



Department
for Environment
Food & Rural Affairs



Llywodraeth Cymru
Welsh Government

Livestock feed controls review for England and Wales

Consultation on whether England and Wales should
change their Transmissible Spongiform
Encephalopathies (TSEs) related livestock feed
controls

February 2025

We are the Department for Environment, Food and Rural Affairs. We are responsible for improving and protecting the environment, growing the green economy, sustaining thriving rural communities and supporting our world-class food, farming and fishing industries.

We work closely with our 33 agencies and arm's length bodies on our ambition to make our air purer, our water cleaner, our land greener and our food more sustainable. Our mission is to restore and enhance the environment for the next generation, and to leave the environment in a better state than we found it.



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About this consultation

This public consultation is for England and Wales only. A separate consultation on the same topic has been published by the Scottish Government. Please only respond to one consultation, where your interest centres.

This consultation is open to the public. It is important for us to hear from those who will be directly impacted by the proposals. This includes, but is not limited to, members of the public, livestock keepers, farmers, home compounders, feed mills, renderers, cutting plants, abattoirs, hauliers, industry trade bodies, enforcement officers as well as non-governmental organisations with an interest in livestock feed controls.

This is a consultation on whether England and Wales should change its livestock feed controls, to allow:

- poultry processed animal protein (PAP) in porcine feed
- porcine PAP in poultry feed
- insect PAP in pig and poultry feed
- ruminant collagen and gelatine in non-ruminant feed

Duration

This consultation will be open for 8 weeks from 04/02/2025 to 01/04/2025.

How to respond

We ask that you respond to the consultation questions using the online form, which can be found at Citizen Space [here](#). However, you may also download the form and send your responses by email or post using the contact details below. If you send your responses by email or post, please include the following information:

1. Would you like your response to be confidential?
 - a. Yes
 - b. No
2. If you answered yes, please provide your reason:
3. What is your full name?
4. What is your organisation, if applicable?
5. Which of the following best describes you, your holding, or organisation?
 - a. Compound feed mill
 - b. Feed ingredient manufacturer

- c. Poultry farmer
- d. Bovine farmer
- e. Ovine farmer
- f. Pig farmer
- g. Other farmer
- h. Insect protein producer
- i. Trade association
- j. Abattoir
- k. Cutting plant
- l. Rendering plant
- m. Haulier
- n. Retailer
- o. Member of the public
- p. Enforcement officer
- q. Other

6. If you selected 'other', please specify:

7. Do you agree with allowing poultry processed animal protein in porcine feed?

- a. Yes
- b. No
- c. Don't know

8. Please detail your reasons why:

9. Do you agree with allowing porcine processed animal protein in poultry feed?

- a. Yes
- b. No
- c. Don't know

10. Please detail your reasons why:

11. Do you agree with allowing insect processed animal protein in porcine and poultry feed?

- a. Yes
- b. No
- c. Don't know

12. Please detail your reasons why:

13. Do you agree with allowing ruminant collagen and gelatine in non-ruminant feed?

- a. Yes
- b. No
- c. Don't know

14. Please detail your reasons why:

15. Do you agree with the proposed measures to prevent cross contamination in the feed chain?

- a. Yes
- b. No
- c. Don't know

16. Please detail your reasons why:

Contact information

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Privacy notice and data protection

Using and sharing your information

How we use your personal data is set out in the consultation and call for evidence exercise privacy notice which can be found [here](#).

Other Information

This consultation is being conducted in line with the Cabinet Office [“Consultation Principles”](#).

Executive summary

Transmissible spongiform encephalopathies (TSEs) are a group of fatal neurological diseases. TSEs notably include scrapie in sheep and goats, bovine spongiform encephalopathy (BSE) – also known as ‘Mad Cow disease’ – in cattle, chronic wasting disease (CWD) in deer, and variant Creutzfeldt-Jakob disease (vCJD) in humans.

The first case of BSE in the United Kingdom (UK) occurred in 1986 and since then there have been over 180,000 confirmed cases of BSE in cattle in the UK. At the height of the epidemic in 1992, 37,056 cases were confirmed. Classical BSE occurs through the consumption of feed contaminated with the BSE agent and is considered zoonotic (transmissible to humans) due to its assumed link with vCJD through the consumption of contaminated meat.

