

Voluntary Report – Voluntary - Public Distribution

Date: March 05, 2026

Report Number: E42026-0017

Report Name: Exporting Feed and Pet Food to the EU

Country: European Union

Post: Brussels USEU

Report Category: Exporter Guide, Grain and Feed, FAIRS Subject Report

Prepared By: Kristyna Spacilova and Gerda Vandercammen

Approved By: Emma Aspell

Report Highlights:

This report aims to provide a comprehensive guide for United States (U.S.) feed and pet food exporters looking for access to the European Union (EU) market. It outlines the EU regulatory framework for all feed categories, comprising feed materials, feed additives and compound feed including pet food. It also provides information on certification and establishment listing for products of animal origin by USDA's Animal and Plant Health Inspection Service (APHIS) in cases where this is an EU entry condition.

Contents

Introduction.....	3
Product Classification.....	3
Overview of Generally Applicable Requirements	4
Undesirable Components	5
Labeling Requirements	6
Additional Requirements	11
If a Product Contains Animal By-Products.....	12
If a Product is or Contains a Feed Additives.....	13
If a Product Contains Genetically Modified Organisms (GMO)/Export of GMOs Ingredients.....	14
If Exporters Want to Sell to the EU Organic Market.....	15
Export of Hay and Straw to the EU	16
Additional Sources of Information	16
Annex 1 Definitions.....	17
Annex 2 Pet Food Certificates	17
Annex 3 EU Legislation Related to Export of Feed	19
Annex 4 Provisions of Regulation 767/2009 – by article.....	20
Annex 5 U.S. EXPORTER CHECKLIST ESSENTIALS.....	21

DISCLAIMER

This report was prepared by the Office of Agricultural Affairs of the USDA/Foreign Agricultural Service (FAS) in Brussels, Belgium covering the European Union (EU), for U.S. exporters of domestic feed and pet food products. While every possible care was taken in the preparation of this report, information provided may not be completely accurate because either policies have changed since its preparation, or because clear and consistent information about these policies was not available. It is highly recommended that U.S. exporters verify the full set of import requirements with their foreign customers, who are normally best equipped to research such matters with local authorities, before any goods are shipped.

Introduction

This report aims to provide a comprehensive guide for United States (U.S.) feed and pet food exporters looking to export to the European Union (EU) market. It addresses the EU's labeling requirements as well as other relevant product requirements and entry conditions for feed marketed in the European Union. Standard U.S. feed labels are not accepted in the EU. In addition, products must meet EU rules on undesirable substances, additives, and feed hygiene. Genetically modified organisms (GMO) or organic products are subject to an additional set of rules. Specific animal health guarantees provided by USDA's Animal and Plant Health Inspection Service (APHIS) may be required as a condition for entry.

All U.S. feed exported to the European Union must comply with EU requirements.

Feed that does not comply with EU regulations will not be allowed on the EU market.¹

Product Classification

Accurate classification of the exported product according to the definitions used in EU legislation is essential for assessing compliance with EU feed rules.

Definition	Source
'feed' or 'feedingstuff' means any substance or product, including additives, whether processed, partially processed, or unprocessed, intended to be used for oral feeding to animals;	Article 3(4) of Regulation (EC) No 178/2002 also Article 3, point (46), of Regulation (EU) No 2018/848
'feed materials' means products of vegetable or animal origin, whose principal purpose is to meet animals' nutritional needs, in their natural state, fresh or preserved, and products derived from the industrial processing thereof, and organic or inorganic substances, whether or not containing feed additives,	Article 3.2 (g) of Regulation (EC) No 767/2009

¹ https://food.ec.europa.eu/plants/plant-health-and-biosecurity/trade-plants-plant-products-non-eu-countries/non-compliance-eu-requirements_en

which are intended for use in oral animal-feeding either directly as such, or after processing, or in the preparation of compound feed, or as carrier of premixtures;	
‘compound feed’ means a mixture of at least two feed materials, whether or not containing feed additives, for oral animal-feeding in the form of complete or complementary feed;	Article 3.2 (h) of Regulation (EC) No 767/2009
‘feed additives’ means substances, micro-organisms or preparations, other than feed material and premixtures, which are intentionally added to feed or water in order to perform, in particular, one or more of the functions mentioned in Article 5(3);	Article 2.2 (a) of Regulation (EC) No 1831/2003
‘pet food’ means feed within the meaning of Article 3, point (46), of Regulation (EU) 2018/848 which is intended for pets as defined in Article 3(2), point (f), of Regulation (EC) No 767/2009 of the European Parliament and of the Council(5);	Article 2 (1) of Regulation (EC) No 2023/2419
‘pet’ or ‘pet animal’ means any non-food producing animal belonging to species fed, bred, or kept, but not normally used for human consumption in the Community;	Article 3(2), point (f), of Regulation (EC) No 767/2009

For additional definitions please refer to annex 1.

Requirements for the products as defined in the above table are available through different pieces of general and specific additional legislation. This complex structure may create challenges to understanding the exact requirements that are applicable to the exported product.

