

FEFANA promotes a Code of Practice for Feed Additives and Premixtures Classification

Brussels, 15 November 2007 – FEFANA (the EU Feed Additives and Premixtures Association) has developed a user-friendly tool, in order to support the feed business operators and the authorities in classifying feed products and mixtures according to the regulatory framework in the European Union. Based on very simple questions and a decision tree system, this tool allows the allocation to the proper regulatory classification status of any single component or feed mixture. Such a tool will prove helpful for operators to ensure compliance of their products with regulatory frameworks. Undoubtedly it will also be used by the authorities to assure a consistent regulatory management of such products on the market.

Feed business operators are faced on a daily basis with questions related to the regulatory requirements of products they plan to or are placing on the market in the European Union. Depending on which category a product will be placed into, it will be subjected to very different regulatory requirements. *“Is my product an additive or an ingredient?”*, *“Is my product a premixture or a complementary feedingstuff?”*, *“Is my product a premixture or an additive preparation?”*, these are questions that frequently need to be answered in order to apply appropriate regulatory options. Although the current set of definitions in the European feed regulatory framework is clear and comprehensive, the interpretation borderlines between different categories are sometimes ambiguous and lead to uncertainties for both the operators and authorities.

The European Regulatory Framework defines five main groups of products:

- feed materials;
- compound feedingstuffs;
- premixtures;
- feed additives;
- veterinary medicinal products.

The regulatory requirements for each of these groups may differ substantially. As an example, if a product is classified as a feed material, it can be placed on the market without a prior assessment from the authorities. If the same product is classified as a feed additive, it would need to obtain a pre-marketing authorisation, leading to a delay of at least 2 years before it can be placed on the market.

Recent discussions in the EU Standing Committee on the Food Chain and Animal Health Section Animal Nutrition (e.g. status of chondroitin sulphate) and questions FEFANA receives from its members show that, in some instances, the feed business operators and the authorities are confused or inconsistent on the classification of certain products. Furthermore, diverging classifications amongst business operators may lead to unfair competition and potential crisis in the feed chain. At worst - and this already happened - this can lead to the withdrawal from the market of a product through the Rapid Alert System, on the basis that its classification by the operator was not in line with the latest interpretation by a specific implementing authority. These uncertainties are detrimental to the sustainability of the EU industry and to the transparency and credibility of the EU legislative framework.

In order to get more clarity on the market place, FEFANA carried out an extensive review of the situation on the market and the different kinds of products that are currently available. Through inputs from its members and a close scrutiny of the reality of the market, this work came to the conclusion that the classification of all products (single products and mixtures) relevant to the overall feed business could be based on a limited series of simple questions; even the difficult