The strict BSE control measures introduced in the UK in 1988 ([The Feeding Stuffs Regulations 1988](#)), 1996 ([The Bovine Spongiform Encephalopathy \(Amendment\) Order 1996](#)), and in 2001 ([Regulation \(EC\) No 999/2001](#)) prohibit animal protein from being fed to farmed animals, with very limited exceptions (see the Appendix for more detail). This prevents BSE agents being recycled back into the ruminant (including cattle, sheep, goats and deer) population. Compliance with these feed controls is also monitored by the Animal and Plant Health Agency (APHA) through the [National Feed Audit \(NFA\)](#).

These livestock feed controls, amongst other BSE control measures, have greatly reduced the incidence of BSE in the UK. The UK has had just five cases of classical BSE since 2014.

Our understanding of BSE and how it is transmitted has also increased greatly in this time, and the livestock feed regulations no longer reflect current scientific knowledge or the level of BSE risk.

Although these controls are effective, they were made in a precautionary manner, when knowledge of BSE was limited. Since then, research has demonstrated that pigs and poultry are not naturally susceptible to TSEs and improvements in feed testing methods allow the differentiation between ruminant and non-ruminant proteins and are able to detect the presence of porcine or poultry protein.

In 2021 the European Union (EU) amended its TSE legislation to allow the use of a wider range of animal proteins in non-ruminant animal feed. The EU has allowed:

- poultry processed animal protein (PAP) in porcine feed
- porcine PAP in poultry feed
- insect PAP in pig and poultry feed
- ruminant collagen and gelatine in non-ruminant feed

These amendments are part of the [EU TSE roadmap](#) to review BSE controls, in the light of the reduced incidence of BSE and increased knowledge of the disease. The UK supported the roadmap when it was an EU member.

A risk assessment of the proposed changes concluded that these maintain the same level of protection of human and animal health as afforded by current controls. This consultation

is therefore seeking views on amending domestic legislation to implement the proposed changes.

These changes would enable investment in the insect protein sector, open new markets for renderers and could vary diets for livestock, whilst ensuring we maintain the UK's high level of biosecurity, animal and public health protection and not increasing TSE risk. It would also maintain a level playing field with the EU.

Key protections will remain in place, including the banning of PAP of ruminant origin being fed to ruminants, a requirement by the World Organisation for Animal Health (WOAH). Animal By-product (ABP) regulations would still prohibit intra-species recycling.

Background

To control the spread of BSE, the UK introduced various legislative packages between 1988 and 1996, culminating in the reinforced feed ban implemented on 1 August 1996 which prohibited animal protein from being fed to farmed animals, with very limited exceptions.

This was followed by EU-wide livestock feed controls in 2001 with the adoption of Regulation (EC) 999/2001. The controls on livestock feed have been updated from time to time, as scientific knowledge advanced. The table in the Appendix summarises the current feed controls for farmed animals.

In Great Britain (GB), compliance with the feed controls is monitored through the NFA, a compliance monitoring programme conducted by APHA, an executive agency of Defra that is responsible for TSE surveillance in GB. This inspection and sampling programme, carried out at various stages of the animal feed chain, monitors for the presence of prohibited ingredients of animal origin in feed. The purpose of the NFA is to protect animal and public health.

The feed ban, monitored by the NFA, alongside other BSE controls such as passive and active surveillance and the removal of Specified Risk Material (SRM) at slaughter, has greatly reduced the incidence of BSE in the UK. In 2001 there were 1,113 confirmed cases of BSE compared to just 5 cases of classical BSE occurring since 2014.

Although these controls are effective, they were made in a precautionary manner, when knowledge of BSE was limited. Since then, research has demonstrated that pigs and poultry are not naturally susceptible to TSEs. Read [The potential for transmissible spongiform encephalopathies in non-ruminant livestock and fish](#) and [Survey for transmissible spongiform encephalopathies in Irish pigs fed meat and bone meal](#). Improvements in feed testing methods allow the differentiation between ruminant and non-ruminant proteins and can detect if the protein is of porcine or poultry origin. [Read Real-time PCR detection and identification of prohibited mammalian and avian material in animal feeds](#), [Validation study of a real-time PCR method developed by CRA-W for the detection of pig DNA in feedingstuffs](#) and [Validation study of a real-time PCR method developed for the detection of poultry DNA in feedingstuffs](#).

