

EU Roadmap consultation: Revision of the Feed Additives Regulation 1831/2003

SUMMARY

More efficient use of resources will be key in the EU's Circular Economy Action Plan. Animal feed and feed additive have an important role to play and have great potential in being part of the transition to a circular economy.

EasyMining fully supports strong safety requirements to prevent risks of pathogens and contaminations in animal feed and feed additives. However, today's legislation and the proposed Roadmap fails to open the legislation for feed additives derived from manure, from municipal or industrial waste water, even after incineration at high temperature, intensive chemical processing and purification, which can guarantee safety. Irrespective of quality and safety, such chemicals are currently excluded from use in feed additives because Regulation 1831/2003 (Feed Additives) refers to 767/2009, which specifies this exclusion in Annex III. Exclusion of such recovered chemicals from animal feed applications is an unnecessary obstacle to the nutrient circular economy.

Our most important feedback on the proposed Roadmap:

- it does not address a modern holistic sustainable foundation and fails to be part of the transition to a circular economy and the challenges in EU's circular Economy Action Plan.
- it does not connect *more efficient use of resource* to the possibility to use recovered nutrients in the future animal feed and feed additive products.
- it's lacking a change of focus from excluding on origin to focusing on quality; i.e. a reused product that fulfils relevant quality and safety demands should be accepted as animal feed and feed additive products.

RECOVERED PHOSPHORUS: AN INEVITABLE PART OF OUR FUTURE SOCIETY

Phosphorus is an essential element for life and a key nutrient. Phosphate rock is the primary raw material for production of phosphate fertilisers, animal feed phosphates as well as a wide range of other important uses (from electronics to fire safety), but mineable phosphate rock is a limited, non-renewable resource that will not last forever. Today, the EU is largely (92%) dependent on import as most mines are located outside Europe. Because of the limited availability of this scarce resource, the EU includes Phosphate Rock and Phosphorus on the list of Critical Raw Materials (CRMs).

With the problem of mineable phosphate rock being non-renewable, and the vital importance of Phosphorus in our society, recycling of Phosphorus will be an inevitable part of our future society.

By using innovative chemical recycling, Phosphorus can be efficiently recovered from incinerated sewage sludge. E.g. EasyMining recovers a Precipitated Calcium Phosphate (PCP) that is pure thanks to the incineration step before and efficient detoxification step in the process (low amounts of unwanted substance, no organic contaminants or pathogens and have the same solubility in citric acid as commercial mono-calcium phosphate). Using the PCP as feed phosphate will contribute to substituting virgin materials, prolonging the life time of mines, lowering contaminants like Cd and saving significant amounts of CO₂ emissions. E.g. EasyMining will produce 15 000 ton PCP / year from 2023 gradually growing to 150 000 ton PCP / year 2030.

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The exclusion hinders sale of such recovered chemicals as animal feed additives and prevents sale of recovered chemicals to the commodity chemical market, in that the current legislation suggests that any commodity phosphorus chemical recovered from a waste stream should be managed in a separate stream to avoid possible use in animal feed production by a downstream customer. This prevents placing on the commodity chemical market and prevents a level playing field with the same chemicals produced from non-renewable mined phosphate sources. This is also a source of legal uncertainty and inconsistency, i.e. the Roadmap fails to address legal clarity and consistency.

Animal feed and feed additive have a great potential in being part of the transition to a circular economy by opening the legislation to more efficient use of resources by recovered nutrient with high quality.

ABOUT US

EasyMining is an innovation company dedicated to closing nutrient cycles. We are owned by the Swedish environmental company Ragn-Sells. EasyMining is passionate about inventing new technology that uses intelligent chemical solutions and our objective is to create new circular material flows in an efficient commercial way.