# THE INTERNATIONAL PLATFORM OF INSECTS FOR FOOD AND FEED

## Regulatory update and future perspectives of the insect rearing industry sector

Mr Christophe Derrien– IPIFF Secretary General

Conference 'New Stakes and Challenges of the Insect Rearing Industry'

26 April 2022

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# I. Introduction: why insects?

▪ Inspired from processes occurring in nature, insect farming provides **solutions** to key European and global challenges, such as:

A. food waste

*'…about 20% of the food produced is wasted…'*

B. reliance on food imports

*'The EU is the biggest importer […] of agri-food products…'*

C. feeding a growing population – while limiting the expansion of agricultural land

*'…68% of the total agricultural land is used for animal production.'*

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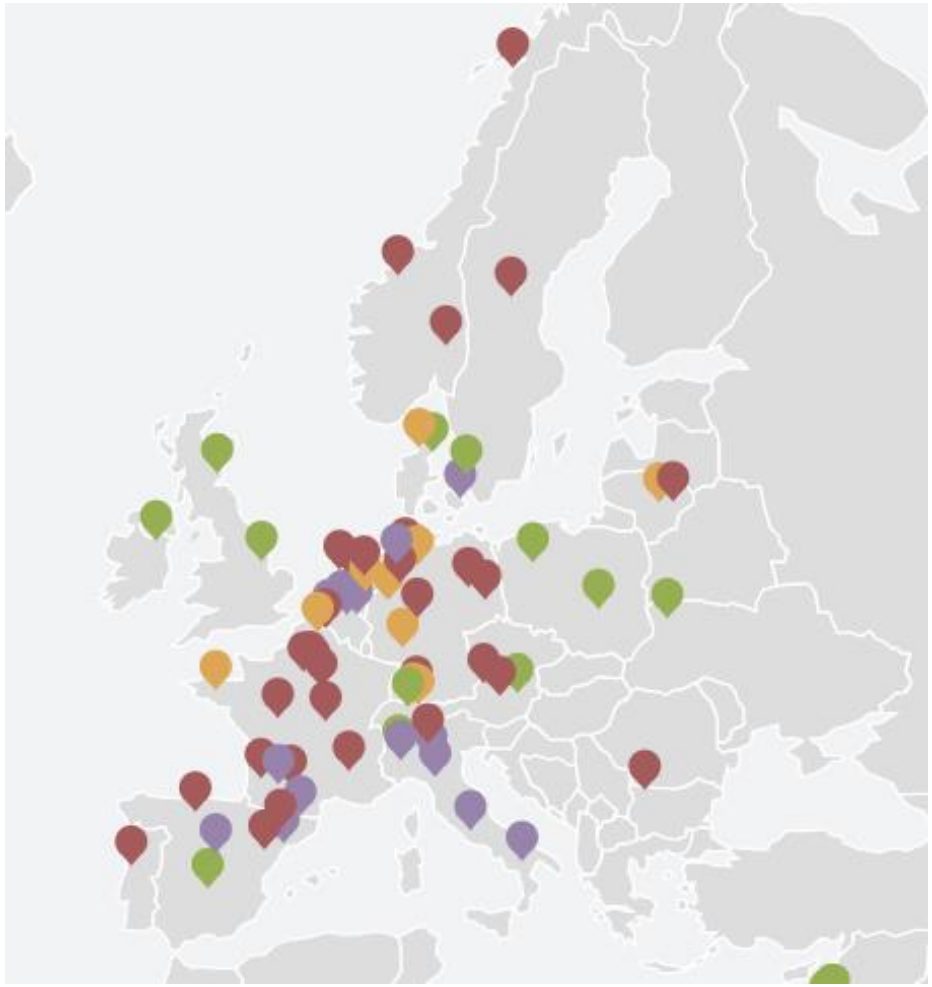
# I. Introduction: IPIFF and the European insect sector



Agronutris · ALIA Insect Farm · AMUSCA · Divaks · ECOFLY · ecoprot · Enterra · ENTOGREEN · essento · Feedect · Hermetia · IBERinsect · ILLUCENS · innova FEED · invers · Invertapro · JIMINI'S · Koppert · MUTATEC · NASEKOMO · nextProtein · Nutriearth · PROBENDA · PRONOFA · PROTIFLY · PROTIX · TEBRIO · tebrito · WP · Ynsect · ZIRP

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# I. IPIFF missions and activities

**80 Members**

voice of insect producers

**Consolidating dialogue**

with EU public authorities

**Advocating**

for appropriate legislative frameworks

**Support**

in the effective implementation of legislation

**Promotion and development**

of shared standards and best practices

**Collaborative actions**

with other umbrella associations

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# The European insect production sector today

▪ Predominantly composed of **SMEs**, serving both the **food and feed** markets (start-ups and 'older' businesses, previously active in other segments e.g. in biocontrol, pet food);

▪ EU production represents today few **thousand tonnes,** whereas investments account for more than **1 billion EUR** – this figure is expected to **exceed 3 billion EUR** by 2025 (source: *IPIFF internal questionnaire 2020*);

▪ **More than a thousand direct jobs today** – likely to exceed thirty thousand by 2030 (source: *IPIFF internal questionnaire 2020)*.

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# II. EU regulatory landscape and latest milestones

# The EU regulatory status of insect farming

▪ Farmed insects are considered '**farmed animals'**:
'…insects farmed in the EU for the production of food, feed or other purposes are 'farmed animals' (Regulation (EC) No 1069/2009 on Animal by-Products);

▪ Insect farming **is** an **agricultural activity**, as insects are included in Annex I of the TFEU;

▪ Thus, insect farming activities **do** fall under the scope of **'EU Agricultural rules'** (e.g. EU organic legislation, Rural development programs under the Common Agricultural Policy).

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# Requirements on substrates of animal origin as feed for insect

- Regulation (EC) No 767/2009: animals in the EU may only be fed with safe feed - **prohibition feeding faeces** and separated digestive tract content;
- Regulation (EC) No 999/2001 prohibits to feed insects with **any PAPs**, except fishmeal;
- Regulation (EU) No 142/2011 (annex X, section 10) **excludes former foodstuffs containing meat and fish;**
- EU residue limits for **contaminants** (Directive 2002/32/EC) apply to feed for insects and insects as feed materials.