In 2021, the EU allowed:

- poultry PAP in porcine feed
- porcine PAP in poultry feed
- insect PAP in pig and poultry feed
- ruminant collagen and gelatine in non-ruminant feed

These amendments are part of the EU TSE roadmap to review BSE controls in the light of the reduced incidence of BSE and increased knowledge of the disease. The UK supported the roadmap when it was an EU member. The amendments apply to Northern Ireland (NI) under the provisions of the [Windsor Agreement](#).

APHA completed in June 2023 risk assessments on the potential impact on animal health of adopting these same changes in GB. These risk assessments indicated that the overall risk of an animal in the UK being infected with a TSE due to these legislative relaxations is very low and is not estimated to increase the level of TSE infection and spread. The [Advisory Committee of the Microbiological Safety of Food \(ACMSF\)](#), a committee of independent experts that provides advice to the government on questions relating to microbiological issues and food, concluded that the risk assessments provide public health assurance for this policy change if other key BSE controls remain in place. The Food Standards Agency (FSA) is an independent, non-ministerial government department and is the competent authority for feed, food safety and hygiene policy in the UK. Based on this advice from ACMSF the FSA determined that no public health risk assessment is required in relation to adopting these changes.

It is important to note that these changes would be deregulatory and enabling for industry. Any guidance published as a result of these proposed changes is designed to protect animal health by avoiding same species recycling or cross-contamination of ruminant feed. Each business can take the decision of whether to make use of the proposed changes depending on their circumstances.

Proposed policy changes

The proposed changes are to allow the use of:

- poultry processed animal protein (PAP) in porcine feed
- pig PAP in poultry feed
- insect PAP in pig and poultry feed
- ruminant collagen and gelatine in non-ruminant feed

This would be achieved with a statutory instrument to change assimilated Regulation (EC) No. 999/2001.

Detail on proposed policy changes

Policy aims

The aims are to:

- ensure feed controls in GB are proportionate to current TSE risk and are in line with the latest scientific evidence and advice
- support industry and ensure our regulations allow and encourage investment in livestock industries and their growth
- support industry to achieve its farming sustainability goals

Cross contamination (CC) monitoring and prevention

It is essential to ensure that, should these changes be adopted, TSE risk in the UK is not increased. To achieve this, it is necessary to prevent any cross contamination in the feed chain that would cause illegal feeding.

Defra has worked with industry, the Welsh and Scottish Governments, the FSA, Food Standards Scotland (FSS), and APHA to develop proposed CC requirements that will monitor and prevent CC across the feed chain. The changes are designed to not be detrimental to current practices. We are seeking views on these proposed measures as part of this consultation.

These CC prevention measures would be included in legislation and APHA would issue guidance should these changes be agreed upon, explaining the legislative requirements to prevent CC in the feed and food chain. It would build upon the current [guidance note on feed controls in the Transmissible Spongiform Encephalopathies Regulations](#) published in 2018. Existing enforcement routes will apply to the new controls.

Proposed CC prevention for poultry processed animal protein intended for porcine feed

These conditions apply to the production and use of PAP derived from poultry animals intended to be used for feeding porcine animals.

Slaughterhouses and cutting plants

Animal by-products intended to be used for the production of poultry PAP must be sourced from slaughterhouses or cutting plants that are registered by the competent authority as not slaughtering or processing ruminant or porcine animals, unless the competent authority, upon inspection, is satisfied that:

- slaughter of poultry animals is carried out in physically separate lines to ruminant and porcine animals

- collection, storage, transport, and packaging facilities for poultry products are separate from those used for ruminant and porcine products
- regular sampling and analysis are undertaken to monitor for the presence of ruminant or porcine protein

Rendering plants, feed ingredient manufacturers and compound feed plants

Poultry derived products intended to be fed to porcine animals must be produced in processing plants registered by the competent authority as exclusively processing poultry products.

Unless, upon inspection, the competent authority is satisfied that:

- the production of poultry products intended for porcine animal feed is carried out in a closed system that is physically separate from that used for the production of ruminant or porcine products
- collection, storage, transport, and packaging facilities of bulk raw and finished material of poultry origin are physically separate from those of ruminant or porcine origin
- regular sampling and analysis are undertaken to monitor for the presence of ruminant or porcine protein

Products must be correctly labelled, and the accompanying commercial document or health certificate must be correctly filled.

