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**IPIFF Contribution Paper on ‘The Future of the Common  
Agricultural Policy’  
Opinion of the Committee of the Regions - Commission for Natural  
Resources**

With this contribution paper, IPIFF expresses the full commitment of the European insect sector to cooperate with the Committee of the Regions in order to promote the economic, social, and territorial development of the EU regions and, rural areas.

The advisory role of the Committee of the Regions to the EU institutions in many relevant areas (e.g. agriculture, fisheries, environment, territorial, social, and economic cohesion) offers an opportunity to stress the role that innovative sectors such as the insect producing sector, can play towards these policies, while promoting regional, economic and social cohesion within the European Union (EU).

Through the present contribution paper, IPIFF aims to respond the questions presented by the Committee of the Regions Stakeholder Consultation towards its Opinion on ‘the Future of the Common Agricultural Policy’. Furthermore, this document provides an overview of the European insect sector, the applicable EU Policies and Regulations as well as the endeavours pursued by our organisation towards the consolidated growth of the sector.

Moreover, the present paper underscores the benefits associated with the development of the insect sector towards food safety, security and sustainability objectives as well as its expected positive impact(s) on the economic and social cohesion of European territories.

The first chapter of this contribution paper provides information about our organisation, the European insect sector and the applicable EU legislative framework.

The second chapter includes our contribution in response to the main subjects addressed by the consultation as well as our recommendations for future EU regulatory reforms, which in our view would be instrumental in unleashing the potential of our sector, thereby maximising its contribution towards meeting the aforementioned objectives.

Notably, this paper highlights the contribution of insect farming activities in the areas identified by the European Commission: Risk management, Rural development, Climate adaptation and Biodiversity. The European Commission is expected to adopt a legislative proposal on ‘The future of the Common Agricultural Policy’ in the course of the year 2025. Against this background, **the European insect producing sector wishes to present a series of proposals, which in our view, would contribute to the transition towards a more resilient and sustainable EU food system.**

- *The European Union faces challenging times, with the Russian invasion of Ukraine and the ever-increasing challenges posed by Climate Change, together with the economic and financial crisis, that notably sheds light on the vulnerabilities of European food systems. The EU Insect sector can play a pivotal role in supporting the achievement of the key priorities of the European Union. Nonetheless, several regulatory bottlenecks should be unlocked in order for our sector to fully contribute to the above objectives.*
- ✓ *The acknowledgment of the strategic importance of the European insect sector in the Common Agricultural Policy Post-2027 is critical in order to accelerate the transition towards a more resilient, competitive, and sustainable food system within the European Union.*



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## **I. INTRODUCTION**

### **▪ WHO ARE WE?**

The International Platform of Insects for Food and Feed (IPIFF) is the umbrella organisation of the European insect-producing sector towards European institutions. Bringing together more than 70 members - most of which are European insect-producing companies - IPIFF promotes the use of insects and insect-derived products as a top-tier source of nutrients for human consumption, animal feed, and plants.



## ▪ WHAT DOES THE EUROPEAN INSECT LOOK LIKE TODAY?

The sector is 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, and pet food). EU production represents today several thousand tonnes of insect protein derived products, whereas investments account for more than 1,5 billion EUR - this figure is expected to exceed 3 billion EUR by 2030. It represents circa 3.500 jobs today, out of which 1000 direct employment - likely to exceed thirty thousand by 2030. Today, the main markets for insect feed products and oil are the pet food and aquaculture segments - The 2021 authorisations for Processed Animal Proteins derived from insects (insect PAPs) to be used in swine and poultry feed as well as the growing number of authorised edible insects as Novel Foods, set expectations for growth both for animal feed and human consumption. Dejecta resulting from insect production activities, better known as 'insect frass' are most used as fertilising product.<sup>1</sup>

## WHAT IS THE REGULATORY FRAMEWORK APPLYING TO THE EUROPEAN INSECT TODAY?

### ▪ THE OVERALL REGULATORY FRAMEWORK APPLYING TO THE EUROPEAN INSECT SECTOR

INSECT PRODUCERS MUST CONFORM TO THE SAME GENERAL RULES THAT APPLY TO OPERATORS IN OTHER FOOD AND FEED SECTORS

EU law regulates the conditions for food and feed business operators, such as insect producers, to produce and commercialise their products in the European Union. Notably, EU policymakers have adopted - in the early 2000s - a package of legislative texts that define **general principles and standards for food and feed safety**. These legislative texts are most commonly known as the 'General Food Law' ([Regulation No 178/2002](#)) and the 'Hygiene Package' (e.g. [Regulation No 853/2004](#) on the hygiene of foodstuffs and [Regulation No 1831/2003](#) laying down requirements for feed hygiene). According to the above Regulations, **producers of insects - like any other food or feed business operator - are responsible for ensuring the safety of the marketed products**: to this end, general obligations apply to those actors - such as the registration or approval of their activities before national competent authorities - and establish hygiene standards to be applied at the different stages of production covered. In this regard, IPIFF published the '[Guide on Good Hygiene Practices](#)' which is intended to assist EU producers of insects' food and feed in the implementation of the aforementioned requirements.