For example, there is no separate EU law dedicated solely to pet food. Pet food labeling requirements are covered by compound feed labeling rules. Pet food of animal origin is also covered by EU veterinary legislation covering a multitude of other animal by-products. Annex 3 of this report provides links to the relevant pieces of EU legislation.

U.S. feed exporters must verify the full set of import requirements with their EU customers. Final import approval is subject to the importing country’s rules as interpreted by border officials at the time of product entry.

Overview of Generally Applicable Requirements

The core legal framework for all feed and pet food placed on the EU market is established by [Regulation \(EC\) No 178/2002](#), known as the "General Food Law." This regulation lays out the fundamental principles of food and feed safety, ensuring that all products are safe, traceable, and properly labeled throughout every stage of production and distribution.

Traceability is a key requirement under EU food law and applies to imported food and feed equally. Products entering the EU must be clearly identified and linked to documentation that allows their origin, production, and movement to be traced throughout the supply chain. For consignments of food and feed of animal origin, certain food and feed of non-animal origin, or other products subject to specific

measures, exporting countries must provide official certificates, confirming compliance with EU rules and ensuring traceability from the point of production to the point of import into the Union.

Under the Feed Hygiene [Regulation \(EC\) No 183/2005](#), all imported feed must be produced and handled under conditions that ensure a level of feed safety and hygiene at least equivalent to that required within the EU, including appropriate facilities, quality control and, where applicable, Hazard Analysis Critical Control Point (HACCP) based procedures. For that reason, feed businesses operators² have to be registered and, where required, approved by the competent authority of the territory in which they operate.

Feed business operators registered or approved in the United States exporting feed to the EU Member States are required to have a representative based in an EU Member State. This may be an importer or distributor based in the EU who has legal rights to market or sell products. Each EU Member State may have specific additional national rules for registration, so it is important to consult directly with your chosen representative in the target country.

U.S. exporters should be aware that EU operators, who are aware that a product (feed/food) they import does not meet safety requirements, must notify the authorities. The Member State who receives the notification from the operator must notify the incident to the EU Rapid Alert System for Food and Feed (RASFF) in case the incident concerns other EU Member States. The EU Commission published guidance³ on the implementation of the Feed Hygiene Regulation.

Marketing and labeling of feed materials and compound feed including pet food is covered by [Regulation \(EC\) No 767/2009](#) while rules on the authorization, marketing, and use of feed additives are laid out in [Regulation \(EC\) No 1831/2003](#).

Undesirable Components

Regulation (EC) No 396/2005 establishes the framework for Maximum Residue Levels (MRL) for pesticides in food and animal feed.

[Directive 2002/32/EC](#) sets maximum levels for undesirable substances in animal feed. These substances are categorized in Annex I and Annex II of the Directive.

Annex I Maximum Levels of Undesirable Substances:

- Inorganic contaminants and nitrogenous compounds
- Mycotoxins
- Inherent plant toxins
- Organochlorine compounds
- Dioxins and PCBs

² Requirements for feed business operators: <https://admin.tccfoodsafetyproject.eu/UploadFiles/News/70/finalposters/en/ENG-Feed%20Hygiene.pdf>

³ [Commission Notice — Guidance document on the implementation of certain provisions of Regulation \(EC\) No 183/2005 laying down requirements for feed hygiene](#)

- Harmful botanical impurities
- Authorized feed additives in non-target feed following unavoidable carry-over

Annex II Action thresholds triggering investigations by Member States:

- dioxins and PBCs

National authorities must ensure compliance, conduct sampling/monitoring, and share information with the European Commission (EC) and other Member States. Regulation (EC) No 767/2009 provides in its Annex III chapter 1 a list of materials whose use as feed is prohibited. Among the listed materials are manure (feces and urine), packaging materials from the agri-food industry, solid urban waste such as household waste, and waste waters. Additionally, [Regulation \(EC\) No 1069/2009](#) on Animal By-Products (ABP) restricts which animal-derived materials can be used in feed. Only animal by-products from so-called Category 3 materials (i.e. fit for use for food but not consumed by humans) may be used for feed purposes. The regulation bans the use of catering waste in feed for farm animals (except fur animals) and also forbids feeding terrestrial animals or farmed fish with processed animal proteins obtained from animals of the same species.

Only approved Genetically modified organisms can be present in the feed, see the chapter further “If product contains Genetically modified organisms (GMO)/export of GMOs ingredients”.

[Regulation \(EU\) 2017/625](#) sets a risk-based system of official controls at EU borders (documentary, identity, and physical checks, including sampling) to verify that imports meet the same standards as EU products. If these checks detect that pesticide, dioxin, or other contaminant limits are exceeded, consignments can be rejected, destroyed or redispached. [Commission Regulation \(EC\) No 152/2009](#) lays out the methods of sampling and analysis for the official control of feed.

Labeling Requirements

Regulation (EC) No 767/2009 on the placing on the market and use of feed lays out the rules for labeling, feed composition, packaging and claims, as well as prohibits unsafe materials and establishes a catalogue of feed materials ([Commission Regulation \(EU\) No 68/2013](#)). Annex 4 of this report specifies the provisions of Regulation 767/2009 by article.

