



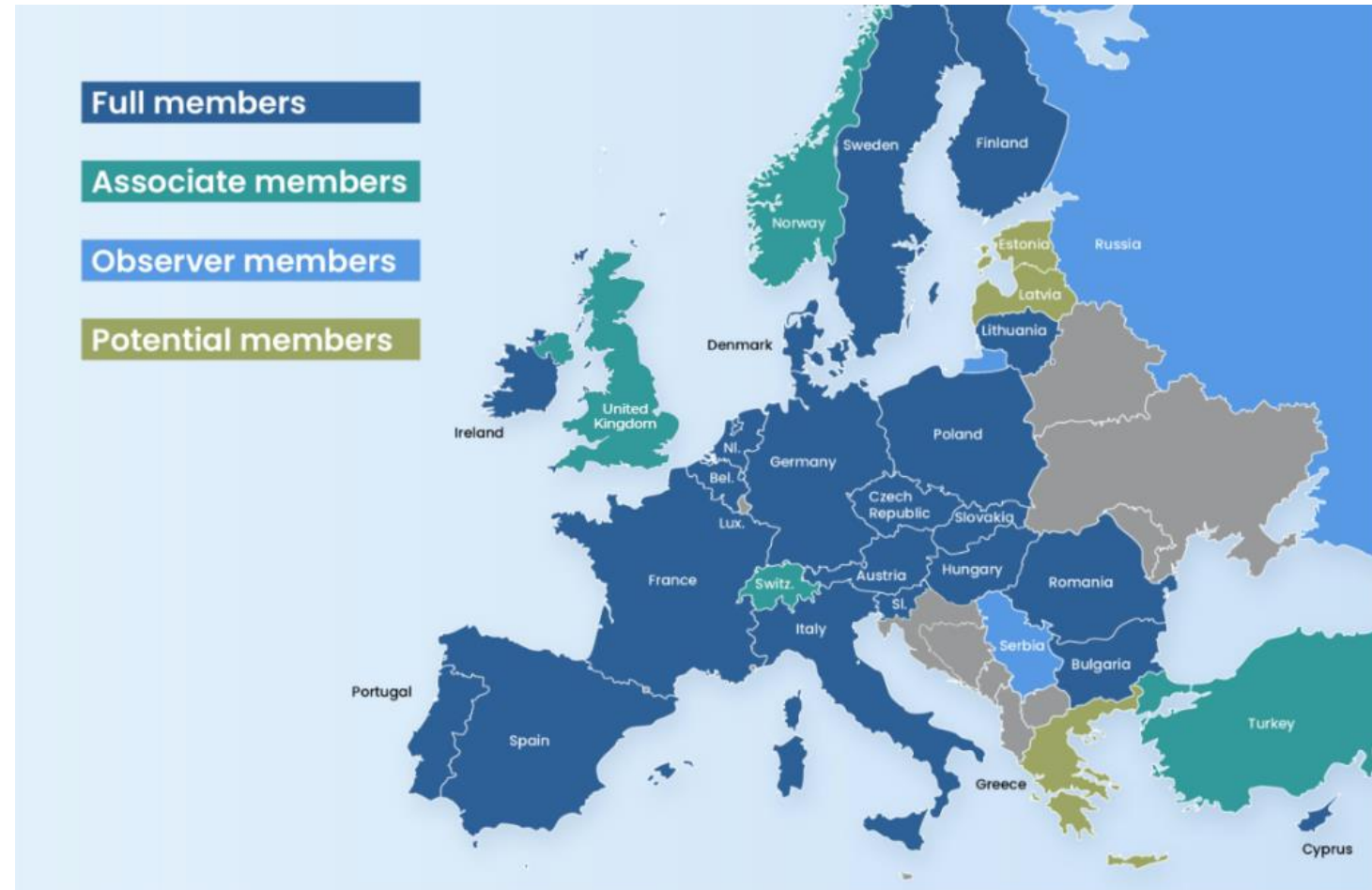
Getting feed ingredients on the market



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- EU4Algae - 14 April 2023

Who is FEFAC?