**Substrates for insects intended for all applications (food, feed, technical uses) – Farmed insects qualify as 'farmed animals'- Article (3)(6) of Regulation (EC) 1069/2009**

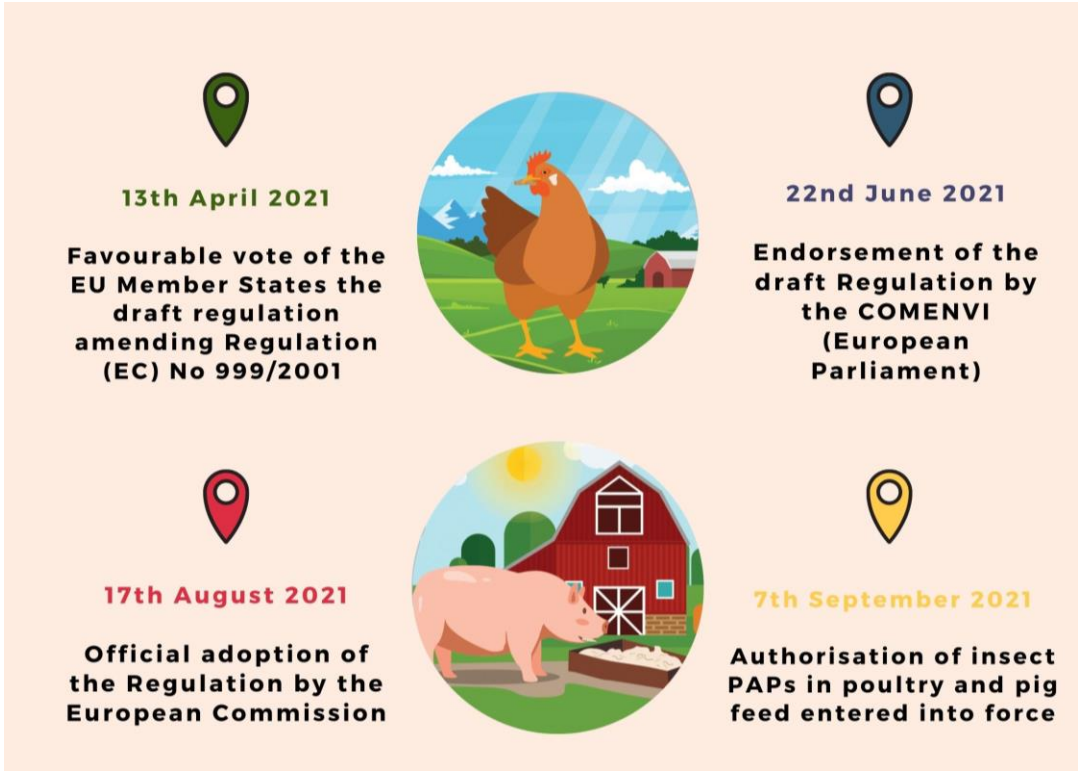
| Authorised | Prohibited |
|---|---|
| **Feed materials of vegetal origin** | **'Feed Marketing' Regulation - Regulation (EC) No 767/2009 Annex III:**<br>- Faeces and separated digestive tract content<br>- hide treated with tanning substances<br>- seeds and other plant-propagating materials (treated with plant protection products)<br>- wood and their derived products<br>- waste derived from urban, domestic and industrial waste treatment<br>- packaging from agri-food products and parts thereof<br>- protein products obtained from yeasts of the Candida variety cultivated on n-alkanes. |
| **Feed materials of animal origin**<br>**ABP health rules - Regulation (EU) No 142/2011; Annex X, Chapter 2, Section 10 and TSE Regulation (EU) No 999/2001, Article 7 and Annex IV, Chapter 1 and 2:**<br>- Hydrolysed proteins, fishmeal, collagen and gelatine or blood products derived from non-ruminants (or parts of non-ruminants)<br>- Hydrolysed proteins from ruminant, hide and skins as well as for di and tricalcium phosphate (including compound feed containing such products) | **EU Animal By-Products (ABP) Regulation (EC) No 1069/2009:**<br>-catering waste (Art. 11 (1) (b))<br>- Insect PAPs derived from animals of the same species (Art. 11 (1) (a)) E.g. feeding of black soldier flies with PAPs derived from that same species. |
| **Former Foodstuffs**<br>**TSE legislation - Regulation (EC) No 999/2001 Annex IV, Chapter II:**<br>- Without meat and/or fish<br>- only products containing the following ingredients of animal origin:<br>eggs and egg products; milk, milk based-products and milk-derived products; honey; rendered fat; collagen; gelatine<br>**these ingredients must have been **previously processed** (either prior their intended use as food product or after being requalified as animal-by-product).* | **TSE legislation - Regulation (EC) No 999/2001:**<br>- Processed Animal Proteins (PAPs), blood products<br>- Collagen<br>- Gelatine<br>- hydrolysed proteins of animal origin and derived from ruminants (annex IV, Chapter 1 and 2). |
| **Residue limits for contaminants and requirements applying to feed additives** | The **'Feed Marketing' Regulation** (i.e. Regulation (EC) No 767/2009) provides that animals (including therefore insects) bred in the EU may be only be fed with **safe feed**.<br>**Regulation (EC) No 396/2005** - maximum residue levels of **pesticides in feed**<br>**Undesirable Substances Directive (i.e. Directive 2002/32/EC)** |
| **Feed additives** | Only the feed additives which are authorised for all animal species may be used as feed ingredient for insects. - **Regulation (EC) No 1831/2003**. No specific additives for insects have been defined. |

*Source: IPIFF Guide on Good Hygiene Practices – update March 2022*

# Authorisation for using insect proteins in poultry and swine feed

- The 2017 authorisation of processed animal proteins derived from insects (**insect PAPs**) for use in **aquafeed** has paved the way to new feed markets for insect producers (until then, authorised feed markets were limited to pet food, fur animals and other 'niche' markets) ;

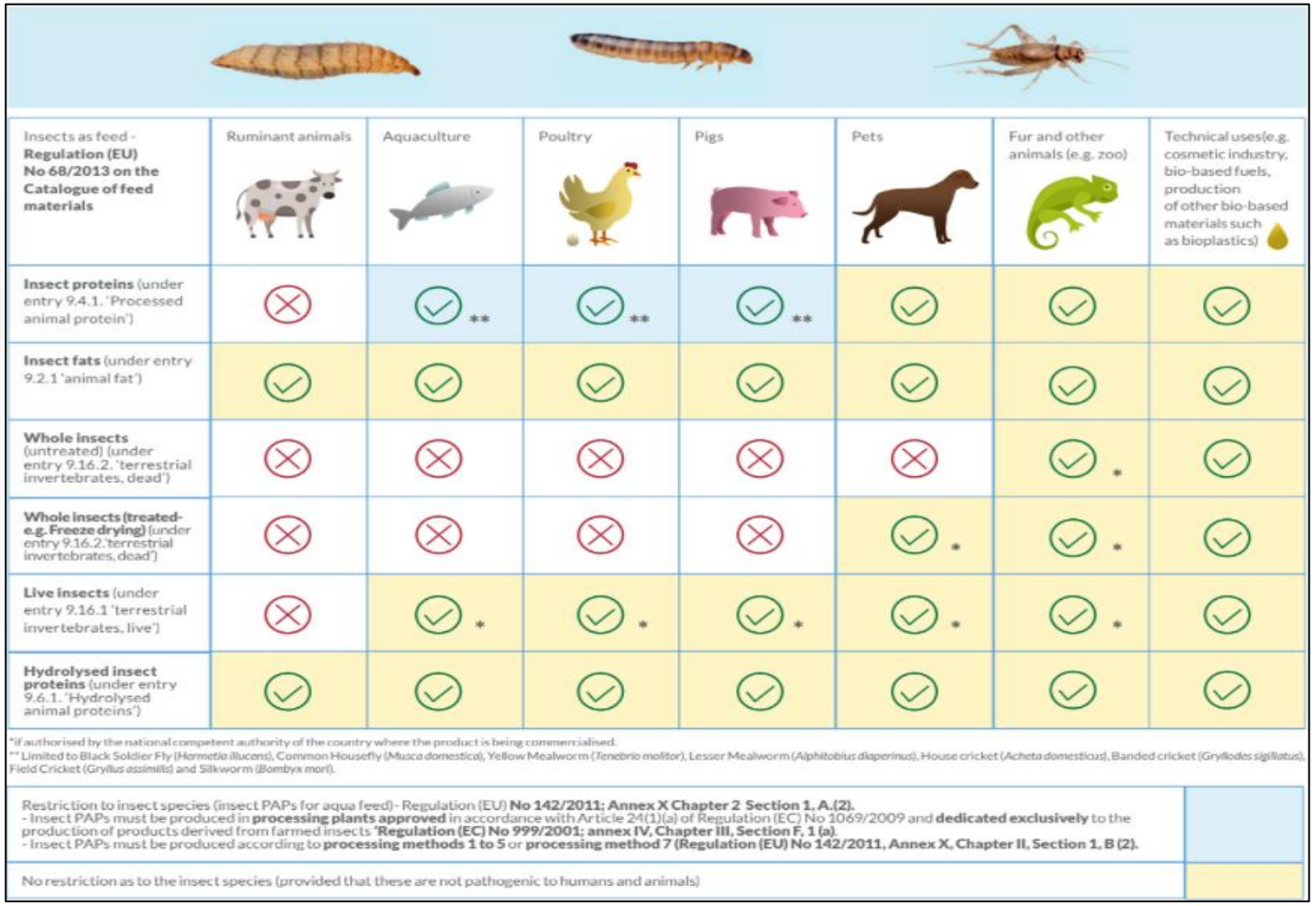
- Commission **Regulation (EU) 2021/1372** authorises the use of insect PAPs in **pig** and **poultry** feed. This authorisation became effective **on 7 September 2021.**



