

IPIFF Contribution Paper on EU organic certification of insect production activities

Context & general remarks

Many producers in Europe are tapping into the organic market(s), responding to growing demands - from European farmers, pet food producers or consumers - for organically produced food and feed. Furthermore, organic production constitutes a valuable outlet for insect producers to secure significant price premium (price premium estimated at 50% and more) for their products.

Partnerships between insect producers and organic producers - through commercial relationships or research project collaboration - are flourishing in Europe, and we forecast these to further develop in the future, especially when insect proteins are being authorised as food¹ and feed for farmed livestock animals in the European Union (EU)².

While insect production is already eligible to organic certification in certain non-EU countries (e.g. USA, Canada or Switzerland), **EU insect producers are not eligible to (public) organic certification**, due to the absence of EU organic standards for their products. However, the European Commission (EC) envisions to remedy this situation by developing specific rules for insect organic production destined to human consumption and/or for animal feed. To this end, the EC services recently published a draft document - i.e. draft delegated act - in the wake of the new EU legislative framework for organic production (i.e. Regulation 2018/848).

IPIFF, which represents the interests of the European insect production sector, **warmly welcomes this initiative**. Generally speaking, we also consider that the **draft provisions contained in the draft delegated act** (see article 2) constitute a **solid basis**.

- First and foremost, **we are satisfied** that the European Commission finally decided to **extend the scope of the proposal to insects as food**. Pending the 'first novel food authorisations', consumers' demand for organic insect food is indeed gaining traction in many EU Member States. On the other hand, insect food producers follow similar practices as to their counterparts from the feed segment³.
- We also observe that the Legislator has adjusted several of the requirements suggested in the previous text, so as to bring **those in line with insect animals specificities** (e.g. specific biological/physiological needs and behaviour patterns) and/or with **insect production practices realities** (e.g. the text specifies that 'dark phases and light supply shall be provided for all insects species' and introduces a derogation from the general principle that animals need access to open areas or pasture).

¹ Several applications for insects as food are currently being assessed by the European Food Safety Authority in view of their authorisation on the EU market - in the framework of Regulation 2015/2283 on novel foods. IPIFF forecasts that these processes - i.e. the first applications to be authorised - should be completed by the end of the year or early next year.

² E.g. Insects represent a very promising alternative for organic poultry producers to complement the animal diet with non-organic materials.

³ Furthermore, European producers are disadvantaged compared with their North American counterparts who benefit from organic certification in the EU, as a result of recognition agreement signed by the EU Legislator with the US and Canadian authorities.

- Yet, this draft **text can be improved**, considering that **several of the proposed standards cannot be realistically implemented** by producers (e.g. provisions regarding stocking density, prevention cannibalism) or do contradict certain obligations imposed to them through other pieces of EU legislation (e.g. obligations in the areas of food and feed safety or biosecurity).
- Finally, we also fear that by requiring insect producers to **source 100% of their substrates/feed on the organic market**, the legislator will largely **hinder the possibility for actors producing insects as feed** to uptake these new organic rules. We would therefore like to propose some adaptations to the draft text so as to overcome this challenge.

The present document outlines in more depth our views and proposals to **define solid and reliable standards for insect organic production**.

'EU organic standards for insect production must be compatible with market realities': IPIFF proposals to foster the uptake of the EU organic legislation

A large part of insect farmers in Europe do stick to the same management principles as of organic livestock producers, including notably through adherence to best environmental practices (e.g. feeding of insects with chemically free and non-GM materials) and/or commitments not to use veterinary drugs and/or chemical substances at production and processing stage. We do therefore consider **appropriate that several of the organic rules which concern 'mainstream' livestock do also apply to European insect producers** (as suggested the European Commission in this draft proposal).

At the same time, the EU legislator should foresee a set of **derogations** and/adaptations to **those general requirements**, notably to ensure that the standards are compatible with insect **production market realities** : notably, insects offer a unique opportunity to re-use agri-food co-products which would have otherwise been discarded (e.g. valorisation of co-products from cereal, starch or breweries, or use of unsold products from supermarkets and local food producers or bakers) into high quality proteins, therefore not generating additional pressure on natural resources, in line with the general principles of the EU organic legislation⁴ and Circular Economy Strategy. However, the **above streams do not generate feed materials that can be organically certified in sufficient quantities and/or at affordable prices**, making it very challenging for insect producers to restrict their sourcing to such products: e.g. today, operators producing insect proteins for use as feed are not technically in capacity to incorporate up to 100% of organically certified materials in the feed ratio of their cheptel.

We therefore fear that the above requirement will hamper, to a large extent, insects producers' capacity to uptake the EU organic rules, therefore hindering the 'circularity' potential (e.g. recycling of by-products) of the sector.

Certain adaptations have been created for aquaculture animals in the framework of the organic legislation (notably for carnivorous fish) to ensure that their feeding regimes can combine environmental and nutritional benefits (e.g. composition of the product tailored to the nutritional needs of the animal). One suggests to apply similar rules to insect production so as to allow the re-use of agri-food co-products with low environmental footprint - i.e. an unavoidable side-stream in the food production in feed - therefore unleashing the potential of the insect sector and its contribution to the environmental objectives foreseen under the EU organic legislation.

