

# 5 key facts pig producers need to know about the EU's ZnO ban



We all know the headlines, “European Commission adopts ZnO ban” or “Zinc oxide to be phased out at EU level by 2022”. Clearly, EU legislation has far-reaching consequences for European pig producers – but in the jungle of acronyms and legalistic jargon, it’s not always clear which institution gets to decide what and why. Here are five key facts that help pig producers make sense of the EU’s zinc oxide ban.

## 1. Zinc oxide can only be used as a feed additive (low dosage)

Pigs require zinc to maintain various metabolic functions, hence it is included in their diet as a feed additive. This use will not be banned: ZnO is included as a source of zinc in the so-called [register of feed additives](#), which applies to the whole EU. The European Commission decides which products are included in the register based on the opinions of the European Food Safety Authority (EFSA), which also advises the Commission on topics like animal welfare and African swine fever. The EFSA currently suggests that a total level of 150ppm meets the animals’ physiological needs for zinc. The European Commission has turned this recommendation into law, hence [150ppm is the legal limit](#) for zinc supplementation for piglets.

## 2. The EU sets common rules for veterinary medicinal products

ZnO-based products to treat post-weaning diarrhea in piglets, on the other hand, contain pharmacological doses of zinc oxide. A commonly administered dosage is 100mg per kg body weight per day for 14 consecutive days, amounting to 2500ppm zinc in the feed. These products are classified as veterinary medicinal products (VMPs) and are thus covered by [Directive 2001/82/EC](#) on medicinal products for veterinary use and by [Regulation \(EC\) No 726/2004](#). These pieces of legislation set out the EU's rules for the production, distribution, and authorizations of VMPs, and they establish the European Medicines Agency (EMA). Just as the EFSA advises the European Commission on feed additives, they turn to the EMA regarding VMPs.

### What is the difference between a "regulation" and a "directive"?

Regulations automatically apply to all EU countries, without needing to be transposed into national law. A directive requires EU members to achieve certain objectives – and to transpose them into national law – but lets them to choose how to do so, as long as they meet a set deadline.

### *Zinc oxide – two different uses, two different situations*

	ZnO as a feed additive	ZnO as a veterinary medicinal product (VMP)
EU agency	European Food Safety Authority (EFSA)	European Medicines Agency (EMA)
Legislation	Regulation (EC) No 1831/2003 on additives for use in animal nutrition	Directive 2001/82/EC on veterinary medicinal products + Regulation (EC) No 726/2004 Note: by 2022 these two will be replaced by the new Regulation (EU) 2019/6
Levels	Max. total 150ppm of zinc (from ZnO and other sources)	Normal dosage ca. 2500ppm
Ban?	No! There is no indication at the moment that zinc oxide will be banned as a feed additive.	<b>Yes!</b> Marketing authorizations for VMPs containing zinc oxide will be withdrawn the across EU by June 2022.

## 3. ZnO products licenses are a national topic – but subject to EU scrutiny

One of EMA's key topics are marketing authorizations: VMPs can only be sold and traded in the EU if they have received a marketing authorization, which is basically a license. Depending on the type of VMP and on when it was first released, the marketing authorization is either issued by the EMA or by national authorities. Veterinary medicines containing zinc oxide are (or rather were) within the remit of national authorization procedures. However, national authorities are supposed to turn to the EMA's [Committee for](#)

[Medicinal Products for Veterinary Use \(CVMP\)](#) if they have any issues with an application that is submitted to them. This is what happened in the case of zinc oxide.

## 4. France and the Netherlands initiated the review of zinc oxide

A European company in the feed industry had applied for marketing authorization for its ZnO-based medicated feeding stuff for piglets in the United Kingdom, hoping for a so-called decentralized authorization procedure to take place. This procedure would mean that the marketing authorization issued in the UK would also be valid in other EU countries. However, France and the Netherlands objected to this on the grounds of environmental concerns. Initially, the CVMP ruled that the marketing authorization could be granted, but France and the Netherlands persisted. In a second round, they raised doubts about the efficacy of risk mitigation measures and the added [issue of antimicrobial resistance](#). This time, [they were successful](#).

## 5. Bottom line: ZnO products will no longer get a marketing authorization

In March 2017, the CVMP concluded that zinc oxide's benefits of preventing diarrhea do not outweigh the risks to the environment. Therefore the panel recommended that national authorities withdraw existing marketing authorizations for zinc oxide-based VMPs and that they no longer grant new authorizations. Shortly after that, on 26 June 2017, [the European Commission adopted the CVMP's recommendation](#), which means that all EU countries have to implement it. This decision also says that countries may defer withdrawing the marketing authorizations if they think that the lack of available alternatives and necessary changes in farming practices put too much pressure on their pig sectors. They can only defer for five years though; hence, the decision must be implemented no later than 26 June 2022.

### How do you say "ZnO ban" in EU terms?

The withdrawal of marketing authorizations for veterinary medicinal products containing zinc oxide to be administered orally to food-producing species.

Today we stand at the half-way point before the ban of VMP ZnO as a veterinary medicinal product kicks in across the EU. Hence the search is on for effective strategies to control post-weaning diarrhea: without zinc but through continuous improvements in management and feed practices, as well as the support of targeted, functional feed additives.

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Article available in [german](#), dutch and [spanish](#).