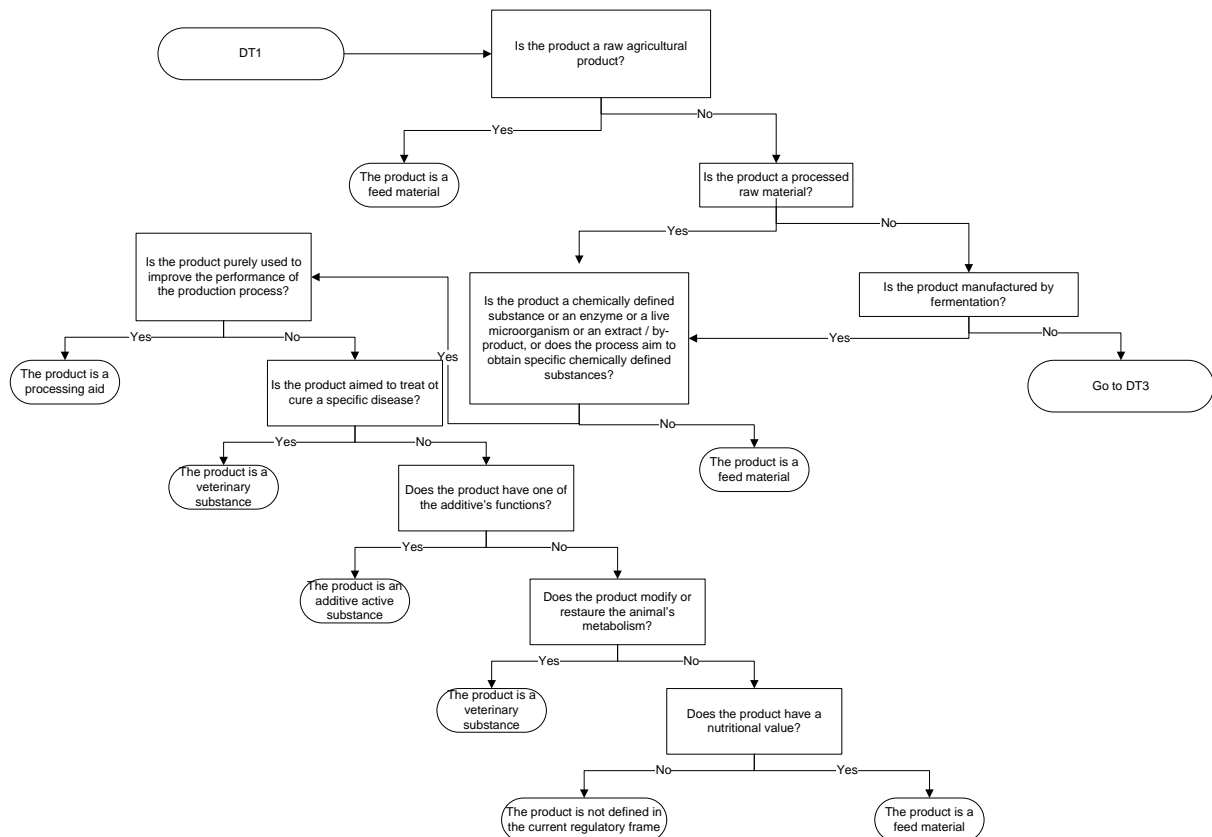
distinction between premixtures and complementary feed can be managed through this. The selected set of questions takes into account:

- the needs for simple wording and questions;
- the predictability of the choice, i.e. the same result is obtained by different operators for the same product;
- the possibility to justify the choice made by the business operators in front of the control authorities.

On the basis of this work, FEFANA has therefore created a Code of Practice for the classification of products and substances in accordance with the European Regulatory Framework. This document was discussed with authorities at the European and Member States levels as well as with other Industry Associations, and modified in order to take the feedback from these discussions into account. The classification of a feed product is a function of both the nature of the products and of its use. For instance, a given substance can be classified as an additive or as a feed ingredient, depending on the way and the purpose for which it is used. The same apply to mixtures. **Figure 1** provides a sample of this tool that is composed of four decision trees. The questions used are a combination of substance-related and use aspects. The flexibility embedded in the approach, which could look at first sight as creating uncertainty, is in fact creating much more transparency and stability than trying once and for ever to put a given substance in a definition box.

This Code of Practice enables any business operator and Authority to classify the product they aim to place on the market in a consistent manner and in a predictable way. This then helps the business operators to take the proper decision to ensure that their products comply with the European regulatory framework. An example of a decision tree is provided in this article for better understanding:

Figure 1: Decision tree for the classification of substances



The Code of Practice is available upon request to FEFANA at the following address: bla@fefana.org.

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 83 members (including producers, traders and importers) from 28 countries, the association is the interface between the feed additives and premixtures 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 President is Dr Hadden Graham of AB Agri.

For more information, please contact:

Didier Jans
Secretary General
FEFANA Asbl
Av. Louise 120 Box 13
B- 1050 Brussels
dja@fefana.org
www.fefana.org
T + 322 639 66 60
F + 322 640 41 11