Home compounders

Authorisation for the production of complete feed from compound feed containing PAP derived from poultry protein shall not be required if home compounders:

- are registered by the competent authority as doing such
- they do not keep farmed animals other than porcine animals, aquaculture animals or fur animals
- The compound feed containing poultry PAP used in their production contains less than 50% crude protein

Farms

The use and storage of PAP derived from poultry shall be prohibited on farms keeping farmed animal species for which the feed is not intended. Unless the competent authority, upon inspection, is assured on-farm measures prevent compound feed being fed to an animal species for which it is not intended.

Transport

Poultry products intended for the production of poultry PAP for porcine animal feed shall be transported to a processing plant in vehicles and containers dedicated exclusively to that.

Vehicles and containers that have previously transported porcine and ruminant derived products may transport poultry products, provided they are thoroughly cleaned in accordance with documented procedure which has been given authorisation by the competent authority.

Labelling

The words 'contains processed animal protein derived from poultry – shall not be used in feed for farmed animals except aquaculture animals, fur animals and porcine animals' shall be clearly indicated on the label of PAP derived from poultry and compound feed containing PAP derived from poultry. An accompanying commercial document must also be completed.

Proposed CC prevention for porcine processed animal protein intended for poultry feed

These conditions apply to the production and use of PAP derived from porcine animals intended to be used for feeding poultry animals.

Slaughterhouses and cutting plants

Animal by-products intended to be used for the production of porcine PAP must be sourced from slaughterhouses or cutting plants that are registered by the competent authority as not slaughtering or processing ruminant or poultry animals, unless the competent authority, upon inspection, is satisfied that:

- slaughter of porcine animals is carried out in physically separate lines to ruminant and poultry animals
- Collection, storage, transport and packaging facilities for porcine products are separate from those used for ruminant and poultry products
- regular sampling and analysis are undertaken to monitor for the presence of ruminant or poultry protein

Rendering plants, feed ingredient manufacturers and compound feed plants

Porcine derived products intended to be fed to poultry must be produced in processing plants registered by the competent authority as exclusively processing porcine products.

Unless, upon inspection, the competent authority is satisfied that:

- the production of porcine products intended for poultry feed is carried out in a closed system that is physically separate from that used for the production of ruminant or poultry products
- collection, storage, transport, and packaging facilities of bulk raw and finished material of porcine origin are physically separate from those of ruminant or poultry origin
- regular sampling and analysis are undertaken to monitor for the presence of ruminant or poultry protein

Products must be correctly labelled and the accompanying commercial document or health certificate must be correctly completed.

Home compounders

Authorisation for the production of complete feed from compound feed containing PAP derived from porcine protein shall not be required if home compounders:

- are registered by the competent authority as doing such
- they do not keep farmed animals other than poultry, aquaculture animals or fur animals
- the compound feed containing porcine PAP used in their production contains less than 50% crude protein

Farms

The use and storage of PAP derived from porcine animals shall be prohibited on farms keeping farmed animal species for which the feed is not intended. This is unless the competent authority, upon inspection, is assured on-farm measures prevent compound feed being fed to an animal species for which it is not intended.

Transport

Porcine products intended for the production of porcine PAP for poultry feed shall be transported to a processing plant in vehicles and containers dedicated exclusively to that.

Vehicles and containers that have previously transported poultry and ruminant derived products may transport porcine products, provided they are thoroughly cleaned in accordance with a documented procedure, which has been given authorisation by the competent authority.

Labelling

The words 'contains processed animal protein derived from porcine animals – shall not be used in feed for farmed animals except aquaculture animals, fur animals and poultry' shall be clearly indicated on the label of PAP derived from porcine animals and compound feed containing PAP derived from porcine animals. An accompanying commercial document must also be completed.

Proposed CC prevention for insect processed animal protein intended for porcine or poultry feed

These conditions apply to the production and use of PAP derived from farmed insects, intended to be used for feeding poultry or porcine animals.

Feed ingredient manufacturers

PAP derived from farmed insects must be produced in processing plants dedicated exclusively to the production of products derived from farmed insects and approved in accordance with relevant regulations.

