FEFANA understands the value of the information to be provided to the customers (the next operators in the feed chain), it questions the way to provide this information via a label.

FEFANA supports the transparency of information in the Feed Chain and has therefore developed jointly with FEFAC a Code of Practice for the labelling of feed additives and premixtures. This Code of Practice is based on the principle that the information shall be given to the operators at the right place. This means that information related to informed choice for the purchasing of a product should be provided to the product's purchaser (usually not the one who is handling the product), who has no access to the label. Furthermore, the reality in the feed chain (valid for the additives and premixtures but also for feedingstuffs) leads to the fact that the choice for a product is not made in front of the product itself but rather on the basis of a technical discussion between a supplier and the purchaser of the product. The choice of the product leads then to the delivery of the product. This means that the label is not visible to the purchaser until he receives the product on the farm or factory, i.e. after he decided to purchase the product.

This is the reason why the Industry Code of Practice distinguishes two types of information:

- the information relevant to the safe use and handling of the product
- the information relevant to the informed choice of the product

and provides for rules regarding information to be delivered in a proper way to the next operator in the chain.

FEFANA understands that a similar type of approach is being taken for products aimed to be supplied to the end consumer and supports this direction taken by the European Commission.

FEFANA knows that the labelling of compound feedingstuffs is currently under review and considers this is the right timing to have a common approach all along the feed and food chain. We think that a double approach based on the split of information between what is needed for the transport and handling of the product and what is needed to make an informed choice is the best approach for applying the labelling principle along the whole chain. Therefore, FEFANA supports a total revamping of the labelling articles within the feed legislation framework at the same time and is ready to provide concrete proposals in due time.