# EU rules applicable today: insect substrates and the use of insects in animal feed

**Feed stocks**

- Vegetal substrates
- Former foodstuff: vegetal, dairy and eggs



| Insects as feed - **Regulation (EU) No 68/2013 on the Catalogue of feed materials** | Ruminant animals | Aquaculture | Poultry | Pigs | Pets | Fur and other animals (e.g. zoo) | Technical uses(e.g. cosmetic industry, bio-based fuels, production of other bio-based materials such as bioplastics) |
|---|---|---|---|---|---|---|---|
| **Insect proteins** (under entry 9.4.1. 'Processed animal protein') | ✗ | ✓ ** | ✓ ** | ✓ ** | ✓ | ✓ | ✓ |
| **Insect fats** (under entry 9.2.1 'animal fat') | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| **Whole insects** (untreated) (under entry 9.16.2. 'terrestrial invertebrates, dead') | ✗ | ✗ | ✗ | ✗ | ✗ | ✓ * | ✓ |
| **Whole insects (treated- e.g. Freeze drying)** (under entry 9.16.2.'terrestrial invertebrates, dead') | ✗ | ✗ | ✗ | ✗ | ✓ * | ✓ * | ✓ |
| **Live insects** (under entry 9.16.1 'terrestrial invertebrates, live') | ✗ | ✓ * | ✓ * | ✓ * | ✓ * | ✓ * | ✓ |
| **Hydrolysed insect proteins** (under entry 9.6.1. 'Hydrolysed animal proteins') | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |

*if authorised by the national competent authority of the country where the product is being commercialised.
** Limited to Black Soldier Fly (*Hermetia illucens*), Common Housefly (*Musca domestica*), Yellow Mealworm (*Tenebrio molitor*), Lesser Mealworm (*Alphitobius diaperinus*), House cricket (*Acheta domesticus*), Banded cricket (*Gryllodes sigillatus*), Field Cricket (*Gryllus assimilis*) and Silkworm (*Bombyx mori*).

| | |
|---|---|
| Restriction to insect species (insect PAPs for aqua feed)- Regulation (EU) **No 142/2011; Annex X Chapter 2 Section 1, A.(2).**<br>- Insect PAPs must be produced in **processing plants approved** in accordance with Article 24(1)(a) of Regulation (EC) No 1069/2009 and **dedicated exclusively** to the production of products derived from farmed insects **'Regulation (EC) No 999/2001; annex IV, Chapter III, Section F, 1 (a).**<br>- Insect PAPs must be produced according to **processing methods 1 to 5** or **processing method 7 (Regulation (EU) No 142/2011, Annex X, Chapter II, Section 1, B (2).** | |
| No restriction as to the insect species (provided that these are not pathogenic to humans and animals) | |

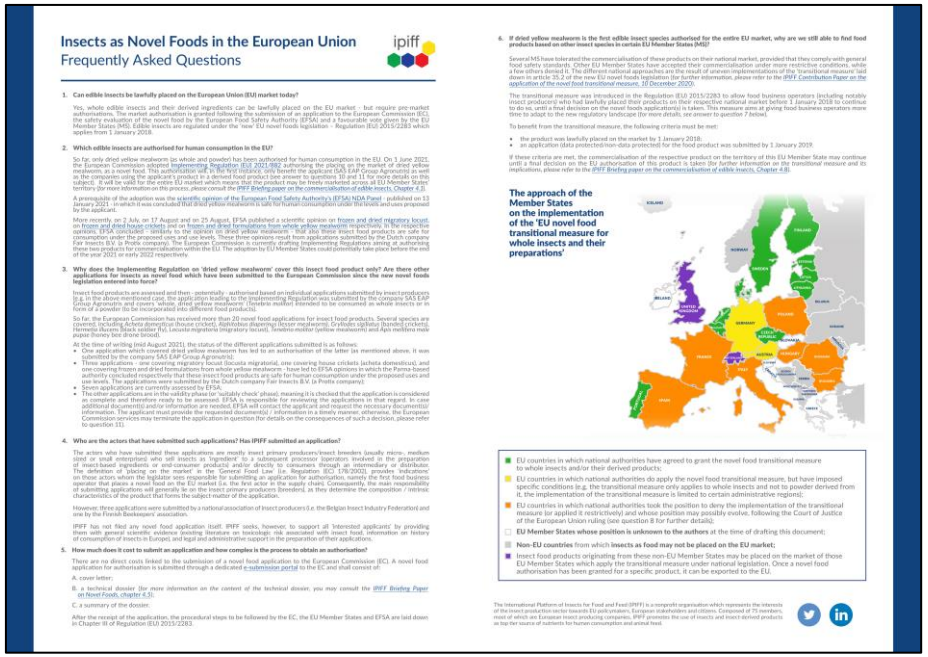
*Legend: Overview of EU regulatory possibilities for feeding whole insect larvae to farmed and non-farmed animals. IPIFF Guide on Good Hygiene Practices (updated version March 2022) (p 25)*

*Source: Draft IPIFF Guide on Good Hygiene Practices – IPIFF (March 2022)*

# Insects as food: EU novel food procedures

## Can edible insects be lawfully placed on the European Union (EU) market today?

*Yes, whole edible insects and their derived ingredients can be lawfully placed on the EU market - but require pre-market authorisations. The market authorisation is granted following the submission of an* ***application to the European Commission*** *(EC), the* ***safety evaluation of the novel food by the European Food Safety Authority*** *(EFSA) and a favourable* ***vote given by the EU Member States*** *(MS). Edible insects are regulated under the 'new' EU novel foods legislation – Regulation (EU) 2015/2283 which applies from 1 January 2018.*


Insects as Novel Foods in the European Union
Frequently Asked Questions
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1. Can edible insects be lawfully placed on the European Union (EU) market today?

