



Mrs Julia Klöckner
Federal Minister of Agriculture
Chair of the EU Agriculture & Fisheries
Council
1049 Brussels
(sent by email)

14.10.2020
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EU feed industry recommendations to the EU Farm Council on the EU Protein plan

Dear Mrs Klöckner,

The EU compound feed and premix manufacturers, represented by FEFAC, welcomed the recent "Common Declaration of Bulgaria, Croatia, Cyprus, Czech Republic, France, Greece, Hungary, Italy, Latvia, Luxembourg, Poland, Romania, Slovakia, Slovenia and Spain on the need to develop plant proteins in European agriculture¹" which was first presented at Agriculture and Fisheries Council meeting on 21 September 2020. We fully share the political EU ambition on increasing further the EU protein self-sufficiency (78 % in the Marketing year 2019/2020)

The EU is dependent on imports mainly in the segment of high protein content feed materials (30-50% protein content). As reported in the EU study on the protein plan in 2018, this situation is not likely to change any time soon and thus the EU must maintain open market access to imported vegetable proteins. As pointed out by Farm Commissioner Mr. Wojciechowski at the informal Council meeting on 30 August - 1 September in Koblenz, international trade is part of the solution and not a problem.

However we agree with the EU Commission and many Member States analysis that an ambitious, pragmatic long-term EU protein strategy is required to boost up the production of protein crops and other alternative protein sources in the EU. An increased protein feed autonomy not only supports the EU food security in COVID times, but can also contribute to positive climate change mitigation² in line with the EU Green Deal goals.

In view of the incoming Agriculture and Fisheries Council meeting on 19-20 October 2020 and discussion on Post 2020 CAP reform package, we would like to recall the 2018 EU Commission report on the development of plant protein³ in the European Union. This report has recognized CAP as an important tool on the way of developing a successful EU Protein Plan. A key finding of the report was that direct (eg. Voluntary coupled support) and indirect (eg. Rural Development Measures) instruments of CAP has contributed to increased cultivation area of protein crops in the EU in recent years. Therefore FEFAC recommended⁴ to the European Commission pay particular attention to support measures to the protein crop sector when evaluating National Strategic Plans (NSP) and priorities those as one of the inclusion targets of NSP.

¹ <https://data.consilium.europa.eu/doc/document/ST-10813-2020-INIT/en/pdf>

² <https://op.europa.eu/en/publication-detail/-/publication/29eee93e-9ed0-11e9-9d01-01aa75ed71a1>

³ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52018DC0757>

⁴ https://fefac.eu/wp-content/uploads/2020/07/20_PR_14_Final.pdf

Next to the focus on the increasing production of protein crops at farmers level, the contribution of other chain partners of agri-food supply must be assessed more closely. Plant breeders are looking at the increased protein levels and their digestibility in seeds. Innovative feed companies and universities are seeking to achieve higher protein levels of raw materials through their processing (e.g. sunflower meal, grass & clover mixtures, faba beans, peas and lupins etc.). FEFAC members and supply chain partners have been, investigating the development of alternative protein alternatives (processed insect protein, algae, marine ingredients, Single cell proteins green biomass), feeding systems (phase feeding) and improving digestibility of feed (elimination of antinutritional factors) and improved quality of proteins (extrusion).

This research investments has enabled our industry to reduce progressively crude protein content in all major farmed species and in aquaculture, thus reducing nutrient leakage and lowering environmental impact of nitrogen emissions.

FEFAC launched its Feed Sustainability Charter 2030⁵, highlighting five key ambitions how the European Feed Industry can contribute to the development of more sustainable livestock and aquaculture value chains. Three of its ambitions are directly or indirectly linked to the EU protein plan:

No 2. Foster Sustainable Food Systems Through Increased Resource & Nutrient Efficiency,
No 3. Promote Responsible Sourcing Practices (encouraging to apply responsible sourcing initiatives focusing on the use of soy products, via FEFAC soy sourcing guidelines⁶),
No 5. Enhance the Socio-Economic Environment and Resilience of the Livestock & Aquaculture Sectors (EU Feed autonomy, contingency planning).

We would however like to draw your attention to the fact that the EU protein import dependency for Hi-Pro vegetable proteins may actually increase in the short term due to the significant decline in availability of co-products from Biofuels sector (Biodiesel and ethanol industry) as result of reduced demand for Biofuels on the one hand but also a significant decline in rapeseed production, as a result of adverse weather conditions and lack of disease management tools. We urge the EU Farm Council to consider effective measures to redress the worrying situation of the EU oilseeds production, which is the major source of EU produced Hi-Pro vegetable proteins.

Lastly, we would like to express our recommendation to evaluate the important role new genomic techniques could play in boosting competitiveness of EU protein crops and oilseeds. We agree it is necessary to increase societal acceptance for new genomic techniques, which may help accelerate the market launch of better protein plants, both from a yield (e.g. higher yielding soybean, peas, faba beans varieties) and protein quality perspective (elimination of anti-nutrients, improved amino-acid composition and digestibility). New more robust sustainable protein plant varieties will directly benefit the European agricultural production and its agri-food supply chain in the EU should also focus on additional economic incentives to EU farmers and value chain partners willing to increase EU plant protein production and help shorten supply chains of home-grown high protein content feed materials to feed and livestock production.

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<https://fefac.eu/wp-content/uploads/2020/09/FEFAC-Feed-Sustainability-Charter-2030.pdf>



We would be delighted if you would take into account our recommendations for an ambitious pragmatic EU protein strategy consideration at the upcoming EU Farm Council meeting and within your next working documents e.g. council conclusions on the EU protein plan.

Yours sincerely,

A handwritten signature in black ink, which appears to read "Asbjørn Børsting". The signature is written in a cursive style.

Asbjørn Børsting
FEFAC President