This document has been endorsed by several Standing Committees (i.e. Committees composed of Member States competent authorities) under the DG SANTE (European Commission) auspices<sup>2</sup>.

<sup>1</sup> IPIFF Brochure: '[perspectives on the evolution of the European insect sector towards 2030: current EU regulatory status, existing opportunities and prospects for development](#)'

<sup>2</sup> The Guide was approved by the PAFF Committee on 'biological safety of the food chain' on 6 October 2022. The document was then approved by the PAFF Committee on 'animal nutrition' organised on 14-15 November 2022.



#### INSECT FARMING IS AN AGRICULTURAL ACTIVITY, AND FARMED INSECTS ARE FARMED ANIMALS

- The EU Legislator considers that farmed insects are ‘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](#)).” Furthermore, insect farming shall be regarded as an agricultural activity, since the insects are implicitly referred as ‘animal products’ under 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 CAP).

#### FARMED INSECTS ARE MOSTLY FED WITH CO-PRODUCTS FROM THE AGRI-FOOD INDUSTRIES OR BY ‘FORMER FOODSTUFFS’. INSECT FEEDING IS DONE ACCORDING TO WHAT IS SET BY THE EU LEGISLATOR.

- [Regulation \(EC\) No 767/2009](#): “animals in the EU may be only be fed with safe feed - prohibition feeding faeces and separated digestive tract content”;
- [Animal by-products legislation](#), which prohibits feeding insects for feed use with manure or catering waste and unprocessed former foodstuffs containing meat or fish;
- [Regulation \(EC\) No 999/2001](#) prohibits feeding insects with any Processed Animal Proteins (PAPs), except fishmeal;
- [Directive 2002/32/EC](#) on the EU residue limits for contaminants applies for insect feeding as well as for insects as feed materials.

#### EU REGULATORY PROVISIONS ON ‘FORMER FOODSTUFFS’

- [Regulation \(EU\) No 68/2013](#) - Annex, Part A defines ‘former foodstuffs as foodstuffs [...] which are no longer intended for human consumption’.
- [Regulation \(EC\) No 1069/2009](#) - Article 10 (f) ‘Category 3 materials: products of animal origin, or foodstuffs containing products of animal origin, which are no longer intended for human consumption for commercial reasons or due to problems of manufacturing or packaging defects or other defects from which no risk to the public or animal health arise’.

#### EU REGULATORY PROVISIONS REGARDING ‘CATERING WASTE’

- [Regulation \(EU\) No 142/2011](#) - Article 10: ‘all waste food (...) originating in restaurants, catering facilities, and kitchens, including central kitchens and household kitchens’.

### ▪ THE REGULATORY FRAMEWORK APPLYING TO INSECT PRODUCTS INTENDED FOR USE IN ANIMAL FEED

#### INSECT PRODUCERS FOR ANIMAL FEED MUST BE REGISTERED AS ‘FEED BUSINESS OPERATORS’

- Producers of insects intended for animal feed use (i.e. farmed livestock, aquaculture or pet food) must be registered as ‘feed business operators’ before their national competent authorities. This prescription is posed by [Regulation \(EC\) 183/2005](#), which defines safety and hygiene standards for animal feed products.
- This qualification entails a series of obligations for producers, defined in [Regulation No 1069/2009](#) and its implementing [Regulation No 142/2011](#) - more commonly referred to as the ‘EU animal by-products legislation’. For producers of processed animal proteins derived from farmed insects (more commonly referred to as ‘insect proteins’), such approval is conditional on the fulfilment of a **specific**



**processing method**, as described in the EU ‘animal by-products legislation’ - i.e. in [Regulation No 142/2011](#) (annex IV, chapter III)<sup>3</sup>.

## ▪ THE REGULATORY FRAMEWORK APPLYING TO INSECT FOOD PRODUCTS

**IN ADDITION TO THE ‘GENERAL FOOD HYGIENE REQUIREMENTS’, THE PRODUCTION AND MARKETING OF INSECTS AS FOOD IN EUROPE IS GOVERNED BY THE ‘NOVEL FOODS’ LEGISLATION**

- [Regulation \(EU\) No 2015/2283](#). This legislation applies to all categories of foods that ‘were not used for human consumption to a significant degree’ within the European Union before 15 May 1997, which is the case of insects<sup>4</sup>. **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)**. For each authorised edible insect food product, the European Commission publishes an **Implementing Regulation** that authorises its commercialisation. Presently (Q1 2024), six (6) Novel Food authorisations have entered into force for edible insects, covering 4 different insect species.<sup>5</sup>

## II. HOW CAN THE EUROPEAN INSECT SUPPORT THE ACHIEVEMENT OF THE EU ‘FARM TO FORK’ STRATEGY BY OFFERING RELIABLE SOLUTIONS TO EUROPEAN FARMERS

Agriculture and fisheries are two strategic sectors in view of addressing the challenges of food security and its environmental, economic, and social impacts.

