

2024

Guide on Good Labelling Practices for Insect-based Feed Materials



International Platform
of Insects for Food and Feed

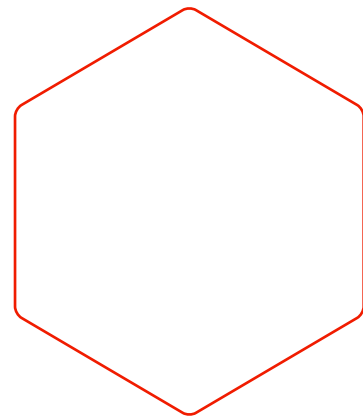
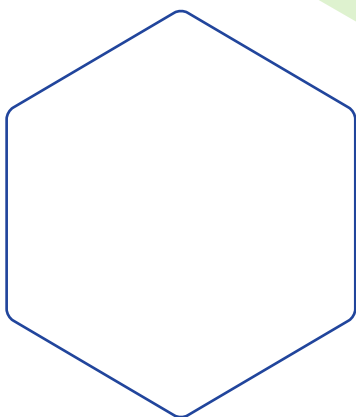


TABLE OF CONTENTS

1. Introduction	3
1.1 Objective of the Guide	3
1.2 Scope of the Guide	4
1.3 Structure of the Guide	4
1.4 How to use this Guide	5
2. Legal framework overview	5
2.1 Feed Regulation	5
2.2 Other regulations	6
3. Feed Regulation provisions relevant for operators placing feed materials on the EU market	7
3.1 General requirements	7
3.1.1 Safety of insect derived ingredients	7
3.1.2 Fair commercial practices	8
3.1.3 Restrictions and prohibitions under EU legislation	8
3.2 Labelling of feed material	9
3.2.1 Main principles for labelling and presentation	9
3.2.2 Responsibility of feed business operators for labelling	9
3.2.3 Mandatory particulars	10
3.2.4 Voluntary information	12
a) General conditions for voluntary labelling	12
b) Claims	13
3.2.5 Non-compliance and Penalties	16
3.3 Practical “Dos” and “Don’ts”	17
(1) Example of a misleading, non-compliant feed material label	17
(2) Examples of compliant feed materials labels	19
ANNEX I – Abbreviations and Definitions	21
ANNEX II – Catalogue of feed materials and the Register of feed materials	23



1. Introduction

1.1 Objective of the Guide

The present Guide has been developed by the IPIFF organisation in order to **assist insect-producing companies in the implementation of the EU compulsory labelling obligations on animal feed**, as laid down in [Regulation \(EC\) No 767/2009](#) on the placing on the market and use of feed (later referred as the '**Feed Regulation**'). The Guide clarifies the specific attributes from the text that operators have to apply when commercialising feed materials.

This Guide aims to **promote good labelling practices** for insect-based feed materials covering specific critical criteria from the Feed Regulation. It draws on the skills and expertise of companies (i.e. IPIFF Members) directly involved in the production of insects, for animal feed purposes.

The authors believe that labelling practices and procedures followed by insect producers should meet the following few objectives:

- Provide useful information and most importantly **facilitate proper use of insect feed based ingredients;**
- Have the capacity to **match the specific requirements of the purchasers and users of the feed material**, notably by ensuring that essential information is appropriately displayed on the label.

The present Guide provides guidance on how to **read** and **apply the requirements on claims** as referred to in article 13 of the Feed Regulation in order to ensure that such claims are meaningful and to allow the purchaser to use the insect derived ingredients in an optimised way. Further information regarding the type of claims, their substantiation as well as their phrasing is also provided in the Guide.

Finally, this document provides guidance on how to implement the specific provisions contained in [Commission Regulation \(EU\) No 68/2013](#) on the **Catalogue of feed materials**.

DISCLAIMER

This Guide is a non-binding document that is intended to facilitate the interpretation and application of the EU Feed Marketing legislation and does not constitute legal or professional advice. It does not necessarily reflect the official position of the European institutions, such as the European Commission or the EFSA, nor of IPIFF or its members.

The binding interpretation of legislation is the exclusive competence of the competent national and European jurisdictions. The views expressed in this guidance document cannot prejudice the position that the authors of this Guide might take before the jurisdictions.

These guidelines have been drafted by the IPIFF Secretariat with the support of the Food Law team of Bird & Bird LLP's Brussels office.

1.2 Scope of the Guide

The Guide defines **the labelling requirements and conditions** applying to the commercialisation - on the European Union market - **of insect derived feed materials** (e.g. processed animal proteins derived from farmed insects, insect fat) intended as feed, either for food producing animals (e.g. poultry, pig or farmed fish), pets or other animals (e.g. fur animals, reptiles' animals kept in laboratories, zoos or circuses).

The Guide shall be **applicable to any type of information**, or **any medium used** by insect producers and intended at communicating about the characteristics of the product to be placed on the EU market. Indeed, the EU legislator defined the scope for Feed Regulation in a broad manner, by considering 'the attribution of any words, particulars, trademarks, brand name, pictorial matter or symbol to a feed' shall fall under the concept of labelling. Under the definition provided by **article 3.2(s)**, placing this information on any medium referring to or accompanying such feed, such as packaging, container, notice, label, document, ring, collar or the Internet, including for advertising purposes has to be considered as labelling within the meaning of the Feed Regulation.

However, it does **not** address the labelling requirements associated with the commercialisation on the EU market (as feed) of **live insects**, whole (treated or untreated) **insects** since the above possibilities are being regulated at EU Member State level¹.

It should be noted that this Guide does not apply to compound feed, feed additives or premixtures of feed additives, which are subject to specific labelling provisions. It does not either apply to medicated feed.

This Guide should be seen as a supplement to the guidance provided in the '**EU Code of good labelling practice for compound feed for food producing animals**² as well as in the '**Code of Good Labelling Practice for Pet Food**³, which have been jointly developed by the organisations Copa-Cogeca and FEFAC and by the FEDIAF association, respectively.

1.3 Structure of the Guide

The Guide addresses the following elements:

- **Specific mandatory labelling requirements for feed materials** as foreseen in the Feed Regulation⁴ and EU Catalogue of feed materials e.g. name of the feed material and accompanying information, compulsory declaration concerning the nutrient content of the feed materials;
- Obligations and conditions for requesting the inclusion of an insect derived in the **Register of feed materials** (see *Annex II*);
- Specific conditions for **using claims** (i.e. labelling drawing the attention on 'positive' nutritional and/or zootechnical and/or technological and/or environmental properties of the product) on the label of the product, e.g. information on unauthorised claims, requirements as to their substantiation.

To this end, the Guide outlines all relevant EU legal provisions of the Feed Regulation and contains concrete examples on how these requirements could be applied 'on the ground' by these operators.

¹ For further details about these possibilities, see [The IPIFF Guide on Good Hygiene Practices for EU producers of insects as food and feed](#)

² The document can be accessed on the FEFAC website, through the following [link](#) (version 1.1 – September 2018).

³ The document is available on the FEDIAF website, through the following [link](#) (revised version dated from October 2019).

⁴ For more details, see article 16 of the Feed Regulation.

1.4 How to use this Guide

In the present Guide:

- Elements included in **green frames** contain information on legal provisions extracted from the Feed Regulation and its most relevant parts are highlighted **in bold**.
- The above provisions are further explained throughout the present document and relevant elements for the insect sector are developed and/or illustrated based on recommendations or concrete examples - in order to facilitate their implementation 'on the ground' by insect producers.
- The content of this Guide is partially based on official communication documents (e.g. European Commission website).

All capitalised terms and abbreviations used in this Guide are defined in Annex I to this Guide.