Unless, upon inspection, the competent authority is satisfied that:

- the production of PAP derived from ruminants or non-ruminants other than insects is carried out in a closed system that is physically separate from that used for the production of insect PAP
- collection, storage, transport, and packaging facilities of bulk raw and finished material of ruminants or non-ruminants other than insects are physically separate from those of insect origin
- regular sampling and analysis are undertaken to monitor for the presence of ruminant protein

Products must be correctly labelled and the accompanying commercial document or health certificate must be correctly completed.

Compound feed plants and home compounders

Compound feed containing PAP derived from farmed insects must be produced in establishments authorised for that purpose by the competent authority and are dedicated exclusively to the production of feed for aquaculture animals, poultry or porcine animals, unless, upon inspection, the competent authority is satisfied that:

- production, collection, storage, transport, and packaging facilities of insect PAP intended for porcine animal and poultry feed are physically separate from those intended for ruminants
- production, collection, storage, transport, and packaging facilities of insect PAP intended for aquaculture animals, poultry or porcine animal feed are physically separate from those intended for other non-ruminant animals
- the production of compound feed containing PAP derived from insects is carried out in a closed system that is physically separate from that used to produce ruminant PAP
- purchasing, sales, and use records are kept
- regular sampling and analysis are undertaken to monitor for the presence of ruminant protein

Products must be correctly labelled and the accompanying commercial document or health certificate must be correctly completed.

For home compounders, authorisation for the production of complete feed from compound feed containing PAP derived from farmed insects shall not be required if:

- they are registered by the competent authority as doing such
- they keep only aquaculture animals, poultry and porcine animals
- the compound feed containing insect PAP used in their production contains less than 50% crude protein

Farms

The use and storage of PAP derived from insects shall be prohibited on farms keeping farmed animal species for which the feed is not intended. Unless the competent authority,

upon inspection, is assured on-farm measures prevent compound feed being fed to an animal species for which it is not intended.

Proposed CC prevention for ruminant collagen and gelatine intended for non-ruminant feed

Slaughterhouse and cutting plants

There is no proposed change to current legislation.

Rendering plants, feed ingredient manufacturers, compound feed plants and home compounders

Production of compound feed intended to be used for feeding non-ruminant farmed animals shall be registered by the competent authority as not producing feed for ruminants, unless, upon inspection, the competent authority is satisfied that:

- production, collection, storage, transport, and packaging facilities of feed intended for non-ruminant animals are physically separate from those intended for ruminant animals
- purchasing, sales, and use records are kept
- regular sampling and analysis are undertaken to monitor for the presence of non-ruminant protein

Products must be correctly labelled and the accompanying commercial document or health certificate must be correctly completed.

Home compounders

Authorisation for the production of complete feed from compound feed containing PAP derived from ruminants shall not be required if home compounders:

- are registered by the competent authority as doing such
- they keep only non-ruminant animals
- they comply with current regulations

Farms, transport, storage, labelling

There is no proposed change to current legislation.

Halal and kosher considerations

Animals reared on a partially carnivorous diet may not be considered Halal or Kosher. Prior to this consultation, Defra has reached out to Halal and Kosher certification authorities, who are experts in Sharia and Kashrut law. Defra is assured that Halal certification schemes are robust enough to ensure that animals are reared on the correct diets to comply with Sharia law. Current legislation allows pig, poultry and insect PAP to be used in aquaculture feed.

Benefits of the proposed changes

Environmental benefits

The use of animal proteins in non-ruminant feed has potential environmental benefits, through a reduced dependency on soybean-based feed. Approximately 76% of global soy production goes towards livestock feed, mostly for pigs and poultry. Read [Forests and Deforestation](#). In 2022, the UK imported 3.46 million tonnes of soybean equivalents, with 90% either used as animal feed or embedded within imported meat, eggs, or dairy products. Read the [UK Roundtable on Sustainable Soya: Annual progress report 2023](#). The soybean industry is a significant contributor to deforestation and greenhouse gas emissions, with over 75.5 million hectares cultivated globally.

Defra is conducting research and development, including a life cycle analysis, on the potential environmental benefits of using insect protein in animal feed in comparison to soymeal and fishmeal. As farmed animals, insects are prohibited from being fed manure, catering waste, and feed material containing or derived from catering waste. We are aware of innovation in the insect protein sector identifying novel insect substrates that are usually underutilised. These innovations, in the mid-term, could contribute to a more sustainable global supply chain, and reduce the reliance on soybean-based feed.

