



# Question & Answers on the IPIFF Guide on Good Hygiene Practices for European Union (EU) producers of insects as food & feed

Do you want to know more about the Draft European Union (EU) producers 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 framework<sup>1</sup>, keeping in regarding 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 feed <sup>2</sup>. 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 more than 70 members from 14 different EU countries. The 'International Platform of Insects for Food and Feed' (IPIFF)<sup>3</sup> 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).

<sup>&</sup>lt;sup>1</sup> The EU Legislator encourages the development of EU Guides on Good Hygiene Practices pursuant to article 9(3) of Regulation (EC) 852/2004 and article 22(4) of Regulation (EC) 183/2005.

<sup>&</sup>lt;sup>2</sup> Companies' names that have been active the development of the Guide are listed in annex III of the Guide.

<sup>&</sup>lt;sup>3</sup> 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 <u>link</u>);
- 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 and fauna in case of insects escape, or of pollution on the surrounding environment) are foreseen at national level (e.g. Food safety and 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 formalities <sup>4</sup>. 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 EU<sup>5</sup>. 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 finalised Guides<sup>6</sup> 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.

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

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

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

<sup>&</sup>lt;sup>4</sup> See The Industrial Emissions Directive

<sup>&</sup>lt;sup>5</sup> EU food and feed safety requirements do not apply in these countries

<sup>&</sup>lt;sup>6</sup> E.g. 'Code of Good Practices- Insect production, processing and use in animal feed' (Portugal)



The document was endorsed by the Standing Committee on Plans, Animals, Food and Feed (later referred as 'PAFF Committee')<sup>7</sup> 'Biological safety of the food chain' and by the PAFF Committee responsible for 'animal nutrition', at their meeting, respectively held on October 6th and November 14th 2022.

Finally, the Guide serve as a point of reference for the development of certification schemes covering insect production. Discussions with the European Commission services in order to certify the Guide as European Union guidance document are ongoing. The latest version of the Guide was endorsed by the European Commission PAFF 'Biological safety of the food chain' Committee and by the PAFF Committee responsible for 'animal nutrition' respectively on October 6th and November 14th 2022. More updates are expected in the course of 2023.

## 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 secretariat@ipiff.org.

<sup>&</sup>lt;sup>7</sup> Composed of national experts who represent EU governments and public authorities, the PAFF Committees deliver opinions and/or vote on European Commission's legal proposals on the implementation of existing legislation in the areas of food & feed safety, animal health & welfare and plant health. For further information about the functioning of the PAFF Committees, and its different sections and meetings, you may refer to the following webpage.