



VP(10)1576

Brussels, 2<sup>nd</sup> March 2010

**RE: Joint EU feed chain briefing paper on PAPs – future use of non ruminant Processed Animal Protein (PAP) for non ruminant farm animals and farmed fish, excluding intra-species recycling**

**Reasons to consider a review of the total feed ban in the EU**

The total feed ban was decided in 2001, in the context of the BSE epidemic, in order to avoid any possible cross contamination between feed for ruminant and feed for non ruminant farm animals. Against the background of considerable progress on safety and traceability and new challenges regarding the sustainability of livestock production, EU PAP feed chain partners would invite MEPs to study the following key arguments in favour of opening the debate for a possible lifting of the present EU feed ban:

**Why should the feed ban be reviewed?**

**Sustainability:**

1. There is a structural deficit of proteins in the EU (self-sufficiency <30% since 2001). Reintroducing the possibility to find other protein sources will enable reducing their price volatility and the EU dependency on import, while improving sustainability of the EU feed and livestock chain (including farmed fish).
2. The animal health and welfare situation on poultry farms might benefit from the re-introduction of non ruminant PAPs, mainly linked to the availability of phosphorus and high digestible proteins. As a reminder, poultry and pigs are two omnivorous species.
3. A substantial energy saving and reduction of CO2 emissions can be expected, coming from the increased use of locally produced proteins.
4. The reintroduction of non-ruminant PAPs could contribute to reduce the cost of livestock production of non ruminants and thus reduce distortion of competition with meat and fish imports from third countries, where PAPs can be used for animal feed.
5. One of the key recommendations made by the High Level Group on the competitiveness of the EU Agro-food sector in its report of March 2009 states: “[...] it is important to have an EU-policy framework that facilitates sufficient supply of competitively priced raw materials as a way to limit price volatility with the view to achieve sustainable growth of the sector”.

## **Why can the feed ban be reviewed?**

### **Safety:**

1. EU precautionary TSE measures have proved to control the situation and the TSE/BSE epidemiological situation improved drastically [on 10 051 735 animals tested in 2008, 125 were found positive (from which only 9 among normal slaughter animals, whose products are destined for the food chain), i.e. 0, 0001% (mainly in animals over 10 years old)]<sup>1</sup>. For 2009, the figures are even lower: 64 in total (risk animals and normal slaughter animals all together).
2. In 2007, The European Food Safety Authority (EFSA) evaluated the BSE risk coming from the use of poultry PAPs<sup>2</sup> in pig feed and pig PAPs in poultry feed. They concluded that if the intra-species recycling ban is respected, the risk to transmit BSE to either non-ruminants or humans is negligible<sup>3</sup>. As a reminder, no naturally occurring TSE, including BSE, has ever been detected so far in pigs and poultry.

### **Traceability:**

3. The EU meat and feed industry has put in place effective traceability systems based on the new ABP<sup>4</sup> and feed hygiene legislation.
4. Safe disposal or use of Category 1 and Category 2 materials<sup>5</sup> is now fully guaranteed and can be controlled by the systematic use of GTH<sup>6</sup> as a permanent marker.

Therefore the EU Feed chain on PAPs is working on a position paper setting out the principles regarding the implementation of the future EU wide feed chain management system for the use of non ruminant PAPs for non ruminant farm animals and farmed fish. This position paper will be based, in part, on an impact assessment and will contribute to the announced update of the Commission TSE roadmap from 2005.

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<sup>1</sup> Report on the monitoring and testing of ruminants for the presence of transmissible spongiform encephalopathy (TSE) in the EU in 2008. European Commission. Health and consumers Directorate General

<sup>2</sup> PAPs: Processed Animal Proteins

<sup>3</sup> Opinion of the Scientific Panel on Biological Hazards on a request from the European Parliament on Certain Aspects related to the Feeding of Animal Proteins to Farm Animals, *The EFSA Journal* (2007) Journal number 576, 1-41

<sup>4</sup> ABP: Animal By-Products

<sup>5</sup> Categorisation of animal by-products defined by Regulation (EC) 1774/2002 of the European Parliament and of the Council

<sup>6</sup> GTH: Glyceroltriheptanoate