



**Feeding the
Food Chain**

**IGFA welcomes you to a workshop on
Understanding Environment Footprinting
in the Animal Feed Sector**

Thursday 26th January 2023, 2-4pm,



ENVIRONMENTAL FOOTPRINT LABELLING

What I will talk about today

1. **Why** is it important understand the environment footprint of the products we manufacture
2. **Legal landscape** – what is the EU Commission saying, what is the legislative outlook and current
3. **Environment footprinting code of practice** which being developed by the European Feed Manufacturers' Federation (FEFAC)'s Green Labelling Task Force to support members



ENVIRONMENTAL FOOTPRINT LABELLING - **WHY**

- **Compound feed manufacturer**

- To allow measurement of environmental impact of compound feed production and develop strategies to improve it
- To answer information requests from farmers
- To differentiate product from competitors

- **The farmer**

- To allow measurement of the environmental impact of his farm and develop strategies to improve it
- To determine and communicate the environmental performance of the livestock products to downstream partners

- **Downstream partners**

- To communicate to consumers



LEGAL LANDSCAPE



- The EU Commission recognises that today it is difficult for consumers, companies and other market actors to make sense of the many environmental labels and initiatives on the environmental performance of products and companies.
- Some of the available methods and initiatives are reliable, some are not
- Another issue is greenwashing – companies giving a false impression of their environmental impact or benefits.
- Greenwashing misleads market actors and does not give due advantage to those companies that are making the effort to green their products and activities.
- It ultimately leads to a less green economy.





OUTLOOK

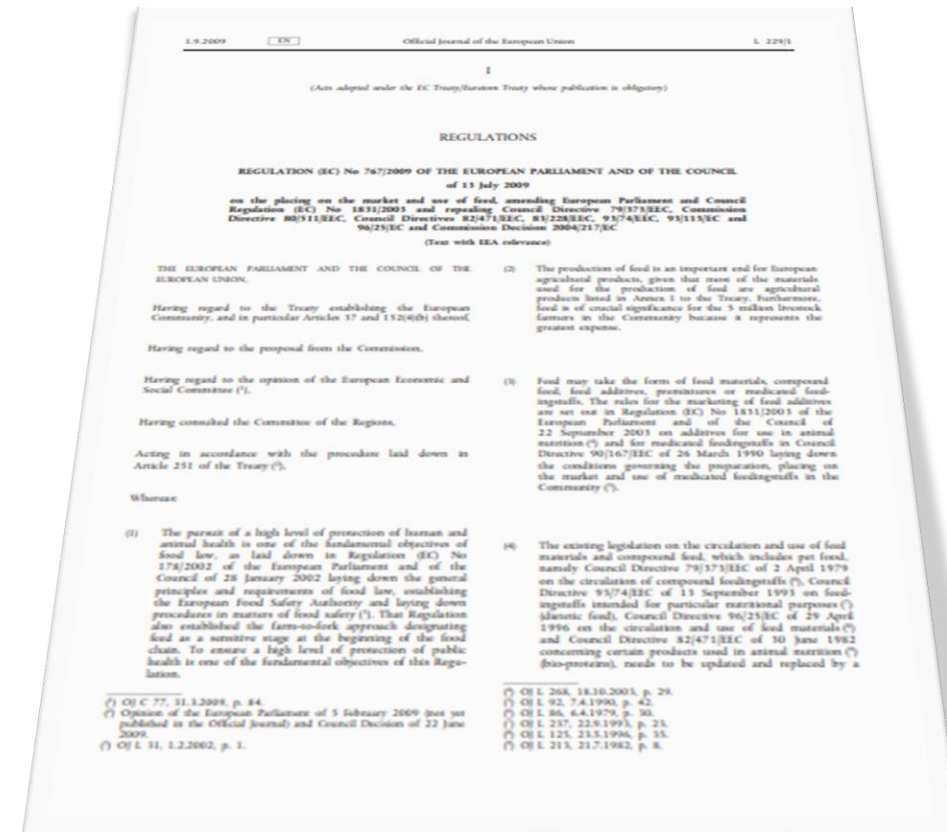
- **European Commission Circular Economy Package II**
 - Includes the proposal for a Directive to Substantiate Green Claims with the PEF method
 - March 2023
- **Sustainable Food System Framework Initiative (DG SANTE)**
 - Sustainable food labelling a key pillar, which supposedly would include LCA and non-LCA based sustainability information
 - Legislative proposal foreseen for Q3 2023
- **Feed additives legislation**
 - Integration of “sustainability” functions and claims with guidelines for justification
 - Q4 2023