Economic benefits

These proposed changes would level the playing field with the EU, providing a platform that will allow investment into the insect protein sector in GB. There is a potential benefit to the insect PAP sector, who would be able to sell their product to a GB market through the use of insect PAP in pig and poultry feed. Insects are becoming of increasing interest in animal feed, with insect meals containing between 50 to 82% crude protein as well as other important nutrients. Read [The Future of Animal Feed: Animal by-products and insects](#). The global market for insect protein was worth approximately \$540 million in 2022 and has been forecast to hit \$1.4 billion by 2029, with Europe making up around a fifth of the market. Read [Global Insect Protein Market – Industry Trends and Forecast to 2031](#). Allowing the use of insect PAP in non-ruminant feed could enable the growth of this market in GB. For example, in 2017 the EU and UK permitted the use of processed protein from seven species of insect to be used in aquaculture feed as well as pet food, including black soldier flies and species of mealworms and crickets. Black soldier flies (and to a lesser extent yellow mealworms) are now being farmed in various locations in the UK. Estimates from the World Wildlife Fund for Nature suggest that demand for insect protein in the UK could be over 500,000 tons by 2050, with half supplied within the country. Read the [Future of Feed](#): a WWF roadmap to accelerating insect protein in UK feeds. Since insect farming is just starting to develop and considering its requirements (for example, hygienic treatment of waste substrates and detection of microscopic contaminants), it may also be a driver for innovation in other sectors, such as biotechnologies.

There are potential benefits to industry, including animal by-product (ABP) processing plants manufacturing porcine or poultry PAP, as they would also be able to sell to a GB market for use in the production of pig and poultry feed. Data from discussions held with industry suggests that most of the porcine and poultry PAP currently produced is exported

for use in pet food, with a small amount used by the UK pet food industry. Porcine ABPs are often mixed with ruminant ABPs, and the mixed PAP products have less value than porcine PAP. Enabling the use of porcine and poultry PAPs in non-ruminant feed would therefore enable them to be marketed more widely which is good for diversifying product ranges and keeping markets competitive.

Trials have been conducted feeding 3.5% porcine PAP to poultry and has been found to reduce mortality and cannibalism and increase the quality of feathers. The use of animal PAPs may lower the carbon footprint of animal feed.

Appendix

Legal position of PAP use in animal feed in GB

Legal PAP use, proposed changes, and prohibited feeding practices in GB.

Product of animal origin	Ruminant	Pig	Poultry	Fish	Other	Pets and fur animals
Ruminant PAP including ruminant blood meal	Illegal	Illegal	Illegal	Illegal	Illegal	Legal
Blood products from ruminants	Illegal	Illegal	Illegal	Illegal	Illegal	Legal
Gelatine and collagen from ruminants	Illegal	Proposed change	Proposed change	Proposed change	Proposed change	Legal
Hydrolysed proteins from ruminant tissues other than hides and skins	Illegal	Illegal	Illegal	Illegal	Illegal	Legal
Non-ruminant PAP including non-ruminant blood meal but excluding fishmeal, porcine and poultry PAP	Illegal	Illegal	Illegal	Legal	Illegal	Legal
Poultry PAP	Illegal	Proposed change	Illegal	Legal	Illegal	Legal
Porcine PAP	Illegal	Illegal	Proposed change	Legal	Illegal	Legal
Insect PAP	Illegal	Proposed change	Proposed change	Legal	Illegal	Legal
Fishmeal from farmed fish	Illegal	Legal	Legal	Legal	Legal	Legal
Blood products from non-ruminants	Illegal	Legal	Legal	Legal	Legal	Legal
Di and tricalcium phosphate of animal origin	Illegal	Legal	Legal	Legal	Legal	Legal
Other animal proteins not listed	Illegal	Legal	Legal	Legal	Legal	Legal
Hydrolysed proteins from non-ruminants or from ruminant hides and skins	Legal	Legal	Legal	Legal	Legal	Legal
Gelatine and collagen from non-ruminants	Legal	Legal	Legal	Legal	Legal	Legal
Egg, egg products, milk, milk products and colostrum	Legal	Legal	Legal	Legal	Legal	Legal