The development of modern agricultural, livestock, and fisheries production contributes to the social, territorial, and economic cohesion of rural and coastal areas, but may at the same times, cause adverse effects on the surrounding environment: **We believe that insect farming can be part of the solution to mitigate such negative impacts, while at the same time bringing new opportunities to developing local supply chains, creating new jobs and stimulating economic growth or revitalization within EU territories.**

## ▪ THE ROLE OF INSECT FARMING IN REDUCING THE DEPENDENCY ON IMPORTED CRITICAL RAW MATERIALS

**INSECT FARMING CAN CONTRIBUTE TO REDUCE THE EU DEPENDENCY ON CERTAIN AGRI-FOOD MATERIALS**

**Insect production can ultimately improve the EU’s self-sufficiency in terms of food, feed, and fertilising materials - ‘fewer imports would be needed, and the expansion of agricultural land**

<sup>3</sup> For more information about the requirements applicable to insect production activities, you may refer to the recommendations provided in the [IPIFF Guide on Good Hygiene Practices or EU Producers of insects as food and feed](#) (latest updated on February 2024)

<sup>4</sup> For additional information, please consult the [IPIFF Info Sheet on the EU applicable legislation for the commercialisation of edible insects](#)

<sup>5</sup> For detailed information on the authorised edible insect food-products as Novel Foods please consult the [IPIFF Info Sheet on the commercialisation of edible insects in the EU](#)



outside the EU would be minimised' in line with the EU's Green Deal aim to reduce the loss of biodiversity.<sup>6</sup>

- ✓ IPIFF suggests the European Committee of the Regions to advise the European Commission and the Council to **include insect protein as part of the reviewed EU Protein Strategy**, in line with the motion for Regulation of the European Parliament adopted on the 3rd of October 2023<sup>7</sup>.

- ✓ **INSECT FARMING OUTPUTS CAN INCREASE THE EU'S PROTEIN AUTONOMY AND STRENGTHEN THE RESILIENCE OF EU FOOD SUPPLY CHAINS**

## ▪ INSECT FARMING PRODUCES NUTRITIOUS ANIMAL FEED

Being highly versatile and efficient, **insects can bio-transform many 'former foodstuffs' (before they become 'waste') into a wide range of higher-value products and ingredients - that can further be included in the feed chains.** Insect production can provide an important contribution to the EU's autonomy and resilience in terms of protein animal feed.

- ✓ Since decades, insect farming provides **pet food materials** as well as feed for fur animals, and other non-food-producing animals (e.g., reptiles, birds of prey, zoo, and circus animals)<sup>8</sup>.
- ✓ Since 2017, following the authorisation for using **insect PAPs as feed for farmed fish**, the sector has become a leader in supplying innovative feed materials for the aquaculture market.<sup>9</sup> In addition, more recently, the **Aquaculture Advisory Council recommended the European Commission to authorise 'conventionally produced' insects for use in organic Aquaculture**<sup>10</sup>.
- ✓ Since 2021, following the authorisation for using insect **PAPs as feed for pig and poultry animals**, the European insect is supplying feed ingredients for such animals - in line with their natural diets.<sup>11</sup>

- ✓ **IPIFF requests the European Committee of the Regions to empower the European Commission to include novel sectors, such as insects, as part of EU the Agro-Food Promotion Programme, in the frame of the ongoing revision of this Policy**<sup>12</sup>. Including insects derived products as part of these Policy's support measures can have a significant impact on the growth of our sector, while it would provide additional instruments to bolster the competitiveness of livestock producers, create new jobs and stimulate economic growth within EU regions.

