

SUMMARY

Having been an important part of the BSE prevention strategy for over 20 years, there is now a compelling case for a **partial** lifting of the feed ban.

Made possible by the much-improved epidemiological situation, a partial lifting of the ban will enable some processed animal proteins (PAPs) to become part of the solution to finding more sustainable, highly nutritious animal feeds.

THE FEED BAN

The use of many ABPs derived products in animal feed is prohibited by regulatory measures introduced to control BSE. These includes a ban on intra-species recycling (feeding material derived from a species to a creature of the same species) and the feeding of catering waste to farmed animals. There are also bans on feeding ruminant-based animal proteins to animals. The authorisation status of processed animal proteins (PAPs) for animal feed is shown in Table 1.

Table 1 - Authorisation status of PAPs per species

Animal products		Feed products			
		Ruminant	Non ruminant	Aqua	Pets and fur animals
Processed Animal Proteins	From ruminants (including blood meal)	✗	✗	✗	✓
	From non-ruminants (including blood meal)	✗	✗	✓	✓
	From insects	✗	✗	✓	✓
	Feather meal	✗	✗	✓	✓
	Fish meal	✓(a)	✓	✓	✓

Note: (a) Fishmeal use in formulations for un-weaned ruminants

Since the enforcement of the total feed ban in 2001, the EU epidemiological situation regarding BSE has improved with no classical BSE case since 2016 and 24 Member States having a negligible BSE-risk status. Great Britain currently has controlled BSE risk status (England, Wales and Scotland) but may be able to qualify for

negligible risk in 2024-25. Northern Ireland already has negligible risk status.

THE PROPOSED PARTIAL LIFTING OF THE BAN

Rendering processes are tightly regulated providing confidence that the near-negligible BSE risk can be maintained. This opens opportunities for exploring ways in which the feed ban can be lifted.

In Europe, a partial lift of the ban was approved in 2021 and came from the EU *Farm to Fork strategy*^{1, 2} which aims to make better use of the protein and other feed material produced in Europe, to reduce the EU's dependency on third country supplies.

The EU's partial lifting of the feed ban:

- allows the use of non-ruminant PAPs in non-ruminant feed e.g., the use of poultry PAPs in pig feed and vice versa;
- allows the use of insect meal in animal feed;

Ruminant-based feed remains prohibited.

This strategy is part of the *European Green Deal*² with circular economy aspirations at its core. The UK has similar aspirations in its Climate Change driven Policies.

Two important sustainability drivers are:

- the need to replace unsustainable feed sources – discussed further below;
- the drive to maximise the value of animal by-products in the food and drink waste hierarchy – discussed in *The Circular Economy and Animal By-products*³.

THE NEED FOR MORE SUSTAINABLE FEED SOURCES

Feed ingredient production represents the largest share of the carbon footprint of an animal product. This is particularly the case for pork, poultry meat, eggs, and farmed fish, where the share is between 70-80%⁴.

Animal-based feeds are a sustainable alternative to plant-based feeds, with less than 20% of the greenhouse gas (GHG) emissions of soya-based feeds.

This has been borne out by the European Fat Processors and Renderers Association (EFPPA) recent (2019/20) work to develop a rendering products life cycle analysis database of main products from rendering in Europe. The report⁵ (under peer review before submission to

GFLI database⁶) compared carbon footprints of PAPs with plant-based alternatives.

The key findings of the study (see also Figure 1) were:

- ABPs offer significant potential for GHG reduction (principally through avoided deforestation);
- Carbon footprint of porcine PAP = 12% that of soybean meal (per kg of protein);
- Carbon footprint of poultry PAP = 19% that of soybean meal (per kg of protein).

