



“Feed additives regulation and assessment in the EU: past, present and future”

EAAP – Nantes- August 2013

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FEFANA

- The EU Association of Speciality Feed Ingredients
- All categories of Feed Additives
- Feed Materials used for other purpose than basic nutrition (functional feed ingredients)
- Premixtures and mixtures of functional ingredients
- Producers and traders 27 European Union countries
- Link industry / EU authorities + National
- Regulatory and enforcement activities



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The EU Feed & Food legislation

- Getting access to the EU market
- The authorisation determines if and how the product can be marketed
- Legislative context has taken a prominent place in companies' product strategy



The EU Feed & Food legislation

WHAT

**General Food
Safety Law 178/2002**

**Feed additive reg. 1831/2003
Marketing of feed reg. 767/2009**

The basic references

WHO

Control
WHAT
and WHO

The licence to operate

Feed hygiene 183/2005

The control loop

Food & Feed control 882/2004



Determining product legal status

Feed additive ?

(1831/2003)



Feed material ?

(767/2009)

Not a “free choice”

Product status is determined by legal definitions

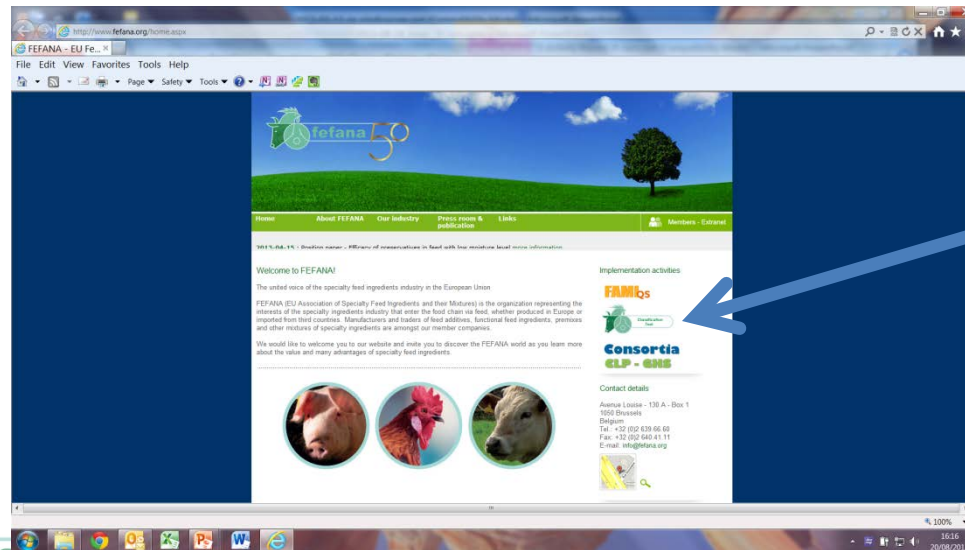
Appropriate positioning of the product

Help for product positioning

Guidelines 2011/25

Commission Recommendation on guidelines clarifying the distinction between feed materials, feed additives and other products (biocidal products, veterinary products,...)

FEFANA classification tool



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Dossier Strategy



Start by the end: the Annex entry

- Identity / expected details
- Holder-specific or not
- Category / functional group
- Type of use / further qualifications
- Etc.

Build application dossier on the basis on how the final authorisation should look like

Dossier Strategy

- Basis for application is Regulation 1831/2003 (authorisation criteria and procedure)
- Regulation 429/2008 (detailed rules for presentation of application and assessment)
- EFSA administrative guidance for preparation of technical dossier
- Other sources of inspiration: EFSA technical guidance (e.g. guidance zotech additives), report on previous applications, etc.



Expectations and Innovation



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Innovation

- Steady state is no option
- Need for a playing field
- Transparency (economic planning)
- Return on investment



Innovation dynamic is fragile.

Threats:

- Uncertain legal environment
- Unfair enforcement
- EFSA

Specialty Ingredients at the core of feed chain innovation



- Productivity only one aspect
- Safe / Wholesome / economic / sustainable / ethic / healthy Animal Products
- Phytogenic ingredients
- Enzymes
- Sensory additives
- Probiotics
- Organic acids
- ...
- Lack of openness at EFSA level
- Support by EU Commission (e.g. mycotoxin inactivators) but overlap risk assessment risk management

Functionality, claims and legislation

Feed industry values.

- Provides basic nutrition
- Provides functionality

Both contribute to sustainability, profitability and societal expectations towards livestock production

- Introduction in EU legislation of claims on compound feed and ingredients is a positive move (Reg. 767/2009)
- Delicate area: requires fairness and transparency



Functionality, claims and legislation

Feed additives

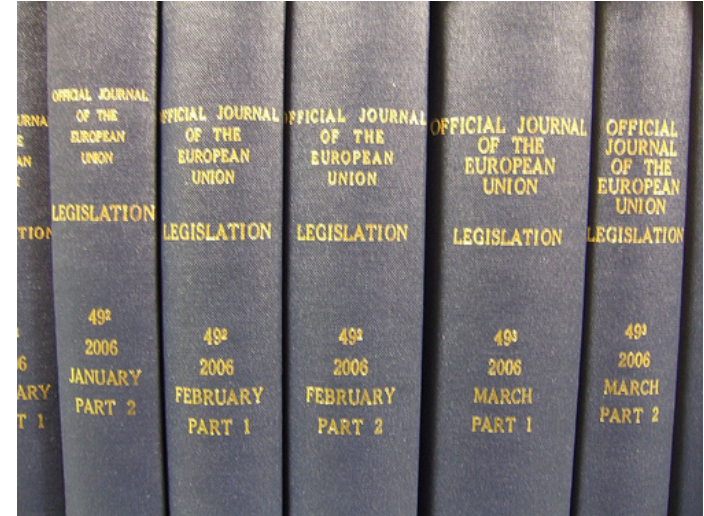
- Functionality under 1831/2003
- Substantiation under 429/2008
- Claims not regulated

Feed Materials

- Claims under 767/2009
- Substantiation not regulated (general orientation)
- Functionality not Regulated

Compound feed

- Claims under 767/2009
- Substantiation not regulated BUT Industry Code Good Labelling



The way forward – Where FEFANA do help



A balance between

- Market and regulators needs
- Innovation / safety-security
- Predictability / over-regulation





fefana



The many ways of saying
XIEXIE "Thank You" SPASIBO
GRACIAS Dank u Grazie Mahalo
Merei Danke WA-DØ
Arigato Shanyawaad Asante

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