This regulation establishes rules to ensure the safety, quality, and proper labeling of feed for animals, including both food producing animals as well as nonfood producing animals.

Mandatory Labeling Requirements for Feed (Articles 15 - 20, Regulation 767/2009)

Mandatory labeling information must be clearly legible and indelible in a prominent place on the packaging in the official language(s) of the Member State where the product is marketed.

Article	Feed Category / Subject	Mandatory Labeling Requirements
Article 15	General mandatory Labeling requirements for all feed	<ul style="list-style-type: none"> - Type of feed: “feed material”, “complete feed”, or “complementary feed” (for pets other than cats and dogs, complete feed or complementary feed may be replaced by compound feed) - Name or business name and address of the feed business operator responsible for the Labeling - Establishment approval number, if available - Batch or reference number - Net quantity (mass, volume, or number of units) - List of feed additives, preceded by the heading additives, in accordance with Annex VI or VII, Chapter 1 to Regulation 767/2009 - Analytical constituents (Annex VII – Chapter II) and moisture content in accordance with point 6 of Annex I to Regulation 767/2009
Article 16	Specific mandatory Labeling requirements for feed materials	<p>In addition to Article 15:</p> <ul style="list-style-type: none"> - Name of the feed material - Compulsory declaration corresponding to the category in Annex V - If additives are incorporated: <ul style="list-style-type: none"> o species or categories of animals for which the material is intended (if authorization is species-specific or limited) o instructions for proper use (when a maximum content of additives is set) o minimum storage life for additives other than technological additives
Article 17	Specific mandatory Labeling requirements for compound feed	<p>In addition to Article 15:</p> <ul style="list-style-type: none"> - Species or categories of animals for which the feed is intended - Instructions for proper use (indicating the purpose) - Producer information (name, address, or identifying number) if different from the party responsible for Labeling

Article	Feed Category / Subject	Mandatory Labeling Requirements
		<ul style="list-style-type: none"> - Minimum storage life: for highly perishable feed, “use before...” followed by the date DD/MM/YY; for other feed, “best before...” followed by the date DD/MM/YY - List of feed materials under the heading “composition”, each named and listed in descending order by weight (percentages may be included) - Compulsory declarations (Annex VI for food-producing animals; Annex VII for non-food-producing animals)
Article 18	Additional mandatory Labeling for feed intended for particular nutritional purposes	<p>In addition to Articles 15, 16, and 17:</p> <ul style="list-style-type: none"> - The qualifying expression “dietetic”⁴ next to the feed designation - Particulars prescribed for the respective intended use (columns 1–6 of Article 9 list of intended uses) - Indication that a nutrition expert or veterinarian should be consulted before use or extending use period
Article 19	Additional mandatory requirements for pet food	<ul style="list-style-type: none"> - A free telephone number or other communication channel allowing purchasers to obtain information about feed additives and feed materials (if designated by category under Article 17(2)(c))
Article 20 and Annex VIII	Additional mandatory Labeling for non-compliant feed	<p>In addition to Articles 15, 16, 17, and 18:</p> <ul style="list-style-type: none"> - Must bear specific Labeling particulars as set out in Annex VIII - Example: Feed with excessive level(s) of ... (designation of undesirable substance(s)), only to be used as feed after detoxification in approved establishments - If intended for cleaning: Feed with excessive level(s) of ... only to be used as feed after adequate cleaning

⁴ Dietetic feed may only be marketed as such if its intended use is included in the list of acceptable intended uses set out in [Commission Regulation \(EU\) 2020/354](#). Pet food may not be marketed as “dietetic” unless the nutritional purpose is included in the list of intended uses established by Directive 2008/38.

Community Codes of Good Labeling Practice

Article 25 of Regulation 767/2009 provides the establishment of “Community Codes of Good Labeling Practice,” one for pet food and one for compound feed for food producing animals. In 2019, the European Pet Food Industry (FEDIAF) published a “[Code of Good Labeling Practice for Pet Food](#)”. In 2024, the European Compound Feed Industry FEFAC published “[Code of good Labeling practice for compound feed for food producing animals](#)”.

Claims

Article 13 outlines the conditions under which claims about feed materials and compound feed can be made regarding their composition, nutritional characteristics, or specific functions. Claims must be objective, verifiable, and understandable, with scientific substantiation provided upon request by competent authorities. Purchasers can challenge claims they find questionable, and unsubstantiated claims are deemed misleading under Article 11. Claims about optimizing nutrition or supporting physiological conditions are allowed unless they imply disease prevention, treatment, cure or make unsupported claims about specific nutritional purposes. Additional specifications may be included in Community Codes under Article 25 Regulation 767/2009.

Packaging (article 23)

Generally, feed materials and compound feed may be marketed only in sealed packages or containers. However, specific exemptions allow certain feed products (blocks, licks, feed materials, or compound feed made exclusively by mixing grain or whole fruit etc.) to be marketed in bulk or unsealed packages under controlled conditions. In all cases, proper documentation is required to ensure transparency and adherence to regulatory standards.

