



16_PR_6

AIBI – COCERAL – EFFPA – FEFAC – FoodDrinkEurope - PFP

Joint Position on the Exclusion of Feed Materials from the Waste Framework Directive

As part of the Circular Economy Package, the European Commission published a legislative proposal on Waste on 2 December 2015 ([COM\(2015\) 595](#)). The legislative proposal holds an amendment (1) to the Waste Framework Directive 2008/98/EC which excludes feed materials from the scope of waste legislation, to the extent they are already covered by other Community legislation. Indeed, the placing on the market and use of feed materials¹ and the manufacturing of compound feed² are subject to EU feed legislation, as well as the General Food Law³, which prescribes the requirements as regards safety, quality and traceability of feed materials. AIBI, COCERAL, EFFPA, FEFAC, FoodDrinkEurope and PFP fully support the proposed amendment to the Waste Framework Directive as this clarification of the non-waste status of feed materials will be an essential contribution to ensuring efficient implementation of feed safety management and, in addition, contribute to the strategic policy goal of food waste reduction.

AIBI, COCERAL, EFFPA, FEFAC, FoodDrinkEurope and PFP stress that, in line with the proposed amendment, all raw materials placed on the market as feed should be subject to EU feed legislation and official feed safety controls only. Good practices in the feed supply chain as regards feed safety management and traceability already ensure an uninterrupted HACCP chain from food to feed. The current uneven implementation of the Waste framework Directive in some EU Member States and regions has led to a legal 'grey zone' where feed materials occasionally are classified as waste and are subject to controls by environmental authorities.

AIBI, COCERAL, EFFPA, FEFAC, FoodDrinkEurope and PFP expect that the explicit exclusion of feed materials from EU waste legislation:

- will improve the efficiency of feed safety management as well as private and official controls along the feed supply chain with the creation of a clear barrier for materials whose 'feed grade' integrity has not been legally assured;
- will clarify the non-waste status of well-defined feed materials such as soybean meal and former foodstuffs, allowing for a reduction in administrative burden for feed business operators producing and handling these products while removing internal market trade barriers;
- will provide legal certainty to food manufacturers who, after having taken the possibilities for food donation into account, choose to forward former foodstuffs (e.g. bread, crisps, biscuits)

¹ Regulation (EC) No 767/2009 on the Placing on the Market and Use of Feed

² Regulation (EC) No 183/2005 on Feed Hygiene

³ Regulation (EC) No 178/2002 on the General Food Law

not meeting human consumption market standards) to feed processing by specialised former foodstuff processors. Feed processing by former foodstuff processors will in its turn become a better identifiable and better controlled link between food and feed manufacturing.

AIBI, COCERAL, EFFPA, FEFAC, FoodDrinkEurope and PFP members stress that their feed-related operations should under no circumstance be linked to waste management and they welcome the fact European legislation aims to confirm this view. The EU associations are pleased that the redrafted Circular Economy Package envisages a holistic approach to foster resource efficiency in the EU, which enables a structured dialogue between food/feed safety and environmental authorities. With this legislative proposal, the Commission also confirms that the feed use of the co- and by-products that result from food production processes is of added value and contributes to food waste reduction targets.

AIBI - the International Association of Plant Bakers – is the voice of European large scale bread producers in Europe and beyond. AIBI is formed of 15 national plant bakeries associations including Russia and Ukraine, which represents more than 2200 plant bakeries producing more than 41 Mio tonnes of bread per year. It represents the interests of its member vis-à-vis the European institutions in Brussels.

COCERAL is the European association of trade in cereals, rice, feedstuffs oilseeds, olive oil, oils and fats and agrosupply. It represents the interest of the European collectors, traders, importers, exporters and port silo storekeepers of the above mentioned agricultural products. COCERAL's full members are 26 national associations in 18 countries and 1 European association [Unistock]. With about 3500 companies as part of COCERAL national members, the sector trades agricultural raw materials destined to the supply of the food and feed chains, as well as for technical and energy uses. COCERAL has two associated members in Switzerland and Serbia and one extraordinary member Gafta.

EFFPA is the European Former Foodstuff Processors Association, representing businesses that process former foodstuffs into animal feed. EFFPA has national association membership from the UK, France, Germany & the Netherlands and company membership from Belgium, Italy, Spain, Greece & Canada. Typical former foodstuffs used are energy-rich products such as bread, breakfast cereals, biscuits, crisps, chocolates and other confectionary. EFFPA estimates around 3.5 million tonnes of former foodstuffs are processed into animal feed annually in the countries where it holds membership.

FEFAC is the European Compound Feed Manufacturers' Federation. FEFAC represents 24 national Associations in 23 EU Member States as well as Associations in Switzerland, Turkey, Croatia, Serbia, Russia and Norway with observer/associate member status, and is the only independent spokesman of the European Compound Feed Industry at the level of the European Institutions. The European compound feed industry employs over 110,000 persons on app. 4,000 production sites often in rural areas, which offer few employment opportunities.

FoodDrinkEurope represents Europe's food and drink industry, Europe's largest manufacturing sector in terms of turnover, employment and value added. FoodDrinkEurope works with European and international institutions, in order to contribute to the development of a legislative and economic framework addressing the competitiveness of industry, food quality and safety, consumer protection and respect for the environment. FoodDrinkEurope's membership consists of 25 national federations, including 2 observers, 26 European sector associations and 19 major food and drink companies.

PFP is the association for the European primary food processing industry to the European institutions and international organisations. The primary food processing industry uses around 220 million tonnes of agricultural raw commodities (cereals, sugar beet, rape-seeds, soy beans, sunflower seeds, crude vegetable oil, starch potatoes, cocoa beans...) a year, employing over 120,000 people in Europe. PFP members form a vital link in the food chain, delivering efficiently produced, high quality safe food for our customers and the consumer. The quality and safety of both agricultural raw materials and end products is paramount to our industries.