Yes, whole edible insects and their derived ingredients can be lawfully placed on the EU market - but require pre-market authorisations. The market authorisation is granted following the submission of an application to the European Commission (EC), the safety evaluation of the novel food by the European Food Safety Authority (EFSA) and a favourable vote given by the EU Member States (MS). Insects are regulated under the 'new' EU novel foods legislation – Regulation (EU) 2015/2283 which applies from 1 January 2018.

2. Which edible insects are authorised for human consumption in the EU?

So far, only dried yellow mealworm (as whole and powder) has been authorised for human consumption in the EU. On 1 June 2021, the European Commission adopted Implementing Regulation (EU) 2021/882 authorising the placing on the market of dried yellow mealworm, as a novel food. This authorisation will, in the first instance, only benefit the applicant (SAS EAP Group Agronutris) as well as the companies using the applicant's product in a derived food product (see answer to questions 10 and 11 for more details on this authorisation). The dried yellow mealworm is now authorised for placing on the market in the EU and Switzerland (for more information on this process, please consult the IPIFF Briefing paper on the commercialisation of edible insects, Chapter 4.3).

A prerequisite of the adoption was the scientific opinion of the European Food Safety Authority's (EFSA) NDA Panel – published on 13 January 2021 – in which it was concluded that dried yellow mealworm is safe for human consumption under the levels and uses proposed by the applicant.

More recently, on 2 July, on 17 August and on 25 August, EFSA published a scientific opinion on frozen and dried migratory locust, frozen and dried house cricket, frozen and dried lesser mealworm, and frozen and dried buffalo worm, respectively, as novel foods. In each of these opinions, EFSA concluded – similarly to the opinion on dried yellow mealworm – that also these insect food products are safe for consumption under the proposed uses and use levels. These three opinions result from applications submitted by the Dutch company Fair Insects B.V. (a Protix company). The European Commission is currently drafting Implementing Regulations aiming at authorising these two products for commercialisation within the EU. The adoption by EU Member States could potentially take place before the end of the year 2021 or early 2022 respectively.

3. Why does the Implementing Regulation on 'dried yellow mealworm' cover this insect food product only? Are there other applications for insects as novel food which have been submitted to the European Commission since the new novel foods legislation entered into force?

Insect food products are assessed and then - potentially - authorised based on individual applications submitted by insect producers (e.g. in the above-mentioned case, the application leading to the Implementing Regulation was submitted by the company SAS EAP Group Agronutris and covers 'whole, dried yellow mealworm' (Tenebrio molitor) intended to be consumed as whole insects or in form of a powder to be incorporated into different food products).

So far, the European Commission has received more than 20 novel food applications for insect food products. Several species are covered, including Acheta domesticus (house cricket), Alphitobius diaperinus (lesser mealworm), Gryllodes sigillatus (banded cricket), Hermetia illucens (black soldier fly), Locusta migratoria (migratory locust), Tenebrio molitor (yellow mealworm) and Apis mellifera male pupae (honey bee drone brood).

At the time of writing (mid August 2021), the status of the different applications submitted is as follows:
- One application – covering dried yellow mealworm – has led to an authorisation of the latter (as mentioned above. It was submitted by the company SAS EAP Group Agronutris).
- Three applications - one covering migratory locust (locusta migratoria), one covering house crickets (acheta domesticus), and one covering frozen and dried formulations from whole mealworm - have led to EFSA opinions in which the Parma-based authority concluded respectively that these insect food products are safe for human consumption under the proposed uses and use levels. The applications were submitted by the Dutch company Fair Insects B.V. (a Protix company).
- Seven applications are currently assessed by EFSA.
- The other applications are in the validity phase (or 'validity check' phase), meaning it is checked that the application is considered as complete and therefore ready to be assessed by EFSA. EFSA is responsible for reviewing the applications in that regard. In case the application is considered incomplete, if needed, EFSA will contact the applicant and request the necessary (scientific) information. The applicant must provide the requested document(s) / information in a timely manner, otherwise, the European Commission services may terminate the application in question (for details on the consequences of such a decision, please refer to question 11).

4. Who are the actors that have submitted such applications? Has IPIFF submitted an application?

The actors who have submitted these applications are mostly insect primary producers/insect breeders (usually micro-, medium sized or small enterprises) who sell insects as 'ingredient' to a subsequent processor (operators involved in the preparation of insect-based ingredients or end-consumer products) and/or directly to consumers through an intermediary or distributor. The definition of 'placing on the market' in the 'General Food Law' (i.e. Regulation (EC) 178/2002), provides 'indications' on which actor is the most likely to submit an application for authorisation. Indeed, the operator that places a novel food on the EU market (i.e. the first actor in the supply chain). Consequently, the main responsibility of submitting applications will generally lie on the insect primary producers (breeders), as they determine the composition / intrinsic characteristics of the product that forms the subject matter of the application.

However, three applications were submitted by a national association of insect producers (i.e. the Belgian Insect Industry Federation) and one by the Finnish Beekeepers' association.

IPIFF has not filed any novel food application itself. IPIFF seeks, however, to support all 'interested applicants' by providing guidance on the EU novel food legislation, iterative an knowledge - the assessment of such insect food information on history of consumption of insects in Europe) and legal and administrative support in the preparation of their applications.

5. How much does it cost to submit an application and how complex is the process to obtain an authorisation?

There are no direct costs linked to the submission of a novel food application to the European Commission (EC). A novel food application for authorisation is submitted through a dedicated e-submission portal to the EC and shall consist of:

A. cover letter;

B. a technical dossier (for more information on the content of the technical dossier, you may consult the IPIFF Briefing Paper on Novel Foods, chapter 4.3);

C. a summary of the dossier.

After the receipt of the application, the procedural steps to be followed by the EC, the EU Member States and EFSA are laid down in Chapter III of Regulation (EU) 2015/2283.

6. If dried yellow mealworm is the first edible insect species authorised for the entire EU market, why are we still able to find food products based on other insect species in certain EU Member States (MS)?

Several MS have tolerated the commercialisation of these products on their national market, provided that they comply with general food safety standards. Other EU Member States have accepted their commercialisation under more restrictive conditions, while a few others denied it. The different national approaches are the result of uneven implementations of the 'transitional measure' laid down in article 35.2 of the new EU novel foods legislation (for further information, please refer to the IPIFF Contribution Paper on the application of the novel food transitional measure, 10 December 2020).

The transitional measure was introduced in the Regulation (EU) 2015/2283 to allow food business operators (excluding notably insect producers) who had lawfully placed their products on their respective national market before 1 January 2018 to continue to do so, until a final decision on the novel foods application(s) is taken. This measure aims at giving food business operators more time to adapt to the new regulatory landscape (for more details, see answer to question 7 below).

To benefit from the transitional measure, the following criteria must be met:

- the product was lawfully placed on the market by 1 January 2018;
- an application (data protected/non-data protected) for the food product was submitted by 1 January 2019.

If these criteria are met, the commercialisation of the respective product on the territory of this EU Member State may continue until a final decision on the EU authorisation of this product is taken (for further information on the transitional measure and its implications, please refer to the IPIFF Briefing paper on the commercialisation of edible insects, Chapter 4.8).