<sup>6</sup> [IPIFF Contribution - Commitment of the European insect sector European insect towards more resilient and sustainable food supply systems](#)

<sup>7</sup> [Report of the European Parliament European Protein Strategy](#), adopted on the 3rd of October, 2023

<sup>8</sup> This possibility is foreseen under article 18 of Regulation (EC) No 1069/2009 of 21 October 2009

<sup>9</sup> Commission Regulation (EU) 2017/893 of 1st July 2017

<sup>10</sup> See [AAC Recommendation to the European Commission on 'Organic Aquaculture'](#), July, 2023

<sup>11</sup> Commission Regulation (EU) 2021/1372 of 17 August 2021

<sup>12</sup> [The Agro-Food Promotion Policy Review](#)





- **INSECT FARMING CAN IMPROVE THE AVAILABILITY AND AFFORDABILITY OF SOIL FERTILISERS**

Insect farming, like other livestock production activities, **generate by-products that can be applied as fertilising products in agriculture**. By-products from insect farming activities, such as **insect frass**, can play a key role in **providing local solutions to improving soil fertility**. Its application is consistent with the circular economy's principles, by reintroducing 'underused' materials into the food production chain - as an alternative to linear models that would end with its disposal - while **offering sustainable solutions to European farmers**. Insect frass contains certain **beneficial bacteria that act as plant growth microorganisms, improving plants' health and facilitating their absorption of nutrients**.

Being characterised by high agronomic efficiency, as notably materialised through its **NPK profile (nitrogen, phosphorus and potassium)**, **insect frass is today being to be upcycled as fertilising product**<sup>13</sup>. Besides its use as organic fertiliser compost material or soil improver, frass can also be introduced as raw material in biogas production plants. Similar to compost or other types of animal manure, frass contains **relevant nutrients and micronutrients**, as well as **chitin**, which could stimulate the **growth of beneficial bacteria in soil**. These properties make **insect frass a valuable solution for farmers active in crop production** (e.g. vineyard producers) or by gardeners across the EU, who can incorporate insect frass as part of their fertilisation strategies<sup>14</sup>

In the past, several EU countries strictly regulated the conditions for commercialising insect frass on their national market (e.g. by imposing treatment standards for frass, such as pressure sterilisation at 133 ° degree Celsius, or through lengthy and burdensome authorisation procedures). This **'fragmented regulatory patchwork' limited the possibilities for many insect producers to upcycle such high-quality materials, impeding their commercialisation on the European market**.

[Regulation \(EU\) 2021/1925](#) established **common baseline standards for insect producers** by requiring operators to heat treat the frass at 70° c for one hour. These harmonised standards opened new opportunities for insect producers, and paved the way to the establishment of a level playing field between them.

[Commission Delegated Regulation 2023/1605](#) defines the **'end point'** for processed insect frass intended for use as organic fertiliser, based on standards defined in the aforementioned Regulation (EU) 2021/1925: this end point indeed attests that the product fulfils the aforementioned heat treatment standards as defined in the [European Commission Regulation \(EC\) No 142/2011](#) (e.g. the product shall undergo a heat treatment of 70 °C for 60 minutes).

A recent study developed by the University of Leuven documented the impact of heat-treating insect frass<sup>15</sup> from black soldier fly larvae, at 70 °C for 60 minutes. Additionally, a few years ago, the French Agency for Food, Environmental and Occupational Health (ANSES)<sup>16</sup> conducted a full safety

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<sup>13</sup> [IPIFF FactSheet on Insect Frass](#)

<sup>14</sup> [IPIFF Contribution Paper on the application of insect frass as fertilising product in agriculture](#)

<sup>15</sup> Noor Van Looveren, Dries Vandeweyer, Leen Van Campenhout, University of Leuven in' [Impact of Heat Treatment on the Microbiological Quality of Frass Originating from Black Soldier Fly Larvae \(Hermetia illucens\)](#)'.

<sup>16</sup> Reference to the authorisation for the use of mealworm larvae insect frass as soil fertiliser based on the [opinion issued by the French Agency for Food, Environmental and Occupational Health \(ANSES\), July 2020, to the IPIFF Member organisation, Ynsect](#).



assessment of insect frass derived from mealworm larvae. Its conclusions confirmed the above findings.

Today, IPIFF pleading for the registration of frass under the EU fertiliser legislation, which is a prerequisite for such products to be commercialised across the entire EU, and thereby ensure better access to organic fertilisers. This proposal is in line with the **European Commission Strategy aiming at deploying sustainable alternatives to mineral fertilisers**<sup>17,18</sup>.

Until the inclusion of 'processed frass' under the EU Fertilisers' legislation<sup>19</sup>, 'transitional solutions' are urgently needed with the view to allowing the use of untreated frass as starting material in biogas plants or for composting. The EU Member States recently approved a draft proposal aiming at clarifying the aforementioned possibilities. We now urge the Member States to implement the future EU provisions - whose adoption is foreseen in Spring 2024 - to its full extent, thereby ensuring that all EU insect producers will have access to such outlets for the commercialisation of their products.