CURRENT



Regulation (EC) No 767/2009 of the European Parliament and of the Council of 13 July 2009 on the **placing on the market and use of feed**, amending European Parliament and Council Regulation (EC) No 1831/2003 and repealing Council Directive 79/373/EEC, Commission Directive 80/511/EEC, Council Directives 82/471/EEC, 83/228/EEC, 93/74/EEC, 93/113/EC and 96/25/EC and Commission Decision 2004/217/EC (Text with EEA relevance)



FEED MARKETING AND CLAIMS LEGISLATION – REGULATION (EU) NO 767/2009 – IN BRIEF

- Article 5(2): The person responsible for the labelling of feed **shall make available** to the competent authorities any information concerning the**claimed properties of the feed** placed on the market by that person, which allows the accuracy of the information given by the labelling to be verified,
- Article 11 (1)(b): The labelling and the presentation of feed shall **not mislead the user** ... by attributing to the feed effects or characteristics that it does not possess or by suggesting that it possesses special characteristics when in fact all similar feeds possess such characteristics; ...
- Article 13: basic criteria and requirements related to claims
- Article 25 and 26: The EU Commission **shall encourage** the development of Community Codes of good labelling practice for compound feed for food producing animals



FEED MARKETING AND CLAIMS LEGISLATION - BASIC DEFINITIONS

- Labelling (article 3(2)(s)): the attribution of **any words, particulars, trade marks, brand name, pictorial matter or symbol** to a feed by placing this information on **any medium referring to or accompanying such feed**, such as **packaging, container, notice, label, document, ring, collar or the Internet**, including for advertising purposes;
- Label (article 3(2)(t)): any tag, brand, mark, pictorial or other descriptive matter, written, printed, stencilled, marked, embossed, impressed on, or attached to the packaging or the container of feed; and
- Claims “any **message or representation**, which is not mandatory under Community or national legislation, including pictorial, graphic or symbolic representation in any form, which states, suggests or implies: the presence or absence of a substance in a feed, a specific nutritional characteristic or process, and **relates any of these to a specific function**”.



FEED MARKETING AND CLAIMS LEGISLATION – REGULATION (EU) NO 767/2009 – CODE OF PRACTICE

- Article 25 and 26: The EU Commission *shall encourage* the development of Community Codes of good labelling practice for compound feed for food producing animals



COPA-COGECA / FEFAC Code of Good labelling practices for compound feed for food producing animals
version 1.1 – September 2018

ANNEX I

Management Of Claims

THIS BRINGS US TO THE CODE OF PRACTICE FOR ENVIRONMENTAL FOOTPRINT LABELLING

- FEFAC set up a task force to develop a framework for communication on the environmental performance of feed in order to secure clear communication to customers and establish a level playing field between feed operators.
- Not wait for the EU proposed legislation on green claims
- Use FEFAC Copa-Cogeca's Code of on Good Labelling Practice as vehicle



GREEN LABELLING TASK FORCE

■ When was the task force set up

- May 2021

■ Who is on the Task force

- Representatives from associations from Portugal, Ireland, Belgium, Germany, Denmark, The Netherlands, Italy, France, UK Feed associations and EFFPA (European former foodstuff association)

■ What work has been done

- Numerous drafts (5) have been documented, they have been sent to some stake holders for comment. including Competent Authorities
- Still a lot to do before getting a usable document that can be presented to SCoPAFF and chain partners for validation

■	January 2023:
■	Revised draft guidelines split in 2 parts (version 5)
■	Discussion on outstanding issues on methodology in PEF/GFLI group
■	Discussion on outstanding green communication issues in TF Green Labelling
■	February 2023:
■	Draft guidelines version 6 –targeted consultation
■	Workshop for SCoPAFF members on PEF methodology
■	March 2023:
■	Final version 7
■	Insertion in Code of Good Labelling Practice
■	Submission to SCoPAFF of code of good labelling for validation

Standing Committee on Plants, Animals, Food and Feed

The Standing Committee on Plants, Animals, Food and Feed (**PAFF Committee**) plays a key role in ensuring that Union measures on food and feed safety, animal health & welfare as well as plant health are practical and effective. It delivers opinions on draft measures that the Commission intends to adopt. [For more information you should visit the Comitology Register.](#)

The PAFF Committee is composed by representatives of all EU countries and presided by a European Commission representative.

Thank your for listening.
Slides and videos will be available for members on
<https://igfa.ie/training/>