Community Catalogue of Feed Materials (article 24)

The Catalogue is established as a tool to improve the Labeling of feed materials and compound feed. It must include, for each feed material listed, at least:

- a) The name
- b) The identification number
- c) A description of the feed material, including information on the manufacturing process, if appropriate
- d) Particulars replacing the compulsory declaration for the purpose of Article 16(1)(b)
- e) A glossary with the definition of the different processes and technical expressions mentioned

The Catalogue of feed materials, available in Annex of Commission Regulation (EU) No 68/2013, enables operators to use more precise names and expressions for the feed they place on the market. Even though its use is voluntary, when used, it must comply with all relevant provisions of the Catalogue. Amendments to the Catalogue are drafted by the EU feed industry in collaboration with Member States, the European Food Safety Authority (EFSA), and feed users.

Benefits of Listing in the Catalogue of Feed Materials

1. Confirms the product's legal status as a feed ingredient material.
2. Allows for tailored labeling requirements.
3. The Catalogue specifically allows for a maximum content in the presence of chemical impurities or processing aids fixed within its entries. Feed materials must generally be free from chemical impurities resulting from their manufacturing process and processing aids. Non-catalogued materials are expected to be pure.
4. Facilitates listing on Good Manufacturing Practices Plus (GMP+) and other certification schemes.

The Catalogue is non-exhaustive, meaning feed materials not listed can still be marketed. However, all materials put on the EU market should be included in the [Register of Feed Materials](#). Operators (importers, exporters, or manufacturers) should notify via the notification form on the Register of Feed Materials for a material's first placement on the market using the procedure described in the [Guide to Notifiers](#). Following such notification, the Register will be updated.

Aspect	Catalogue of Feed Materials	Register of Feed Materials
Legal Basis	EU Regulation (official, binding) Commission Regulation (EU) No 68/2013	Industry tool, within the mandate of EC Regulation 767/2009
Management	European Commission (with input from Member States and stakeholders)	EU industry organizations under EU Feed Chain Task Force
Listing Criteria	Only fully standardized, vetted, and described materials added via regulatory process on proposal received from EU Feed Chain Task Force	New or non-standard materials, typically notified by industry
Status of Entries	Official, labeling must meet requirements	Informative, no automatic legal approval ⁵
Updating Frequency	Infrequent; usually after 1–3 years or as needed	Continuously throughout the year, as new materials are developed or discovered and notified
How Updates are Made	Through official EU amendment procedure - proposal, review, consultation, adoption, publication	Via online notification and submission by businesses, validated by EU industry organizations

⁵ notification does not equal approval

Aspect	Catalogue of Feed Materials	Register of Feed Materials
Usage/purpose	Reference for mandatory labeling and compliance	To introduce new feed materials, improve market transparency, and meet notification obligations

[Commission Recommendation 2011/25](#) establishes guidelines for the distinction between feed materials, feed additives, biocidal products, and veterinary medicinal products. These non-binding guidelines were developed to assist feed and pet food manufacturers with the classification of their products.

There are nine Annexes of Regulation (EC) No 767/2009 on the placing on the market and use of feed:

ANNEX TITLE

I	Technical provisions on impurities, milk replacers, feed materials for binding or denaturizing, the ash level and moisture content (Article 4)
II	General provisions on labeling (Article 11(4))
III	List of materials whose placing on the market or use for animal nutritional purposes is restricted or prohibited (Article 6)
IV	Permitted tolerances for the compositional labeling of feed materials or compound feed (Article 11(5))
V	Compulsory declaration for feed materials as referred to in Article 16(1)(b)
VI	Labeling particulars for feed materials and compound feed for food-producing animals
VII	Labeling particulars for feed materials and compound feed for non-food producing animals
VIII	Specific provisions for the labeling of feed which does not comply with safety and marketing requirements under Community law (Article 20(1))
IX	Correlation Table

Additional Requirements

Operators intending to export feed that contains animal origin products to the EU have to comply with Regulation (EC) 1069/2009 on Animal By-Products that requires feed business operators be registered or approved within their own territories by their competent authorities. Health certificates are generally required for these products.

If feed does not contain any animal product (i.e., it is of non-animal origin), health certificates are generally not needed. Documentation regarding ingredients and production standards may be requested by the feed business operator that demonstrates the product meets EU regulations.

If a Product Contains Animal By-Products

EU legislation requires feed containing an animal origin ingredient be subject to veterinary inspection upon entry into the EU. These products must be sourced from approved establishments and must be accompanied by a veterinary certificate. The specific veterinary certification requirements for animal-origin products are outlined in Regulation (EC) 1069/2009 commonly known as the "EU Animal By-Products Regulation (ABP regulation)". Additional relevant regulation addressing animal products not for human consumption include:

- [Commission Regulation \(EU\) No 142/2011](#) which lays out implementing measures for the public and animal health rules established by Regulation (EC) No 1069/2009 (the Animal By-products Regulation).
- [Regulation \(EC\) No 999/2001](#) provides the rules intended to prevent, control, and eradicate Transmissible Spongiform Encephalopathies (TSEs) in animals, such as Bovine Spongiform Encephalopathy (BSE, or "Mad Cow Disease").

Exporters must ensure compliance with establishment approval and certification requirements before exporting goods to the European Union.

