

Annex 2: Stakeholder Consultation Strategy

Evaluation of Regulation (EC) No 1831/2003 on additives for use in animal nutrition

1. Context

The present stakeholder consultation aims to provide broad and high quality information to support the evaluation of the EU legislation on feed additives. This initiative will evaluate the effectiveness, efficiency, coherence, relevance and EU added value of the feed additives Regulation.

An Inter Service Steering Group (ISSG) has been set up to take into account the input of relevant Directorates-General of the European Commission throughout the process. The Commission will be assisted by an external contractor both for the data collection and analysis phase.

The current strategy document will (1) set out the objectives and scope of the consultation, (2) map key stakeholders, and (3) establish consultation methods and tools.

2. Objectives and Scope

The consultation aims at collecting factual information, data and knowledge on the application of the Regulation. It also aims at drawing upon the experience of different stakeholders with the implementation of the relevant rights and obligations established under the feed additives legislation, and collecting particular views and opinions on different aspects of the Regulation and its effects, including information on costs and benefits of the Regulation. Among other elements, the consultation activities will cover the five main evaluation criteria, namely:

- Effectiveness of the intervention,
- Efficiency in relation to resources used,
- Relevance in relation to identified needs and problems,
- Coherence with other interventions with common objective, and

- EU added value compared to what could have been achieved by Member State action.

To that scope the stakeholders will be consulted on the following key aspects: the positive and negative impacts of the Regulation, the risk assessment and risk management processes, the criteria and procedure for the authorisation of feed additives in the EU, the administrative burden of the Regulation and the enforcement of the rules.

3. Relevant stakeholders

This section will help to identify the key stakeholders. The consultations should target stakeholders inside the EU, both at national and European level.

Public authorities. Member State Competent Authorities (MS CA) are important actors as they are directly involved in the risk management of the feed additives, in the authorisation of the feed additives through their representatives in the Standing Committee for Plants, Animals, Food and Feed and through the enforcement of the legislation.

Commission representatives (including EURL). The Commission has a risk management role, facilitates the interpretation and application of the Regulation and adopts Regulations to authorise or deny authorisation of feed additives in the framework of comitology.

The European Food Safety Authority (EFSA). The EFSA has a key role in the risk assessment of feed additives. The Regulation authorising a feed additive is based on EFSA Opinion.

Feed additives industry: The interest of the feed industry is strong, as they are directly affected by the Regulation. They are the addressees of the obligations set in the Regulation. There are important EU level organisations representing the sector:

- **Producers of feed additives:** e.g., FEFANA, EMFEMA, IFAH;

- **Users of feed additives** (to manufacture pet food or compound feed), e.g. FEDIAF, FEFAC, including Aquaculture organisations;

Farmers. The farmers are directly affected as end-users of feed additives. There are national and EU level organisations representing farmers, e.g., Copa-Cogeca, IFOAM-representing organic farming.

FVE- Federation of Veterinarians of Europe. Veterinarians have the key role in ensuring animal health.

Consultants' associations. They represent the applicants who request authorisation for a feed additive. They are in close contact with the industry, the Commission and EFSA.

Food additives association. Certain food additives may be used also in feed. The procedure for their authorisation as feed additives is simpler. Thus, food additives associations have an interest in the current evaluation.

Citizens and consumers. Citizens as consumers are also end-users as they are exposed to feed additives through food. Consumer organisations such as BEUC will be part of targeted consultations.

NGOs (e.g. environmental, health, and animal welfare organisations). There are numerous NGOs with interest in the area of feed additives, e.g., Eurogroup for Animals, Friends of the Earth and Greenpeace.

Research and innovation community (e.g. academia). These stakeholders are indirectly affected as they are involved in developing the scientific methods used in the risk assessment. This category also includes experts, either from the academia or the private sector, who are subcontracted to develop methodologies or assessments of technologies for industry or public authorities.

4. Consultation tools

The data collection strategy envisages the use of the following consultation tools:

- Surveys of Member State Competent Authorities and of stakeholder organisations.
- Case studies to shed light on the practical details of the legislation. There is merit to conduct some of the case studies early in the process as they can

provide information where to collect relevant data. Other case studies will be used in order to follow up on information collected during the open public consultations and online surveys;

- Open 12 week public consultation via 'Your Voice in Europe' with a questionnaire available in English to target citizens as well as the maximum possible number of stakeholders. The launch of the public consultation is foreseen early in the evaluation process;

- In depth interviews. These interviews aim to further investigate, clarify and analyse elements that came up in the context of the online surveys. They will be conducted throughout the entire evaluation process, both at Member State level and at EU level.