

# Policy Priorities of the European insect sector:

IPIFF's Recommendations for  
the EU Strategic Agenda  
2024-2029



International Platform  
of Insects for Food and Feed

# I. INTRODUCTION

Food production contributes significantly to the total greenhouse gas emissions in Europe, as it requires the use of excessive amounts of natural resources. Complementary to the excessive use of resources, vast amounts of food end up in wastelands<sup>1</sup>.

The European Union (EU) and actors form the agri-food chain have taken actions in order to overcome these challenges. A global leader in the climate transition to more sustainable food supply chains, the EU aims to **reach climate neutrality by 2050**<sup>2</sup>.

In order for EU policy makers to turn these ambitions into reality, significant strides must be made to reduce emissions and **accelerate the shift** of our **food systems from linear to circular production models**. According to the European Commission, this would also necessitate actions to identify and foster the development of new innovative food and feed products<sup>3</sup>.

Moreover, the COVID-19 pandemic and the Russian invasion of Ukraine put additional pressure on our food and feed supply chains, highlighting the **vulnerabilities of our current agri-food system**. These growing geopolitical tensions have also placed **food security** and **competitiveness challenges** at the centre of the EU policy agenda, alongside **climate change**<sup>4</sup>. The new geopolitical landscape shed light on the **structural bottlenecks** for European industry and companies alike. These include high energy prices, skills and labour shortages and their difficulties in accessing access capital, which increases European companies' difficulties to compete at international level<sup>5,6</sup>.

Nevertheless, **maintaining food security, industrial competitiveness, and climate change mitigation are not incompatible**. Quite the contrary -the European Commission recognises that 'one of the greatest risks to our security is the impact of climate change'. Not only are they not incompatible, rather they complement one another.

The **Farm to Fork Strategy** is at the **heart of EU climate ambitions**, setting ambitious goals in accelerating the transition to **sustainable food systems**, which is a key priority towards achieving the climate and environmental objectives of **the Green Deal**<sup>7</sup>. Notably, this strategy recommends to **foster the development of EU produced innovative and alternative protein sources** in order to achieve this goal.

The present document sets out the **strategic priorities of the European insect sector** in contributing to the **transition towards more sustainable and resilient food systems**. We are confident that the proposals included herein will **support the EU institutions'** reflection on how to **improve the competitiveness, resilience, and circularity** of our **food systems** in Europe.

1. In the EU, **over 59 million tonnes** of food waste (132 kg/inhabitant) are generated annually ([Eurostat, 2024](#)), with an associated market value estimated at **132 billion euros** (SWD (2023)421).

2. A Clean Planet for all - A European strategic long-term vision for a prosperous, modern, competitive and climate neutral economy COM (2018) 773

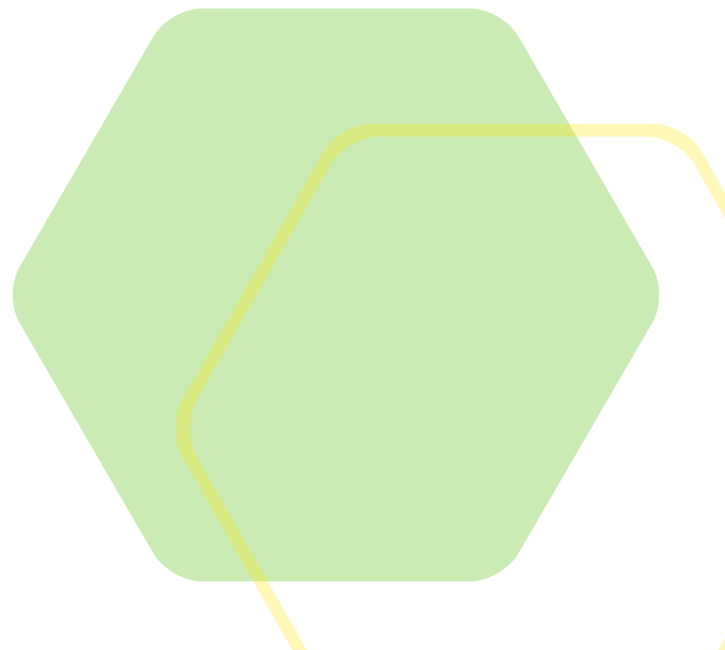
3. Communication from the European Commission: 'The European Green Deal' (11 December 2019). COM (2019) 640 final.

