

Position Paper

Former Foodstuff Processors & The Circular Economy

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Former foodstuffs as a secondary raw material market

Food losses at plant level such as broken biscuits, over-flavoured crisps, misshapen chocolate bars or unsold bread have lost their value on the human consumption market, but still contain energy-rich nutrients suitable for animal feed. EFFPA members have the skills and knowledge to process this food loss (“former foodstuffs”) into highly valuable feed materials used in compound feed manufacturing for food producing animals. It is estimated that currently approximately 3.5 million tonnes of former foodstuffs are processed into animal feed in the countries where EFFPA holds active membership¹. Former foodstuff processors provide a guaranteed and sustainable secondary raw material market for the foodstuffs considered to be no longer suitable for human consumption, thereby keeping food losses preserved in the food chain.

Food chain sustainability merits

By processing former foodstuffs into animal feed, former foodstuff processors contribute to the sustainability of the food chain. This works in two ways;

Reduction of food waste accumulation at food factory level: The feed valorisation of food losses is well-recognised as a means to prevent food waste from occurring, as well as being the most sustainable alternative to human consumption². By converting food losses into food of animal origin via the feed pathway, food losses are kept in the food chain.

Reduction of environmental footprint of feed manufacturers: The end-product that former foodstuff processors create (e.g. “biscuit meal”) is used in compound feed as an alternative to cereal grains. As the incorporation of former foodstuffs into compound feed does not require any additional land resources, the environmental footprint of compound feed and animal products is lower compared to cereal grains.

Environmental gains never at the cost of feed safety

Reasons of sustainability may however never be the leading argument when valorising former foodstuffs into animal feed. The key overarching criteria will always need to be feed safety. Former foodstuff processing, which by no means should be seen as a form of “food waste recycling”, is based on strict HACCP safety requirements and demands compliance with the General Food Law’s principles as regards responsibility and traceability. Food waste resources which can’t comply with such requirements, such as catering and household waste, are therefore not acceptable.

¹ Belgium, France, Germany, Greece, Italy, The Netherlands, Portugal, Spain, United Kingdom

² After the food manufacturer has taken into account the options for donation to food banks

Unlocking the full potential

In order to unlock the full potential of the former foodstuff processing sector, EFFPA advises the EU to tackle several pertinent issues:

Create an EU-harmonised definition for the legal status of former foodstuffs destined to animal feed: Currently operators depend on Member State interpretation of former foodstuffs as “by-products” and not as “waste”. This creates legal certainty risks in daily business and occasionally creates conflicts in the international trade of former foodstuffs between Member States upholding different legal statuses.

Provide governmental guidance as regards legal responsibility: Particularly in Member States where former foodstuff processors are still in a start-up phase, it is often unclear how feed safety regulation exactly applies to food manufacturers and former foodstuff processors, when engaging in the feed conversion of former foodstuffs. In Eastern and South-Eastern Europe food manufacturers are often hesitant to invest in better upgradability of their food losses as they fear feed valorisation of their by-products creates liability risks. Together with EFFPA, competent authorities can help to create the necessary guidance as regards legal demands and good manufacturing practices when undertaking former foodstuff processing activities.

Remove any incentives that cause disrespect of the food waste hierarchy: There have been a lot of efforts to stimulate the creation of renewable energy in the EU. As a perverse side effect, using former foodstuffs as a feedstock in bioenergy is incentivised in certain Member States, thereby diverting resources from the more sustainable outlet animal feed.

Reauthorize the use of ruminant gelatine in animal feed: Because of TSE regulations, the presence of ruminant gelatine in animal feed is not allowed. Scientific assessments have shown the safety risk of ruminant gelatine in feed is negligible. EFFPA and involved stakeholders (Gelatine Manufacturers of Europe, FEFAC, FoodDrinkEurope) have estimated approximately 100.000 tonnes of ruminant gelatine containing former foodstuffs are currently not used in animal feed

Taking into account the possible future legal clarifications and innovative advancements, EFFPA estimates that in the EU another 1 million tonnes of feed-eligible former foodstuffs could be valorised. With an ambitious proposal for the circular economy, the European Commission can take a step towards making the food and feed chain more resource efficient and more waste reducing.