

(12) LC-R-33 - Invitation
30 November 2012

Joint workshop on labelling of feed additives along the feed chain
Co-organised by COPA-COGECA, FEDIAF, FEFAC, FEFANA and EMFEMA

31 January 2013

10.00 – 16.00 hrs

Avenue Louise - 130 A - Box 1 - 1050 Brussels

Dear experts

Regulations (EC) No 1831/2003 and (EC) No 767/2009 lay down among others the basic labelling rules for feed additives, feed materials, premixtures and compound feed.

Among the different categories of labelling particulars, the feed additives related labelling rules happen to be practically difficult to implement when applying the letter of the law. COPA-COGECA, FEDIAF, FEFAC, FEFANA and EMFEMA developed alone or together Codes of Practice for feed additives, premixtures, petfood or compound feed for food producing animals to help implementing the legal requirements¹. These codes were developed in cooperation between suppliers, users and partially the authorities. However, the ability of this approach to address properly all practical issues in relation to feed additives labelling along the chain in a satisfactory way for both the customer and his supplier is restricted in the sense that the capacity of deviating from the letter of the law is limited. In addition, there is no legal basis today for an official recognition by the EU Commission of a code of practice for the labelling of feed additives and premixtures.

In addition, in the framework of the re-authorisation of feed additives, additional labelling particulars specific to certain feed additives were introduced, which prove also difficult to implement practically.

Finally, the re-authorisation process also leads to a wider number of feed additives to be declared by name and with the added quantity on the label, which may pose some new challenges when it comes to the listing of flavourings on the premixture and compound feed label.

¹ Code of practice for the labelling of feed additives and premixtures (FEFAC, FEFANA and EMFEMA)
Code of Good Labelling Practice for Pet Food (FEDIAF)
Code of practice for labeling of compound feed (COPA-COGECA and FEFAC)

This is why COPA-COGECA, FEDIAF, FEFAC, FEFANA and EMFEMA held the view that it was necessary for operators representing both customers and suppliers of feed at all stages of the chain to reflect on the appropriate way to declare feed additives along the feed chain and to discuss this with authorities. The five organizations do not intend to challenge a legislation that has been recently recast and results from long discussions between the EU Council and the EU Parliament but to look for a pragmatic application of the law and if modifications of the law happen to be needed to meet the expectations of the operators, these should be minimal and preferably concern only parts of the legislation not subject to ordinary procedure (former codecision).

As a first step, COPA-COGECA, FEDIAF, FEFAC, FEFANA and EMFEMA decided to convene a gathering of 3 experts from each organization with a view to agree on basic principles for the labelling of feed additives along the chain, to inventorise the practical problems in applying the present legislation to the letter of the law, to agree on how an improved label would look like when applying the legislation pragmatically and finally to identify whether such improved labelling could be achieved without or with minimal changes in the legislation.

We would therefore like to invite you to participate in this workshop, whose results will subsequently be submitted for validation by the 5 organisations before being shared with the EU Commission services and national authorities, in the framework of a workshop preferably co-organised with DG SANCO.

You will find herewith a draft programme, which will be completed later on with preparatory documents.

We rely on your participation to this initiative which will hopefully deliver to the full satisfaction of all operators of the feed chain.

Best regards

COPA-COGECA, FEDIAF, FEFAC, FEFANA and EMFEMA

(12) LC-R-33 - programme
30 November 2012

**COPA-COGECA / FEDIAF / FEFAC / FEFANA / EMFEMA
WORKSHOP ON LABELLING OF FEED ADDITIVES ALONG THE FEED CHAIN**

31 January 2013

10.00 – 16.00 hrs

FEFANA office

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PROGRAMME

10.00 – 10.10 hrs: Welcome address / antitrust rules / objective of the workshop

10.10 – 10.40 hrs: Purpose of labelling of feed additives along the chain (information? safety? quality? marketing? control? other).

10.40 – 12.00 hrs: Inventory of shortcomings in the application of the present legislation

12.00 – 12.30 hrs: Lunch break

12.30 – 14.30 hrs: Improved label meeting the expectations of the customers and the suppliers (active substance vs. product, worker safety, added amounts vs. total amounts, etc.)

14.30 – 15.00 hrs: Coffee break

15.00 – 15.45 hrs: Screening of the optimised label against existing legislation, identification

15.45 – 16.00 hrs: Conclusions – next steps