



FEFANA Position on Plant Extracts for feed use in organic production

Council Regulation (EC) No 834/2007¹ on organic production and labelling of organic products and repealing Regulation (EC) 2092/91 provides the basis and rules for organic production. Article 14(1)(d)(iv) of the said Regulation provides for the conditions of use of certain feed substances/products in organic production. The substances/products concerned include:

- non organic feed materials from plant origin;
- feed materials from animal and mineral origin;
- feed additives;
- certain products used in animal nutrition, and
- processing aids.

These products/substances are clearly defined in Community legislation. They would be considered for authorisation in organic production only if they comply with the relevant Community legislation governing the production, preparation, marketing, labelling and control on animal nutrition. One of such piece of legislation is the Feed Additive Regulation (Regulation (EC) No 1831/2003²).

To be authorised for organic farming under the EC procedure (according to article 37(2)), products/substances would have met certain criteria described in article 16 and the relevant general and specific conditions stipulated in articles 3 to 7 of the Regulation (EC) No 834/2007. On authorisation for use in organic production they would be included in Annex VI (as feed additives) or Annex V (as feed materials) of Commission Regulation (EC) No 889/2008³.

Feed additives must be authorised under Regulation (EC) No 1831/2003 prior to use. Substances used in animal nutrition such as herbs, spices and extracts of plants, and

¹ Council Regulation (EC) No 834/2007 of 28 June 2007 on organic production and labeling of organic products and repealing Regulation (EEC) No 2092/91.

² Council Regulation (EC) No 1831/2003 of the European Parliament and of the Council on additives for use in animal nutrition.

³ Commission Regulation (EC) No 889/2008 laying down detailed rules for the implementation of Council Regulation (EC) No 834/2007 on organic production and labelling of organic products with regards to organic production, labelling and control.

to a lesser extent, of animals including fish, are considered as feed additives should they perform the function of a feed additive for example sensory additives (category 2) and functional group: (b) flavouring compounds – substances the inclusion of which in feedingstuffs increases feed smell or palatability. These and similarly authorised feed additives are listed on the EU Register of Feed Additives (established under article 17 of Regulation (EC) No 1831/2003). Such products may only be considered as feed materials if their purpose is solely to provide nutrients to the animals and they have no additive functionality. FEFANA recognises that it is sometimes difficult to differentiate between plants, herbs and spices used solely as feed materials or used as feed additives. It is for this reason that FEFANA has developed an interactive tool called 'ID-Feed' to allow the correct legal characterisation of different feeds.

The feed additive register currently contains a number of plant and animal extracts, and salts (coarse rock salt, sodium sulphate, sodium carbonate, calcium carbonate, calcium lactate and sodium sulphate) which are also assigned to Annex V of Regulation 889/2008 as feed materials. To ensure that there is harmonisation, proper functioning of the internal market and equitable implementation of EC legislation, while ensuring that there are no room for ambiguity, it seems appropriate to synchronize the requirements of the two Regulations. Authorisation under Regulation (EC) No 1831/2003 is a pre-requisite for authorisation of a feed additive under Regulation (EC) No 834/2007 and subsequent entry in the Annexes of Regulation 889/2008.

FEFANA therefore considers that all plant extracts (including herbs and spices), and to a lesser extent some animal extracts and salts already considered as feed additives (due to the function they perform in feed) should be continue to be regarded as such. They should be transferred from Annex V to Annex VI of Regulation (EC) No. 889/2008 to indicate their appropriate status with regards to EC legislation on animal nutrition.