In the longer run, we recommend to develop more tailored standards for insect frass (e.g. 'lower' treatment than 70 °C), thereby preserving the nutritional value of the frass, reducing heating costs for operators and thereby further reducing the environmental footprint of our sector.<sup>20</sup> IPIFF is considering contributing to the development of such an 'alternative method for the disposal of insect frass' (pursuant to art. 20 of [Reg. 1069/2009](#)).

- ✓ IPIFF urges the European Committee of the Regions to advise the European Commission to authorise 'transitional solutions' to allow the commercialisation of 'processed insect frass' as soil fertiliser in the EU, and thus, enabling the immediate availability of locally produced soil fertilising options for the EU farmers.
- ✓ IPIFF stresses the European Committee of the Regions to advise the European Commission to implement tailored standards applying to the marketing of insect frass as organic fertiliser, to take into consideration its specificities and therefore allow its wider use for accelerating the Common Agriculture Policy objectives on organic agricultural production.
- ✓ The EU Insect sector calls the attention of the European Committee of the Regions to empower the European Commission to include insect frass as part of the EU Fertilisers legislation<sup>21</sup> in order to ensure more availability and better affordability of soil fertiliser to EU farmers, now and in the long run.

## ■ INSECT FARMING CAN PLAY AN IMPORTANT ROLE TOWARDS MEETING FOOD SECURITY OBJECTIVES AND DEVELOPING SUSTAINABLE FOOD SYSTEMS

<sup>17</sup> See Communication from the European Commission 'ensuring the availability and affordability of fertilisers in the EU' (9 November 2022) [COM/2022/590 final/2](#)

<sup>18</sup> Such position was also echoed by the European Parliament in its [resolution dated 16 February 2023](#)<sup>18</sup>. The latter institution indeed considered that frass is 'currently not used to the fullest (...) and that 'it can play an important role in meeting soil nutrient requirements'. Having regard to the above considerations, the European Parliament 'calls on the Commission (...) to incentivise the use of frass by removing unnecessary legislative and administrative burdens as soon as possible'

<sup>20</sup> [IPIFF research brochure](#)

<sup>21</sup> [Regulation \(EU\) 2019/1009 of the European Parliament and of the Council of 5 June 2019 laying down rules on the making available on the market of EU fertilising products](#)





The insect sector can play a pivotal role in enhancing food security through sustainable protein production. Insects are a rich source of protein and can be used in animal feed, reducing the pressure on traditional protein sources.

**The European Committee of the Regions may advise the European Commission to promote more research and innovation funding opportunities for the development of insect farming techniques and regulations to ensure food safety and environmental sustainability in insect production.**

- ✓ The EU insect sector calls the attention of the European Committee of the Regions on the need of additional European research funding opportunities, in identified relevant areas for the development of alternative sustainable protein sources, in order to accelerate the transition towards a more sustainable and resilient food system.

#### ▪ **INSECT PRODUCTION ACTIVITIES GENERATE NUTRITIOUS FOOD PRODUCTS**

By upcycling former foodstuffs through insect production, **the European insect sector contributes to reintroduce into the food chain, products which would have otherwise been wasted**<sup>22</sup>.

With its highly productive vertical farming practices, **insect farming is among the most efficient protein production systems, demanding less land use than most agricultural practices.**

**The high protein content of edible insects** makes them an innovative alternative protein supplier. Edible insects can therefore complement low-protein diets thanks to their **diverse amino acid composition.**

**They also contain numerous vitamins, minerals, and prebiotic fibers** - important for the metabolism and immunity of the human body.<sup>23</sup>

- **What are your proposals to limit unfair competition with imported agricultural products?**

- ✓ IPIFF urges the European Committee of the Regions to propose to the European Commission, Parliament and Council to amend [Regulation \(EU\) No 1169/2011](#) to include a mandatory origin/provenance in the label of insect food products (including on the place of farming of the insects). Such amendment allows the EU consumers to make an informed choice to identify insects' food products manufactured in the European Union, which respond to highest safety standards in line with EU food hygiene rules and provisions of the EU novel food authorising Regulations.<sup>24</sup>

In the same line, considering that the **EU marketing standards**<sup>25</sup> aim at establishing a **standardised and satisfactory quality for agri-food products available on the EU market**, (e.g. setting out technical definitions, classification, presentation, marking and labelling, packaging, production method, conservation, storage, transport, related administrative documents, certification and time limits, restriction of use and disposal), such **sector specific standards applying to insect food**

<sup>22</sup> [IPIFF FactSheet Edible Insects & Human Nutrition](#)

<sup>23</sup> Please consult the [IPIFF Info Sheets](#) on insect food products to learn about their nutritional and health benefits; versatility and capacity to nutritionally enrich other food products; environmental benefits related to eating insects; World consumption of edible insects.

