



FEFANA position to the proposed Regulation on the placing on the market and use of feed

Though focusing on compound feed, this proposal has several important implications for feed additives and premixtures.

FEFANA appreciates the initiative of the European legislator to regroup the spread dispositions of the four current directives under the regime of a new Regulation. The feed additive industry is convinced that such legal piece will in all improve the regulatory framework for the marketing and use of feed. During the discussion of the draft, FEFANA nevertheless identified some areas which urgently need adaptation or additions. These areas are as follows:

The concept of the **Code for labelling** shall be extended to the mandatory aspects of the labelling (currently restricted to voluntary labelling in the proposal), in line with the labelling principles included in the FEFANA/FEFAC established labelling code for feed additives and premixtures (Article 14). As highlighted in the Recitals, the experience with the Community guidelines in the field of Feed Hygiene has been positive.

It is indispensable to align the labelling provisions provided under Regulation 1831/2003 to the labelling information concept put in place by this Regulation (Article 30; revision of Article 16 of Regulation 1831/2003). The same provisions as provided for the development of Codes of good labelling in this Regulation should be introduced in the Regulation 1831/2003.

Additive-type **claims** based on feed material should be possible only if they are substantiated with efficacy and safety information equivalent to the one required for the additives (Article 13). In case the claim is based upon an additive contained at the appropriate concentration in the feed, no further substantiation should be required. For the sake of transparency, it is important that the Commission establishes guidelines in order to rule the substantiation of the feed material-based claims (both for the substantiation and the verification of it).

A definition for **'Supplementary feed'** should be included (Article 3). The complementary feed category is inadequate to cover a wide range of concentrated feed additives. Introducing a specific definition for them shall allow an adapted management of the placing on the market and use of these products, in line with the requirements of the Food law 178/2002 and of the Feed Hygiene Regulation 183/2005, what would not be possible under the set of currently available definitions.

About FEFANA

FEFANA is the EU Feed Additives and Premixtures Association. It was established on October 13th, 2004 and is the new juridical form of the feed additives producers association that was founded in 1963. With 91 members from 28 countries, the association is the interface between the feed additives industry and the European Union authorities, including Member States authorities, in order to promote, safeguard and defend common and general interests of the industry (in several topics like guidelines, register, labelling and definitions, analysis, feed hygiene and food chain safety or non-feed use of additives). FEFANA's chairperson is Dr. Hadden Graham of AB Vista.