

IPIFF Contribution: Specific labelling criteria for edible insect food products in the European Union (EU)

Introduction

Edible insects are considered as ‘novel foods’ under EU Law, and therefore require pre-market authorisation under [Regulation \(EU\) 2015/2283](#)¹. Subsequently on authorisation, edible insect food products intended for final consumers are subject to all mandatory labelling specifications (e.g. name of the food, list of ingredients, quantity of certain ingredients, allergen labelling, origin labelling where applicable, etc) under the so called ‘Food Information to Consumers Regulation’ (FIC) - i.e. [Regulation \(EU\) No 1169/2011](#). Although currently (October 2020) no edible insects have been authorised as a novel food in the EU, an authorisation and, additional specific labelling requirements could be expected following their inclusion in the [Union list of Novel foods](#) (hereinafter ‘UL’). Edible insect products currently on the market within EU Member States (MS) applying the so called ‘novel food transitional measure² have put in place specific labelling criteria in addition to the ones foreseen in the FIC Regulation, such as allergen labelling³. Against this background, IPIFF published last year sector specific [labelling guidance document](#).

Labelling specifications for edible insect products

The inclusion of the authorised edible insect species in the UL will lay down the specifications entitled for the designated product (these include pathogen criteria, labelling, etc). However, among the products currently on certain MS markets, IPIFF identifies, two labelling particulars, that need to be addressed, namely the ‘Name of the food’ and ‘Allergen Labelling’. These subjects are being further addressed below.

1. The designation of the novel food on the labelling of the foodstuffs (the ‘name of the food’):

Background

Currently, insects in or as food do not have any ‘legal name’ nor are subject to the specific criteria under the FIC Regulation. These include mandatory food information to be provided to consumers on commercialisation of the product⁴. Indeed, insects and their products will be subject to the FIC regulation following a novel authorisation.

Considering the novelty of the product, as well as the lack of regulated terminology, operators currently do have the freedom to apply descriptive names⁵. However, the lack of harmonised use of terminology in regard to product characteristic, has led to diverse descriptions. The use of terms like ‘flour’ as misnomer terms for insects-based products as ‘cricket flour’ or ‘mealworm flour’, could be also seen as misleading the consumer. Certain national authorities (in MS applying the transitional measures) have confronted operators on the use of the word ‘flour’ vs ‘powder’⁶.

¹ For details see [IPIFF Briefing paper on the provisions relevant to the commercialization of insect-based products intended for human consumption in the EU](#). Pg. 8

² The transitional measures allow operators to continue placing their products that are currently being assessed in view of its authorisation on the EU market. For details, please refer to footnote 1.

³ E.g. Netherlands: [Nederlandse Voedsel- en Warenautoriteit; Eetbare insecten kweken en verkopen voor menselijke consumptie](#).

⁴ By contrast, detailed rules are in place already for insects used as feed -see notably the Catalogue of feed materials, in which insects are listed as ‘terrestrial invertebrates’ ‘animal fat or ‘processed animal protein’ and that requires to indicate the insect species, its life stage (e.g. larvae) or the process used. See Sections 9.2.1, 9.4.1 and 9.16.1 of Part C of Annex to Commission Regulation (EU) No 68/2013 of 16 January 2013 on the Catalogue of feed materials.

⁵ see definition of ‘descriptive name’ in Article 2 of the [FIC Regulation](#).

⁶ In a recent case IPIFF encountered two interactions of operators confronted by the competent national authorities in a MS applying the transitional measures on the use of the word ‘insect flour’ on the label and denying placing the product on the market.

IPIFF recommendation

IPIFF considers that the name of such products should be defined. This specifically would focus on defining the characteristic description of the edible insect-based product e.g. ‘*name of insect*’ powder, or ‘*name of insect*’ oil/extract, or when whole ‘*name of insect*’:

Product Characteristic	Proposed labelling designation in the UL	Example
Whole insects	‘common name of insect’ (Scientific name)	Mealworms (<i>Tenebrio molitor</i>)
Ground insects	‘common name of insect’ (Scientific name) powder	Mealworms (<i>Tenebrio molitor</i>) powder
Insect fat extracts	‘common name of insect’ (Scientific name) oil	Mealworms (<i>Tenebrio molitor</i>) oil

2. Allergen labelling

Background

Food Business Operators (FBOs) are required to label ingredients (substances) that may cause allergens or intolerances in the concerned food product. This obligation applies in relation to the list of substances in Annex II of the FIC Regulation. **Edible insects are currently not listed in this annex and may therefore not today be identified as allergens on the product**, these products contain allergenic properties though. These allergenic properties correspond to substances mentioned in Annex II of the FIC regulations, namely: crustaceans, molluscs. A distinction between three situations should be made, two of which are already contemplated under the FIC Regulation, the third one not.

Allergen labelling situations covered under FIC Regulation:

- **Situation 1:** allergies that may result from the **substrate ingested by the insects**. For example, if cereals containing gluten have been fed to the insects.
- **Situation 2:** allergies that may be caused by **other ingredients contained in insect-based products**. For example, if a product contains nuts or milk.

Allergen labelling situations not covered under FIC Regulation:

- **Situation 3:** allergies that may be caused by the insect itself. Neither insects nor insect-derived ingredients are listed in Annex II to the FIC Regulation.

IPIFF Recommendation

In our view the specifications on the UL should include mandatory allergen labelling on the following situation:

<u>Situation</u>	<u>Proposed allergen labelling criteria in the UL</u>	<u>Labelling example</u>
<p>Situation 3: allergies that may be caused by the insect itself. Neither insects nor insect-derived ingredients are listed in Annex II to the FIC Regulation. Therefore, FBOs Commercialisation insect-based food products are not required to label the presence of insects or insect-derived ingredients as allergy-causing substances or products. However, considering the existence of scientific evidence showing allergic cross-reactivity between insects and crustaceans, IPIFF recommends FBOs placing insect-based food products on the market to include a caution on the label of their products on the allergenic properties of edible insects. It should be indicated the products have similar allergic properties that of crustaceans and molluscs as they form an entry in the list of the 14 allergens included in Annex II to the FIC Regulation. Furthermore, the allergen indication should include allergy to dust mites as well⁷.</p>	<p>Not contemplated under the FIC Regulation:</p> <p>Any foodstuff containing '<i>name of insect</i>' shall bear a statement that this ingredient may cause allergic reaction to consumers who are allergic to molluscs and crustaceans and/or dust mites</p>	<p>'People who are allergic to molluscs and crustaceans and/or dust mites may have an allergic reaction to insect consumption'</p>

⁷ Pali-Schöll, Isabella, et al. "Edible insects: Cross-recognition of IgE from crustacean-and house dust mite allergic patients, and reduction of allergenicity by food processing." *World Allergy Organization Journal* 12.1 (2019): 100006.