- European Association of Compound Feed Manufacturers
- Founded in 1959
- Represents 28 National Associations in 27 European countries
- The EU Industrial compound feed production in 2022: 144.2 mt.



On the menu today

- Boundaries of the feed sphere: Welcome in the feed chain
- Status of Algae products: Feed material vs. feed additive
- Listing of feed materials
- Few words on risk analysis
- Few words on use of waste streams

Am I a Feed Business Operator?

- A feed must be placed on the market by a registered/approved feed business operator. Am I a feed business operator when I'm
 - Producer of rock phosphate?
 - Producer of sodium sulphate
 - Meant for use for the production of salts of fatty acids
 - Direct use as feed
 - Food company or retailers with surplus food?
- **Commission notice - Guidance document on certain provisions of Feed hygiene Regulation (OJEC 2019/ C 225/01)**
 - **Intention of the operator to sell as feed**
 - **Legal status (food, animal by-product, waste, etc. vs. feed)**
 - **Type of operator selling and purchasing**
 - **Label, commercial information**

Feel like a feed business operator

- **Safety Assurance**: safety for feed means safety for all animal species, safety for consumer of animal products, safety for the environment, and also impact on animal's performance
- **Responsibility**: we are at the boundary between two worlds: the waste recovery world, with environmental background and the food world, with a safety culture. We need **operators** who are knowledgeable on both sides and we also need supervision by **authorities competent** on both sides
- **Transparency**: we are in the world of innovation and that means intellectual property / competition: safety here should be the limiting factor to know how protection
- **Social acceptance**: intra-species recycling, religion, ethics

What is the legal status of my feed?

Feed additive	Feed material	Compound feed
<p>Substances, micro-organisms or preparations, other than feed material and premixtures, which are intentionally added to feed or water in order to perform, in particular, one or more specific functions</p>	<p>Products of vegetable or animal origin, whose principal purpose is to meet animals' nutritional needs, in their natural state, fresh or preserved, and products derived from the industrial processing thereof, and organic or inorganic substances, whether or not containing feed additives, which are intended for use in oral animal-feeding either directly as such, or after processing, or in the preparation of compound feed, or as carrier of premixtures</p>	<p>Mixture of at least two feed materials, whether or not containing feed additives, for oral animal-feeding in the form of complete or complementary feed</p>

Why does it matter?

Feed additive vs. feed material

	Feed additive	Feed material
Authorisation	Required	Not required except for GMOs – No Novel Feed regulation
Listing	Register of feed additives (positive list)	Negative list (annex III R767/2009) Non exhaustive Catalogue (R2202/1104) Register of feed materials
Safety	Generic safety by EFSA HACCP for supplier	Generic safety by EFSA for certain types of feed materials or processes Risk assessment by supplier HACCP by supplier
Restrictions	Species specific authorisation Function specific authorisation Holder specific (for certain FA)	Restrictions to certain species (e.g. feed ban)
Claim	No claim permitted beyond the function for which the additive is authorized	Claim possible but require justification (guidance on claims in FEFAC/Copa-Cogeca Code of Good labelling practice as reference)

Which criteria for differentiation?

Feed additive vs. feed material

- Criteria for differentiation: **Recommendation 2011/25**
 - Clarification on what meeting nutritional needs of animals means
 - Level of standardization / purification achieved (essential oils are rather feed additives, whereas macerations may be feed materials)
 - Mode of use
 - Functionality (although not exclusive to feed additives)
- FEFANA classification tool at <https://fefana.org/ClassTool/>


Why does it matter?