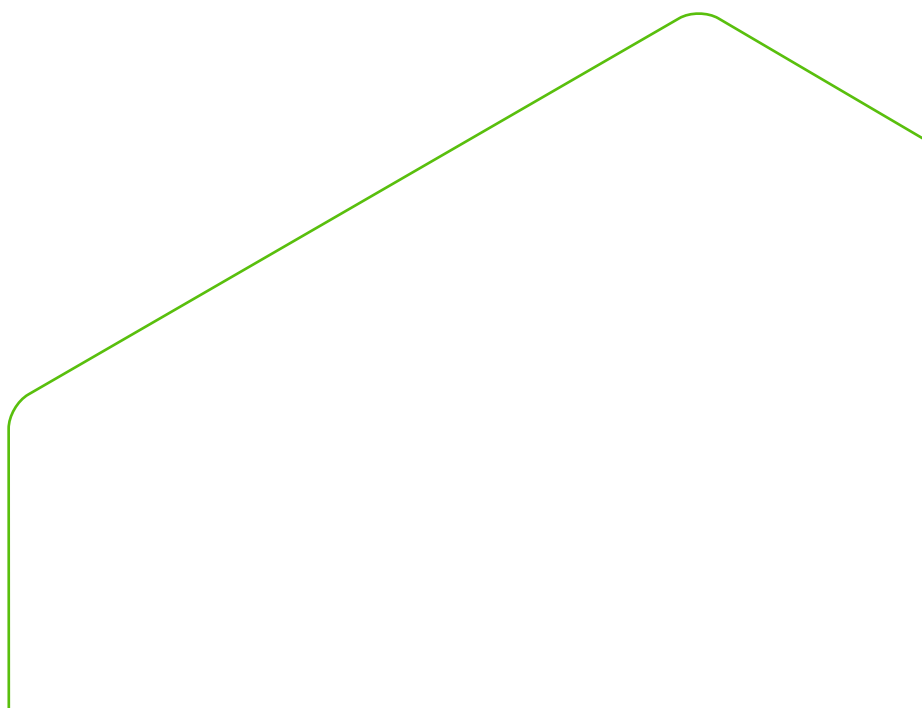
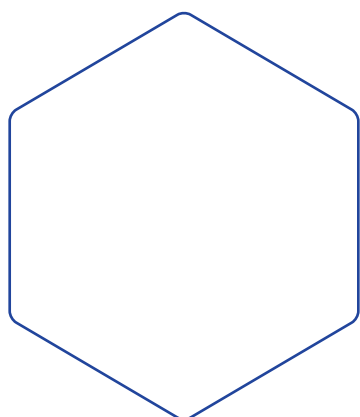
2. Legal framework overview

2.1 Feed Regulation

This Guide focuses on **the implementation of the provisions** included **in the Feed Regulation** that aims to 'harmonise the marketing of feed, provide for feed safety and public health, ensure adequate information for the users of feed, and strengthen the Community market' (article 1 of the Feed Regulation). To this end, the Feed Regulation replaced and updated a few measures on aspects of the marketing, labelling and composition of animal feed, bringing their provisions together into a single comprehensive document.

Furthermore, the **Feed Regulation** aims at improving market transparency on feed materials and compound feed and to ensure adequate and accurate information to feed users and consumers, by providing a non-exhaustive list of feed materials which are allowed for use in animal feed (including feed for food producing animals, other farmed animals as well as pets).

To this end, the Feed Regulation established the EU Catalogue of feed materials and the Register of feed materials (see Annex II).



2.2. Other regulations

Besides the Feed Regulation, other pieces of legislation have to be complied with by operators placing feed materials on the market. Although these other provisions are not examined in the present Guide, we provide in this section a non-exhaustive list of legal texts, and a high-level summary of what those texts regulate

Regulation (EC) No 178/2002 on General Food Law⁵:

This regulation establishes the basic principles and requirements of EU food law, aimed at ensuring a high level of protection of human health and consumers' interests in relation to food. It establishes the European Food Safety Authority (EFSA) and lays down procedures relating to food safety, including traceability, risk management and the obligations of food business operators.

Regulation (EC) No 999/2001 laying down rules for the prevention, control and eradication of certain transmissible spongiform encephalopathies⁶:

This Regulation establishes measures for the prevention, control and eradication of transmissible spongiform encephalopathies (TSEs), such as bovine spongiform encephalopathy (BSE), in order to protect animal and public health in the European Union. It imposes strict requirements in terms of surveillance, restrictions on specified risk materials, traceability and management of products derived from potentially infected animals.

Regulation (EC) No 1069/2009⁷ and Commission Regulation (EU) No 142/2011⁸ laying down health rules as regards animal by-products and derived products not intended for human consumption:

Regulation (EC) No 1069/2009 lays down health rules for the collection, transport, processing, use and disposal of animal by-products and derived products not intended for human consumption, in order to prevent risks to public and animal health. Commission Regulation (EU) No 142/2011 complements and implements Regulation (EC) No 1069/2009 by specifying the technical and administrative requirements for these activities, including treatment standards, authorisations, traceability and the necessary official controls.

Regulation (EC) No 1831/2003 on additives for use in animal nutrition⁹ :

The Regulation lays down rules for the placing on the market, use and labelling of additives intended for use in animal nutrition, in order to ensure a high level of protection for human and animal health, as well as the environment. The regulation introduces a system of prior authorisation based on rigorous scientific evaluation by the European Food Safety Authority (EFSA) and imposes strict traceability and monitoring requirements for additives used in animal feed.

Commission Regulation (EU) 2020/354 establishing a list of intended uses of animal feed intended for particular nutritional purposes and repealing Directive 2008/38/EC¹⁰:

Commission Regulation (EU) 2020/354 establishes a list of feed intended for particular nutritional purposes, specifying the conditions of use to ensure the safety and efficacy of these feeds. This regulation repeals Directive 2008/38/EC, updating and simplifying the existing provisions in order to ensure greater transparency and harmonisation in the use of feed intended for specific nutritional purposes within the European Union.

⁵ Regulation (EC) No 178/2002 of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety.

⁶ Regulation (EC) No 999/2001 of the European Parliament and of the Council of 22 May 2001 laying down rules for the prevention, control and eradication of certain transmissible spongiform encephalopathies.

⁷ Regulation (EC) No 1069/2009 of the European Parliament and of the Council of 21 October 2009 laying down health rules as regards animal by-products and derived products not intended for human consumption and repealing Regulation (EC) No 1774/2002 (Animal by-products Regulation).

⁸ Commission Regulation (EU) No 142/2011 of 25 February 2011 implementing Regulation (EC) No 1069/2009 of the European Parliament and of the Council laying down health rules as regards animal by-products and derived products not intended for human consumption and implementing Council Directive 97/78/EC as regards certain samples and items exempt from veterinary checks at the border under that.

⁹ Regulation (EC) No 1831/2003 of the European Parliament and of the Council of 22 September 2003 on additives for use in animal nutrition.

¹⁰ Commission Regulation (EU) 2020/354 of 4 March 2020 establishing a list of intended uses of feed intended for particular nutritional purposes and repealing Directive 2008/38/EC.

3. Feed Regulation provisions relevant for operators placing feed materials on the EU market

This section of the Guide is meant to provide an overview of **general principles** and **requirements applying to the labelling of insect-based ingredients** intended as feed (e.g. feed for poultry/pig/ farmed fish or pet food) (see section 3.1.).

It is also meant to clarify the elements of the labelling that are mandatory (see section 3.2.3.) and those that can be stipulated voluntarily (see section 3.2.4.).

3.1 General requirements

3.1.1. Safety of insect derived ingredients

a) Safety and marketing requirements

Article 4.1. of the Feed Regulation

1. Feed may only be placed on the market and used if:

(a) it is **safe**; and

(b) it does **not** have a **direct adverse effect** on the **environment** or **animal welfare**.

The requirements set out in Article 15 of Regulation (EC) No 178/2002 shall apply, *mutatis mutandis*, to feed for non-food producing animals.

b) Responsibilities and obligations of feed businesses

Insect producers placing feed materials on the market¹¹ are considered as **'feed business operators'** pursuant to the Feed Regulation.

Therefore, these operators fall subject to the **requirements** laid down in article 5.1, which defines the **responsibilities** and **obligations** of feed businesses in the area of feed safety.

Article 5.1. of the Feed Regulation

1. Feed business operators shall comply, *mutatis mutandis*, with obligations set out in Articles 18 and 20 of [Regulation \(EC\) No 178/2002](#) and Article 4(1) of [Regulation \(EC\) No 183/2005](#) in respect of feed for non-food producing animals (...)

