

| via FEDIAF

## Biofuel changes pose a 'significant threat' to Europe's pet food supply, warns industry rep

Keep valuable pet food ingredients, like Category 3 animal fats, out of engines for the sake of 300 million-plus household pets in Europe... and their owners, says FEDIAF.

"FEDIAF is calling on EU policymakers and MEPS, during the September Plenary vote on the Renewable Energy Directive, to explicitly restrict the use of category 3 animal fat for biofuels and implement the cascading principle in biofuels."

## **BY FEDIAF**

With over 90 million European households benefiting from the love and companionship of their 300 million-plus companion pets, they may soon be faced with a new challenge – that of their continued supply of pet food. FEDIAF – the European pet food industry, representing 15 European national pet food associations, together with five pet food manufacturers operating in Europe – is sounding a warning bell about a significant threat to the continued supply of pet food, as a result of planned changes to EU biofuel rules.

Current proposals of amendments in the European Parliament, as well as in the Council for the Renewable Energy Directive and the FuelEU Maritime and ReFuelEU Aviation proposals, create various incentives for the use of fit-for-feed animal fat (so-called Category 3 animal fat) - a critical raw material for pet food – for biofuels to be used in transport. For decades, FEDIAF and its members have been living by the protocol that food not intended for human consumption should be recycled by using it in pet food first, which sits well above energy use in the EU's own hierarchy of most-prefera-ble options for food waste disposal. Other types of animal fats, which do not fulfil the necessary standards to be used in pet food due to safety and contamination reasons, such as Category 1 and 2 animal fats, are much more suitable for use in biofuels for all forms of transport, and not just the maritime and aviation industry.

Incentivizing the use of Category 3 animal fats in biofuels could seriously impact EU pet food makers' access to essential and difficult to replace pet food ingredients. The EU's pet food sector serves more than 300 million companion animals in Europe each year and provides direct (and indirect) employment to more than 1 million European citizens. In addition to being a source of love and friendship, numerous scientific studies have analyzed the many ways in which pets are beneficial for our health and our society.

Decarbonization of transport has become one of the key pillars of EU Green Deal, something that FEDIAF wholeheartedly supports. "However, we do not believe that valuable pet food ingredients belong in engines," says FEDIAF president, Rosa Carbonell.

Fortunately, there is a solution, and now is the time to fix this problem. FEDIAF is calling on EU policymakers and MEPS, during the September Plenary vote on the Renewable Energy Directive, to explicitly restrict the use of category 3 animal fat for biofuels and implement the cascading principle in biofuels. Likewise in upcoming trilogues on the ReFuelEU Aviation proposal and the negotiation of the FuelEU Maritime proposal, we encourage policymakers to correct the current way of thinking.

Excluding Category 3 animal fats from the transport quota (RED, ReFuelEU Aviation and FuelEU Maritime) is the most sensible way to promote a truly sustainable fuel pathway for these industries. EU policymakers can throw a lifeline to our animal companions and their welfare, while providing investment certainty for all transport, including aviation and maritime fuel players beyond 2030, by making this change.

EU pet food market bears the brunt of energy policy-driven distortion

Under the EU Animal By-Products Regulation Category 1 and 2 animal fats, which cannot be used for feed or pet food on food safety and animal health grounds, have been used in biofuels for some time. Unfortunately, our industry is already challenged managing the impacts of driving pet food ingredients toward road fuels. This problem risks being exacerbated by policies which promote the use of Category 3 animal fats for biofuels for the aviation and maritime industries - despite reputable NGOs demonstrating other, more credible, pathways of making transport more sustainable, which will not negatively impact the pet food industry.

The original EU Commission Re-FuelEU Aviation proposal indicated that compliance with sustainable aviation fuel (SAF) quotas must rely on advanced fuels, such as those in RED Annex IX. However, by expanding the scope of eligible fuels to Category 3 animal fats, the Parliament and member countries have effectively dealt a significant blow to our pet food industry.

There seems to be low awareness of the unintended consequences and potential negative impact of this move. If carried out, it will impact FEDIAF members' ability to meet consumer demand and safeguard the health of millions of companion animals in the EU.

If policymakers do not correct course, pet food makers will be left with less-sustainable options, including the potential use of materials otherwise destined for human food. Overall, we will be observing a much-higher carbon footprint, after decades of being a flagship industry in this regard, while being faced with the real risk of pet food ingredient shortages.

As the issue reaches crunch point within the EU, we are seeing similar trends emerging across the globe. Creating a policy model which integrates circularity and a cascading use of resources into energy incentives can ensure that emissions are truly reduced at a global scale, rather than shifted from one industry to another. Before setting sustainable fuel quotas, policymakers must assess the impact they have on the capacity to feed people and their pets first.

Meanwhile despite many challenges, FEDIAF continues to raise awareness of the beneficial role our pets play in society. It now asks policymakers to join FEDIAF and demonstrate that decarbonization of transport should not be at the expense of more than 300 million family pets and their 90 million pet owners in Europe.