On USDA APHIS's website there is a section "Animal Product Not for Human Consumption" which provides an overview of export requirements of products within the scope of the EU ABP Regulation, including pet food products.

Please contact [APHIS-Veterinary Services Area Office](#) for details on how to request required listings and certificates.

Establishment Listing and Approval

Prior to obtaining APHIS certificates, pet food facilities must be approved by APHIS in compliance with the above mentioned regulations. If the facility is approved by APHIS under these regulations, the information is generally automatically submitted to the EU TRACES system. The TRACES system is an EU management tool for tracking the movement of animals and products of animal origin within the EU. TRACES lists of authorized establishments are available at the following website

https://webgate.ec.europa.eu/tracesnt/directory/listing/establishment/publication/index#!/search?classificationSectionId=PETFOOD_PLANTS&countryCode=US.

Certification

EU-required certificates for pet food imports follow standardized formats based on the model certificates in [Regulation \(EU\) No 142/2011](#). Those certificates can be found on APHIS's website,

[Export Animal Products to European Union](#), under the commodity specific information section Animal Products NOT for Human consumption.

Most Member States accept English-only certificates. EU legislation, however, allows Member States to require that certificates are provided in their official language. APHIS's website on [International Regulations for Animal Product Exports \(IREgs\)](#) will provide the necessary information for the individual EU Member States. For example, France and Spain have been reported to require documents in French and Spanish.

Certificates must be issued before shipment leaves for the EU.

See annex for the various APHIS certificates needed for feed and pet food products exported to the EU.

If a Product is or Contains a Feed Additives

[Regulation \(EC\) No 1831/2003](#) on feed additives lays out rules for the authorization, marketing and labeling of feed additives. The regulation applies to all feed additives and premixtures. It does not apply to processing aids or veterinary medicinal products (VMPs) which are regulated by the new Regulation (EU) 2019/6 on veterinary medicinal products.

Feed additives⁶ may be classified into the following categories:

- Technological additives (e.g. preservatives, antioxidants, emulsifiers, stabilizing agents, acidity regulators, silage additives)
- Sensory additives (e.g. flavorings, colorants)
- Nutritional additives (e.g. vitamins, minerals, amino acids, trace elements)
- Zootechnical additives (e.g. digestibility enhancers, gut flora stabilizers)
- Coccidiostats and histomonostats

Only feed additives that have been through an authorization procedure may be placed on the market and used. Read more about the authorization process at the EC Feed additives website [Authorisation types and withdrawal](#). Once a feed additive is authorized in the EU, it is officially entered into the [EU Register of Feed Additives](#), which is maintained by the European Commission. The EU Register provides information about the status of feed additives, the animals for which the feed additive has been authorized and the relevant conditions for use.

Inclusion of a feed additive in the EU Register means that this additive is legally permitted for sale, use, and import to the EU. However, compliance with specific requirements for labeling, traceability, and quality standards for business operators is mandatory. Article 16 of Regulation (EC) No 1831/2003 addresses labeling and packaging requirements. Every package or container of feed additive or premixture must include:

⁶ Antibiotics, other than coccidiostats or histomonostats, are not feed additives under European legislation.

The specific name given to the additive upon authorization, preceded by the functional group listed in the authorization.

- f) Name or business name and address of the person responsible for the product's particulars (producer, distributor, packer, etc.)
- g) Net weight (for solids) or net volume/net weight (for liquids or premixtures)
- h) The approval number of the establishment manufacturing the additive or premixture, if applicable
- i) Directions for use and any safety recommendations, including specific requirements from the additive's authorization (e.g., animal species/categories for which it is intended)
- j) The identification number
- k) The batch reference number and date of manufacture

Premixtures have specific labeling requirements. The word "premixture" must appear on the label, and the minimum storage life must be based on the shortest shelf life of the components. Carriers must also be declared as per Article 17(1)(e) of Regulation (EC) No 767/2009. While, points (b), (d), (e) and (g) shall not apply to the incorporated feed additives in case of premixtures.

If a Product Contains Genetically Modified Organisms (GMO)/Export of GMOs Ingredients

[Regulation \(EC\) No 1829/2003](#) on genetically modified food and feed sets out rules for GMOs for feed use, feed containing or consisting of GMOs and feed produced from GMOs (article 15). Article 12(2) of the Regulation states that the GMO labelling section does not apply where GMO material is present in a proportion no higher than 0.9%, provided this presence is adventitious or technically unavoidable.

[Regulation \(EC\) No 1830/2003](#) on the traceability and labeling of GMOs and the traceability of food and feed products produced from GMOs sets out rules for traceability and labeling rules of GMOs.

Only GMOs authorized under Regulation (EC) 1829/2003 may be imported for use in animal feed. Exporter/importer may consult the EU the [Community register of GM food and feed](#) to check whether the GMO feed ingredient was authorized.

Labeling of GMOs

Article 25 outlines specific labeling requirements for certain types of feed containing or consisting of GMOs, the words "genetically modified (name of the organism)" must appear in parentheses immediately following the specific name of the feed. For feed produced from GMOs, the words "produced from genetically modified (name of the organism)" must appear in parentheses immediately following the specific name of the feed. Alternatively, these words may appear in a footnote to the list of feed printed in a font of at least the same size as the composition list. If the feed differs from its conventional counterpart in composition, nutritional properties, intended use, or health implications for specific animal species, these differences must be disclosed as per authorization.