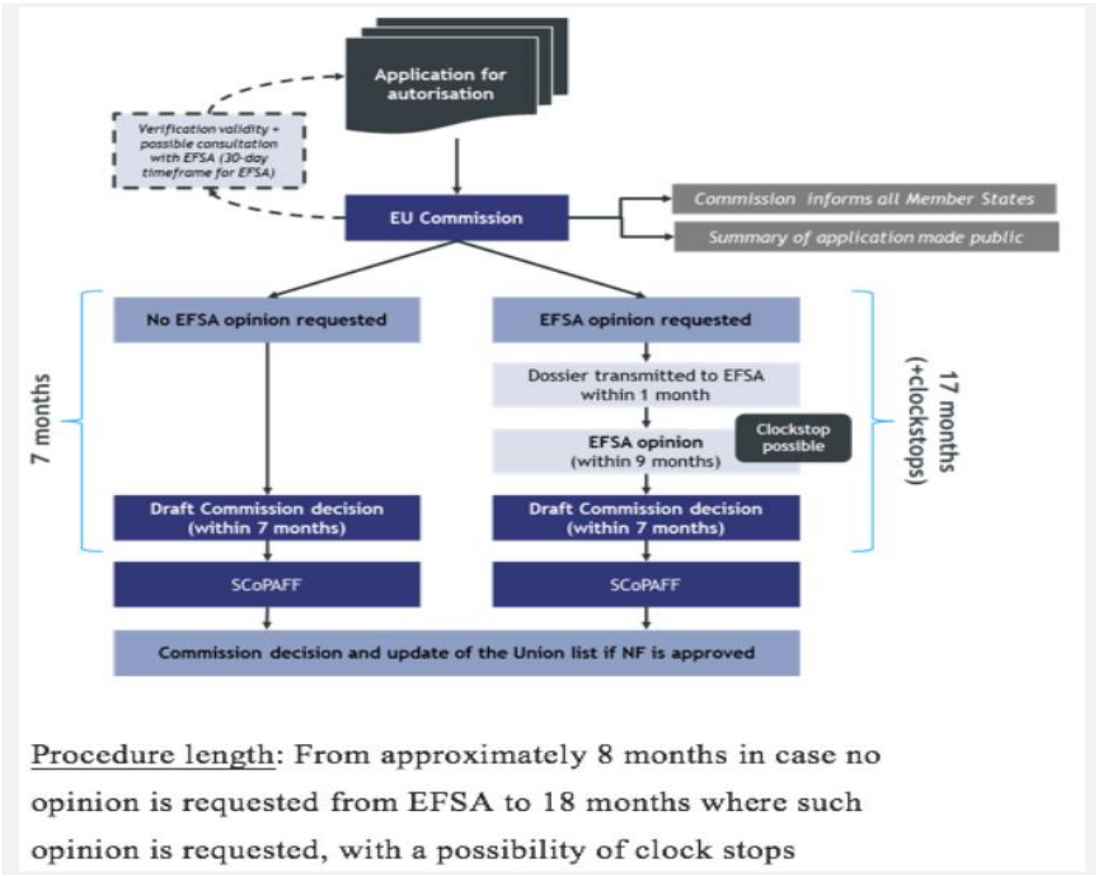
The approach of the Member States on the implementation of the 'EU novel food transitional measure for whole insects and their preparations'



- EU countries in which national authorities have agreed to grant the novel food transitional measure to whole insects and/or their derived products;
- EU countries in which national authorities do apply the novel food transitional measure, but have imposed specific conditions (e.g. the transitional measure only applies to whole insects and not to powder derived from it, the implementation of the transitional measure is limited to certain administrative regions);
- EU countries in which national authorities took the position to deny the implementation of the transitional measure (or applied it restrictively) and whose position may possibly evolve, following the Court of Justice of the European Union ruling (see question 8 for further details);
- EU Member States whose position is unknown to the authors at the time of drafting this document;
- Non-EU countries from which insects as food may not be placed on the EU market;
- Insect food products originating from these non-EU Member States may be placed on the market of those EU Member States which apply the transitional measure under national legislation. Once a novel food authorisation has been granted for a specific product, it can be exported to the EU.

The International Platform of Insects for Food and Feed (IPIFF) is a non-profit organisation which represents the interests of the insect production sector towards EU policymakers, European stakeholders and citizens. Composed of 75 members, most of which are European insect producing companies, IPIFF promotes the use of insects and insect-derived products as top-tier source of nutrients for human consumption and animal feed.

## Standard authorisation procedure




Procedure length: From approximately 8 months in case no opinion is requested from EFSA to 18 months where such opinion is requested, with a possibility of clock stops

*Source: Novel food briefing paper – IPIFF (May 2018 – updated in 2021)*

# Insects as food: recent regulatory developments and achievements

- **20+ 'novel food' (NF) applications** transmitted for evaluation to the European Food Safety Agency;

- CJEU ruling on the 1st of October – **'whole edible insects'** are **not novel** under Reg. 258/97;

**First EFSA opinions** on dried yellow mealworm (13 January 2021), *Locusta migratoria* **(**2 July 2021**);** Acheta domesticus (17 August 2021) and *Tenebrio molitor* (25 August 2021)**.**

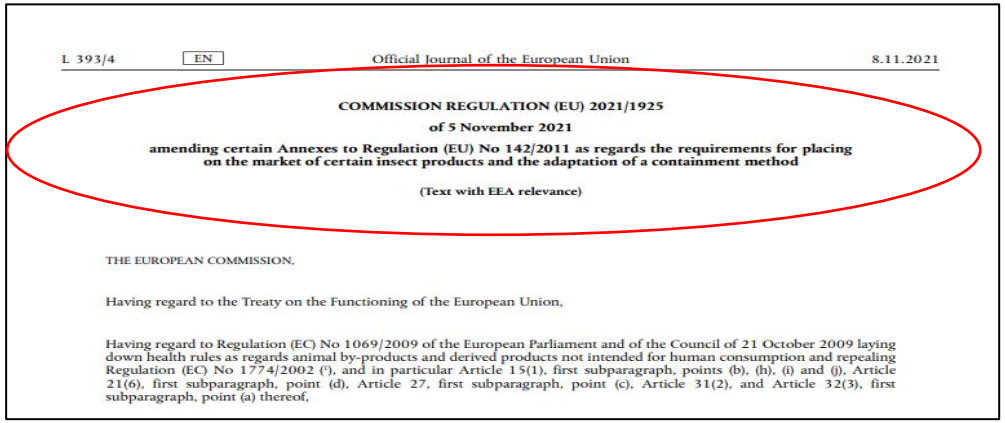
- These 4 products have been are authorised for commercialisation on the EU market.

# Establishment of EU baseline standards for processed insect frass

- Regulation 2021/1925 setting **EU standards for insect frass** (i.e. heat treatment of 70 ° C for at least 60 minutes, setting of microbiological standards) entered into force on 28 November 2021.

- The EU legislator also introduced **a definition for** '**frass**': *mixture of excrements derived from farmed insects, the feeding substrate, parts of farmed insects, dead eggs and with a content of dead farmed insects of not more than 5% in volume and not more than 3% in weight.*'

- BONUS: authorisation of ***Bombyx mori*** **PAPs** in feed for food producing animals (e.g. aquaculture + poultry and pigs).



