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Q&A About non-ruminant PAP – Processed Animal Protein

(FEAP, EFPRA & FEFAC joint communication)

What is PAP and what is the difference with MBM?

Processed animal protein (PAP) is a complete feed material with a high nutritional value produced from category 3 animal by-products, i.e. the part of animals (bones, offals, etc.) coming from non-ruminant animals controlled as fit for human consumption at the point of slaughter. In addition to highly digestible protein and energy, PAP is also able to contribute to the nutritional needs for calcium, phosphorous and vitamin B12. In the EU it is mainly used in pet food and as fertilizer.

Meat and bone meal (MBM) is made from category 1 and 2 animal by-products, which are not fit for human consumption (e.g. deceased animals or carcasses of animals deemed not fit for human consumption). Since the outbreak of the BSE crisis **MBM cannot be used as a feed material**, but it is valued as a source of green energy and a raw material in a variety of industrial applications. Unfortunately PAP has been incorrectly linked to MBM and the BSE crisis several times in non-scientific publications, giving it an unnecessary and unjustifiable raise of concern. One possible explanation for the confusion could be that outside the EU the term MBM is still used for animal proteins which can be used as feed. Another reason could be that the newly created, but already ten year old acronym PAP has not yet arrived media representatives and consumers.

While PAP and MBM are both derived by means of the rendering process, the regulations governing the production of PAP ensures it is never produced in the same processing facility as MBM in the EU.

Is the use of PAP in fish feed safe?

The scientific knowledge available today with regard to nutrition of fish has expanded enormously thanks to major research investments in the last decades. In 2011 EFSA publically announced that the use of PAP in fish feed is beneficial for fish and completely harmless to people. Fish require a diet that is rich in highly digestible protein. Therefore land animal proteins can provide a perfect alternative to fishmeal due to their high nutritional value, being a rich source of proteins, energy and phosphates.

As these PAP are produced according to the strictest safety rules and coming only from healthy animals fit for human consumption, they are completely safe to use. In addition non-ruminant PAP must be channeled at every stage of the value chain through dedicated production and transport facilities to dedicated fishfarms. Lifting the feed ban for fish therefore feed comes with reinforced traceability procedures, to have a better control, and new testing techniques, making sure only non-ruminant PAP enter the aquafeed chain. Ruminant PAP remains prohibited for the feeding of farmed fish.

Why is it important to allow the use of PAP in fish feed?

First of all, the allowance of PAP in fish feed will create a level playing field for EU aquafeed production on the global market, as for aquafeed outside of the EU the use of PAP in fish feed (to replace fish meal) has already been common practice for several years. Due to growing global production of aquafeed the demand pressure on fish meal grows proportionally. The production of fish meal can however simply not be increased due to the need to maintain fishing resources and its supply is therefore limited. PAP is available in large quantities (about 10 times the amount of fish meal) and from an ecological perspective the disposal of PAP through incineration should be considered a waste of natural resources.

Secondly in the EU protein is scarce as coal. Like coal (85% import) up to 70% of proteins are imported. European PAP can thus reduce this imbalance and huge dependency from third countries.

How does PAP relate to the "horse meat scandal"?

There is simply no connection between the partial lifting of the feed ban allowing PAP to be used in fish feed and the horse meat scandal. The horse meat scandal is a highly regrettable case of fraud which, despite it not being a safety issue, has caused a considerable amount of media commotion. The decision to re-authorize PAP in fish diets was taken a few months ago by EU institutions upon a proposal of the EU Commission based on EFSA scientific opinions and under strict conditions. It was pure coincidence that the two events occured at the same time, thus adding to the commotion. The independent scientific background supports the use of PAP in fish feed and shows that the distrust is not justifiable.