Labeling requirements for feed shall not apply to feed containing GMO material in a proportion no higher than 0.9 per cent of the feed and of each feed of which it is composed, provided that this presence is adventitious or technically unavoidable (article 24).

Article 4 of Regulation (EC) No 1830/2003 outlines that pre-packaged products containing GMOs must be labeled as “This product contains genetically modified organisms” or “This product contains genetically modified (name of organism)”. For non-pre-packaged products offered to final consumers, the same wording must appear on or near the product display.

[If Exporters Want to Sell to the EU Organic Market](#)

The United States and European Union have an arrangement for the exchange of certified organic agricultural products. The U.S.-EU Organic Equivalence Arrangement allows USDA certified organic products access to the European market without the need for an additional EU organic certification. The equivalence includes organic products in these categories: Crops, Wild Crops, Livestock, and Processed Products. The U.S.-EU Organic Equivalence Arrangement is managed by the USDA Agricultural Marketing Service (AMS) National Organic Program (NOP). Visit the AMS NOP [U.S.-EU Organic Equivalence Arrangement](#) website for more details.

Many USDA certified organic products, including animal feedstuffs, are eligible for export to the EU under the U.S.-EU Organic Equivalence Arrangement. For example:

- USDA certified organic crops like oats and alfalfa hay for livestock feed.
- USDA certified organic processed products like compound animal feed.

To be sold, labeled, or represented as organic, U.S. agricultural products must first meet requirements in the USDA organic regulations, [7 Code of Federal Regulations \(CFR\) 205](#). For example, [7 CFR 205.237 Livestock feed](#) prohibits feed formulas that contain urea, mammalian or poultry slaughter by-products, antibiotics including ionophores, and feed additives and supplements in violation of the Federal Food, Drug, and Cosmetic Act. Also, crops and processed products for animal feed must not use any substances, ingredients, or additives that do not comply with the [National List of Allowed and Prohibited Substances, 7 CFR 205 Subpart G](#).

U.S. businesses interested in exporting their USDA certified organic crops or processed products for animal feed should work with their USDA organic certification agent to ensure they meet the terms of the U.S.-EU Organic Equivalence Arrangement. For example, USDA certified organic products must comply with EU labeling and import documentation requirements.

If you are not yet USDA certified organic but want to learn more about the USDA organic program, visit [the USDA AMS NOP website](#). To find a USDA accredited organic certification agent, visit the [USDA Organic Integrity Database](#), click the Search tab and select Certifier Locator.

Export of Hay and Straw to the EU

Hay and straw are included in the lists of goods subject to official controls at border control posts (BCP) upon entry into the Union, as set out in [Implementing Regulation \(EU\) 2021/632](#), in accordance with Regulation (EU) 2017/625. As per [Commission Implementing Decision \(EU\) 2022/575](#), the U.S. is listed as an eligible country to ship hay and straw products. APHIS Plant Protection and Quarantine (PPQ) phytosanitary certificates may be required for those products, exporters should [contact PPQ](#) for more information on these certificates.

The Catalogue of feed materials lists various types of straw recognized as feed materials that must comply with safety and use restrictions:

Number	Name	Description
6.3.1	Cereals straw	Straw of cereals
6.3.2	Cereal straw, treated	Product obtained by an appropriate treatment of cereal straw
6.6.1	Hay	Species of any grass or legumes plants or herbs, field dried or artificially dried Compulsory declarations: Ash insoluble, in HCl, if > 3,5 % of dry matter
6.8.1	Horse bean straw	Straw of horse bean (<i>Vicia faba</i> L. ssp. <i>faba</i> var. <i>equina</i> Pers. and var. <i>minuta</i> (Alef.) Mansf.)
6.9.1	Linseed straw	Straw of linseed (<i>Linum usitatissimum</i> L.)
6.12.1	Pea straw	Straw of <i>Pisum</i> spp.
6.13.1	Rapeseed straw	Straw of <i>Brassica napus</i> L. ssp. <i>oleifera</i> (Metzg.) Sinsk., of Indian sarson <i>Brassica napus</i> L. var. <i>glauca</i> (Roxb.) O.E. Schulz and of rape <i>Brassica rapa</i> ssp. <i>oleifera</i> (Metzg.)

Additional Sources of Information

Exporters are encouraged to consult the EU [Animal Feed](#) website and explore codes of good practice provided by key EU industry organizations:

- [FEFAC](#) – EU compound feed industry, see [EU Code of good Labeling practice for compound feed for food producing animals \(2024\)](#) if exporter wants to make claims.
- [FEDIAF](#) – EU Pet Food Industry, see [Code of Good Labeling Practice for Pet Food \(2019\)](#).
- [FEFANA](#) – EU Specialty Feed Ingredients, see [EU Code of Practice on claims \(2018\)](#).

U.S. key industry organizations:

- [AFIA](#) - American Feed Industry Association
- [APPA](#) - American Pet Products Association

For further information you may also visit EFSA's [Panel on Additives and Products or Substances used in Animal Feed](#) (FEEDAP).