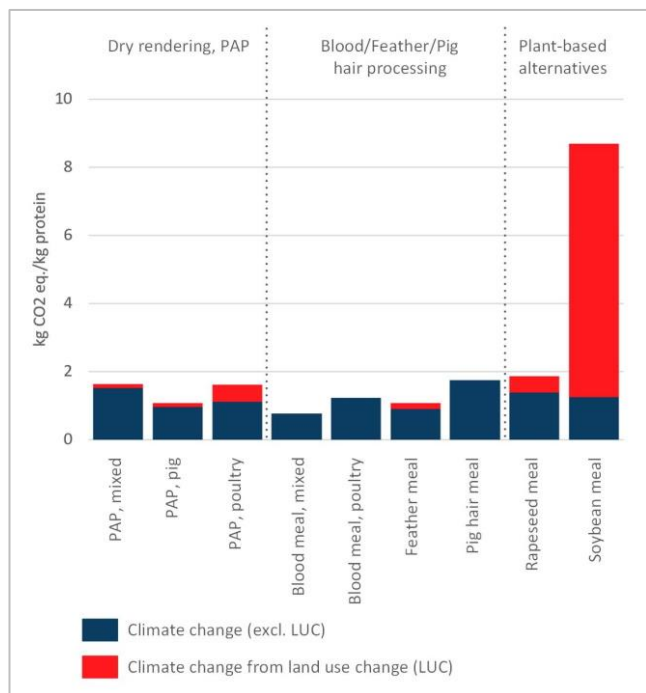


Figure 1 – Carbon footprint comparison

Additional concerns for non-sustainable soybean cultivation include:

- deforestation of the tropical rainforest,
- habitat losses,
- increased water and soil pollution,
- loss of business for small farmers and the native population.

PAPs are beneficial because they:

- reduce demand for inorganic phosphorous, a scarce natural resource,
- reduce diffuse phosphorus water pollution associated with manure-based fertiliser,
- contribute to closing the bioeconomy circle - a key policy objective for the EU and UK³.

The higher protein content of rendered products compared to plant-based alternatives amplifies the carbon footprint benefit meaning PAPs could displace significantly more soymeal, depending on the desired feed formulation.

Pork and poultry feeding trials^{7, 8} showed these meals are highly palatable, digestible and nutritious, containing

a variety of vitamins and minerals, such as calcium and phosphorus for strong bones and growth development.

NEXT STEPS

PAPS offer a low carbon alternative to soybean for animal feed. However, unlike in the EU, their use in farmed animal feed continues to be banned in the UK.

Whilst our circular economy ambitions add significant weight to the feed ban being lifted, the EU recognised that legislative changes need to address reliable protein testing strategies, robust controls and give appropriate assurances to support trade. There must also be consumer demand for the meat derived this way.

FABRA UK has been engaging with the meat industry Courtauld 2025 signatories⁹ and Government stakeholders to drive this initiative. The next steps are:

- UK animal and public health risk assessments
- Approved protein testing strategies
- Consumer perception research alongside educational and promotional initiatives.
- UK formal public consultation on regulatory change.

REFERENCES

1. Future Waste Policy and Animal By-products, Factsheet FABRA-FS-007
2. https://ec.europa.eu/info/strategy/priorities-2019-2024/european-green-deal/actions-being-taken-eu/farm-fork_en May 2020
3. The Circular Economy and Animal By-Products, Factsheet FABRA-FS-004
4. FEFAC Feed Sustainability Charter 2030
5. LCA data of EFPRA rendered products for the GFLI database
6. <https://globalfeedlca.org/gfli-database/gfli-database-tool/>
7. <https://www.wur.nl/en/Research-Results/Research-Institutes/livestock-research/show-wlr/Nutritional-value-of-poultry-by-products-in-pig-diets.htm>
8. <https://www.wur.nl/en/Research-Results/Research-Institutes/livestock-research/show-wlr/Nutritional-value-of-poultry-by-products-in-pig-diets.htm>
9. Meat in a Net Zero World – WRAP – 30 June 2020

This factsheet is produced by FABRA UK, the Foodchain & Biomass Renewables Association and is based on our current understanding only and is subject to change. This factsheet must not be relied upon as reflecting the official UK Gov position and FABRA UK takes no responsibility for the accuracy of this information.

To contact us go to www.fabrauk.co.uk/contact-us