Feed material vs. compound feed

- Labelling
 - Biomass from 2 different algae **grown together** on same feedstock or harvested in the sea: **feed material**
 - Specified nutritional characteristics (e.g. crude proteins, crude fat, etc.)
 - Names of all algae present listed if above 5%
 - Biomass from 2 different algae **grown separately**, mixed together and processed: **compound feed**
 - Specified nutritional characteristics (e.g. crude proteins, crude fat, etc.)
 - Listing of ingredients by descending order (different algae species listed)
 - **Percentage of each ingredient (each algae) available on request of customer**

Catalogue vs. register

Catalogue of feed materials

L 159/48  Official Journal of the European Union 21.6.2017

COMMISSION REGULATION (EU) 2017/1017
of 15 June 2017
amending Regulation (EU) No 68/2013 on the Catalogue of feed materials
(Text with EEA relevance)

- Articles 24 and 26 of R767/2009
- Non exhaustive
- Content proposed by EU organisations of the feed chain based based on legally defined structure
- **Approved by authorities**
- Published in Official Journal
- Use of a name of the catalogue requires compliance with description

Register of feed materials

FEEDMATERIALSREGISTER.EU

- Article 24(6) of R767/2009
- All feed materials not listed in the Catalogue
- Content notified by first placer on the market (structure free)
- **No legal validation**
- Publication of the notifications in register by EU organisations of the feed chain
- No exclusivity in use of names

**Presence on EU feed materials
register is NOT an evidence of feed
materials status**

Interactions between Catalogue and Register

- Feed materials listed in the EU catalogue of feed materials cannot be notified to the register of feed materials
- A notification to the Register is **not an application** for listing of the feed material in the EU Catalogue of feed materials
- Register is a source of inspiration for the update of the Catalogue
- New entries to the Catalogue should have been first notified to the Register
- Moving a Register entry into the Catalogue requires securing a description generic in nature, whereas register entries are specific to the applicant

What if not in the catalogue?

- Decision to put a feed material on the catalogue stays with EU organisations
- Two reasons for not being in the catalogue:
 - Matching none of the entries of the catalogue
 - Matching the specification of an entry but not labelled in accordance with the catalogue (e.g. marketed under another name)
- Not being in the catalogue means:
 - No legal blessing of the feed materials status
 - Labelling of analytical constituents according to standard rules (annex V)
 - No tolerance for residues of chemical impurities (as from September 2012)
 - Notification to the register required

Criteria for eligibility to inclusion in Catalogue

- Non-exhaustive catalogue means choice.
- **Safety is a prerequisite, not a criterion**
- Principles:
 - Reflects what is on the market
 - Keep Catalogue of workable size
 - Whenever possible, wide generic entries (e.g. « vegetable oils and fats » or « Animal by-products »)
 - More specific for chemically well defined feed materials (mineral feed materials, some « grey-zone » products)
 - Consistency (same level of details among categories)
 - No « brand names »
 - European dimension, means feed materials with small and/or local market should in principle not be included

4 updates of the catalogue

- Baseline: Regulation (EC) No 242/2010
 - First update: Regulation (EC) No 575/2011
 - Second update: Regulation (EC) No 68/2013
 - Third update: Regulation (EC) No 2017/1017
 - Fourth update: Regulation (EC) No 2022/1104
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- Next call for proposals to update the Catalogue: 2024

41 EU FCTF members

(coordinators in red)

- AICV
- AIJN
- Brewers of Europe
- CEEREAL
- CEEV
- CEFI
- CEFIC (APAG/GME)
- **CEFS**
- COCERAL
- COFALEC
- **Copa-Cogeca**
- EABA (algae)
- EAPA
- EBB
- EDA
- EFFPA
- EFPRA
- EMFEMA
- EMIDAS
- EPA
- ePURE
- EUCOLAIT
- EUPPA
- EUROMAISIERS
- EUROMALT
- EUROPATAT
- European Flour Millers
- EUSALT
- EUVEPRO
- FEDIAF
- FEDIOL
- **FEFAC**
- FEFANA
- FERM
- FoodDrinkEurope
- IFFO
- IMA-Europe
- IPIFF
- PROFEL
- spiritsEUROPE
- Starch Europe