L 393/4 EN Official Journal of the European Union 8.11.2021

**COMMISSION REGULATION (EU) 2021/1925**

**of 5 November 2021**

**amending certain Annexes to Regulation (EU) No 142/2011 as regards the requirements for placing on the market of certain insect products and the adaptation of a containment method**

**(Text with EEA relevance)**

THE EUROPEAN COMMISSION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Regulation (EC) No 1069/2009 of the European Parliament and of the Council of 21 October 2009 laying down health rules as regards animal by-products and derived products not intended for human consumption and repealing Regulation (EC) No 1774/2002 (1), and in particular Article 15(1), first subparagraph, points (b), (h), (i) and (j), Article 21(6), first subparagraph, point (d), Article 27, first subparagraph, point (c), Article 31(2), and Article 32(3), first subparagraph, point (a) thereof,

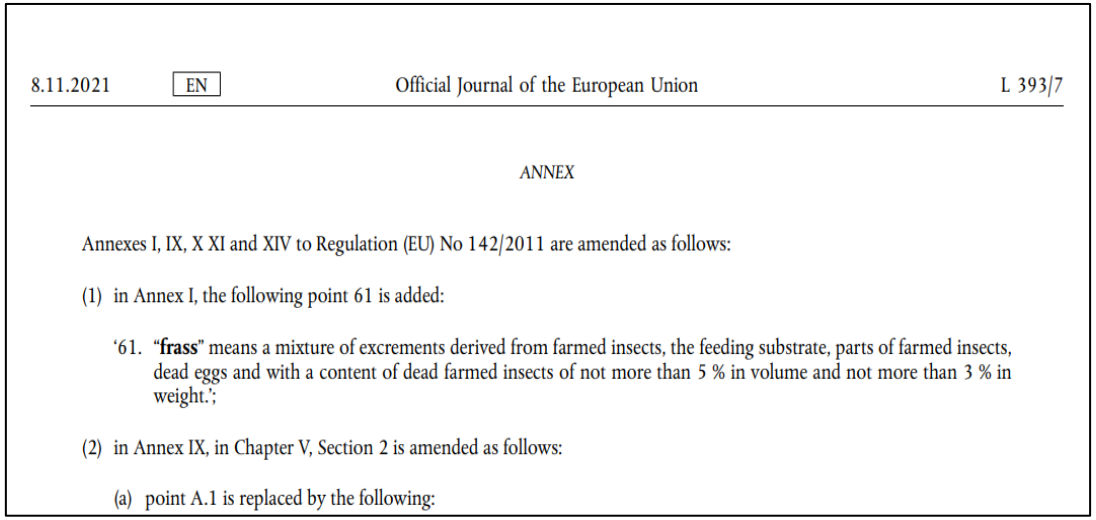
# IPIFF views on the recent reform

- IPIFF **welcomes the adoption of (EU) Regulation 2021/1925** creating a baseline standards for **insect frass**

- The setting of **baseline heating processing standards** would contribute to **establishing a level playing** field amongst insect producers across Europe.

- Processed frass, complying with horizontal rules are **eligible for organic production.**

- In the longer run, we consider necessary to **develop tailor-made requirements** (i.e. 'end point' under the ABP legislation).



8.11.2021 EN Official Journal of the European Union L 393/7

*ANNEX*

Annexes I, IX, X XI and XIV to Regulation (EU) No 142/2011 are amended as follows:

(1) in Annex I, the following point 61 is added:

'61. "**frass**" means a mixture of excrements derived from farmed insects, the feeding substrate, parts of farmed insects, dead eggs and with a content of dead farmed insects of not more than 5 % in volume and not more than 3 % in weight.';

(2) in Annex IX, in Chapter V, Section 2 is amended as follows:

(a) point A.1 is replaced by the following:

# IPIFF Milestones

## 2012 - 2015

Jan 2012
FAO expert group explores the potential of Insects as food and feed and recommends to set up an international insect protein industry association

13 April 2015
IPIFF is formally created as EU umbrella organisation for insect producers

8 October 2015 EFSA risk profile opinion on insects as food and feed

## 2016 - 2019

13 December 2016
EU Member states approve the EC proposal to **authorise insect proteins in aqua feed** (effective since 1st July 2017)

January 2018
The **1st novel food applications** covering insects for food have been submitted to the EC

22 February 2019
Submission to the European Commission of the **IPIFF Guide on Good Hygiene Practices**

## 2020 - 2021

20 May 2020

Publication of **the 'EU Farm to Fork strategy'**

Achievements:
- 1st EU **'Novel food' authorisations**;

- Authorisation of insect PAPs in **poultry and swine feed**;

Setting EU harmonised standards for **insect frass.**

## 2022

Today
**80 Members**
From 23 countries worldwide and 14 EU Member States

Policy objectives:
-Support the authorisation of **new feeding substrates** for farmed insects;

-Development of EU regulatory standards for **'organic insect production'**;

-Monitoring EU policy initiatives under **'Farm to Fork strategy** the EU '

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# II. Contributing to the F2F objectives – What is coming next

# Supporting the EU 'Farm to Fork' Strategy

- …'fostering EU-grown plant proteins as well as alternative ***feed materials such as insects'*** …;


- … '*A* ***key area of research*** will relate to (…) increasing the availability and source of alternative proteins such as plant, microbial, marine and ***insect-based proteins.'…;***

# Supporting the EU 'Farm to Fork' Strategy

→ In our view, insect farming may contribute to several F2F objectives, such as:

