



A sector group of Cefic
European Chemical Industry Council - Cefic side



Animal fats category 3: Fueling airplanes or feeding animals and pets?

Brussels, 15 July 2022 – APAG, the European Oleochemical Industry, a sector group of Cefic, together with FEDIAF and FEFAC representing the manufacturers of petfood and feed for food producing animals respectively, call for animal fats category 3 to be prioritized for animal feed, pet food and oleochemical industries. Last week, the European Parliament’s Transport committee approved the broadening of the definition of “sustainable aviation fuels” (SAFs). If endorsed by Plenary, this would set the Parliament’s negotiation position to allow animal fats category 3 to be considered a sustainable feedstock until 2034.

In June, the Council included animal fats category 3 in the SAF definition of its General Approach, with a proposed 3% cap for feedstocks that have uses in animal feed and cosmetics.

Animal fats category 3 are highly valuable by-products from the animal processing industry which can be used in a variety of applications. Promoting animal fats category 3 for aviation fuels diverts the access to this feedstock from the animal feed, pet food and oleochemical industries. *“We have seen significant pressure on animal fats category 3 already from the use in biofuels for road transport, any further pressure on this very limited feedstock, which our industries can only source from Europe, will affect the sustainability performance of our industries”*, emphasised Sofia Ferreira Serafim, manager of APAG.

We urge the co-legislators and the European Commission in their triologue negotiations to ensure that decarbonising the aviation sector does not sacrifice Europe’s most sustainable industries and that alternative solutions should be found.

- We strongly support the proposal made by the European Commission. It had limited biofuels that can be SAFs, to those made from real wastes (i.e. those listed in the Renewable Energy Directive (RED II), Annex IX parts A & B) which have no other uses and fulfil the sustainability criteria, Waste Hierarchy¹ and cascading use principle.
- We strongly support the limitation of biofuels considered as SAFs to those feedstocks listed in RED II, Annex IX parts A and B. We appreciate the proposed time limit by the European Parliament, but during this transitional period our industries will struggle to access sufficient animal fats category 3.

On behalf of the undersigned.

<p>APAG – The European Oleochemical Industry (a sector group of Cefic)</p>  <p>A sector group of Cefic European Chemical Industry Council - Cefic side</p>  <p>Sofia Ferreira Serafim – APAG manager</p>	<p>FEDIAF – The European Pet food Industry</p>   <p>Raquel Izquierdo de Santiago – FEDIAF Secretary General</p>	<p>FEFAC - European Compound Feed Manufacturers' Federation</p>   <p>Alexander Döring – FEFAC Secretary General</p>
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¹ Art. 4 of the Waste Framework Directive 2008/98/EC

What are animal fats category 3, and where are they used?

Rendered animal fats are products resulting from the rendering of animal by-products (ABPs). ABPs are parts of animals not used for human nutrition (due to cultural, commercial, or safety reasons) such as tissues and fats - the raw materials to produce rendered animal fats. The rendering process converts ABPs into protein meal and rendered animal fats under the effect of heat and pressure, making them suitable for nutritional, animal feeding and industrial applications.

- **Animal fats cat. 1 & 2** are made of risk materials like brains and spines of animals or any body part of an infected or suspected to be infected with transmissible spongiform encephalopathies (TSE or mad cow disease); manure, animal by-products containing residues of authorised substances or contaminants and products of animal origin (other than cat. 1) imported from a third country. They may represent a risk for human health. These fats are used for biofuel production and in the case of category 2 for some fertiliser applications.
- **Animal fats cat. 3** are high quality fats and a great feedstock for animal nutrition and oleochemical production. These derive from carcasses and parts of animals slaughtered, or bodies/parts fit for human consumption but not intended for human consumption for commercial reasons. They are in particular an essential component of milk replacers for young ruminants and an alternative to vegetable fats with a high melting point like palm or coconut oil.

Why can animal fats category 3 only be sourced from Europe?

Animal fats category 3 can only be sourced from Europe, because of specific concerns related to the mad cow disease and the set up of legislation in Europe regulating ABPs, the Regulation on animal by-products and derived products not intended for human consumption (EC No. 1069/2009). These rendered animal fats cat. 3 can only be sourced in Europe because former net-exporters like the USA, Argentina and Brazil are categorized as cat. 1.² The same concern regarding security and import restrictions do not exist for biofuel producers.

² Articles 8, 9 and 10 of Regulation (EC) No 1069/2009 of the European Parliament and of the Council of 21 October 2009 laying down health rules as regards animal by-products and derived products not intended for human consumption.