Algae entries in the EU Catalogue of feed materials

ID number	Name	Description	Labelling particulars
7.1.1	Algae (1)	Algae, live or processed, including fresh, chilled or frozen algae. May contain up to 0,1 % antifoaming agents	Crude protein, fat, ash Iodine if > 100 ppm
7.1.2	Algae(1), dried	Product obtained by drying algae. This product may have been washed to reduce the iodine content and the algae have been inactivated. May contain up to 0,1 % antifoaming agents	Crude protein, fat, ash Iodine if > 100 ppm
7.1.3	Algae(1)meal	Product of algae oil manufacture, obtained by extraction of algae. The algae have been inactivated. May contain up to 0,1 % antifoaming agents	Crude protein, fat, ash Iodine if > 100 ppm
7.1.4	Algal(1)oil	Oil obtained by extraction from algae. May contain up to 0,1 % antifoaming agents	Crude fat Moisture if >1%
7.1.5	Algae extract	Watery or alcoholic extract of algae that principally contains carbohydrates. May contain up to 0,1 % antifoaming agents	
7.1.6	Seaweed(1)meal	Product obtained by drying and crushing macro- algae, in particular red, brown or green algae. This product may have been washed to reduce the iodine content. May contain up to 0,1 % antifoaming agents	Crude protein, fat, ash Iodine if > 100 ppm
7.1.7	Algae meal from <i>Asparagopsis</i>	Product obtained by drying and crushing macro- algae of the genus <i>Asparagopsis</i> . May be washed to reduce iodine and bromine content	Crude protein, fat, ash Iodine if > 100 ppm

(1) The name shall be supplemented, as appropriate, by the plant, fungus or algae species. If the obtained feed material contains other species above 5 %, these species shall be also indicated.

Algae entries in the EU Catalogue of feed materials

- All algae are covered by the EU Catalogue except if GM
- If an algae is not safe for feed use, it is the responsibility of the supplier to not sell it as feed
- Certain algae processed products are covered by the Catalogue
 - Those listed in the part C
 - Algae and algae product having undergone a process listed in the glossary of process (example: algae hydrolysed)
- If process not listed in glossary → notification of processed feed to the register of feed materials

Other lists

- German positive list of feed materials – with safety considerations
- GMP+ list of feed ingredients

Risk analysis for feed

- Risks for
 - Different animal species (not the same)
 - Consumer of animal products
 - Environment (feed additives)
 - Occupational health (feed additives)
- References
 - Risk profiles by EFSA (e.g. insects)
 - FAO: Hazards associated with animal feed
(<https://www.fao.org/publications/card/en/c/CA6825EN/>)
 - NVWA: Advice on the risks of the chain 'fodder crops and vegetable feed'. From production up to delivery to farm animals
(<https://www.nvwa.nl/documenten/dier/diervoeder/diervoeder/risicobeoordelingen/advies-van-buro-over-de-risico%E2%80%99s-van-de-voedergewassen--en-diervoederketen>)
- Code of Good Hygiene practice for algae products ???

Is my product eligible for feed use?

- List of prohibited materials: (annex III of Regulation (EC) No 767/2009), thereof
 - Manure
 - Waste water irrespective of any further processing of that waste and irrespective of the origin of the wastewaters:
 - Is the feed use of algae grown on waste water permitted? No
- Animal By-products regulation (1069/2009 + 142/2011)
 - Category 1 and 2 ABP and derived products prohibited for use as feed material for food producing animals
 - Ban on catering waste and derived products
 - Is the feed use of algae grown on manure permitted for feed use? No
- Waste Framework Directive 2008/98
 - Decision to grant an “end-of-waste” status stays with the national authorities
 - EU Commission intention to define “end-of-waste” criteria
 - Under what conditions, algae grown and harvested using wastes as inputs are considered as waste?

Thank you for your attention



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