<sup>24</sup> [IPIFF Contribution Paper - Specific labelling criteria for edible insect food products in the European Union \(EU\)](#)

<sup>25</sup> [Commission updates marketing standards for agro-food products to address the consumer needs and sustainability](#)



products can also enable an increased consumption by the EU consumer, once it improves the access to information on its production and use.

- ✓ IPIFF stress the importance for the European Committee of the Regions to advise the inclusion of insect food products, in the context of Regulation (EU) No 1308/2013 on the common organisation of the markets in agricultural products, as to allow the development of sectoral marketing standards which ensures a mandatory origin/provenance indication in their label. Such parameters would result in a increased trustworthiness and reliability of EU citizens in new types of protein sources, and thereby contribute to a more sustainable and resilient Food System.

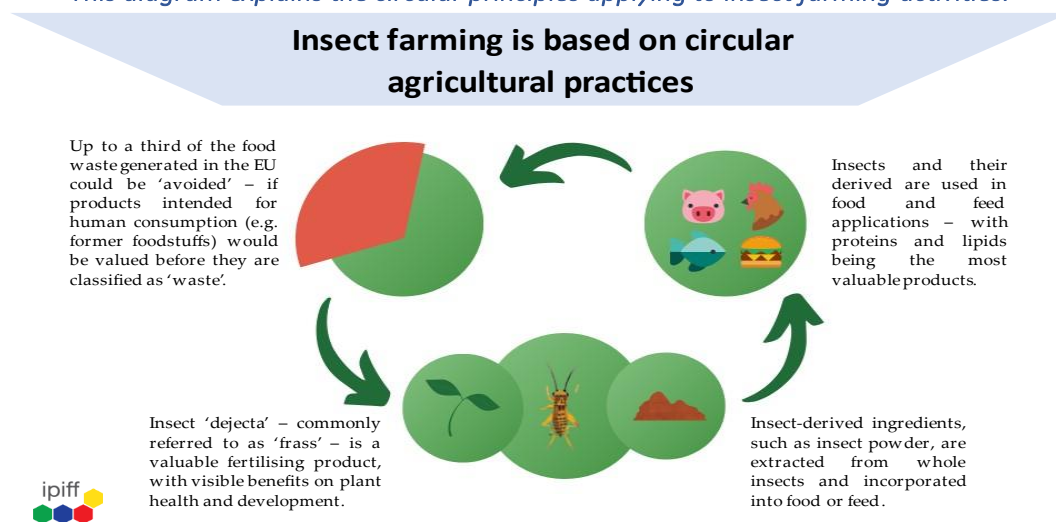
### III. THE ROLE OF INSECT FARMING ACTIVITIES IN SUPPORTING OUR FARMERS IN THIS TRANSITION TO SUSTAINABLE FARMING

INSECT FARMING CAN BEST SUPPORT THE EU IN ACHIEVING THE 'GREEN DEAL' AND ITS 'FARM TO FORK STRATEGY'

INSECT FARMING CAN SUPPORT THE ACHIEVEMENT OF THE 'EU FOOD WASTE REDUCTION TARGETS' & OF A SUSTAINABLE FOOD SYSTEM

Insects have the potential to become resource-efficiency champions - upcycling products that generate costs and GHGs emissions into sustainable feed ingredients that will reduce the necessity to increase the EU's imports of proteins. As insects are mostly fed on agri-food co-/by-products or former foodstuffs no longer intended for human consumption (i.e., former foodstuffs), such farming practices contribute to safely reintroducing nutrients in the agri-food chains, reducing the food waste burden (e.g., as such products may be downcycled, incinerated or landfilled).<sup>26</sup>

*This diagram explains the circular principles applying to insect farming activities.*



<sup>26</sup> [Position Paper - The contribution of the European insect sectorEuropean insect to improving sustainability from 'Farm to Fork'](#)



Up to a third of the food being wasted every year could be reintroduced it in the food supply chain, if authorised former foodstuffs which contains meat and fish as substrates for insect breeding. There is growing documentation supporting the filling of current knowledge gaps (e.g. potential of insects to transfer ‘infectious diseases’) as for the European Commission to allow its authorisation.

- ✓ IPIFF urges the European Committee of the Regions to advise the European Commission to **move forward the authorisation of former foodstuffs, containing meat and fish for the breeding of insects at the EU level.**
- ✓ To this end, IPIFF also calls the attention of the European Committee of the Regions to advise the European Commission to mandate the European Food Safety Authority to evaluate the safety risks associated with these products based on comprehensive evidence/documentation, when available.

#### **IV. IPIFF BELIEVES THE POTENTIAL OF INSECT FARMING CAN BE OPTIMIZED BY AN ENHANCED ROLE OF THE REGIONS ON THE DISCUSSIONS RELATED TO THE CAP**

IPIFF considers that the next Common Agricultural Policy should not be based on a ‘fits a. IPIFF does not believe that direct payments should **not be based on a ‘one fits all approach’**. E.g. by being based on criteria such as land use or intensive work.