The obligations of the Feed business operators referred to in article 5.1 are as follows:

- Obligation to ensure the traceability of feed placed on the market. Hence the **obligation to indicate a batch or lot number** under article 15 (d) of Regulation 178/2002, which we shall see below (article 18 of Regulation 178/2002)
- Obligation to immediately **initiate procedures to withdraw feed from the market** if the feed business operator considers or have reason to believe that feed which they have placed on the market does not satisfy the feed safety requirements, and **to inform the competent authorities** accordingly (article 20 of Regulation 178/2002)
- Obligation to ensure that **all stages of production, processing and distribution comply with Community legislation** (article 4(1) of Regulation (EC) No 183/2005)

¹¹ e.g. scenario of insect producers completing a commercial transaction with compound feed manufacturers in view of selling them feed ingredients/

c) Hygiene requirements

Information on the hygiene requirements for feed materials are mainly set out in Regulation (EC) No 183/2005 laying down requirements for feed hygiene¹².

3.1.2. Fair commercial practices

Article 4.2 (a) of the Feed Regulation

2. In addition to the requirements set out in paragraph 1 of this Article, feed business operators placing feed on the market shall ensure that the feed:

(a) is **sound, genuine**, unadulterated, fit for its purpose and of **merchantable quality**; (...)

3.1.3. Restrictions and prohibitions under EU legislation

The placing on the EU market of certain feed materials is currently prohibited under the Feed Regulation. Those materials are listed in article 6 and Annex III. Furthermore, the **restrictions applying to the feeding of farmed insects are extended to other materials**, in accordance with other EU requirements applying for **feeding of 'farmed animals'** (as defined in article 3(6) of Regulation 1069/2009)¹³.

Article 6.1. of the Feed Regulation


1. Feed shall not contain or consist of materials whose placing on the market or use for animal nutritional purposes is **restricted** or **prohibited**. The list of such materials is set out in **Annex III**. (...)

Annex III of the Feed Regulation

List of materials whose placing on the market or use for animal nutritional purposes is restricted or prohibited as referred to in Article 6

Chapter 1: Prohibited materials

- **Faeces, urine and separated digestive tract content** resulting from the emptying or removal of digestive tract, irrespective of any form of treatment or admixture.
- **Hide** treated with tanning substances, including its waste.
- **Seeds** and other plant-propagating materials which, after harvest, have undergone specific treatment with plant protection products for their intended use (propagation), and any by-products derived therefrom.
- **Wood**, including sawdust or other materials derived from wood, which has been treated with wood preservatives as defined in Annex V to Directive 98/8/EC of the European Parliament and of the Council of 16 February 1998 concerning the placing of biocidal products on the market (1).
- **All waste** obtained from the various phases of the urban, domestic and industrial wastewater as defined in Article 2 of Council Directive 91/271/EEC of 21 May 1991 concerning urban waste-water treatment (2), irrespective of any further processing of such waste and irrespective also of the origin of the water.
- **Solid urban waste**, such as household waste.
- Packaging from the use of products from the agri-food industry, and parts thereof.

 The use of the above materials as feed for farmed insects in the EU is therefore **strictly prohibited**.

¹² Regulation (EC) No 183/2005 of the European Parliament and of the Council of 12 January 2005 laying down requirements for feed hygiene.

¹³ [The IPIFF Guide on Good Hygiene Practices for EU producers of insects as food and feed](#) (latest updated in February 2024) (see page 17 and followings as well as the table on page 21) provides a comprehensive overview the applicable restrictions.

3.2 Labelling of feed material

3.2.1. Main principles for labelling and presentation

The main principles which insect producers shall adhere to when placing insect derived feed on the EU market are defined in article 11.1. of the Feed Regulation.

Article 11.1. of the Feed Regulation

1. The labelling and the presentation of feed shall **not mislead the user**, in particular:

(a) as to the **intended use or characteristics of the feed**, in particular, the nature, method of manufacture or production, properties, composition, quantity, durability, species or categories of animals for which it is intended;

(b) **by attributing to the feed effects or characteristics that it does not possess** or by suggesting that it possesses special characteristics when in fact all similar feeds possess such characteristics;

(...)

3.2.2. Responsibility of feed business operators for labelling

The responsibility of insect producers, as feed business operators, for **ensuring the accuracy of labelling particulars** associated with insect-based ingredients (insect PAPs or insect fat) which they intend to place on the EU market is clearly established in article 12 of the Feed Regulation.

Insect producers are liable, not only towards their direct commercial partner (e.g. feed manufacturer producing compound feed intended for farmed animals or manufacturer of pet food) but also towards the **final end user** (e.g. farmer or pet owner) provided that the latter intermediary actor appropriately conveyed this information to the final user of the product.

Article 12 of the Feed Regulation

1. The person responsible for the labelling shall ensure the **presence and substantive accuracy** of the labelling particulars.

2. The person responsible for the labelling shall be the feed business operator **who first places feed on the market** or, where applicable, the feed business operator under whose name or business name the feed is marketed.

(...)

5. Within the businesses under their control feed business operators **shall ensure that mandatory labelling particulars are transmitted throughout the food chain** in order to allow the information to be provided to the final feed user in accordance with this Regulation.

3.2.3. Mandatory particulars

a) General mandatory labelling requirements

The information that must be provided by a feed business operator on a mandatory basis, no matter if he/she is active in the production of feed materials (e.g. insect-based ingredients such as insect PAP or insect fat) are stipulated in article 15.

Article 15 of the Feed Regulation

A feed material or compound feed shall not be placed on the market unless the following particulars are indicated by labelling:

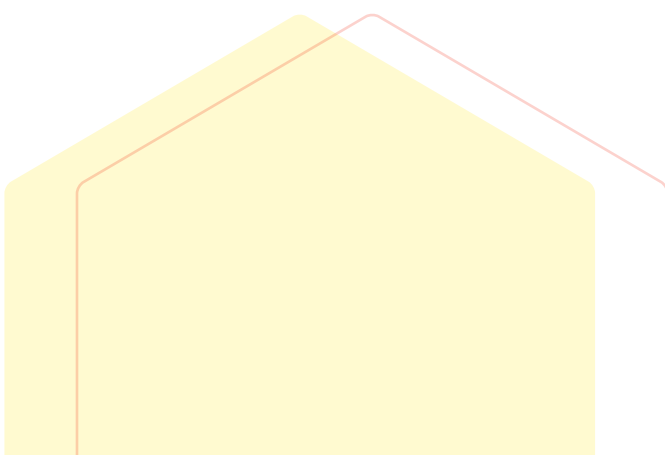
- the **type of feed**: 'feed material', 'complete feed' or 'complementary feed', as appropriate; (...)
- the name or business name and the **address of the feed business** operator responsible for the labelling;
- if available, the **establishment approval number** of the person responsible for the labelling;
- the **batch** or lot **reference** number
- the **net quantity** expressed in units of mass in the case of solid products, and in units of mass or volume in the case of liquid products;
- the **list of feed additives** preceded by the heading 'additives' in accordance with Chapter I of Annex VI or VII, as applicable, and without prejudice to labelling provisions laid down in the legal act authorising the respective feed additive; and
- the **moisture content** in accordance with point 6 of Annex I*

*The latter mentioned point 6 of Annex I stipulates, for the different categories of feed materials, the thresholds above which the compulsory indication of moisture content is required, including for the categories of feed materials listed in Annex V of this Regulation. However, the Catalogue of feed materials may foresee other levels for each specific feed material which is listed in the concerned instrument.

b) Specific mandatory requirements

i) Specific mandatory requirements

The specific mandatory labelling requirements for feed materials as defined in article 16 and in Annex V apply to insect-based ingredients.



Article 16 of the Feed Regulation

- In addition to the requirements provided for in Article 15, the labelling of feed materials shall also include:
- **the name of the feed material**; the name shall be used in compliance with **Article 24(5)**; and
- the **compulsory declaration** corresponding to the respective category as set out in the list in **Annex V**; the compulsory declaration may be replaced by the particulars laid down in the **Community Catalogue** referred to in Article 24 for each feed material in the respective category.
- In addition to the requirements provided for in paragraph 1, the labelling of feed materials shall include the following **when additives** are incorporated:

(a) the species or categories of animals for which the feed material is intended where the additives in question have not been authorised for all animal species or have been authorised with maximum limits for some species;

(b) instructions for proper use in accordance with point 4 of Annex II, where a maximum content of the additives in question is set; and

(c) the minimum storage life for additives other than technological additives.

Annex V: Compulsory declaration for feed materials as referred to in Article 16(1)(b)

Specific mandatory requirements for feed materials marketed in bulk or in unsealed packaging or containers are contained in article 23(2) in accordance with article 11(2) of the Feed Regulation.