4. See EC Communication from March 2022.

5. European Choice: Political Guidelines for the next European Commission 2024-2029 (18 June 2024)

6. In a report published in September 2022 (report on 'the Future of Europe Competitiveness: a competitiveness strategy for Europe'), The former President of the European Central Bank, Mario Draghi echoes the views of the President of the European Commission, while stressing the need to maintain foothold *Europe's economic security* and prevent *lower food security*

7. Communication from the European Commission 'A Farm to Fork Strategy for a fair, healthy and environmental-friendly food system' (20 May 2020). [COM \(2020\) 381 final](#)



## II. The European insect-producing sector today: Contributing to EU objectives and unleashing the potential of the European insect sector

The European Union's agri-food policy goals are instrumental for ensuring the bloc's food security and economic competitiveness, and the European insect sector has a pivotal role in **supporting the achievement of these goals**, including:

- **The EU Protein strategy** towards diversifying our protein sources/increasing EU food autonomy by boosting the production of local and sustainable protein sources;
- The Achievement of **food waste reduction targets**;
- Reducing the **environmental footprint** of our food and feed chains.

European insect-producing companies are poised to **address** these challenges, thanks to its **sustainability** and **circularity** credentials.

At the same time, the European insect sector has been growing steadily over the past years<sup>8</sup>. The recent **positive EU market milestones** (i.e. EU novel food authorisations as from 2021, insect proteins approval as feed in aquaculture in 2017, authorisation expanded to pig and poultry markets in 2021) **cleared the path for the development of the sector** by giving businesses regulatory certainty to develop their market activities<sup>9</sup>. Through such reforms, the EU legislator also recognised the economic potential for using insects in food and feed applications.

With such reforms, the European insect sector has **reached a critical threshold** on the path to achieving **industrial and commercial maturity**, as evidenced by the substantial investments (i.e. above 1.5 billion EUR) allocated to the building of production capacities amounting to over 150 production facilities across Europe, and the employment opportunities generated by the industry within European geographies (3.500 jobs have been created by European insect-producing companies until today).

- ▶ Published in November 2023, the IPIFF document 'IPIFF perspectives on the evolution of the European insect sector towards 2030' (document available on the IPIFF website through the following [link](#)) provides a comprehensive overview of the European insect sector today<sup>10</sup>.

Thus, the European insect sector has entered into **a new phase**, reaching important milestones in its efforts to achieve **the required level of scalability to realise its full potential**. These recent developments go along with the **mutations** and **challenges** that are traditionally faced by 'novel' and capital-intensive industries: Operators are focusing on further innovations, attracting capital, reducing cost prices, increasing production capacities, and advocating for regulatory changes, all with the objective to become profitable<sup>11</sup>. Recently, these challenges have been exacerbated by difficulties operators face when attracting capital, in the context of ever-**scarcer financial resources**.

8. Several reports indicate a compound annual growth rate (CAGR) of 33% [Insect Protein Market Share & Growth Analysis Report](#).

9. For further details on this subject, see the aforementioned brochure (page 3).

10. For further background about the recent evolutions experienced by European insect producing companies and current state of the sector, see IPIFF brochure titled 'IPIFF perspectives on the evolution of the European insect sector towards 2030: current EU regulatory status, existing opportunities and prospects for development' (November 2023), available on the IPIFF website through the following [link](#).

11. For further details, see the aforementioned document.

In addition to more challenging economic environment and challenges associated with production scaling up, **European insect producers continue to suffer from regulatory restrictions**<sup>12</sup> (including delays in the running of several EU major policy reforms for the sector) and the lack of **ambitious** and consistent **strategic plans** (at EU or national/regions), which would contribute to **accelerating the train of regulatory reforms**.

These reforms are indeed notably necessary to **broaden the range of (i) substrates** (e.g. primarily through the EU authorisation of using meat and fish containing former foodstuffs, such as food losses from supermarkets and from agri-food industries, and catering waste in a second phase) with which insects can be fed (the can, on the one hand, materially reduce the cost price of insect based ingredients and, on the other hand, can materially contribute the food waste reduction targets).

**(ii) facilitate market access for the use of insect frass as a fertilising product**, or for **other effective applications**, consistently with the EU Food Waste Pyramid<sup>13</sup> (e.g. upcycling of frass through biogas production, composting or its export as a fertilising product outside the territory of the European Union).

These reforms would contribute **to maximise the potential of the insect sector** and enhance its contribution to circular food supply chains, by **broadening markets** in which insect products could be used (i.e. use of insect products in food applications, feed or plant nutrition) thereby **reducing their environmental footprint**.

Owing to their sustainability credentials and nutritional or functional benefits, as well as product safety, we also plead for establishing specific measures towards **incentivising their increasing adoption by European consumers and business customers**<sup>14</sup>.