**IPIFF also stresses the importance for EU Regions to be involved in the design of the national strategic frameworks from its conception until the final line of their execution, at regional level.**

The future Common Agricultural Policy must envisage a more streamlined approach, horizontally, in regard to the optimization and complementarity of strengths and weaknesses of the different EU regions, and between different farming activities.

**IPIFF advocates for a Common Agricultural Policy that acknowledges the needs of the existing farming activities, while envisaging the role of new farming activities, such as insect production.**

Regional authorities must be able to design their own regional-level CAP implementation plans, which are to be included as part of the respective national strategic frameworks. This is the best possible way to support more efficiently the farmers specific needs in the different regions, while benefiting from each region best contribution.

**IPIFF advocates for a Common Agricultural Policy that can promote the complementarity of existing and new farming activities at local and regional levels, while simultaneously being able to foster their synergetic contribution to the EU protein diversification strategy, sustainability and resilience of the agrifood system.**

IPIFF stresses that the future CAP must take in the lessons learned from a war scenario, pandemic, and climate change. **The CAP Post-2027 must be entrusted of preparedness and flexibility to address on the spot, to arising circumstances.** It must also be prepared for future circumstances, by envisaging from its conception a complementary and synergetic approach to existing and new farming activities towards a more resilience and sustainable food system.

Rural areas can benefit from insect farming, creating employment and economic opportunities. The European Committee of the Regions can highlight the potential of insect farming as a rural



development strategy and facilitate discussions on integrating insect farming into rural and regional development policies.

**INSECT FARMING CONNECTS LOCAL AGRICULTURAL SUPPLY CHAINS AND CONTRIBUTES TO STIMULATE THE BIOECONOMY IN EUROPE**

Enhancing circularity throughout the agri-food chains is key to reducing losses - **the sustainability of our food system will be enhanced if farmers are given the opportunity to use biomass residues and new feed products to feed their animals.** In line with the waste hierarchy of insect farming, upcycling such streams will also prevent competition with products already used as animal feed.<sup>27</sup>

## **V. EMPHASISING THE IMPORTANCE OF THE AGRI-FOOD SECTOR UNDER THE CAP**

The Common Agricultural Policy (CAP) and agricultural strategies should consider the role of insect farming in sustainable agriculture. The European Committee of the Regions can advocate for the inclusion of insect farming in CAP discussions, ensuring that policies support the growth of the insect sector while addressing environmental and economic concerns. In summary, the European Committee of the Regions' strategic priorities in agriculture align with various objectives of the insect sector, such as enhancing food security, promoting technology adoption, exploring new rural opportunities, and emphasizing the importance of CAP. By integrating insect farming into these discussions and initiatives, the European Committee of the Regions can contribute to the sustainable development of the insect sector within the EU.

As exposed above, despite insect farming being under the scope of 'EU Agricultural rules' (e.g. EU organic legislation, Rural development programs under the CAP), its producers are currently excluded from the Common Agricultural Policy. The inclusion of insects and other alternative sources of protein in the Common Agricultural Policy Post 2027 would enable the transition to a more sustainable and resilient Food System since these sectors can contribute to ensuring the competitiveness of EU agriculture and generate new economic, regional, and social development opportunities in Rural areas.

- ✓ IPIFF calls the attention of the European Committee of the Regions to advise the European Commission, Parliament, and Council of the EU to enable the inclusion of alternative sources of protein, such as insects, algae, or yeast, under the Common Agricultural Policy Post 2027. Thus, bolstering the competitiveness of European livestock producers

<sup>27</sup> [IPIFF FactSheet- Connecting local agricultural supply chains through insect farming](#)



## **VI. THE CONTRIBUTION OF INSECT FARMING SECTOR TO ENSURE A FAIRER AND MORE TARGETED DISTRIBUTION OF INCOME SUPPORT, AGEING AND MEET OBJECTIVES OF TERRITORIAL COHESION**

- ✓ Contemplating new farming activities, such as insect farming activities, which foster the resilience and sustainability of existing farming activities under the new Common Agricultural Policy can have a determinant role.
- ✓ **Insect farming activities can promote income support to farmers.** They create new revenue streams for the farmers and creating new local supply chains, while improving their self-reliance in animal feed and soil fertilizer.
- ✓ **Insect farming can prevent farm extinction** by enhancing circularity, through partnership with local agrifood businesses, active throughout the agri-food chain, with a key role to reducing losses and enhancing the sustainability of our food system.
- ✓ **EU regions and rural areas can benefit from the consequences of aging with insect farming.** Insect farming and producing activities create employment and economic opportunities in traditional and new segments of the agrifood market. The insect sector is an innovative sector employing highly qualified professionals, while at the same time working in close partnership with local farmers.
- ✓ **Insect farming connects local agricultural supply chains and contributes to stimulating the bioeconomy in Europe.**