Article 11.2. of the Feed Regulation

2. Feed materials or compound feed marketed in bulk or in unsealed packages or containers in accordance with Article 23(2) shall be accompanied by a document containing all mandatory labelling particulars required under this Regulation.

ii) Provisions of the Catalogue of feed materials concerning the name of the feed materials

There are also specific requirements concerning the name of the feed materials linked to the Catalogue of feed materials. Using a name of a feed material listed in the Catalogue requires compliance with all relevant provisions for the specific feed material as laid down in the Catalogue (in particular the description).

Article 24.5. of the Feed Regulation

5. Use of the Catalogue by the feed business operators shall be **voluntary**. However, **the name of a feed material listed in the Catalogue** may be used only on condition that all relevant provisions of the Catalogue are complied with.

More information about the Catalogue of feed materials and the Register of feed materials can be found in Annex II.

iii) Instructions for use of insect PAPs as provided by Regulation (EC) No 999/2001

The labelling conditions for processed animal protein derived from farmed insects (as well as porcine animals or poultry) and Compound Feed containing such processed animal protein are defined in **Chapter V section G of Annex IV** to [Regulation \(EC\) No 999/2001](#).

Annex IV of the Regulation (EC) No 999/2001

Chapter V, section G 'Accompanying document and labelling of processed animal protein derived from farmed insects, porcine animals or poultry, and compound feed containing such processed animal protein'.

The commercial document or, as appropriate, the accompanying health certificate (...) and the label of the processed animal protein derived from farmed insects, shall be clearly marked with the following words: '**Processed animal protein derived from farmed insects**' – '**shall not be used in feed for farmed animals except Aquaculture animals, fur animals, porcine animals, poultry**'.

The following words shall be clearly indicated on the label of compound feed containing processed animal protein derived from farmed insects, '**contains processed animal protein derived from farmed insects – shall not be fed to farmed animals except Aquaculture animals, fur animals, porcine animals, poultry**'.

IPIFF recommends that the label mentions that the product is '**not intended for human consumption**'

c) Presentation of labelling particulars

Article 14 of the Feed Regulation

- The mandatory labelling particulars shall be given in their entirety in a **prominent place** on the packaging, the container, on a label attached thereto or on the accompanying document provided for in Article 11(2), in a **conspicuous, clearly legible and indelible manner**, in the **official language or at least one of the official languages of the Member State** or region in which it is placed on the market.
- The mandatory labelling particulars shall be **easily identifiable** and shall not be obscured by any other information. They shall be displayed in a colour, font and size that does not obscure or emphasise any part of the information, unless such variation is to draw attention to precautionary statements (...)

3.2.4. Voluntary information

a) General conditions for voluntary labelling

The general conditions for operators to provide voluntary information in relation of feed materials are established in article 22 of the Feed Regulation.

Article 22 of the Feed Regulation

1. In addition to the mandatory labelling requirements, the labelling of feed materials and compound feed may also include voluntary labelling particulars, provided that **the general principles laid down** in this Regulation are complied with.

b) Functional claims

i) Definition

The Feed Regulation does **not** define the concept of 'claims'. The notion is nonetheless defined under **EU food legislation¹⁴, in particular in respect of nutrition and health claims**. Additionally, the notion of claims is also addressed in a number of consumer protection legislation¹⁵.

Applying the notion of 'claim' as defined under the nutrition and health claims legislation to feed materials, the notion of 'claim' can be understood as referring to any message or representation, which is **not mandatory under EU or national Member State legislation**, including pictorial, graphic or symbolic

representation in any form, which states, suggests or implies: the presence or the absence of a substance in a feed, a specific nutritional characteristic or process, and relates any of these to a specific function.

Claims form an essential medium for passing on information in relation to a feed material or compound feed to the purchaser to ensure an optimal and informed choice and use of the product. Advertising or promoting the feed material producing company with no direct reference to a product is not regarded as a claim and is thus not covered by the present Code.

ii) Typology of claims

Claims on insect feed ingredients may be made in relation to specific characteristics of the feed material including the following properties:

- Appearance / processing of the Feed;
- Composition of the Feed;
- Nutritional and/or analytical characteristics of the Feed;
- Functional properties of the Feed;
- Environmental performance of the Feed.

In practice, claims may be a combination of several of the categories of claims listed above, one (primary claim) being directly connected to the other (secondary claim).

iii) Main conditions for the use of the claim

Using claims requires compliance with a **number of obligations** which are defined in **article 13** of the Feed Regulation.

The key principles are as follows:

- Claims **shall not attribute to the feed effects or characteristics that it does not possess** or by suggesting that it possesses specific characteristics when in fact all similar feeds possess such characteristics.
- Claims should be **scientifically substantiated**.
- The person **responsible for the labelling is responsible for the accuracy of the claims**.

¹⁴ See Regulation (EC) No 1924/2006 on nutrition and health claims made on food.

¹⁵ See notably Directive 2005/29/EC concerning unfair business-to-consumer commercial practices in the internal market and Directive 2011/83/EU on consumer rights.

From the principles defined in article 13, we conclude that the **following claims** are **prohibited**:

- Claims concerning optimization of the nutrition and support or protection of the physiological conditions which explicitly use the following words “preventing, treating or curing a disease”.
- Claims with words such as “stimulates”, “increases”, “improves” or “reinforces” when they refer to a certain physiological function.
- Claims suggesting that, whatever the process, the insect ingredient provides specific/enhanced characteristics whereas such features are common to all similar Compound Feeds.

Article 13 of the Feed Regulation

- The labelling and the presentation of feed materials and compound feed may draw particular attention to the presence or the absence of a substance in the feed, to a specific nutritional characteristic or process or to a specific function related to any of these, provided that the **following conditions are met**:
- the claim is **objective, verifiable** by the **competent authorities** and **understandable by the user** of the feed; and

(...)

2. Without prejudice to paragraph 1, claims concerning optimisation of the nutrition and support, or protection of the physiological conditions are permitted, unless they contain a claim of the type referred to in paragraph 3(a).

3. The labelling or the presentation of feed materials and compound feed shall **not** claim that:

(a) it **will prevent, treat or cure a disease**, except for coccidiostats and histomonostats as authorised under Regulation (EC) No 1831/2003; this point shall not, however, apply to claims concerning nutritional imbalances provided that there is no pathological symptom associated therewith;

(b) it has a **particular nutritional purpose**, as provided for in the list of intended uses as referred to in Article 9, unless it satisfies the requirements laid down therein. (...)

iv) Conditions for substantiation of claims

Information must be verifiable by the competent authority. The competent authorities can request that the person responsible for the labelling provides evidence of the scientific substantiation of the claims. The conditions for substantiating claims are defined in article 13.1.b.

According to IPIFF, the substantiation may consist of one or more of the following:

- Formulation evidence
- Scientific literature (peer reviewed articles)
- Scientific opinions and publications from EU and recognised worldwide authorities (e.g. EFSA, FDA, national feed/food authorities)
- Research & Development trials:
 - External
 - In-house (such as company research result).

Long standing and well recognised use may also constitute one, but not the only element of proof.

Article 13 1.b of the Feed Regulation

(b) the person responsible for the labelling provides, at the request of the competent authority, scientific substantiation of the claim, either by **reference to publicly available scientific evidence** or **through documented company research**. The scientific substantiation shall be available at the time the feed is placed on the market. Purchasers shall have the right to bring to the attention of the competent authority their doubts in respect of the truthfulness of the claim. Where the conclusion is reached that the claim is not sufficiently substantiated, the labelling in respect of such claim shall be considered misleading for the purposes of Article 11. Where the competent authority has doubts regarding the scientific substantiation of the claim concerned, it may submit the issue to the Commission. The Commission may adopt a decision, where appropriate after obtaining an opinion from the Authority, in accordance with the advisory procedure laid down in Article 28(2).

v) Conditions for the use of Green Claims

The European Commission has drawn up a proposal for a directive on environmental claims, namely the *Proposal for a Directive of the European Parliament and of the Council on substantiation and communication of explicit environmental claims ('Green Claims Directive')*. This draft legislation is meant to apply solely to **Business-to-Consumers relations ('B2C')**. However, products sold on a B2B basis may subsequently be sold to consumers ('B2C'), in which case they will be subject to the directive.

