

De: Arnaud Bouxin <abouxin@fefac.eu>
Envoyé: mercredi 18 septembre 2024 15:16
À: Sandra.Gallina@ec.europa.eu; krr@fvst.dk
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Objet: HoA Sustainability Catalogue - measures to increase EU feed circularity - Letter from 7 EU organisations of the feed chain
Pièces jointes: 24_INST_23.pdf; HoA_Sustainability_Catalogue_2023.pdf

Dear Mrs Gallina
Dear Heads of Food Safety Agencies

Please find herewith a letter from EFFOP, EFFPA, EFPRA, ESPP, FEDIAF, FEFAC and IPIFF regarding measures to improve feed circularity. We would welcome an opportunity to exchange with you on the follow-up to the Catalogue of measures to increase circularity, in particular feed, included in the report "Towards sustainable food systems – Reflections by Heads of Food Safety Agencies" drafted in September 2023 (here attached) and the prospect for the development of a Circular Feed Road Map.

Best regards
On behalf of EFFOP, EFFPA, EFPRA, ESPP, FEDIAF, FEFAC and IPIFF

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[Check out the FEFAC statistical yearbook Feed & Food 2023 & our website on sustainable animal feeding strategies](#)

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18.09.2024
(24) INST 23

Heads of Food Safety Agencies

Sandra Gallina
Director General of DG SANTE
By email

Dear Heads of Agencies,

Dear Ms Gallina

The undersigned organisations, representing operators of the circular bioeconomy, are convinced of the possibility to increase EU performance in terms of circularity via the use in animal feeds of biomass resources that are not used/usable as food but are not today used in feeds for different reasons, i.e. economic, logistic, or regulatory.

In this sense, our attention was drawn to the report drafted by the Heads of Food Safety Agencies in September 2023 entitled "**Towards sustainable food systems - Reflections by Heads of Food Safety Agencies**", with a catalogue of potential measures to increase the sustainability of food systems. We are in particular very much interested in the thematic area "Reduce use of natural resources and dependency on critical feed materials (soya, deforestation) and reduce waste", with emphasis put on sustainable feed production, considering that "the potential of feed in the sustainable transition of food systems is substantial". In this report, a number of examples of biomass/nutrients that cannot be used as feed nowadays or whose use is restricted by law is provided.

We also noticed that this report is presented as a "**point of entry for further discussions on the sustainability agenda**", that "these elements are reflected on in further discussions on sustainability both within HoA and with EC, in order to best deliver on the sustainability strategy."

We can only subscribe to these statements and consider this report as of extreme value for the EU Commission to support the future orientations of the EU food sustainability policy. We consider in particular that the catalogue of measures under thematic area 3 should be used as a basis for the **drafting of a Feed Circularity Roadmap**, identifying existing legal restrictions whose relevance should be reconsidered in the light of technical and scientific developments in particular.

We regret that this **HoA report has not been granted the public promotion that it deserves**. We think, as a minimum, that public access to this report should be granted via the HoA website and DG SANTE's website, as external source of information regarding food sustainability. We also propose to publish the report on our respective websites to facilitate its dissemination, and hereby request the permission of the HoA to do this.

We also note that "the catalogue could be further developed over time, taking on board new themes and new challenges, which will arise". In this perspective, we would welcome the possibility to exchange and collaborate with HoA on this ongoing work. We have together identified several additional restrictions to the feed use of biomass / nutrients which would be worth exploring in our views. For some of these restrictions, the dialogue between some of our organisations and your services has already started. It is our intention to share our findings **in the form of a report that we plan for release in early 2025**.

We would welcome an opportunity to exchange with you on the perspectives of further development of the HoA proposed catalogue of measures especially related to feed and

the prospect for the development of a Circular Feed Road Map and remain at your disposal for any further information.

Yours sincerely,



Anne Mette Bæk, Managing Director of EFFOP,
European Fishmeal and Fish oil Producers



Anton van den Brink, Executive Director of EFFPA,
European Former Foodstuff Processors Association



Martin Alm, Technical Director of EFPPA,



Robert Van Spingelen, President of ESPP, European
Sustainable Phosphorus Platform

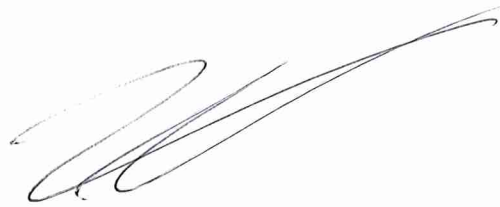


Alice Temple Costa, Deputy Secretary General,
European Pet Food Association

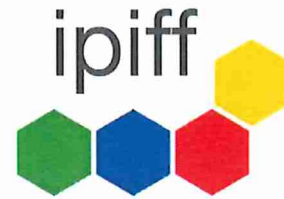


Alexander Döring, Secretary General, European
Feed Manufacturers' Federation





Christophe Derrien, Secretary General of IPIFF,
International Platform of Insects for Food and Feed



Cc: Messrs Koen van Dyck (Head of Unit "Food Hygiene, Feed and Fraud"), Francisco Reviriego Gordejo (Head of Unit "Animal Health"), Bruno Gautrais (Head of Unit "Food Processing, Technologies and Novel Food") - DG SANTE.

Annex: Towards sustainable food systems - Reflections by Heads of Food Safety Agencies". HoA, September 2023