## **VII. THE CONTRIBUTION OF INSECT FARMING ACTIVITIES FOR GENERATIONAL RENEWAL AND MORE GENDER-EQUAL AGRICULTURE**

- ✓ The introduction of new farming activities under the Common Agricultural Policy, such as insect farming, can bring new economic and employment opportunities to the regions and rural areas of the European Union. Therefore, contributing to the retention and even attraction of young people to our regions and rural areas.
- ✓ With its different application purpose products, such as human nutrition, animal feed, soil fertiliser and/or technical applications, the EU insect sector recruits a young, highly qualified and gender diversity labour force.
- ✓ Insect farming activities work in close partnership with local agrifood businesses and create new supply chains. It contributes for to the revitalization of existing farming activities, namely by creating new revenue streams for farmers and local agrifood businesses.

- **Would you support a shift of direct payments from a surface-based approach to a work intensity-based approach?**



- ✓ The new CAP must envisage the inclusion of new farming activities such as insect farming. Due to its vertical farming practices, insect farming does not need a vast use of land surface. Nevertheless, we advocate for the non-use of one approach to all. A one approach to all is not suitable. Direct payments should take into consideration the specific realities of each farming activity, including new ones as insect farming, and should not be based on an exclusive system: surface area or intensive work.
- ✓ We must envisage a new, modern, and inclusive Common Agricultural Policy. It must address the specific needs of existing and as well of new farming activities, such as insect farming. It must also be able to promote the potential of their complementarity.
- ✓ The complementary of existing and new farming activities are able to revitalize regional and rural areas by creating new business, economic and employment opportunities, while ensuring the sustainability of our agrifood system. For this to be ensured, it is needed that new farming activities are acknowledged in the Common Agricultural Policy Post-2027.
- ✓ The new Common Agricultural Policy with its objectives of a greener and more sustainable agriculture, and of rural development, must take into consideration the role of complementary farming activities such as insect farming, which can make available to farmers locally supplied complement to animal feed and soil fertilizer and thus making them more resilient.

## VIII. INSECT FARMING ORGANIC PRODUCTION METHODS CERTIFICATION- CONTRIBUTING TO ACHIEVE ORGANIC AGRICULTURE PRODUCTION UNDER THE COMMON AGRICULTURAL POLICY

**Insect farming activities could also contribute to the increase of organic production, according to the objectives set by the Common Agricultural Policy.** 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. With its locally produced and nutritious products, the European insect can effectively contribute to enhancing organic animal nutrition in a sustainable way.

Earlier this year, the European Commission's services (DG AGRI) decided to resume discussions with the EU Member States with the view of establishing organic production rules for farmed insects, which started in May 2022 (with the 1st draft document being discussed in July). The EU discussions are expected to continue over the year 2023 (The EGTOP is expected to publish a report by ed 2023, which could serve as the basis for forthcoming discussions) and later (e.g. detailed rules to be developed via 'implementing' acts).<sup>28</sup>

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<sup>28</sup> Please see the IPIFF Contribution Paper ['The European insect sector European insect's response to the growing demand for EU organic products'](#)





In the framework of the ongoing discussions towards the development of the EU regulatory standards for the organic certification of insect production activities there is the need for tailored-made rules that may apply to the insect farming reality.

Current EU legislation does not take into account invertebrate animals such as insects, which may lead to undoable standards. **Namely, it is unrealistic to require to insect farmers a minimum % of the feed to be sourced from the agricultural holding from which the insect animals are kept.**

Despite the vast majority of insect producing companies to be 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](#))' **insect farmers are still unable to source organic feed material exclusively from the region**, according to what is set by EU organic legislation. Also, in what refers to **husbandry practices, it does not adequately reflect the physiological needs of the animals**. Parameters such as 'maximum densities' or 'prevention of cannibalism', the use of appropriate, light and temperature conditions should therefore be carefully managed by insect producers indeed. Yet, the same 'quantitative limits' and/or 'single solutions' may not be realistically proposed for all insect species. Furthermore, this proposal should be tailored for all species that are traditionally produced for food or feed (e.g. *Tenebrio molitor*).

- ✓ We ask the support of the European Committee of the Regions to advise the European Commission to make progress on the ongoing discussions towards the development of **EU regulatory standards for the organic certification of insect production activities**, while taking into consideration the need for tailored-made rules that may apply to the insect farming reality.<sup>29</sup>

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<sup>29</sup> [IPIFF Contribution Paper - EU organic certification of insect production activities](#)