The Green Claims Directive provides a framework for the use of environmental claims, which are defined by Article 2(o) of Directive 2005/29/EC as *'any message or representation which is not mandatory under Union or national law, in any form, including text, pictorial, graphic or symbolic representation, such as labels, brand names, company names or product names, in the context of a commercial communication, and which states or implies that a product, product category, brand or trader has a positive or zero impact on the environment or is less damaging to the environment than other products, product categories, brands or traders, or has improved its impact over time;'*.

Claiming that a product is "green" or sustainable influences consumers' choice of whether or not to purchase a product. For that reason, green claims must be justified and verifiable so as not to mislead the consumer.

Firstly, the following **information** about the products concerned must be made **available**, in physical form or in the form of a web link, QR code or equivalent (Article 5 of the Green Claims Directive)

- (a) environmental aspects, environmental impacts or environmental performance covered by the claim;
- (b) the relevant Union or the relevant international standards, where appropriate;
- (c) the underlying studies or calculations used to assess, measure and monitor the environmental impacts, environmental aspects or environmental performance covered by the claim, without omitting the results of such studies or calculations and, explanations of their scope, assumptions and limitations;
- (d) a brief explanation how the improvements that are subject to the claim are achieved;
- (e) the certificate of conformity referred to in Article 10 regarding the substantiation of the claim and the contact information of the verifier that drew up the certificate of conformity;
- (f) for climate-related explicit environmental claims that rely on greenhouse gas emission offsets, information to which extent they rely on offsets and whether these relate to emissions reductions or removals;
- (g) a summary of the assessment including the elements listed in this paragraph that is clear and understandable to the consumers targeted by the claim and that is provided in at least one of the official languages of the Member State where the claim is made.

Moreover, **explicit environmental claims** must be substantiated (Article 3 of the Green Claims Directive). The assessment shall:

- (a) specify if the claim is related to the whole product, part of a product or certain aspects of a product, or to all activities of a trader or a certain part or aspect of these activities, as relevant to the claim;
- (b) rely on widely recognised scientific evidence, use accurate information and take into account relevant international standards;
- (c) demonstrate that environmental impacts, environmental aspects or environmental performance that are subject to the claim are significant from a life-cycle perspective;
- (d) where a claim is made on environmental performance, take into account all environmental aspects or environmental impacts which are significant to assessing the environmental performance;
- (e) demonstrate that the claim is not equivalent to requirements imposed by law on products within the product group, or traders within the sector;
- (f) provide information whether the product or trader which is subject to the claim performs significantly better regarding environmental impacts, environmental aspects or environmental performance which is subject to the claim than what is common practice for products in the relevant product group or traders in the relevant sector;
- (g) identify whether improving environmental impacts, environmental aspects or environmental performance subject to the claim leads to significant harm in relation to environmental impacts on climate change, resource consumption and circularity, sustainable use and protection of water and marine resources, pollution, biodiversity, animal welfare and ecosystems;
- (h) separate any greenhouse gas emissions offsets used from greenhouse gas emissions as additional environmental information, specify whether those offsets relate to emission reductions or removals, and describe how the offsets relied upon are of high integrity and accounted for correctly to reflect the claimed impact on climate;
- (i) include primary information available to the trader for environmental impacts, environmental aspects or environmental performance, which are subject to the claim;
- (j) include relevant secondary information for environmental impacts, environmental aspects, or environmental performance which is representative of the specific value chain of the product or the trader on which a claim is made, in cases where no primary information is available.

Specific rules for **comparative explicit environmental claims** are also set out in Article 4 of the Green Claims Directive.

Additional rules relating to **environmental labels** are listed in Articles 7 and 8 of the Green Claims Directive.

Although these rules are not meant to apply to B2B transactions -and will thus not apply to the supply of feed materials in this type of transactions-, particular attention should be given to the compliance of the information conveyed along the supply chain with high standards of compliance with the principles applicable to the use of green claims. It is recommended to apply those B2C rules by analogy in B2B contexts, and to communicate on the sustainability credentials of any feed materials in accordance with these rules.

3.2.5. Non-compliance and Penalties

In case of non-compliance with the rules set out in the Feed Regulation, the penalties are determined by each Member State and by their national legislation (article 31 of the Food Regulation).

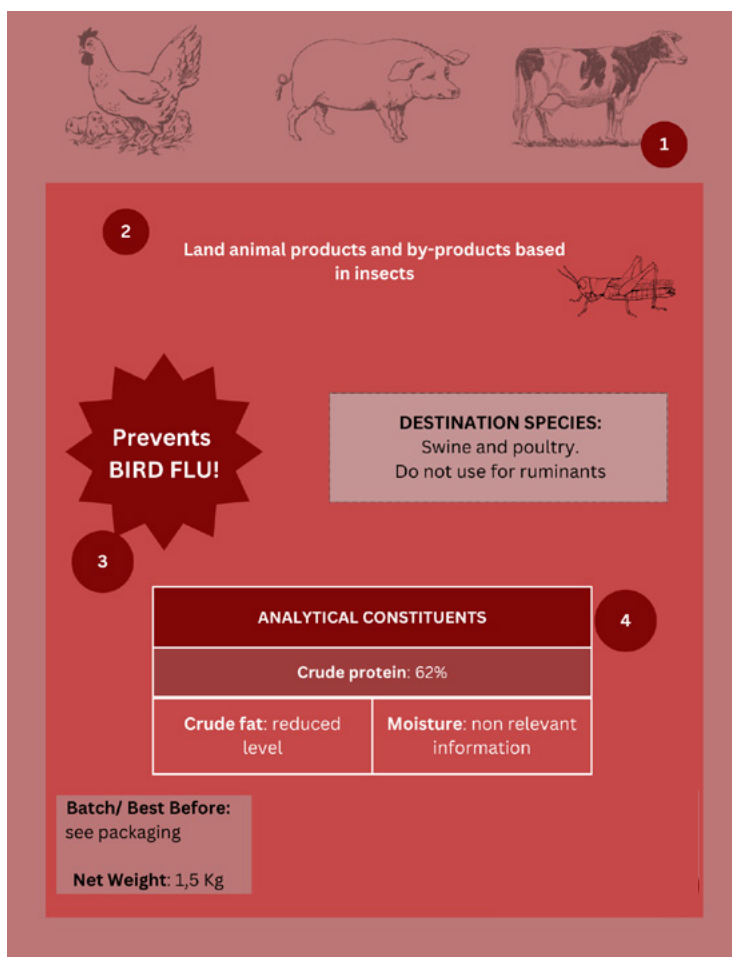
Article 31 of the Feed Regulation

Member States shall lay down penalties applicable to infringements of the provisions of this Regulation and shall take all measures necessary to ensure that they are implemented. The penalties provided for must be effective, proportionate, and dissuasive.

Member States shall notify such provisions to the Commission by 1 September 2010 at the latest and shall notify it without delay of any subsequent amendment affecting them.

3.3 Practical “Dos” and “Don’ts”

(1) Example of a misleading, non-compliant feed material label for an insect PAP product



Several elements of this fictitious example in Figure 1 above can be construed as misleading:

1. Main principles for the labelling (see 3.1.3.) - Article 11.1 Feed Regulation

1. “The labelling and the presentation of the feed shall not mislead the user”.

In this case, portraying images with ruminants might mislead the consumer since it is thought to be used for ruminants when it is not. (Reg. 767/2009- Article 11.1)

2. General mandatory requirements (see 3.2.1.) - Article 15 Feed Regulation

A feed material or compound feed shall not be placed on the market unless the following particulars are indicated by labelling:

(a) the type of feed: ‘feed material’, ‘complete feed’ or ‘complementary feed’;

In this case, there is no reference to the type of feed material

“A feed material or compound feed shall not be placed on the market unless the following particulars are indicated by labelling:

- (b) the name or business name and the address of the feed business operator responsible for the labelling;
- (c) if available, the establishment approval number of the person responsible for the labelling
- (d) the batch or lot reference number;

Based on these requirements we confirm that the label doesn't state the address of the feed business operator, the establishment approval number and the batch or lot reference number. It is therefore non-compliant with the Feed Regulation.

3. Specific mandatory requirements (see 3.2.2. and 3.2.3.) - Article 16 and 24 Feed Regulation

The labelling of feed materials shall also include:

The term "land animal products and by-products" used in accordance with Article 24.