- ▶ Throughout this document, we **aim to focus the attention of the European Commission**<sup>15</sup> and **EU Policy makers** on the aforementioned priorities for our sector, and **create a sense of urgency** to address them.

We indeed consider that such efforts would be **instrumental** in the **realisation of the strategic goals of the European institutions** (*see above*) while being a **game changer for many insect-producing companies** and conditioning the capacity of the European insect sector to keep its leading role globally. Conversely, **further delays in the shaping** and/or **the realisation of these reforms** would seriously undermine development plans for several actors from the sector, while also putting **at risk the survival of certain companies**, and by extension of that – of thousands of European employees.

In order to achieve the aforementioned goals, IPIFF and its members have developed a **'joint vision'**, which materialises through the present **Manifesto**.

- Targeted at the European Commission and other actors who contribute to the EU Strategic Agenda 2024-2029, IPIFF's vision is has outlined **3 main pillars** (*see Chapter III below*).
- These goals are then translated into a series of **'key policy recommendations'** (*see Chapter IV below*).

12. In an internal survey developed in February 2023, the IPIFF members were consulted on the main challenges and 'limiting external factors' for the development of the European insect sector, which they are currently facing. From the 33 survey's answers received, **'scaling up of production'** was identified as the main challenge for the insect sector (45, 5% of the respondents) followed by **'regulatory constrains/limitations'**. See the results from the concerned survey on page 6 of the aforementioned brochure, available through following [link](#). See also the IPIFF info sheets on 'food products made with ingredients from insects' (6 September 2023)

13. See the corresponding document through the following [link](#)

14. For further information about the sustainability credentials and/or functional/nutritional benefits of insect food and feed products, you may refer to the following factsheets documents, available on the [IPIFF website](#).

15. At the time of writing this document, the newly elected European Commission to act for the year 2025-2029 had yet been yet officially appointed.

### III. IPIFF Manifesto: 3 pillars for EU policy action

The strategic vision developed by the European insect sector focuses on three main pillars:

# 1.

#### PILAR 1 IMPROVE COMPETITIVENESS:

**Removing the EU regulatory bottlenecks that currently hinder the competitiveness of the European insect sector to establish a future-proof legislative framework that enables industrial competitiveness, but not at the expense of sustainability.**

Over the last years, IPIFF has actively contributed to the **shaping** of **EU regulatory standards** applicable to insect producers in Europe, creating the legislative framework for business operators, while providing them with the necessary visibility to plan their investment and marketing activities.

Yet, we consider that this EU regulatory framework remains **incomplete**, as the full potential of the insect sector is being **hampered** due to the **'restrictive' categorisation of insects and their by-products as food or feed by the EU legislator**. For instance, the classification of invertebrates as 'farmed animals' under the EU animal by-products legislation<sup>16</sup> prevents operators from upcycling underused biomasses<sup>17</sup>, including through the reintroduction of food losses containing meat and/or fish into the food chain, consistently with the EU Food Waste Pyramid.

- ▶ IPIFF pleads for engaging the **necessary reforms** towards **broadening the range of biomasses currently authorised in insects' diets**, thereby maximising the bio-conversion potential of insects and effectively addressing the issue of food waste at European level.
- ▶ Moreover, European insect producers urge the European Commission services to step up efforts to **achieve progress on EU policy reforms** that would open viable **outlets for the different insect by-products**, notably through the effective upcycling of insect frass.

The aforementioned reforms are indeed **instrumental to ensure the competitiveness** of companies active in insect production activities through the reduction of input costs and the **effective valorisation of the insect by-products** (e.g. insect frass), both within and outside the food and feed chains, in line with the principles of the Circular Economy.

*The proposed recommendations be included under these frameworks are described in chapter IV, section i of the present document.*

16. See article 3 6. of [Regulation \(EC\) No 1069/2009](#) (OJ L 300, 14.11.2009, p. 1–33)

17. See IPIFF Regulatory brochure: 'IPIFF's Policy Priorities towards 2025 (July 2020) document available on the IPIFF website through the following [link](#).

## 2.

## PILAR 2 PROMOTING DEMAND:

### support the increased use of insect products in various value chains

We consider that the EU legislator should open **markets for other insect-derived ingredients** than protein-based products (e.g. dried insects, fat and chitin), as those represent valuable materials which could be efficiently valorised through various value chains.

More broadly, EU Policy makers should be empowered to provide the **incentives** or **information tools for European end consumers** and business **customers** to **prioritise** the use and/or consumption of **insects and its derived products** vis à vis **other protein sources**, which may be more competitive price-wise but have adverse impacts on our ecosystems (e.g. deforestation, depletion of our oceans) and/or vis à vis **imported insect ingredients or products** of lower quality and/or not complying with equivalent safety standards as those being followed by European insect producers'.

