

Animal Feed Guidance

Animal Feed

WRAP has developed this guidance for retailers, distributors and food manufacturers to encourage a greater quantity of food and drink to be used as an ingredient in animal feed¹ rather than being disposed as waste.

Food and drink material that is sent to animal feed does not legally constitute waste because it is regarded as 'redistribution'. As such, for signatories to the Courtauld Commitment, it also contributes towards the Manufacturing and Retail waste prevention target.

Wholesome food and drink should be used to feed people first, directly through markets or through redistribution networks, charitable or otherwise. If this cannot happen then the environmental and economic case for using food and drink as an ingredient in animal feed is far stronger than any option lower in the food and drink material hierarchy providing it is safe.

For further information on tools and techniques including case studies on how leading companies are preventing waste see [[here](#)].

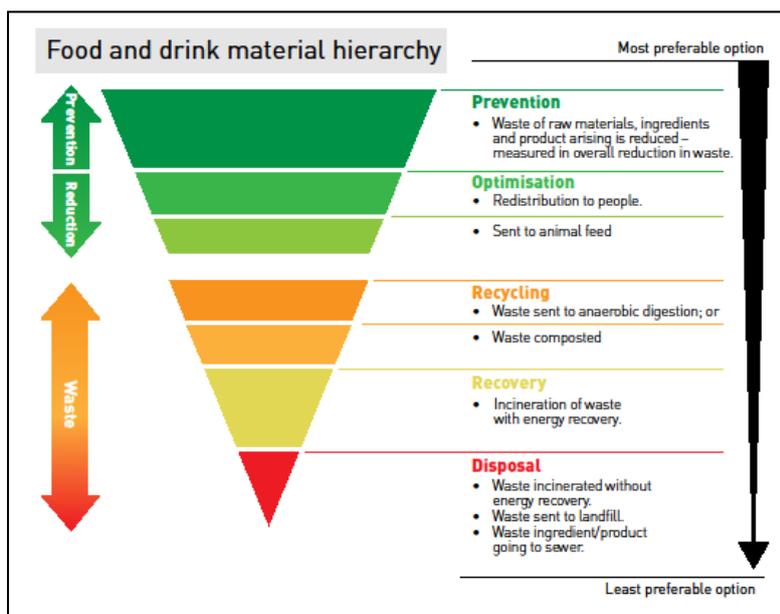


Figure 1: Food and drink material hierarchy

¹ This is a complex area that is highly regulated. Companies need to approach their local Trading Standards Departments in the first instance. Sending food for pet feed or for zoos is excluded from these guidelines.

Environmental case

Using appropriate food and drink material for animal feed saves the resources – land, carbon and water - that are used to grow alternative crops for feeding animals.

In 2012, the UK was a net importer of almost 4 million tonnes of feed materials for animals, excluding un-milled cereals ², requiring over 3 million hectares of land to produce. Imported feed materials included a net import of over 1.7 million tonnes of soya, 0.3 million tonnes of vegetable residues or by-products and 0.2 million tonnes of brewing or distilling by-products. Whilst the UK feed supply chain has the potential to substitute directly animal feed derived from the latter two categories, it also has the potential to substitute for other feed, including soya, avoiding up to 1.6 million tonnes CO₂ equivalent p.a. ³, plus further savings from avoided land use change, for example through deforestation.

Economic case

Retailers and manufacturers that provide food and drink material for animal feed are typically paid a fee per tonne that varies for commercial and supply reasons. As such, these amounts are not transparent and will vary annually. However if food and drink material is sold for animal feed there will be revenue ⁴ which contrasts with a cost of £80 to £121 per tonne for landfill (including landfill tax) and a cost of £25 to £66 per tonne for anaerobic digestion (AD) ⁵.

It is most likely that food and drink material will be used to feed pigs but it could also be part of rations for cattle or poultry.

The payments made for animal feed materials depend on the market prices of the alternative ingredients, for example cereal crops and soy and these in turn will depend on a number of factors, including harvests and demand. Poor harvests in recent years have resulted in rising and fluctuating prices which will be reflected in the prices paid for ingredients.

Potential

About 450,000t of former foodstuffs are currently used as ingredients in animal feed ⁶. This means that many companies use this approach and there are well established collection systems. This total comprises a wide variety of different foods.

