



Inorganic feed phosphates producers' statement regarding the draft Regulation amending the Annex IV of the Regulation (EC)999/2001 as regards prohibitions concerning animal feeding

IFP (Inorganic Feed Phosphates) is a sector group of CEFIC (European Council of Chemical industries) representing the European producers of inorganic phosphates used as an essential element of animal feed.

It is scientifically recognized that an adequate supply of phosphates in animal feed is essential for the optimal performance and well-being of animals. Inorganic feed phosphates are constant in composition, low in impurities and considered by scientists as the best available source of phosphorus for animals.

The IFP members have voluntarily committed to supply high quality consistent inorganic phosphates to guarantee the most consistent and safe feed ingredient. This commitment is reflected by the IFP quality mark that is granted to inorganic feed phosphates suppliers on the basis of the results of ring tests carried out annually in several laboratories across Europe, including independent ones.

IFP members see with great concern the intentions of the Commission to re-authorise the use of processed animal proteins (PAP) coming from Category 3 (containing amongst other meat, bones and blood) in feed materials and compound feed.

IFP members see in the relaxations of the rules the following risks and challenges that are not proportionate with the expected benefits:

1. PAPs contain a part of meat meal and bone meal. Each part brings phosphorus (P) at different level with specific molecular forms. Each molecular form has specific digestibility ranging from 59% for bone meal to 65% for meat meal¹.
2. Consequently, depending of the proportion of each type of meal (bone or meat), there is an impact on the P content and digestibility in the PAP.
3. Therefore, the variability in P content and digestibility in PAP does not allow to have a guaranteed and stable phosphorus intake for the animals. In case of deficit, it can negatively impact the growth, the well-being and the productivity of animals (risks of bone demineralization, lameness, injuries, etc.). In case of excess, it can lead to environmental issues (eutrophication).
4. There is no scientific certainty about the potential improved animal welfare resulting from the use of PAP, e.g. on the prevention of tail-biting or feather pecking.
5. The digestibility of the phosphorus coming from PAP is lower than the latest generation of inorganic feed phosphates (like monocalcium phosphate¹). In consequence, any P source coming from PAP will finally excrete more P into the environment compared to inorganic P sources.

¹ Van der Klis and Versteegh, 1999 [in Payne 2005]





6. Moreover, the amount of proteins from non-animal origin (including imported one) that would be replaced by PAP in the EU would be limited and so would be the economic benefit of such a substitution, while the risk of sanitary issues might be disproportionately increased.
7. It will therefore be of utmost importance to ensure a clear and transparent chain-of-custody – with strict separation and regular controls - and a full traceability of the PAP for animal feed from the slaughter to the production of feed compounds.
8. Still, it is not clear yet whether the market and consumers are ready to welcome such a re-authorisation, after the several food scares that have impacted the agro-food industry over the last decades.

Therefore, IFP members call on the Commission to:

1. Re-assess the risk-benefit as well as the cost-benefit ratios of such a re-authorisation in a context where a precautionary approach is needed to build confidence on the food markets
2. Provide for clear, transparent and third-party verifiable chain-of-custody and traceability systems, drawing from the lessons learned from previous food safety crises.
3. Require that animal feed containing phosphorus from PAP carry a clear label stating the source of phosphorus it contains, allowing the farmer to take this into consideration in the ration calculation.
4. Further back-up with science the claimed benefits of processed animal proteins as part of the food intake, moving away from an approach based on “negligible to no risk” to an approach based on “proven benefits”.

We know there are countries outside Europe, where the use of PAP is only allowed with official exemption from the regulatory body in the country. In case the EU would anyway consider lifting the ban, an exemption-based approach would be preferable to ensure the right level of control, avoiding a cost-driven only use of PAP that ignores other impacts, especially for the environment.

Information on the proven benefits of inorganic feed phosphates can be found on <https://www.feedphosphates.org/>

Brussels, 12 November 2020.

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EU Transparency Register n° 61879142323-90