IPIFF recommends the use of the term "Processed animal protein" to be compliant with the designation which is provided in the EU Catalogue of Feed Materials. In this case, there is no reference to the "Processed Animal Protein".

Moreover, according to Article 17 Feed Regulation and according to Commission Regulation (EU) No 68/2013 on the Catalogue of Feed Materials and as foreseen in footnote 20 of the above-mentioned regulation, some additional information should be added.

In the provided Label there is no reference to the life stage of the animal, neither on the processed using purposes, nor the name of the animal species processed. To comply with the regulation, the person who places the product on the market shall ensure that all mandatory information is included in the label.

Art. 16 1. (b) The compulsory declaration corresponds to the product category: if we refer to Article 24, the analytical constituents would be correctly declared. If we name our product based on the Catalogue of Feed Material (EU) No 68/2013) referred to before, we should check if there are different parameters to declare".

Art. 24 "The label shall include for each feed material listed at least the following particulars:

(a) the name;

(b) the identification number;

(c) a description of the feed material including information on the manufacturing process, if appropriate;

(d) particulars replacing the compulsory declaration for the purpose of Article 16(1)(b); and

(e) a glossary with the definition of the different processes and technical expressions mentioned."

Based on the requirements foreseen both in Feed Regulation (annex V) or in the Catalogue of Feed Materials (9.4.1 'Processed Animal Protein') **the crude fat content and moisture, 'if above 8%', should have been indicated on the label. The Label provided doesn't include information on fats and moisture despite the fact the product contains content above the percentage (e.g. crude protein: 62%)**

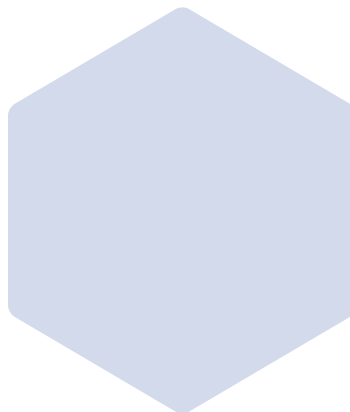
4. Basic conditions for the use of the Claim (see 3.3.2.2.) - Article 13.3 Feed Regulation

"The labelling or the presentation of feed materials and compound feed shall not claim that:

(a) it will prevent, treat, or cure a disease, except for coccidiostats and histomonostats as authorised under Regulation (EC) No 1831/2003; this point shall not, however, apply to claims concerning nutritional imbalances provided that there is no pathological symptom associated therewith;

(b) it has a particular nutritional purpose, as provided for in the list of intended uses as referred to in Article 9 unless it satisfies the requirements laid down therein."

The label **suggests the feed material could prevent a disease (Bird flu)**. To be compliant with the regulation, every claim provided on the label must be objective and verifiable.



(2) Examples of compliant feed materials labels

nextLarvae

Processed animal protein derived from farmed insects - defatted products - Black Soldier Fly (adult) Larvae

Recipient: 1

Address: 2

Tel:

Protein: >50%	Crude fat: <10%
Moisture content: <5%	Ash: <15%
Batch number: nMXXXXXX	Manufacture date: 01/01/202X
Net quantity: 000kg	Expiry date: 01/01/202X

TRANSPORT/DELIVERY CONDITIONS

Store at a cool and dry place, out of direct sunlight 3

NOT FOR HUMAN CONSUMPTION

PROCESSED ANIMAL PROTEIN DERIVED FROM FARMED INSECTS - SHALL NOT BE USED IN FEED FOR FARMED ANIMALS EXCEPT AQUACULTURE ANIMALS, FUR ANIMALS, PIGS AND POUCELT

4

Oil 6-9

Made in France - Fabriqué en France

Feed material - Rendered fat derived from farmed insects (*Tenebrio molitor*) 1

Graisses fondues dérivées d'insectes d'élevage (*Tenebrio molitor*)

FRANCE

Obtained by processing larvae of *Tenebrio molitor* 3

Fabriqué par transformation de larves de *Tenebrio molitor*

AVERAGE VALUES / VALEURS MOYENNES :	Batch N° / N° de lot :
Total Fatty acids / Total acides gras >	Manufacture Date / Date de fabrication :
	Best before / DDM :

Category 3 animal by-product: Not intended for human consumption.
Sous-produit animal de catégorie 3 : Non destiné à la consommation humaine

Feed material.
Matière première pour aliment des animaux.

Store in a dry, cool and clean environment in the original unopened containers.
A conserver dans un environnement sec, frais et propre dans leur contenant d'origine non ouvert.

Net Weight / Poids net : 1,8 kg 4

Protein 70

Made in France - Fabriqué en France

Feed material - Processed animal protein derived from farmed insects (*Tenebrio molitor*) 1

Matière première pour aliment des animaux - Protéines animales transformées dérivées d'insectes d'élevage (*Tenebrio molitor*)

FRANCE

Obtained by processing larvae of *Tenebrio molitor* 3

Fabriqué par transformation de larves de *Tenebrio molitor*

AVERAGE VALUES / VALEURS MOYENNES :	Batch N° / N° de lot :
Crude Protein / Protéines brutes	Manufacture Date / Date de fabrication :
Crude Fat / Matières grasses brutes	Best before / DDM :
Crude ashes / Cendres brutes	

Category 3 animal by-product: Processed animal proteins derived from farmed insects — Shall not be used in feed for farmed animals except of aquaculture animals, fur animals, porcine animals, poultry.
Sous-produit animal de catégorie 3 : Protéines animales transformées dérivées d'insectes d'élevage - Ne pas utiliser dans les aliments pour animaux d'élevage à l'exception des animaux d'aquaculture, animaux à fourrure, porcins, volailles.

Feed material, not for human consumption.
Matière première pour aliment des animaux, non destinée à la consommation humaine

Store in a dry, cool and clean environment in the original unopened bags.
A conserver dans un environnement sec, frais et propre dans leur sac d'origine non ouvert.

Net Weight / Poids net : 1,8 kg 4

1. General mandatory requirements (see 3.2.1.) - Article 15 Feed Regulation

The Label provided is compliant since it has provided:

“(a) the type of feed material.

(b) the compulsory declaration corresponding to the respective category as set out in the list in Annex V.”

The indication on the label is compliant because, even if some information is obscured for privacy reasons, the labelling includes the name or business name and the address of the feed business operator responsible for the labelling, the establishment approval number of the person responsible for the labelling, the Batch or lot reference number and the net quantity expressed in units of mass in the case of solid products, and units of mass or volume in the case of liquid products.

2. Specific mandatory requirements (see 3.2.) - Article 16 and 24 - Feed Regulation

In addition to the requirements provided for in Article 15, the labelling of feed materials includes **the term “Processed Animal Protein”**, used following Article 24 in compliance with the regulation listed in the EU Catalogue of Feed Materials.

Finally, as foreseen in footnote nr.20 (9.4.1 regulation (EU) No 68/2013) there is a reference to the life stage of the animal and the processed using purposes.

In accordance with Feed Regulation - Article 24, the Label provided the following particulars:

“(a) the name;

(b) the identification number;