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# Why we need to replace zinc oxide in tackling post-weaning diarrhea



Piglets experience significant stress when they are weaned from the sow and change diet, making them susceptible to gastrointestinal disorders. Primarily during the first two weeks after weaning, they are likely to suffer from post-weaning diarrhea (PWD). PWD is a significant problem for pig producers worldwide: it leads to severe dehydration, stunted growth and [mortality rates of up to 20-30%](#). Treatment and additional labor costs further squeeze farm profitability and necessitate unwanted antibiotic interventions.

## Zinc oxide: an effective but highly problematic tool

Since the early 1990s zinc oxide (ZnO) has been used to control post-weaning diarrhea and promote growth in piglets, mainly at pharmacological dosages of 2500 to 3000ppm. Its mode of action is still not entirely understood; effects on [immune or metabolic processes, altered microbiota, or post-absorptive metabolism](#) are likely to play a role. What is clear is that the use of ZnO in European pig production has strongly increased since the EU banned the use of antibiotic growth promoters such as [colistin](#) in 2006 to curb the development of antimicrobial resistance.

Pigs depend on a continuous supply of zinc. Among other roles, this trace element constitutes a functional component of around 300 biochemical enzymes, making it pivotal to most metabolic processes, and by extension to optimal health, production and reproduction. [Modern pig diets thus include zinc supplementation](#) to meet the animals' requirements. The European Food Safety Authority (EFSA) currently suggests that [a total level of 150ppm](#) of zinc in feed matches the animals' physiological need for zinc. The EFSA's concerns are solely connected to the environmental concerns arising from pharmacological high dosages of ZnO.

These concerns are grave indeed: zinc is a heavy metal after all. Too much zinc is toxic for the animal, hence its physiology ensures that excessive zinc intake is excreted. The bioavailability and absorption of zinc from zinc oxide is particularly low. Therefore most of the zinc given to piglets in this way accumulates in their manure – which is widely used as an organic fertilizer for agricultural soils.



The continual application of manure gradually increases topsoil zinc concentrations; leaching and run-off then lead to contamination of groundwater, surface waters, and sediment. As zinc is non-volatile and non-degradable, it is only a matter of time before concentrations lead to ecotoxic effects, including food crops, aquatic life, and drinking water. Classic mitigation measures such as diluting the manure or keeping certain minimum distances between application areas and surface waters can only slow down the environmental accumulation of zinc, not prevent it.

## EU ban: ZnO to be phased out by 2022

In 2017, the European Medicines Agency (EMA) – the EU agency responsible for the scientific evaluation, supervision and safety monitoring of medicines, including veterinary medicinal products – conducted an overall risk-benefit analysis for ZnO. It concluded that the benefits of preventing diarrhea in pigs did not outweigh the significant environmental risks caused by zinc pollution. By June 2022 [all EU member states will thus have to withdraw marketing authorizations](#) for veterinary medicinal products containing zinc oxide that are administered orally to food-producing species.

In its [decision](#), the EMA's Committee for Medicinal Products for Veterinary Use also points out the risk that, due to co-resistance, the use of zinc oxide might promote the development of antimicrobial resistance. High doses of zinc supplementation have been shown to [increase the proportion of multidrug-resistant \*E. coli\*](#) and [Salmonella](#), two of the most important pathogens in pig production.

What is more, studies show that [excessive zinc can accumulate in the liver, the pancreas, and blood serum](#), and that it [permanently reduces the lactobacilli population](#) of the gut flora. With what consequences for performance in the fattening phase? Hence, there are plenty of reasons why getting rid of zinc oxide is a good thing and will ultimately result in even better, more sustainable pig production – but, of course, only if effective replacement strategies to control PWD and boost piglet performance are in place.

## Towards zero ZnO: smart feed additives optimize gut health

The search for ZnO alternatives takes us right back to the start, to the piglets' challenged [gastrointestinal tract](#). During their first three months of life, [pigs' gastrointestinal system undergoes a complex maturation process](#) of its epithelial, immune, and enteric nervous systems. Only once all of these systems are fully developed is the gut capable of delivering its normal functions (digestion, nutrient absorption, immunity, etc.), while also providing an effective barrier against the pathogens, antigens, and toxins in the lumen.

Unlike in nature, where weaning occurs around the time when GIT functions have matured, weaning in commercial pig production takes place during this vulnerable developmental period. Post-weaning diarrhea is ultimately a consequence of intestinal dysbiosis, a state of imbalance in the intestinal microbiome which in turn is induced by the dietary, behavioral, and environmental stressors of the weaning phase (such as separation from the sow, vaccinations, transport, introduction of solid feed).

PWD control thus starts with managing these stressors, which includes ensuring sufficient colostrum intake, gradual feed changes, and meticulous nursery hygiene. Critically, the weaning diet needs to optimally support gut health. Intelligent feed additive solutions are able to

- reduce the pathogenic load in the piglet's GIT,
- strengthen the piglet's maturing gut barrier functionality, and
- selectively induce the development of beneficial microorganisms within the microbiome.

A synergistic combination of phytomolecules, medium-chain fatty acids, glycerides of butyric acid, and prebiotics achieves these objectives in a reliable and cost-effective manner. Thanks to their antimicrobial, anti-inflammatory, and digestive properties these selected ingredients effectively support piglets during this critical phase of their postnatal gut development, while also boosting their feed intake.

In the past decade, the European pig sector has successfully adapted to the 2006 ban on antibiotic growth

promoters through significant improvements in management and feed practices. Cutting out zinc oxide is an ambitious challenge – but with the support of targeted, functional feed additives, producers will be able to set their piglets up for a strong, sustainable, zero ZnO health and growth performance.

\*You can find this article in polish and italian.

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