



FEFANA Position on the supply of ‘conventional’ produced vitamin B2 for use in feed for organic livestock production.

Vitamin B2 produced in containment is identical to the conventional¹ produced vitamin B2. The future of vitamin B2 produced using conventional processes has however become extremely uncertain, as preference for economic and certain environmental considerations favour production processes involving fermentation using genetically modified micro-organisms in containment. It is now crucial for the sake of sustainability of European livestock production (including appropriate regards to health and welfare of farmed animals) that the European Commission and all interests act to ensure the continued supply of vitamin B2 for organic production.

FEFANA is the association of EU manufacturers of feed additives and premixtures and as part of its mandate of ensuring sustainability of agricultural production in the EU including the use of additives in organic farming, it has trawled its members (representing about 80% of feed additives manufacturers/suppliers in the EU) for sources of vitamin B2 given recent concerns with the sourcing and availability of synthetically produced vitamin B2, an essential nutrient in livestock production. Historically, vitamin B2 was mainly produced from chemical synthesis but in recent times, production has shifted to use of genetically modified micro-organisms (GMM) in containment due to economic and environmental (including sustainability) reasons. Use of genetically modified organisms (GMO) in containment is subject to Directive 2009/41/EC, however, Regulations (EC) No 1829/2003 and 1830/2003 considers that final products produced from genetically modified organisms but do not contain genetically modified materials do not need to be labelled as GM. Manufacturers therefore unless otherwise requested for written assurance to confirm chemical synthesis of their vitamin B2 may inadvertently (and or otherwise) affirm their product as non-GMO sourced.

Europe and China are the main suppliers of vitamin B2 (with about 60 and 40% respectively of the market share). The global market for pure vitamin B2 is estimated to be 5,000 tonnes, with around 80% used in the animal feed, and 20% in human food (including food supplements) sectors. In recent years,

¹The term ‘Conventional’ refers to chemical synthesis, fermentation using non GMM or extraction from non-GM feed or food materials

our member companies have notified their difficulty in sourcing conventionally produced vitamin B2 and in the last year, the situation has become critical. A manufacturer known to have maintained the one production plant using chemical synthesis has notified the pre-mixture industries in Europe that chemical production of vitamin B2 has now stopped. Given this development, the global supply of vitamin B2 produced from synthetic material is very limited and is expected to run out shortly, if not already.

Purified products produced from GMM in containment are outside the scope of GM labelling and traceability requirements according to Regulations (EC) No 1829/2003 and 1830/2003. Since it is likely that there is now very little truly conventional vitamin B2 available on the world market, it is important that the European Commission, National Authorities and organic certification bodies act quickly. They should allow the use of the safe, identical product, produced by fermentation using GMM in containment as the future and sustainability of EU livestock production is in real danger.