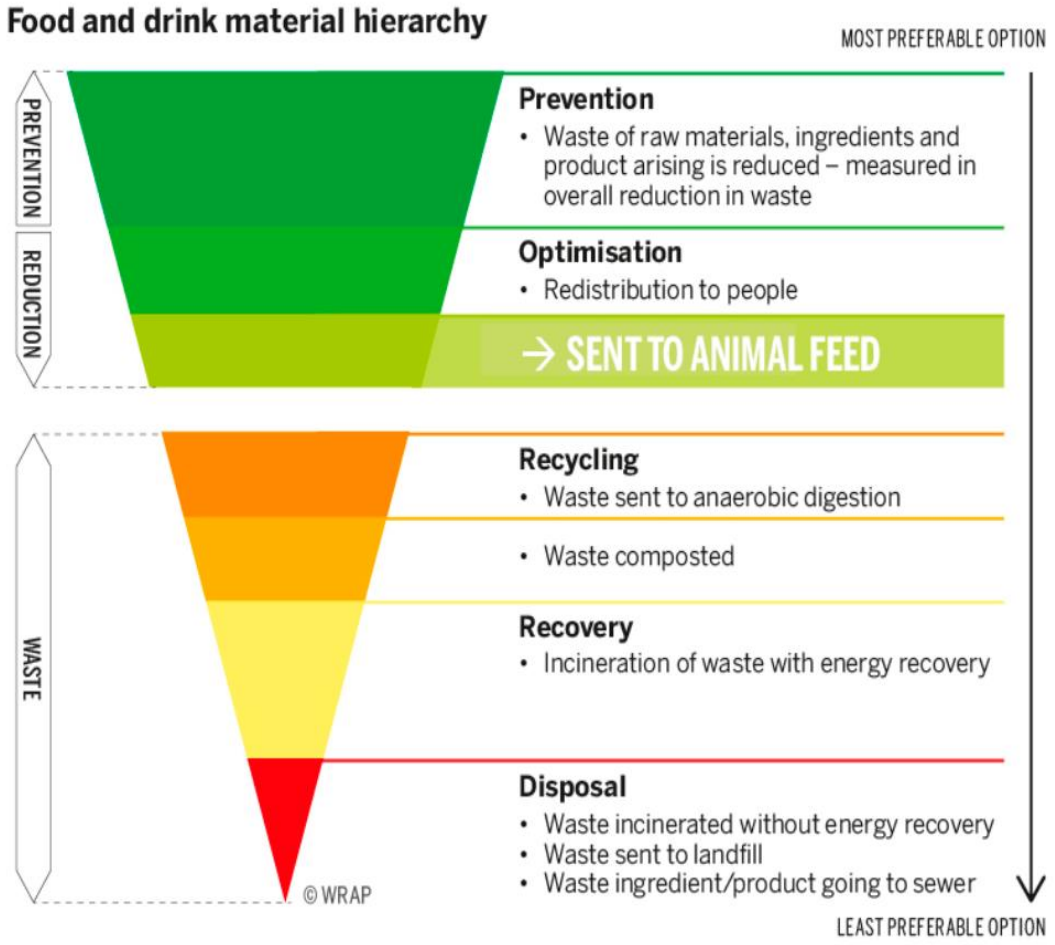
- Strengthening local food and feed self-sufficiency (locally produced protein-rich food and feed ingredients);
- *'halving per capita food waste at retail and consumer levels by 2030 (SDG Target 12.3)'*;
- achieving *'at least 25% of the EU's agricultural land under organic farming by 2030 and a significant increase in organic aquaculture'*;
- improving animal health and welfare.

# EU opportunities for authorising 'new feeding substrates'

- Diversifying the spectrum of authorised substrates used in insect farming is considered as key to **reducing the footprint** of insect farming activities while representing a promising opportunity for **tackling the problem of food waste.**

- **About 30% of the food waste** (e.g. former foodstuffs, catering waste) generated in the EU could be suitable for insect farming activities.

- '*IPIFF wishes to explore the possibilities for authorising* ***former foodstuffs containing meat and fish*** *and* ***catering waste*** *as insect feeding substrate* **(IPIFF Regulatory Brochure, May 2020).**




https://www.effpa.eu/reducing-food-waste/

# Insects for organic production

- The authorisation of insects in organically certified compound feed is directly influenced by the EU **'horizontal legislation'** (e.g. the recently lifted feed ban).
- Currently, there is a derogation **for organic poultry or swine juveniles (under 12 months)** – which may be fed with up to 5% non-organically certified feed.
- IPIFF supports and will contribute to the forthcoming EU discussions on setting **EU regulatory standards for insect organic production** (discussions to start as from Q2 of 2022).

International Platform of Insects for Food & Feed (IPIFF)

59 avenue Adolphe Lacomblé, B.8

16 July 2021

**IPIFF Contribution Paper**
**'The European insect sector's response to the growing demand for EU organic products'**

**Context & general remarks**

1. Introduction: EU policy context

With the publication of the **'Farm to Fork Strategy'**[1] and **the 'Action Plan for the Development of the Organic Sector'** *(later referred as 'Organic Action Plan')*[2], the European Commission has tabled in the past year two ambitious framework policies which aim at promoting the organic sector. IPIFF welcomes many of the forward-looking initiatives included in there. In our view, the objectives included in these framework policies such as the goal of at least 25% of total farmland being used for organic farming by 2030 would also play an important role in the development of the European insect sector - which in turn, could help in the transition towards more sustainable and resilient food systems.

2. The European insect sector's contribution to growing needs from European farmers and consumers

Many producers in Europe are tapping into the organic market(s), responding to growing demands - from European farmers, pet food producers and consumers - for organically produced food and feed. Furthermore, organic production constitutes a valuable outlet for insect producers to secure significant price premium for their products.

This is notably true in the food segment as demand **for organic insect (food) products is indeed gaining traction in several EU Member States**, especially in the wake of the EU novel food authorisations.

According to the European farmers and Agri-cooperatives' organisation (Copa-Cogeca) *"there is (also) a*

# EU regulatory standards for insect frass: next steps

International Platform of Insects for Food & Feed (IPIFF)

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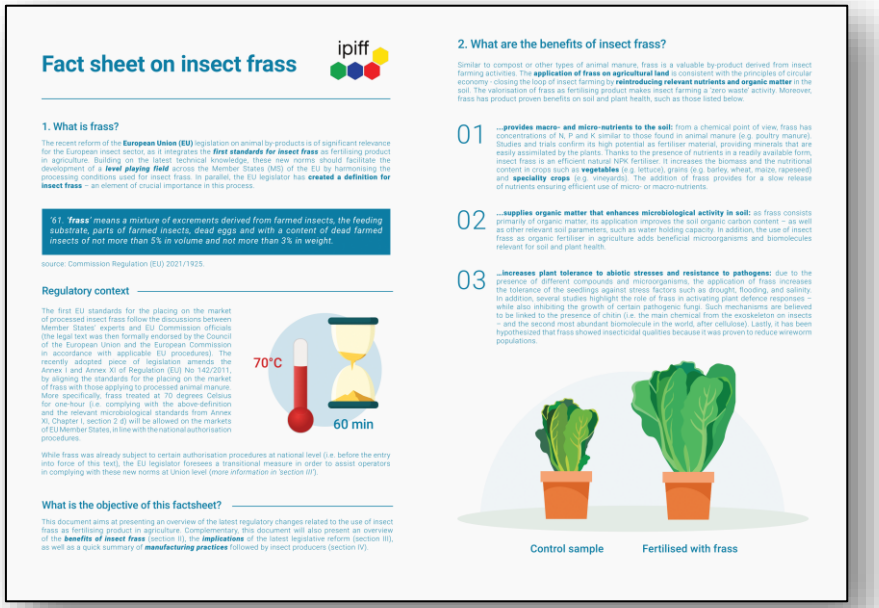
strategic importance of the European insect sector: such regulatory step would indeed serve to recognise a Component Material Category (CMC) for insect frass as part of the EU Fertilisers Regulation[5], thereby allowing its marketing as fertilising product across the European Union, in line with the general objectives of this legislation.

Based on the current EU regulatory standards[6] combined with the conclusions from the aforementioned EFSA's opinion, we do consider that the temperature requirements of 70 ° C for 60 minutes constitute an appropriate benchmark for establishing this 'end- point' for the commercialisation of processed insect frass as organic fertiliser and/or soil improver.

➔ We were therefore wondering whether you would consider taking the above parameters as 'legal basis' for the European Commission to determine an 'end-point in the manufacturing chain for insect frass'.

