

Feed the hemp exception

EIHA MD
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For inexplicable reasons, Member States proposed to adopt limits of THC for hemp feed materials that are:

- not based on *any scientific studies*
- *not justified* by verified *health* issues on animals
- the *same as in food* (unlike *any* other contaminant)
- *in spite of* the *safeguards* offered by the EU legislation



The implication of this choice:

1. Limit farmers outlets and reduce their income

Products that were slightly above the threshold established for food would enter the feed markets.

Same limits as in food, imply the **destruction of feed materials**.
As a consequence: **reduced market options (and income)** for farmers and a **decrease of the profitability** of hemp.



The implication of this choice:

2. Impact on the environment

It is absolutely irrational from an environmental point of view to destroy feed that could have been otherwise used as a source of fibre and proteins for animals.



The implication of this choice:

3. Counterproductive in the sense of the protein strategy and feed sovereignty

While the EU calls for protein independence, we restrict the potential use of hemp as protein crop for animal feed.



The implication of this choice:

4. The EU demonstrates absolute absence of common sense

While animal cruelty practices are endorsed by the EU legislation, ... the EU decides to focus on adopting absurd measures without any solid scientific background to protect animal health (?)



Why not like all other contaminants?

It is an consolidated practice (also scientifically appropriate) to make differences between food and feed for the same contaminant, since the animal metabolism differs significantly from the human organism.



Why not like all other contaminants?

- *Arsenic* MRLs 10x higher (2 ppm vs. 0.1-0.2)
- *Cadmium* MRLs 5/10x higher (1-2 ppm vs. 0.1-0.2)
- *Aflatoxin* MRLs B1 10x higher
- *Hydrocyanic acid* for linseed products and almonds are significantly higher as well
- ...



Is it really necessary to recall that...

only registered and certified hemp varieties can be marketed in the EU?

This varieties have a limit of **0,3% THC**... which automatically leads to natural low limits in the final product.



What now?

More than 20 contributions to the public consultation going in the same direction...

Please take into account the contributions and the scientific reasoning proposed.

DG SANTE to analyse feedbacks and rediscuss with Member States.



Member States proposal ...

Seed, expeller	3 mg/kg (ppm)
Seed oil, flour, fibre	7.5 mg/kg (ppm)
Complete feed	0.5 mg/kg (ppm)



A more sensible approach would be the following...

Seed, expeller	5 mg/kg (ppm)
Seed oil, flour, fibre	15 mg/kg (ppm)
Complete feed	1.5 mg/kg (ppm)

... as it would reflect market values and a reasonable higher level compared to food, while ensuring animal and consumers health.

One question...

On the basis of what should the EU impose these values?

One message...

Let's be **reasonable**

One request...

Rediscuss with Member States because **higher levels** are needed, logical and scientific based.