Annex 1 Definitions

'feed business' means any undertaking whether for profit or not and whether public or private, carrying out any operation of production, manufacture, processing, storage, transport or distribution of feed including any producer producing, processing or storing feed for feeding to animals on his own holding;	Article 3(5) of Regulation (EC) No 178/2002
'feed business operator' means the natural or legal persons responsible for ensuring that the requirements of food law are met within the feed business under their control;	Article 3(6) of Regulation (EC) No 178/2002
'complete feed' means compound feed which, by reason of its composition, is sufficient for a daily ration;	Article 3.2 (i) of Regulation (EC) No 767/2009
'complementary feed' means compound feed which has a high content of certain substances but which, by reason of its composition, is sufficient for a daily ration only if used in combination with other feed;	Article 3.2 (j) of Regulation (EC) No 767/2009
'mineral feed' means complementary feed containing at least 40 % crude ash;	Article 3.2 (k) of Regulation (EC) No 767/2009
'feed intended for particular nutritional purposes' means feed which can satisfy a particular nutritional purpose by virtue of its particular composition or method of manufacture, which clearly distinguishes it from ordinary feed. Feed intended for particular nutritional purposes does not include medicated feedingstuffs within the meaning of Directive 90/167/EEC;	Article 3.2 (o) of Regulation (EC) No 767/2009
'Undesirable substances' shall mean any substance or product, with the exception of pathogenic agents, which is present in and/or on the product intended for animal feed and which presents a potential danger to animal or human health or to the environment or could adversely affect livestock production;	Article 2 (1) of Directive 2002/32/EC
'premixtures' means mixtures of feed additives or mixtures of one or more feed additives with feed materials or water used as carriers, not intended for direct feeding to animals;	Article 2 (2e) of Regulation (EC) No 1831/2003

Annex 2 Pet Food Certificates

Below is an overview of the various APHIS certificates needed for pet food products exported to the EU. Please note that these certificates are also required for transiting pet food products through the European Union. Furthermore, a specific certificate has been developed for shipping trade samples.

PRODUCT	LINK	CERTIFICATE
Canned pet food	Pet Food (Canned) - Chapter 3(A)	Health Certificate for canned petfood intended for dispatch to or for transit through the European Union
Processed pet food other than canned pet food	Pet Food (Processed Pet Food Other than Canned) - Chapter 3(B)	Health Certificate for processed pet food other than canned pet food, intended for dispatch to or for transit through the European Union.
Dog chews	Pet Food (Chews) - Chapter 3(C)	Health Certificate dog chews intended for dispatch to or for transit through the European Union.
Flavoring innards for use in the manufacture of pet food	Pet Food Ingredient: Flavoring innards (includes digests) - Chapter 3(E)	Health Certificate for flavoring innards for use in the manufacture of petfood, intended for dispatch to or for transit through the European Union.
Unprocessed ABP for manufacture of Petfood	Pet Food Ingredient: Unprocessed Animal By-Products - Chapter 3(F)	Health Certificate for animal by-products for the manufacture of petfood, intended for dispatch to or for transit through the European Union.
Trade Samples	Trade Samples of Animal By-Products – Chapter 8	Health certificate for animal by-products to be used for purposes outside the feed chain or for trade samples, intended for dispatch to or for transit through the European Union. <i>Unlike other Regulation (EU) 142/2011 certificates, this certificate does not require APHIS inspection and approval of the producer/exporter in most cases. An APHIS facility number is never included when Chapter 8 is utilized for trade samples.</i>
Animal-Origin Pet Supplements	Some BCPs may exempt certain pet supplements (E.g. glucosamine capsules) from certification requirements. However, unless the products meet the requirements to be considered by the BCP to be pharmaceutical under EU regulations, the BCP may require a Regulation 142/2011 Chapter 3A (for retort processed products) or Chapter 3B (for products not produced through retort processing) Health Certificate.	

Annex 3 EU Legislation Related to Export of Feed

Feed and Animal Nutrition	
Legislation	Description
Directive 2002/32/EC	On undesirable substances in animal feed
Regulation (EC) No 1831/2003	Concerning additives in animal nutrition
Regulation (EC) No 152/2009	Laying out the methods of sampling and analysis for the official control of feed
Regulation (EC) No 767/2009	On the marketing and use of feed
Commission Regulation (EU) 2020/354	Establishing a list of intended uses of animal feedingstuffs for particular nutritional purposes
Commission Regulation (EU) No 68/2013	Catalogue of feed materials
Commission Recommendation (EU) 2016/1319	Amending Recommendation 2006/576/EC as regards deoxynivalenol, zearalenone, and ochratoxin A in pet food
Directive 2009/34/EC	Relating to common provisions for both measuring instruments and methods of metrological control
Directive 82/475/EEC	Laying out the categories of feed materials for the Labeling of compound feedingstuffs
Regulation (EC) No 429/2008	On detailed rules for the implementation of Regulation No 1831/2003 as regards feed additives
Recommendation 2011/25/EU	Establishing guidelines for the distinction between feed materials, feed additives, biocidal products, etc.