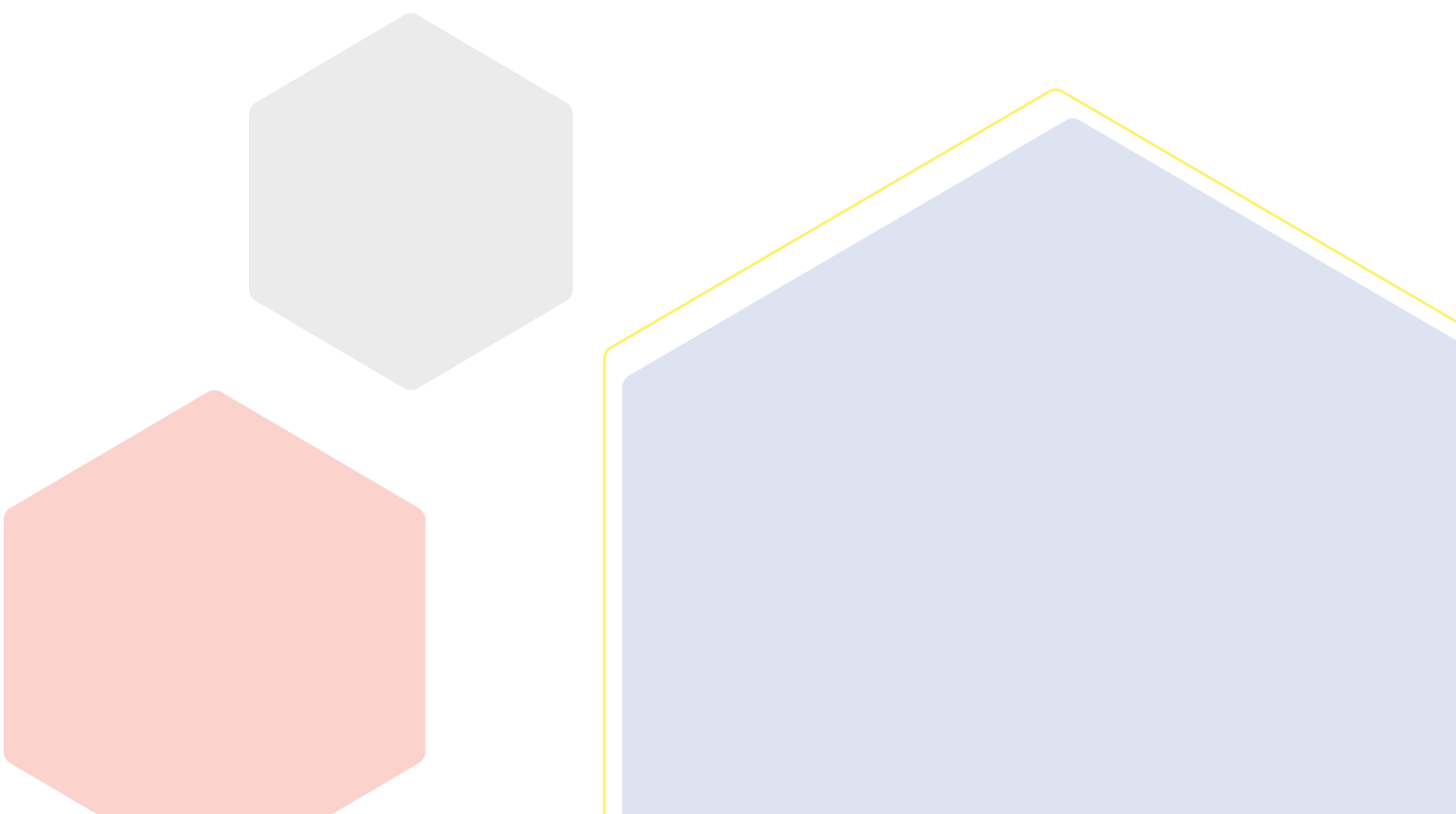
(c) a description of the feed material including information on the manufacturing process

(e) a glossary with the definition of the different processes and technical expressions mentioned.”

Based on the requirements foreseen both in Feed Regulation (annex V) or in the Catalogue of Feed Materials (9.4.1 ‘Processed Animal Protein’) the crude fat content and moisture, (as above 8%), have been indicated on the label.

3. Mandatory labelling particulars - Article 14 Feed Regulation

The Mandatory labelling particulars have been given entirety in a **prominent place on the packaging**, and the container, and in a conspicuous, clearly legible and indelible manner, in the official language or at least one of the official languages of the Member State or region in which it is placed on the market. Moreover, **the mandatory labelling particulars are easily identifiable.**



ANNEX I – Abbreviations and Definitions

Abbreviations

- EU: European Union
- EC: European Commission
- MS: Member States
- Insect PAP: processed animal proteins derived from farmed insects
- Catalogue: Community Catalogue of feed materials
- Register: Register of feed materials

Definitions

Batch or **Lot** means an identifiable quantity of feed determined to have common characteristics, such as origin, variety, type of packaging, packer, consignor or labelling, and, in the case of a production process, a unit of production from a single plant using uniform production parameters or a number of such units, when produced in continuous order and stored together (article 3(2) Feed Regulation).

Claim: any labelling or presentation which draws particular attention to the presence or the absence of a substance in the feed, to a specific nutritional characteristic or process or to a specific function related to any of these (article 13 Feed Regulation).

Complementary feed: Compound feed which has a high content of certain substances but which, by reason of its composition, is sufficient for a daily ration only if used in combination with other feed (article 3(2) Feed Regulation).

Complete feed: compound feed which, by reason of its composition, is sufficient for a daily ration (article 3(2) Feed Regulation).

Compound feed: mixture of at least two feed materials, whether or not containing feed additives, for oral animal feeding in the form of complete or complementary feed (article 3(2) Feed Regulation).

Feed: any substance or product, including additives, whether processed, partially processed or unprocessed, intended to be used for oral feeding to animals (article 3(4) Feed Regulation).

Feed business operator: any natural or legal person responsible for ensuring that the requirements of this Regulation are met within the feed business under their control (article 3(2) Feed Regulation).

Feed intended for particular nutritional purposes: feed which can satisfy a particular nutritional purpose by virtue of its particular composition or method of manufacture, which clearly distinguishes it from ordinary feed. Feed intended for particular nutritional purposes does not include medicated feedingstuffs within the meaning of Directive 90/167/EEC (article 3(2) Feed Regulation).

Feed materials: products of vegetable or animal origin, whose principal purpose is to meet animals' nutritional needs, in their natural state, fresh or preserved, and products derived from the industrial processing thereof, and organic or inorganic substances, whether or not containing feed additives, which are intended for use in oral animal-feeding either directly as such, or after processing, or in the preparation of compound feed, or as carrier of premixtures (article 3(2) Feed Regulation).

Food-producing animal: any animal that is fed, bred or kept for the production of food for human consumption, including animals that are not used for human consumption, but that belong to a species that is normally used for human consumption in the Community (article 3(2) Feed Regulation).

Label: means any tag, brand, mark, pictorial or other descriptive matter, written, printed, stencilled, marked, embossed, impressed on, or attached to the packaging or the container of feed (article 3(2) Feed Regulation).

Labelling: means the attribution of any words, particulars, trademarks, brand name, pictorial matter or symbol to a feed by placing this information on any medium referring to or accompanying such feed, such as packaging, container, notice, label, document, ring, collar or the Internet, including for advertising purposes (article 3(2) Feed Regulation).

Minimum life storage: the period during which, under proper storage conditions, the person responsible for the labelling guarantees that the feed retains its declared properties; only one minimum storage life may be indicated in respect of the feed as a whole, and it is determined on the basis of the minimum storage life of each of its components (article 3(2) Feed Regulation).

Non-food producing animals means any animal that is fed, bred or kept but that is not used for human consumption, such as fur animals, pets and animals kept in laboratories, zoos or circuses (article 3(2) Feed Regulation) (article 3(2) Feed Regulation).

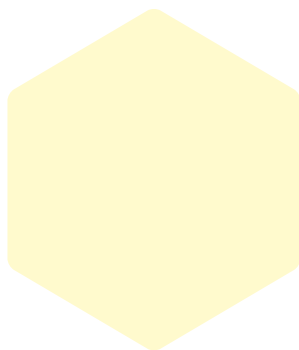
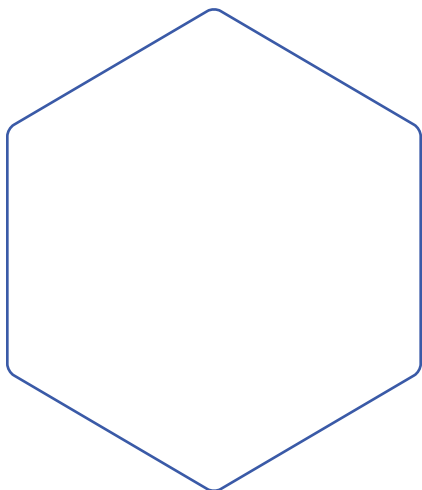
Particular nutritional purpose: purpose of meeting the specific nutritional needs of animals whose process of assimilation, absorption or metabolism is, or could be, temporarily or irreversibly impaired and who can therefore benefit from the ingestion of feed appropriate to their condition (article 3(2) Feed Regulation).

Pet or pet animal means any non-food producing animal belonging to species fed, bred or kept, but not normally used for human consumption in the Community (article 3(2) Feed Regulation).

