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Future lifting of the feed ban – proposed amendments of the TSE-Regulation

It is about 25 years since the strict rules on use of animal proteins in feed for food producing animals were implemented due to the mad cow crisis (TSE Regulation, Annex IV). Since then, only few amendments in the feed ban have been adopted.

We consider the need for further amendments of the TSE rules. We welcome a discussion in the TSE Working Group with the aim to ensure further relaxations in the feed ban with a view to more balanced and knowledge-based risk management within safe limits. This should be based on updated analytical methods, control systems and scientific knowledge. The epidemiological BSE situation worldwide has changed significantly since the TSE Regulation was developed. There is a need to further develop sustainable and circular systems, and this is also in line the Vision for Agriculture and food to ensure access to sustainable and local valuable protein feed materials. We have several requests for easing the feed ban from the feed industry and stakeholders in Norway.

TSE Road Map 2 outlines the goal of implementing relaxations within safe limits, based on scientific evidence and the availability of technical tools to control the measures. Regarding the feed ban, the strategic goal in Roadmap 2 was "*to review certain measures when certain conditions are met*."

We would like to share the following proposal for future discussion:

1. Use of marine raw materials for ruminants

Background

The ban on the use of fishmeal in feed for ruminants entered into force in 2001. The main reason for this ban was the risk of cross-contamination or intentional mixing with non-permitted animal proteins. Adequate analytical methods to differentiate between proteins from fish and terrestrial animals had not been developed at that time. Thus, it was not the fishmeal itself that was considered a risk for transmitting BSE, but the lack of control methods to detect potential contamination.

In addition to the ban on the use of fishmeal in ruminant feed, a ban was also introduced on producing feed for pigs and poultry containing fishmeal on the same production line as feed for ruminants. Several feed factories produce feed for ruminants, pigs and poultry on one production line, and this regulatory barrier means that fishmeal (including other marine

species such as mussels and other aquatic animals) in practice cannot be used for non-ruminants unless there are separate production lines.

Proposal for further discussion

- We propose to remove the ban on feeding fishmeal to ruminants.
- We propose to remove the requirement for separate production lines when producing pig or poultry feed containing fishmeal on the same production line as ruminants in combined facilities.

Reasoning behind this proposal

- Marine raw materials such as fishmeal are locally high-quality produced feed materials. There is also expected future access to new sustainable marine feed materials within the definition of fishmeal.
- Since the ban was introduced, an analytical method (PCR) has been developed that distinguishes protein from fish and land animals (Regulation (EC) No 152/2009 Annex VI) and enables control to identify whether there has been contamination of processed animal protein (PAP) in fishmeal. The main argument for introducing the ban on the use of marine feed materials is therefore no longer valid.
- There is no scientific evidence that marine feed materials in feed transmit BSE or TSE and therefore should be considered safe for animal and human health.
- The Parliament adopted a resolution on 10.07.2007 where they urged to review this ban, noting that there is now an analytical method that can identify illegal PAP even if fishmeal is in the same feed mixture. They state that *"the basis for prohibiting the feeding of fishmeal to ruminants is therefore no longer valid and that the prohibition should be lifted*." "*Calls on the Commission and the Council to lift the ban on feeding fishmeal to ruminants*."

2. Same production line in feed factory for pig feed and poultry feed using poultry-PAP and pig-PAP respectively

Background

Processed animal protein (PAP) from pigs may be used in poultry feed and poultry PAP in pig feed (Regulation (EU) 2021/1372). However, there are strict requirements for separate production lines in the whole production chain. The feed mills in Norway mainly produce feed for pigs and poultry at the same feed-factory and production line, and this result in limited use of these new sustainable feed ingredients in livestock feed. FEFAC (European Feed Manufacturers' Federation) estimates that only 10% of feed businesses in EU countries have separate production lines and can therefore use poultry PAP and pig PAP under current regulations (21_EU_18_Q_A_lifting-feed-ban.pdf).

We understand that an important reasoning behind this requirement is the lack of an analytical method to quantify cross-contamination of pig-PAP and poultry-PAP to ensure satisfactory control routines.

Proposal for further discussion

We propose to request a new EFSA assessment to evaluate the risk of prion disease in fish and monogastric animals with small amounts of cross-contamination, and to request an assessment of a "technical zero" in the development of an analytical method for

quantification of PAP. The goal is to remove the ban on using the same production line for producing pig feed and poultry feed using poultry-PAP and pig-PAP respectively.

