



2021

22 January

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## EDA input to the public consultation (Roadmap/Inception Impact Assessment) on the revision of the Feed Additives Regulation (Regulation (EC) No 1831/2003)

In the past decades, many efforts to limit GHG emissions within the dairy sector have been focused on the reduction of methane from enteric fermentation and manure. According to the official EU GHG inventory, a 27% reduction in absolute emissions of methane from enteric fermentation in dairy has been achieved from 1990 to 2017, thanks to the efforts of all actors within the chain.

In this framework, the European dairy industry welcomes the Commission's effort to review the Feed Additives Regulation (Regulation (EC) No 1831/2003), with the aim of modernising the legislation to adapt it to the goals of sustainable farming and improve its effectiveness and efficiency without compromising health and food safety.

However – whereas we can agree in principle that feed additives, jointly with other measures, may contribute to the EU's sustainability goals – we see the need to put forward the following aspects for further consideration.

- Feed additives for the reduction of methane or mitigation of other sustainability issues related to dairy cattle are increasingly being developed. They constitute both one of the challenges and opportunities that the dairy sector is facing. We are in favour of faster, less costly, and cheaper procedures to get these new additives into the market that would be accessible for any company, including SMEs.
- Smaller companies are facing large difficulties to get an additive approved by EFSA. The effect may be that these companies will get their product on the market through other routes.
- Regarding milk production, it is topical to assure that great attention is paid to milk quality and milk composition in relation with feed additives, keeping in mind that the safety of a product is different from its quality but equally essential.
- We would prefer that the claims will not be established under Regulation No 1831/2003 because companies need to be able to include also feed components/ingredients in the claims, and this could be problematic if the claims are established under the Feed Additives Regulation. We would rather support their inclusion in Regulation No 767/2009 on the placing on the market and use of feed.
- Attention must be paid to feed additives that are added to products for human consumption but are no longer fit for that purpose. Those products should/could be used as animal feed, but their



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uptake is limited because often they contain additives that may not have been approved for use in animal feed. A solution should be found to facilitate the use of such products.

- We agree that requiring the compliance of animal feed produced for export with the EU legislation poses a trade barrier. In fact, if the use of an additive is not allowed (in a certain quantity) in Europe but the receiving country allows it, producing companies cannot export unless they have a signed authorisation of the receiving country.
- Finally, we would like to point out another issue that is often encountered by companies: there are too many exceptions on additives that need to be specifically approved for each species or animal husbandry category. There is a specific limit, for example, for the amount that can be fed to suckling calves compared with their mothers. All additives need to get approval for a specific animal category and then can be used for 5 to 10 years. All approvals are summarised in a catalogue of three books. The first book contains all the additives, the second all additives that will be removed from approval and the third catalogue contains all corrections to the two other catalogues. This makes a very complex legislation and results in a large administrative burden for companies.

In the context of the European Green Deal and Farm to Fork Strategy, EDA supports the EU's ambition to take leadership at European and global level in the ongoing transition towards a more sustainable EU food system – including livestock farming – as long as it is coherent and fully out fledged to a true long-term solution. The dairy industry would then be very certainly committed to play its role and further strengthen its full engagement into the efforts made at all levels of the supply chain.