**Activity 1: establish tailored standards under the EU animal by-products' legislation**

**Activity 2: creation of a legal basis under the EU fertilisers' legislation**




Knowledge platform on '**insect frass**'

Dialogue with EU policy makers as regards the setting of tailored standards

# Feeding of whole treated insects to farmed animals: IPIFF proposals

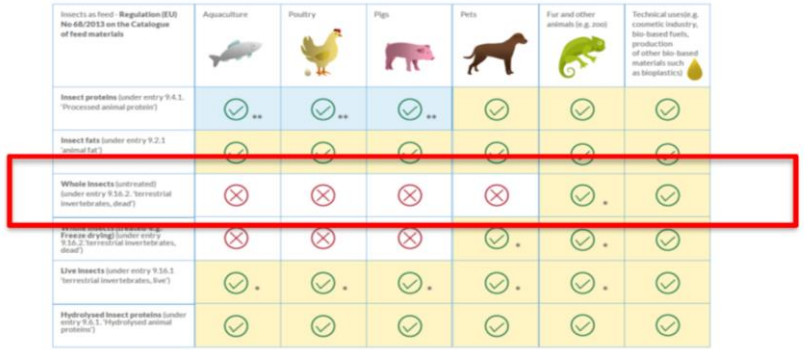
**IPIFF position paper on the use of insect larvae as feed for food producing animals**

**Contextual elements**

1. General background

Insect production generates different outputs which may be used in animal feed, ranging from insect **larvae**, either alive or 'treated' (e.g. dehydrated, freeze dried), to insect **meal** (defatted or un-defatted) or **oil**.

**Dead** (and treated) **insect larvae present numerous advantages** when used as feed for livestock production (e.g. feed complement) and/or for enticing properties (e.g. used as environmental enrichment in poultry husbandry for its similarity to invertebrates eaten naturally by such animals). These products have indeed proven to entail beneficial effects on the health and welfare of farmed animals, which contributed to the **rapid emergence of this market outlet** in several EU countries.




*Legend: Overview of EU regulatory possibilities for feeding whole insect larvae to farmed and non-farmed animals.*
*IPIFF Guide on Good Hygiene Practices - (updated version September 2021) (p 73)*

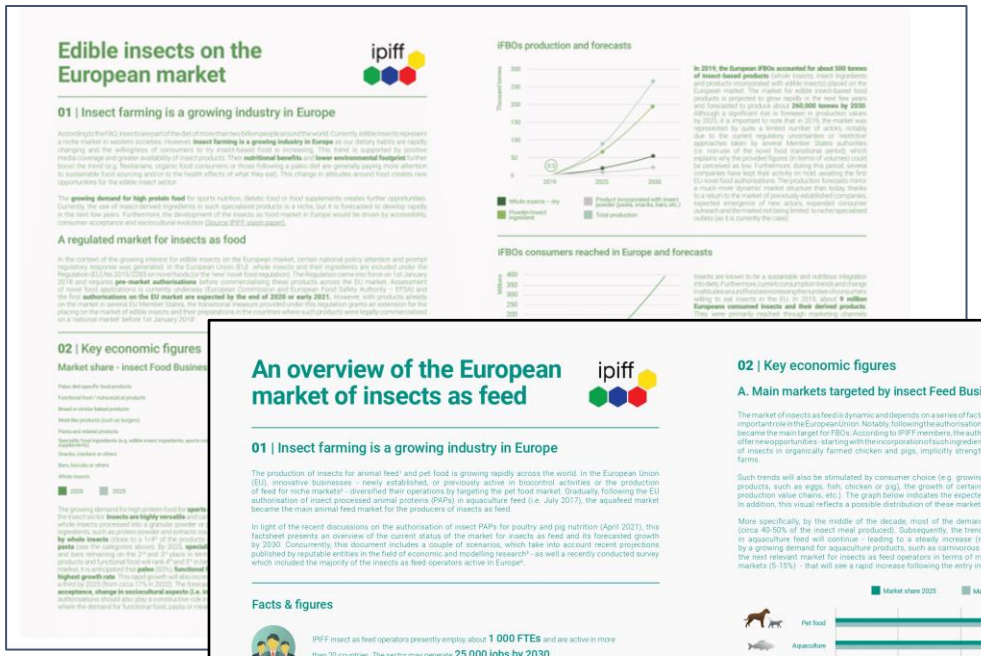
IPIFF pleads for the **establishment of EU tailored rules** - the framework of the EU ABP legislation – in order to regulate the use of these products (i.e. alignment with rules applying to insect PAPs intended as feed for farmed animals).

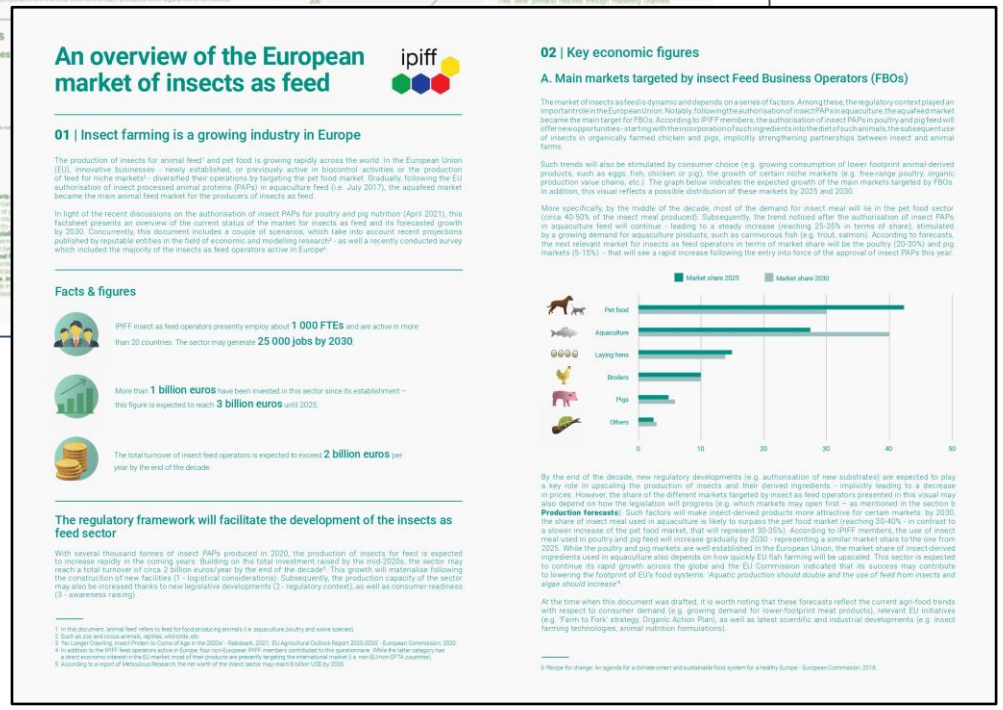
main parameters of such method would be based on criteria foreseen for the **existing method 7.**

The list of **insect species** which might be used as feed for farmed animals will be **aligned with the ones** which are currently allowed for use as **PAPs for farmed animals**.

# Main IPIFF publications






Regulatory Brochure, Guide on Good Hygiene Practices, Market factsheets and others –
**available on our website -www.ipiff.org**

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Thank you for your attention!

## CONTACT US

IPIFF's Secretariat,

Avenue Adolphe Lacomblé 59,

BTE 8 B-1030, Brussels, Belgium

+32 (0)2 743 29 97

info@ipiff.org

@IPIFF_org

IPIFF (International Platform of Insects for Food and Feed)

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