Pet food: any product intended for oral feeding to pet animals whether processed, partially processed or unprocessed, including dog chews, feed materials and compound feed (article 3(4) Regulation 178/2002).

Placing on the market: the holding of food or feed for the purpose of sale, including offering for sale or any other form of transfer, whether free of charge or not, and the sale, distribution, and other forms of transfer themselves (article 3.8 Regulation 178/2002).

Presentation: means the shape, appearance or packaging and the packaging materials used for the feed, further to the way in which it is arranged and the setting in which it is displayed (article 3(2) Feed Regulation).



ANNEX II – Catalogue of feed materials and the Register of feed materials.

The Feed Regulation creates the legal basis for an **EU Catalogue of feed materials** and a **Register of feed materials**.

1. General information on the Catalogue of feed materials

The Catalogue of feed materials (hereinafter '**the Catalogue**') is set out under [Regulation \(EU\) No 68/2013](#). The Catalogue consists of a comprehensive, but non-exhaustive, list of feed materials along with a product description. The Catalogue currently includes over 1000 entries.

(a) Purpose of the Catalogue

The Catalogue was created as a tool intended to improve the labelling of feed materials and compound feed. The Catalogue is meant to facilitate the exchange of information on the product properties along the supply chain.


(b) Structure of the Catalogue

Article 24(1) of the Feed Regulation provides that for each feed material listed in the Catalogue, the following particulars are mentioned:

- (a) **the name**;
- (b) the **identification number**;
- (c) a **description of the feed material** including information on the **manufacturing process**, if appropriate;
- (d) particulars **replacing the compulsory declaration** for the purpose of Article 16(1)(b); and
- (e) a **glossary** with the definition of the different processes and technical expressions mentioned (...)

(c) Authorised and un-authorised feed materials

The mere fact that a **product** is listed in **the Catalogue** or in the accompanying **Register of feed materials** does **not** necessarily mean that **the product is authorised as feed material for farmed insects**, considering that the use of several feed materials included in the Catalogue are subject to restrictions as to their intended use, in **accordance with relevant EU legislation**.

 This is notably the case for certain feed materials consisting of or **containing animal by-products** which are only allowed as **feed for non-food producing animals**, including fur animals.

Conversely, feed materials, not listed in the Catalogue of feed materials, may still possibly be used for feeding purposes at EU level. Yet, the person, who for the first-time places on the market a feed material that is not listed in the Catalogue has to immediately notify its use to the representatives of the European feed business sectors. The latter notification will be published in a public Register.

2. Requirements related to the use of the Catalogue and IPIFF recommendations

(a) Conditions

Using a name of a feed material listed in the Catalogue requires **compliance with all relevant provisions** for the specific feed material as laid down in the Catalogue (in particular the description).

Article 24.5. of the Feed Regulation

5. Use of the Catalogue by the feed business operators shall be **voluntary**. However, **the name of a feed material listed in the Catalogue** may be used only on condition that all relevant provisions of the Catalogue are complied with.

IPIFF recommends to use the name of feed materials listed in the EU Catalogue of feed materials ([Regulation \(EC\) No 68/2013](#)).

A feed material may be labelled using a name that is not listed in the Catalogue of feed materials. This may be the case where a more descriptive name or a brand name is used, or where the specific feed material does not align well with existing descriptions given in the Catalogue. It is required that the name of the feed material is not misleading.

(b) 2 cases of specific names provided for in the EU Catalogue of feed materials (Chapter 9 Regulation 68/2013: land animal products and products derived thereof)

(1) Insect fat

	Name	Description	Compulsory declaration
9.2.1	Animal fat	Product composed of fat from land animals, including invertebrates other than species pathogenic to humans and animals in all their life stages. If extracted with solvents, may contain up to 0,1 % hexane	Crude fat Moisture if > 1%

(2) Insect PAP

	Name	Description	Compulsory declaration
9.4.1	Processed Animal Proteins	Product obtained by heating, drying and grinding whole or parts of land animals, including invertebrates other than species pathogenic to humans and animals in all their life stages from which the fat may have been partially extracted or physically removed. If extracted with solvents, may contain up to 0,1 % hexane.	Crude protein Crude fat Crude ash Moisture if > 8 %

For insect fats and insect PAPs, if the catalogue is used for labelling purposes, **the name (respectively 'animal fat' or 'processed animal proteins') has to be supplemented** as appropriate by

- **the animal species processed** (e.g. porcine, ruminant, avian, insect) and/or
- **the life stage** (e.g. larvae) and/or
- **the material processed** (e.g. bone) and/or
- **the process used** (e.g. defatted, refined) and/or
- the naming of the animal species not used in respect of the ban on **intra-species recycling** (e.g. poultry free).

These supplementary indications apply in addition to the mandatory requirements concerning commercial documents and health certificates for animal by-products and derived products as laid down in Regulation (EU) No 142/2011 (in particular, Annex VIII, Chapter III).

3. Notification of new feed materials

I. INITIAL STEPS

Any operator who intends to place a feed material on the EU market for the first time has to check if this material is included in the Catalogue. If it is not, then the operator has to notify the feed material so as to include it in the Register. This is a preliminary step to include a feed material in the Catalogue.

Before proceeding with the notification of a feed material, the operator needs to check if the product is indeed a feed material and if its notification is required.

Concretely, the following steps should be taken:

- Check the feed materials status of your product. The Recommendation 2011/25/EU of the Commission can be useful¹⁶.
- Check on the EU official Catalogue of feed materials and the Register (www.feedmaterialsregister.eu) if the name of the product you place on the market is listed (**! a notification of the product with the same name to the register of feed materials would be illegal !**).
- Check on the online Register if a notification for a product of the same nature has been withdrawn for legal reasons (in which case notifying the product again may be regarded as abusive).
- Check on the online Register if a notification has already been made for a product with the same name and similar characteristics (in which case a notification is not necessary).

Note:

- If the name of the feed material is listed in the Register but the characteristics of the feed material do not meet the ones mentioned in the Register, the operator has to file a new notification (same name but different characteristics);
- If the name of the feed material is not mentioned at all in the Register, the operator has to introduce a new notification (new name and new characteristics).

II. NOTIFICATION PROCEDURE

1) Registration

1.1) Name of the feed material

It is required to provide the name of the feed material in English. The product can also be specified in the different languages of the countries where the product is meant to be placed.

1.2) Feed materials characteristics

The notifier is required to provide information on the key characteristics of the feed material he places on the market. For transparency and to facilitate quality check, it is recommended to provide that information in English.

This information will be useful for other operator who would intend to place the same feed material on the market, and for authorities to check whether the feed material has been effectively registered.

Indicative list of such characteristics:

- Type of feed material (vegetable, mineral, animal)
- Process from which the feed material results
- Identity of the raw material from which the feed material is produced
- Main nutrients provided or carrier.

1.3) Notifying parts

The notification should be performed by the operator who places the feed material on the market, or a party mandated specifically to that purpose.

The notifying party need to provide the following information:

- **Name, business address and registration number as feed business operator placing on the market.**
- **Name and address of the company notifying the placing on the market** if the notification is delegated to a third party. Information on the third party is needed for subsequent contact in the framework of quality check.
- **Personal information on the notifier:** for the purpose of quality check, there must be a possibility for the manager of the register to contact the person who performs the notification.

1.4) Classification check: clarification of the legal status of the product

1.5) Submission and validation

When submitted, you will receive an email inviting you to validate your notification. Once validated, you will receive an acknowledgment of registration of your product in the online register.

2) Publication of information on the register (name + characteristics)

3) Access to the information provided by the notifying feed business operators

4) Maintenance of the register/withdrawal of notifications

Notifications will be automatically deleted if not validated within 1 month of the date of notification.

In case of multiple notifications with the same name/description/notifier, only one will be kept. Also, the developers and owners of the website reserve their rights to withdraw illegal notifications.



International Platform
of Insects for Food and Feed

More IPIFF publications are available here



All rights reserved. No part of this brochure may be used or reproduced without written permission, except for non-commercial uses, such as brief quotations in critical articles. For permission requests, contact the IPIFF Secretariat, 7 rue Joseph Stevens (13th floor), 1000 Brussels, Belgium.

Cover art & brochure design by:

distinkt

Usually right.

www.distinkt.bg
Say hello@distinkt.bg
Hristo Botev Blvd.
Sofia, Bulgaria, 117
p: +359 2 9815 684