



## **FEFANA Position on use of technological additives in feed additive preparations used for organic feed production**

Annex VI of Commission Regulation (EC) No 889/2008<sup>1</sup> laying down detailed rules for the implementation of Council Regulation (EC) No 834/2007<sup>2</sup> on organic production and labelling of organic products with regards to organic production, labelling and control, lists feed additives which are permitted for use in organic feedingstuffs. Any feed additive permitted for use in organic feeds and listed in the above annex must have been authorised in accordance with Regulation (EC) No 1831/2003<sup>3</sup> on additives for use in animal nutrition. Additives authorised in animal nutrition are listed in the Community Register of Feed Additives pursuant to Regulation (EC) No 1831/2003.

### Need for preparations of additives

Generic additives are listed in the Community Register according to their active substance. However, it is recognised (and acceptable) that some pure active substances (particularly the fat soluble vitamins) are not in a stable form that enables them to be manageably handled including in relation to their incorporation in pre-mixtures and or feeds, due to their inherent physical or chemical characteristics. In such cases, in order to ensure homogeneity and longer term stability in feed, the active substances need first to be stabilised and or provided in an easily manageable and dispersible form.

For some products therefore, the active substances are blended with carrier materials and in some cases certain other substances such as technological additives in order to impact the required characteristics to make them suitable for use in feed. Such final preparations which are placed on the market in this form, are described as feed additive preparations but are regarded as the authorised feed additives for practical purposes. It must however be stressed that the safety assessment of the preparations are also considered prior to the active substance's authorisation as a feed additive.

The types of products which may be typically included in additive preparations are also mostly technological additives such as anti-oxidants (to provide protection to sensitive active substances which would otherwise quickly degrade on exposure to atmospheric

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<sup>1</sup> Commission Regulation (EC) No 889/2008 of 5 September 2008 laying down detailed rules for the implementation of Council Regulation (EC) No 834/2007 on organic production and labeling of organic products with regards to organic production, labeling and control.

<sup>2</sup> 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.

<sup>3</sup> Regulation (EC) No 1831/2003 of the European Parliament and of the Council of 22 September 2003 on additives for use in animal nutrition.

conditions) or flowing agents (in order to impact appropriate physical characteristics to allow easier flow and homogeneous mixing).

Such technological additives commonly used in additive preparations are themselves authorised in accordance with Regulation (EC) No 1831/2003. In addition, they are only used at levels which impact the required characteristics or protection to the additive itself, and thus contribute to the optimal animal welfare status of the animal. Their safety and efficacy are considered in the assessment of the active substance in question during the additive authorisation process. They are not added or designed to impact technological effects in the feed other than that it performs with regards to the active substance. In this respect, they may be considered as processing aids<sup>4</sup> as they are added intentionally to fulfil a technological purpose of stabilising/protecting the additive. All additive preparations are compliant with all relevant EU feed legislation and in particular the feed hygiene Regulation (Regulation EC (No) 1831/2005<sup>5</sup>).

#### Use of additive preparations in feeds for organic livestock

It is recognised that not all technological additives used in the formulation of additive preparations are currently in the list of additives approved for use in organic feed according to Annex VI of Regulation (EC) 889/2008. The manufacturers of additive preparations have through a long experience of product formulation and testing established the ingredients/substances which are most effective over a wide range of applications for use in additive preparations. Therefore such additives used as technological additives or processing aids as mentioned above should also be listed for use in organic farming. If the use of technological additives such as antioxidants were not permitted, this would effectively preclude the use of some vitamin products in organic feed, with the consequence of potential deficiency and welfare problems (particularly for stock fed on feed subject to heat processing to minimise microbiological contamination). Development of alternatives continues to be an option but it is long term, expensive and may well reduce the effectiveness of the additive preparations, to the possible detriment of the feed industry and the livestock receiving the feed.

**FEFANA therefore considers that all substances (including carriers and technological feed additives) used in preparations of feed additives listed in Annex VI of Regulation (EC) No 889/2008, should also be permitted for use in organic production where they are used in the additive preparation purely as carriers, stabilisers and or 'flowing agents'. These substances in preparations were evaluated for their safety as part of the additive authorisation under Regulation (EC) No 1831/2003.**

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<sup>4</sup>'Processing aids' means any substance not consumed as a feedingstuff by itself, intentionally used in the processing of feedingstuffs or feed materials to fulfil a technological purpose during treatment or processing which may result in the unintentional but technologically unavoidable presence of residues of the substance or its derivatives in the final product, provided that these residues do not have an adverse effect on animal health, human health or the environment and do not have any technological effects on the finished feed (Extract of Regulation (EC) No 1831/2003).

<sup>5</sup> Regulation (EC) No 1831/2005 of the European Parliament and of the Council of 12 January 2005 laying down requirements for feed hygiene.