Food Safety, Hygiene, and Traceability	
Legislation	Description
Regulation (EC) No 178/2002	Laying out the general principles and requirements of food law and food safety
Regulation (EC) No 852/2004	On the hygiene of foodstuffs
Regulation (EC) No 183/2005	Laying out requirements for feed hygiene
Regulation (EU) 2017/625	On official controls for food and feed law
Commission Implementing Regulation (EU) 2021/632	Laying out rules for the application of Regulation (EU) 2017/625
Regulation (EC) No 1829/2003	On genetically modified food and feed
Regulation (EC) No 1830/2003	On the traceability and labeling of genetically modified organisms
Regulation (EC) No 834/2007	On organic production and labeling of organic products

Veterinary and Animal Health	
Legislation	Description
Regulation (EU) 2019/6	On veterinary medicinal products
Regulations (EC) No 1069/2009 and (EU) No 142/2011	Laying out health rules as regards animal by-products and derived products not intended for human consumption
Regulation (EC) No 999/2001	Laying out the rules for the prevention, control, and eradication of certain transmissible spongiform encephalopathies

Annex 4 Provisions of Regulation 767/2009 – by article

PROVISION	SUBJECT
Article 1	Objective
Article 2	Scope
Article 3	Definitions
Article 4	Safety and marketing requirements
Article 5	Responsibilities and obligations of feed businesses
Article 6	Restrictions and prohibitions
Article 7	Characteristics of types of feed
Article 8	Content of feed additives
Article 9	Marketing of feed intended for particular nutritional purpose
Article 10	List of intended uses of feed intended for particular nutritional purposes
Article 11	Principles for labeling and presentation
Article 12	Responsibility
Article 13	Claims
Article 14	Presentation of Labeling particulars
Article 15	General mandatory labeling requirements
Article 16	Specific mandatory labeling requirements for feed materials
Article 17	Specific mandatory labeling requirements for compound feed
Article 18	Additional mandatory labeling requirements for feed intended for particular nutritional purposes
Article 19	Additional mandatory labeling requirements for pet food
Article 20	Additional mandatory labeling requirements for non-compliant feed
Article 21	Derogations
Article 22	Voluntary labeling
Article 23	Packaging
Article 24	Community Catalogue of feed materials
Article 25	Community codes of good labeling practice
Article 26	Establishment of the Codes and amendments to the Community Catalogue and the Community Codes
Article 27	Implementing measures
Article 28	Committee procedure
Article 29	Amendment to Regulation (EC) no 1831/2003
Article 30	Repeal
Article 31	Penalties
Article 32	Transitional measures
Article 33	Entry into force

Annex 5 U.S. EXPORTER CHECKLIST ESSENTIALS

1. Compliance

- Determine product, it falls under what category? feed material, feed additive, compound feed, or pet food.
- Review and comply with relevant EU regulations (e.g., EC No 767/2009 for feed, Regulation (EC) No 1831/2003 on feed hygiene, EC No 1831/2003 for additives, EC No 1069/2009 for animal by-products, Directive 2002/32/EC undesirable substances).
- Use mandatory labeling in the official language of the EU Member State of destination. See [APHIS International Regulations \(IRegs\) for Animal Product Exports website](#) for more information (select the Country).
- Contact your importer to verify customer requirements and specific national rules of the destination EU Member State.

2. If a Product Contains Animal Origin Product

- Ensure your company/facility are registered or approved by appropriate U.S. authorities (FDA, APHIS) and listed for export to the EU.
- Confirm that U.S. establishments [are recognized in the EU TRACES system](#) if exporting products of animal origin.
- Obtain necessary certificates.

3. If a Product Contains Feed Additives/Feed Additives Export

- Look at [the EU register](#) to check that all feed additives are authorized for use in the EU under Regulation (EC) No 1831/2003.
- If not found in the register, you must request authorization for feed additive/contact your supplier of feed additive to request authorization.
- If found in the register, label feed accordingly (EC No 1831/2003 for additives).

4. If a Product Contains Genetically Modified Organisms (GMO)/Export of GMOs Ingredients

- Ensure the GMO is approved for food or feed use in the EU. Only GMOs authorized under Regulation (EC) 1829/2003 may be imported for use in animal feed.
- Label any feed that contains more than 0.9% of authorized GMOs (Regulation (EC) No 1830/2003).

5. If Exporter Wants to Sell to the EU Organic Market

- Ensure that at least 95% of the agricultural ingredients are organic.
- Obtain a valid Certificate of Inspection (COI) of [the USDA National Organic Program \(NOP\)](#).
- Label product accordingly (Regulation (EU) 2018/848 on labeling organic feed and Regulation (EU) 2023/2419 on labeling organic petfood)

6. Export of Hay and Straw to the EU

- Confirm that your country (e.g., the United States) is listed as eligible for hay and straw exports to the EU ([Commission Implementing Decision \(EU\) 2022/575](#)).
- Obtain a phytosanitary (PPQ phyto) certificate, if required by the destination Member State; consult USDA-APHIS PPQ for exact certificate formats and issuance procedures.

Attachments:

No Attachments.