Reasoning behind this proposal

We consider that it should be acceptable to use the same production line for producing pig feed and poultry feed using poultry-PAP and pig-PAP respectively. Our National Reference Laboratory (NLR) has informed us that it seems to be possible to develop an analytical method to quantify PAP if a certain tolerance level for trace amounts is accepted, i.e. a "technical zero threshold." This is necessary due to the heterogeneity of the animal material and the limitations of the analytical methods. For comparison, it has always been allowed to use animal fat from all animal species for all animal species with up to 0,15% insoluble impurities (includes protein).

We would like to contribute on this important topic and later send more detailed information and knowledge from our NLR to facilitate future discussion on this issue and to ensure basis to request EFSA for a risk-assessment.

3. Use of Ruminant-PAP for pigs, poultry, and fish

Background

It is prohibited to use PAP from ruminants in feed for pigs, poultry and fish. As far as we know, the main reason for this is to prevent the risk of prohibited material being present in ruminant feed through cross-contamination when such feed materials were introduced into the food chain.

However, this is a sustainable feed ingredient with valuable content of protein, minerals and fat.

The Union of European Veterinary Hygienists (UEVH) has adopted a position paper on, among other things, ruminant-PAP from animals slaughtered for human consumption to be used in feed for pigs, poultry and fish. The background for their proposal is the improved BSE situation, self-sufficiency and that the EU has stricter rules for the use of PAP than WOAH. They encourage, based on scientific grounds, working towards risk-based and sustainable use of ruminant-PAP, among other things.

Proposal for further discussion

We propose to request a new EFSA assessment to evaluate the risk of using ruminant PAP in feed for poultry, pigs and fish, to provide a basis for considering a future possible relaxation of the feed ban within safe limits.

Reasoning behind this proposal

There is a need for knowledge on whether it is possible to introduce relaxations in the feed ban regarding the use of ruminant-PAP within safe limits. We are not aware of any scientific evidence of the risk of BSE or prion infection in pigs, poultry or fish. However, we believe that an updated risk assessment from EFSA on the use of ruminant PAP in feed for pigs, poultry and fish is needed.

4. Use of Gelatine and Collagen from Ruminants

Background

We understand that the use of gelatine and collagen was discussed at the CVO meeting in January.

EFSA has evaluated the BSE risk associated with gelatine and collagen from small ruminant and cattle bones (excluding hides and skins). According to WOAH's BSE code, collagen and gelatine from cattle are listed as safe products and are therefore exempted from TSE regulations. EFSA's quantitative risk assessment concludes that the probability of no new cases of BSE in the cattle or small ruminant population after exposure to gelatine and collagen made from ruminant bones is 99-100%.

If it is allowed for ruminants to consume bones from ruminants, this would be a step towards allowing the use of ruminant material and easing the cannibalism ban in the EU.

Proposal for further discussion

We consider that the EFSA-report indicates that it is safe to allow the use of collagen and gelatine from ruminants in feed for ruminants, and we preliminarily support an amendment in the TSE Regulation to allow such use.

5. Use of PAP from pigs and poultry as substrate for insects

Background

It is allowed to use PAP from insects in feed for poultry, pigs and fish, but it is not allowed to feed insects with PAP from pigs and poultry.

Proposal for further discussion

We propose to allow the use of PAP from pigs and poultry as substrate for insects.

Reasoning behind this proposal

We question the reason why PAP from pigs and poultry is not allowed to be used as substrate (feed) for insects. We are not aware that this topic has been discussed or considered. However, we do not see any scientific justification for this ban. At the same time, we have been in contact with the insect industry, which indicates that PAP from pigs and poultry probably is too costly and less relevant to use. However, they support such a relaxation of the feed ban. It may also be an important step towards allowing the use of food waste as feed substrate.

6. Use of mixed-PAP (pigs, poultry and ruminants) for insects

Background

Mixed PAP with material from pigs, poultry and ruminants of category 3 material is not allowed in feed for food producing animals. There is a lot of material at slaughterhouses from various animal species that gets mixed and currently only goes to pet food or is used as fertilizer.

Due to the cannibalism ban, such mixed-PAP would only be relevant for future use in feed for fish and insects.

Proposal for further discussion

We welcome more scientific knowledge about the risks of using mixed PAP for insects.

Reasoning behind this proposal

We welcome more knowledge about the use of such substrate for insects within safe limits. Knowledge about this could be an important step towards approving the use of food waste as substrate for insects.