<p>Food Products that were intended for human consumption but unsuitable for various reasons⁷:</p> <ul style="list-style-type: none">■ Bread – out of date or damaged■ Cake and cake products■ Confectionery■ Cheese and yoghurts	<p>Food By-products that arise from production which generally are not suitable for human consumption⁸:</p> <ul style="list-style-type: none">■ Brewers grains■ Rape seed expeller■ Sugar beet
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² Eurostat 2013

³ Audsley, E., Brander, M., Chatterton, J., Murphy-Bokern, D., Webster, C., and Williams, A. (2009). *How low can we go? An assessment of greenhouse gas emissions from the UK food system and the scope to reduce them by 2050. FCRN-WWF-UK.*

⁴ <http://thepigidea.org/the-solution.html#facts>

⁵ WRAP Gate Fees report 2013. *These costs will vary site by site and will need to be part of any cost benefit assessment into alternative options.*

⁶ http://www.wrap.org.uk/sites/files/wrap/Estimates%20of%20waste%20in%20the%20food%20and%20drink%20supply%20chain_0.pdf

⁷ *These products must meet certain conditions: for example, they must not contain meat or meat derivatives including gelatine and they must not have been in direct contact with meat or meat derivatives.*

⁸ *Under European waste law, by-products are not regarded as waste.*

WRAP data show that some 3.0 million tonnes of food is currently being disposed of in ways that are environmentally less beneficial than through animal feed. It will not be possible to use all this food and drink for animal feed but a proportion could potentially be diverted.

Regulations ⁹

Legislation on animal feed is harmonised at EU level (includes all farmed animals, pets, equines, zoo and circus animals and animals living in the wild).

In the UK, the Food Standards Agency is responsible for drawing up the rules on the composition and marketing of animal feed. Trading Standards Departments of local authorities enforce the regulations.

All food and drink businesses (including retailers) that supply ingredients for animal feed must:

- be registered as a Feed Business Operator with their trading standards department;
- apply a Hazard Analysis and Critical Control Point (HACCP) system to the materials designated for feed to ensure products are fit for purpose; and
- ensure that certain ingredients are excluded.

The Government prohibits the feeding of catering waste to livestock and there are strict restrictions on feeding other food waste ¹⁰ to livestock. The following are examples of materials that cannot be fed to animals:

- Meat and fish (and meat and fish products) are prohibited from use in feed for farmed animals; and
- Foodstuffs containing ruminant gelatine - no matter how small the amount of gelatine contained in the foodstuff.

In the UK, the feed sector has strict assurance standards for both feed producers and for the supply of feed materials ¹¹. These are run by the Agricultural Industries Confederation (AIC) and you will also need to be registered with the relevant assurance scheme.

Next Steps

Companies should re-evaluate their waste management plans in the following way:

- review how the food and drink material hierarchy is being applied;
- measure (using the true cost of waste, taking account of the value of wasted foodstuffs, not just its disposal cost) and monitor performance regularly;
- know what waste is being produced and make efforts to produce less; and
- sort and segregate any food that can be used for animal feed.

Other factors will influence the decisions you make about waste generation and management, such as which options are technically feasible, which are economically viable, and which best protect natural resources or human health.

⁹ This is not a guide to the law. You should consult either the Food Standards Agency or local Trading Standards departments.

¹⁰ <http://www.defra.gov.uk/ahvla-en/disease-control/abp/food-feed-businesses/using-derived-products-animal-origin-farm-animal-feed/>

¹¹ <http://www.aictradeassurance.org.uk/femas/about-femas/>

These other factors are better considered on a case-by-case basis, according to the circumstances of your business or organisation. Whether and how they are relevant will depend for example on the geographical location, type and size of your business/organisation.

As well as Trading Standards there are other organisations that could be approached for help¹². However, it is recommended that you discuss your plans with Trading Standards at the outset.

There are a number of companies that will collect out of date or damaged food and drink products from retailers and manufacturers destined for animal feed. Some of these companies offer a national collection service. Feed business operators have recently formed the UK Former Foodstuffs Processors Association (UKFFPA) to provide a focal point for the industry.

¹² <http://thepigidea.org/>