At the same time, IPIFF is conducting further investigations to evaluate the feasibility of defining 'minimum'/ 'technically achievable' thresholds for the presence of organically certified materials in insects' feed formula. Notably, the above assessment should take into account 'specific market situations' as well as differences between food and feed production segments.

⁴ See notably article 5 of Regulation (EU) 2018/848) which advocates for the responsible use of natural resources.

More precisely, we suggest to introduce the following changes in the draft text

- The section 1.9.7.1 ‘Nutrition’ should include as general principle that the feed used as input for insects is **adapted to the nutritional requirements** and health of the animal (owing to the nutritional quality of the product) whilst **‘generating reduced environmental footprint’** (by reusing co-products that cannot be used for food or have been discarded from the food chain for technical reasons - e.g. former foodstuffs from local processors or unsold products from local retailers).
- In the same section, the Legislator should specify that *‘feed used in insect production shall be sourced in priority from organic materials. Where insect producers are unable to obtain feed exclusively from organic production, those materials should have been produced in accordance with ‘sustainable’ agricultural and/or agri-food practices.*
- Finally, the text should allow, under specific conditions to be defined, the **coexistence between organic insect and conventional insect production lines** in the same production unit.

‘Organic insect producers must follow stringent but tailored production standards’: IPIFF recommendations for adapting the EU organic livestock rules to insect production realities:

Organic certification should be **reserved to producers applying very stringent standards**, both at **breeding** (e.g. prohibition of using veterinary drugs, GM or genome editing techniques) and **processing stage** (e.g. non-use of chemically harmful substances). On the other hand, these standards should be adapted to the particular biological needs of invertebrate animals, while remaining consistent with what is ‘technically achievable’ at insect farming level.

Therefore, we have herewith formulated a series of recommendations to adjust those ‘general’ rules to the specificities of insect production.

❖ Regarding the proposed rules on ‘own farmed’ or ‘locally sourced feed materials’ - point 1.9.7.1 on ‘Nutrition’

We agree that insect producers should be encouraged to give preference to locally produced materials, as a means to limit the environmental impact of their production. We do **however consider unrealistic to require a minimum % of the feed to be sourced from the agricultural holding from which the insect animals are kept** (see as suggested in the draft proposal). The vast majority of insect producing companies are indeed exclusively dedicated to insect production activities, consistently with EU food and feed safety requirements (e.g. Regulation (EC) No 142/2011 and Regulation (EC) No 999/2001)⁵.

❖ Regarding the proposed rules covering insect husbandry practices - point 1.9.7.1 ‘Nutrition’

- Cannibalism is for some species’ natural instincts. One must therefore acknowledge that those behaviours cannot be completely prevented in insect farming, while these contradict animal welfare paradigms. We therefore suggest to **delete the reference to the ‘prevention of cannibalism’**.
- Besides, the setting of **maximum population density levels** (as foreseen under the general livestock rules - annex II part II point 1.6.3) is irrelevant in the case of farmed insects: many

⁵ Those texts require that the processing of insects’ proteins intended for animal feed (incl. the killing to processing) take place in establishments exclusively dedicated to insect production activities.

species indeed thrive when bred densely populated. We therefore plead for applying a **derogation from the 'general' livestock requirement which concerns stocking density.**

- However, we agree that insect producers should not use materials that could cause injuries to insects: we therefore **concur with the proposed prohibition to use of materials made of recycled paper or board or eggs carton**, if evidence is **provided that those materials may entail adverse effects on insects** (i.e. presence of harmful contaminants).

❖ On proposed breeding practices - point 1.3.4.4.4.6)

Following in-depth investigations conducted among our Members, we conclude that the proposed limitations of 0,5% for stock renewal of non-organic breeding (per calendar year) will be challenging to implement for operators. As alternative, we propose a **threshold of 5%**.

As IPIFF, we are committed to promoting good welfare practices in insect husbandry, transport and at the point of death. Along that line, we have recently developed a **reflection paper which aims to promote animal welfare standards for insect producers in Europe** (i.e. the document is available through the following [link](#)). We believe that several of the principles included in this document would constitute a solid basis to enrich the 'animal welfare' section in the draft text.

❖ Proposed recommendations on rules for animal welfare and killing methods (point 1.9.7.3)

- Owing to animal welfare considerations, the used killing method should ensure **the rapid death** of the animal: in that sense, IPIFF does **not** recommend any specific technique but **refers to the three currently accepted techniques** (e.g. killing by freezing, applying hot temperatures or mincing) since these ensure a quick death and reduce potential pain risk. The reference to these three techniques should therefore be included in the text: notably, **mincing should be added.**
- We believe that **Brambell's 5 degrees of freedom**⁶ (i.e. freedom from hunger and thirst, freedom from discomfort, freedom from pain, injury or disease, freedom to express normal behaviour and freedom from fear and distress) **constitute a good basis for the establishment of good welfare practices in insect production** in general. In our [refection paper on animal welfare](#), we have included a set of proposals for adapting those principles in the context of insect animal production.

The International Platform of Insects for Food and Feed (IPIFF) is a non-profit organization which represents the interests of the insect production sector towards EU policy makers, European stakeholders and citizens. Composed of more than 50 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.

⁶ Report of the Technical Committee to Enquire into the Welfare of Animals kept under Intensive Livestock Husbandry Systems, the Brambell Report, December 1965 (HMSO London, ISBN 0 10 850286 4).