

Question & Answers on the Draft EU Guide on Good Hygiene Practices for producers of insects as food & feed

Do you want to know more about the Draft European Union (EU) Guide on Good Hygiene Practices? Why did IPIFF develop such a document and what does it contain? Is this a legally binding document for insect producers? Will this document be reviewed in the future?

Please, look into the answers given below.

1. Why did IPIFF develop such a Guide?

The Guide aims to support the effective implementation of EU food and feed safety legislation by producers active in the production of insects for food and/or feed. In turn, this will also help the insect producers to achieve a high level of consumer protection and animal health. The guide is developed in accordance with objectives of the EU hygiene regulatory framework¹, keeping in mind that the Guide does not aim to substitute nor replace these as well as national regulatory provisions.

2. Who is the author of this Guide?

This document has been drafted by an IPIFF internal working group of experts, called 'IPIFF Task Force on Good Hygiene Practices' which represents companies active in the production of insects as food or as feed². Based on input coming from producers, this document also **reflects standards being followed by European insect producers**. The draft has been officially adopted by the IPIFF General Assembly on 21 February 2019.

As the EU umbrella organisation for insect producers as food or feed - i.e. the association is composed of 50 members, with a majority of 43 companies from 15 different EU countries. The 'International Platform of Insects for Food and Feed' (IPIFF)³ took the initiative to develop such a document in November 2016.

3. What does the Guide contain?

It contains **general recommendations** for operators to implement good practices in the area of food and feed safety, in accordance with applicable EU regulatory standards. To this end, it also comprises extensive references to the respective EU pieces of legislation.

It covers both **food and feed** production activities, and **all production steps** (e.g. breeding, feedstock control, killing, processing stages, etc).

¹ The EU Legislator encourages the development of EU Guides on Good Hygiene Practices pursuant to article 9(3) of Regulation (EC) 853/2004 and article 22(4) of Regulation (EC) 1831/2003.

² Companies' names that have been active in the development of the Guide are listed in annex VI of the Guide.

³ IPIFF can be considered as representative body of the European insect sector, in accordance with EU legislation (for more details, see *following footnote and Guidelines for the development of Community Guides for more information*).

4. Does the Guide cover subjects as animal health or welfare, environment or building standards?

No, the scope of the Guide is strictly limited to food and feed safety standards, in line with EU requirements for the development of such Guides (see point 6. below for more details). However, references to those other relevant topics mentioned in the title are sometimes provided in the Guide (e.g. biosecurity, etc)

IPIFF has also undertaken work on other associated topics and produced in depth reports on them:

- IPIFF has developed guidelines on the implementation of **the EU novel food legislation** for insect producers (the document is available through the following [link](#));
- On the subject of **animal welfare**, IPIFF has developed a set of recommendations, which are contained in the document titled '*Ensuring High Standards of Animal Welfare in Insect Production*' (available through the following [link](#)).

Furthermore, several of those subjects are being **regulated at a national level**: indeed, besides EU food and feed safety requirements, authorisation procedures (e.g. production plan permit, capacity certificate for producing insects, to prevent risks on flora & fauna in case of insects escape, or of pollution on the surrounding environment) are foreseen at national level (e.g. Food safety & Environment approval for insect producer plants in regard to outbreaks or emissions, certificate of competency for the rearing of non-domestic animals, etc) though, those requirements often derive from EU legislation, which sets general objectives. All those who would intend to build a production facility should comply with national obligations and contact their national contact authorities to receive information on applicable obligations and formalities⁴. For further information about these obligations and/or formalities and national contact points, you may contact the IPIFF Secretariat.

Furthermore, this document is **not** a '**manual of production**' for insect production: indeed, the document is not intended to describe all possible techniques or methods for producing insects, nor it presents production building structures or equipment's to be used in the framework of insect producing activities. For any information on the above, you may contact companies that are active in the breeding and/or processing of insects (e.g. IPIFF Members) or insect production equipment manufacturers.

5. To whom is this Guide intended for?

The document is mainly intended for **insect producers in a country of the European Union**. It may also serve as a reference for production activities taking place outside the EU⁵. The Guide also applies to subsequent activities (e.g. packaging, transport, retail) if they take place in the European Union, from the EU importer up to the final distribution stage.

Similar initiatives have emerged in non-EU countries: e.g. 'Good Agricultural Practices standard for Cricket production' developed by the Thai Agricultural Commodity. Furthermore, there are projects currently under development and finalized Guides⁶ at an EU national level.

6. Is the Guide legally binding for insect producers and what is its legal status?

The document is a **non-binding document**, drafted under the sole initiative of the IPIFF association (see point 2 above for more details): However, IPIFF has consulted EU representative organisations from the food and feed chain in the drafting of the Guide and has strived to reflect input from those associations into the document, whenever deemed appropriate.

Furthermore, the Guide **has not** yet been officially **recognized by the European Institutions**. But IPIFF has officially **transmitted the Guide to the European Commission services** in view of its assessment by the

⁴ See The Industrial Emissions Directive

(<http://ec.europa.eu/environment/industry/stationary/ied/legislation.htm>)

As well as a non-exhaustive list of IPPC-related

sites(<http://ec.europa.eu/environment/industry/stationary/links.htm>)

⁵ EU food and feed safety requirements do not apply in these countries

⁶ E.g. 'Code of Good Practices- Insect production, processing and use in animal feed' (Portugal)

Standing Committee on Plants, Animals, Food and Feed (SCoPAFF) in accordance with EU procedures⁷. The document should, therefore, be referred to as a ‘draft’⁸.

Finally, the Guide may not be directly certified, but serve as a point of reference for the development of certification schemes covering insect production.

7. Can insect producers claim and/or advertise the Guide in its normal operations?

Yes, all operators who decide to adhere this Guide may, for instance use it in the framework of **official controls** so as to demonstrate compliance with obligations foreseen under the EU food and feed safety legislation (e.g. use of checklists). Companies may claim adherence to this Guide in the context of **corporate communication activities**, but subject to control by their competent national authorities.

Adherence is made through self-declaration which means that IPIFF does not check that companies effectively comply with the provisions of this Guide nor it can be held responsible for any breach of requirements contained in the Guide.

8. Will this Guide be reviewed in the future?

The Guide will be reviewed as required to consider technological or scientific advances, as well as legislative developments on the topic of safe insect production. Any further changes to the Guide will be in consultation with stakeholders and subject to endorsement by the Standing Committee on Plants, Animals, Food and Feed.

Can't find the answer to your question? Please send us an email at info@ipiff.org.

⁷ For further information on the EU regulatory framework, see notably article 9(3) of Reg. 852/2004 and article 22(4) of Reg. 1831/2005 as previously mentioned

For more information about the EU legal framework, you may consult [Guidelines for the development of Community guides to good practice](#)

An overview Guides in the food sector is provided through the following [link](#).

- [EU Register of National Guides to Good Hygiene Practice](#)

An outline of EU Guidelines to implement feed hygiene legislation is available through the following [link](#)

- A [Register for National Guides to Good Hygiene Practice](#)

⁸ Upon endorsement of the SCoPAFF, the document will be published in the Official Journal of the European Union.