

09.08.2023
(23) LETTER OUT 2

To: European Commission DG SANTE (SANTE-CODE-OF-CONDUCT@ec.europa.eu)
European Commission DG GROW (GROW-CODE-OF-CONDUCT-FOOD@ec.europa.eu)

Re: EU Code of Conduct on Responsible Food Business and Marketing Practices

Dear Madam/Sir,

The European Former Foodstuff's Processor's Association (EFFPA) is the EU trade association representing the former foodstuffs processing sector. EFFPA was founded in Brussels in January 2014 and consists of full members: TROTEC (BE), BFAN (DE), PROMIC Group (ES), DALMA Mangimi (IT), VIDO (NL), and UKFFPA (UK), associate members: SPB Solutions (CA), Bakery Feeds (USA), and observer members: Adival (DK), VALORIA (FR), Nuevo (GR), and lungo (PL).

EFFPA, acting as the representative of the former foodstuff processing sector at EU level, actively and positively collaborates with the European Union Institutions to aid in the establishment of an equitable regulatory framework for the sector. Approximately 5 million tonnes of processed former foodstuffs, meaning '*food no longer intended for human consumption*', are annually used in animal feed in Europe. EFFPA represents the sector at EU level since 2014 and has made pre-competitive efforts in the field of safety, nutrition and sustainability.

EFFPA welcomes the ongoing work to stimulate the development of more sustainable food systems through a European Farm-to-Fork Strategy. We are convinced that former foodstuff processing makes a key contribution to the sustainability of both food and feed manufacturing by mitigating food waste in the EU and by reducing the need for feed materials that require agricultural land, and thus the need for fertilisers, helping in preserving soil health. In addition, science-based evaluation show that animal feed based on former food doesn't have negative effects on animal welfare and performance.¹ The 'raison d'être' of the former foodstuff processing sector is essentially based on the circular economy and EFFPA is committed to continuously seek facilitation of the food-to-feed transition, with a view to further extend the uptake of former foodstuffs, for example from the retail sector.

With this letter, EFFPA endorses its support for the EU Code of Conduct on Responsible Food Business and Marketing Practices and requests to become a signatory. We commit to actively participating in dialogues and cooperating with various stakeholders to help accomplish the goals and aspirations outlined in the Code. EFFPA also commits to distributing the Code to its Members, urging them to embrace the principles and align their sustainability initiatives with the targets and objectives defined within the Code.

EFFPA is a member of the EU Food Waste Platform, and is co-chair of the sub-group on Action & Implementation for the year 2023 together with the University of Wageningen. EFFPA supports and coordinates best practice initiatives both on factory level and in retail, as an international partner of GMP+, and in close cooperation with chain partner associations, such as AIBI, and EuroCommerce which are both already signatories of the Code. As part of our outreach activity, EFFPA organised a technical webinar as part of the EU Green Week in June 2023.

¹ Guo, J. Y., Phillips, C. E., Coffee, M. T., & Kim, S. W. (2015). Efficacy of a supplemental candy coproduct as an alternative carbohydrate source to lactose on growth performance of newly weaned pigs in a commercial farm condition. *Animal Science*, Volume 93, Issue 11, 5304–5312.

EFFPA recognises the significance of endorsing the Code of Conduct as a crucial measure in attaining the European Commission's Farm to Fork Strategy targets. EFFPA wholeheartedly reaffirms its commitment to engaging in constructive and proactive cooperation with EU institutions in line with the Code of Conduct, as well as working together towards the common goal of promoting a healthy, innovative, and sustainable food system.

Yours Sincerely,

Valentina Massa

President EFFPA