Such measures are intended **to mirror the true costs** associated with the production of the concerned products, while these would serve to inform European consumers and customers about their sustainability credentials and nutritional or health benefits, providing them with the necessary information to make an informed choice.

- ▶ Such efforts would notably materialise through **guaranteeing market access for whole dried larvae** (for use in animal feed) and the recognition of insect production activities under the EU policy frameworks tailored for products adhering to **highest sustainability standards** (e.g. EU organic legislation).
- ▶ These endeavours may consist of **imposing stricter safety controls and checks on insect products** (intended for food or for feed) **imported from outside the European Union**.
- ▶ Finally, we plead for the **establishment of compulsory labelling provisions**, allowing European consumers to **identify the origin the produced animal in insect food products**. As such, consumers would be empowered to prioritise locally produced proteins and more sustainable products higher, due to lower footprint as compared with products produced overseas (due to environmental impacts implied by transport operations).

*The concrete regulatory actions recommended by PIFF in these areas are outlined throughout chapter IV of the present document.*

**Other policy instruments** could also be mobilised to set the foundations for the **systemic changes** needed to accelerate the transition to a sustainable food system. The recently **proposed EU initiative** for a **legislative framework for sustainable food systems**<sup>18</sup> - one of the flagship initiatives of the Farm to Fork Strategy – sets out some general objectives and principles that would ensure such a paradigm shift. Through ambitious and cross-cutting provisions that would be embedded in all existing or future legislations targeting sustainability, the Initiative aimed, on one hand, to cut out less sustainable operations and, on the other hand, to **encourage the development of more sustainable practices** along the agri-food supply chain.

<sup>18</sup> Further information about the concerned initiative can be found on the webpage of the European Commission, available through the following [link](#).

- IPIFF and its members **recommend taking example** from several of the ‘push’ and ‘pull’ measures envisaged under the framework of this initiative in order to **incentivise customers’/ consumers’ choice** towards more **sustainable food and feed ingredients**, including through the introduction of **binding provisions** and **(sustainability) standards**. Such standards would materialise through the inclusion of a minimum percentage of alternative and sustainable protein sources, such as insects, in food or feed products. These ingredients would thereby constitute a viable solution that would **support the acceleration of the food and feed industry transition** from the use of unsustainable protein sources causing deforestation and loss of biodiversity to sustainable alternative protein materials (such as insect proteins)



*Note: The EU ban on the sale of new petrol and diesel cars from 2035 serves (for the insect industry) as an example of successfully implementing sustainability standards*

The proposed recommendations be included under these frameworks are described *in chapter IV, section ii* of the present document.

### 3.

#### PILAR 3 CATALYSING FINANCING

**We plead for the development of EU ambitious policies and financial and other support measures, which would contribute to harness the multifunctional benefits and positive externalities of the insect producing sector.**

While the EU legislator has already identified several goals – in the form of Policy Recommendations<sup>19</sup> supporting alternative proteins such as insects - IPIFF considers **that EU policy makers should make greater commitments to support innovative and sustainable sectors**, especially since those can contribute to achieving the EU’s ambitious targets for carbon reduction of our food system.

To this end, we consider that EU public authorities could **take examples from previously developed support measures** targeted at **sectors** which were considered of **strategic importance for the domestic economy**. For instance, in a report published in July 2024, the Boston Consulting Group highlighted that ‘public sector support has been critical to the growth of novel technologies, from semiconductors and the internet to biotechnology or electric vehicles’<sup>20</sup>. For the authors of the report, **‘the alternative protein industry should take inspiration from the electric vehicle sector** in order to realize its full potential’.

- IPIFF and its members share the views that EU efforts towards **boosting protein diversification** and the **development of alternative proteins** must be recognised as **a strategic priority**.

19. E.g. See aforementioned EU Communication from the European Commission on the ‘A Farm to Fork Strategy’ (20 May 2020). In this document, the European Commission indicated that will examine EU rules to reduce the dependency on critical feed materials (e.g. soya grown on deforested land) by fostering EU-grown plant proteins as well as alternative feed materials such as insects, marine feed stocks (e.g. algae) and by-products from the bio-economy (e.g. fish waste).

20. See Report published by the Boston Consulting Group ‘What the Alternative Protein Industry Can Learn from EV Companies’ (11 July 2024).

Along that line, IPIFF has previously stressed the need to **recognise such new food and feed sources under EU strategic frameworks**<sup>21</sup>, emphasising the need to stimulate the production of innovative products, such as insects, algae, microbial culture, fermentation products. Notably, we highlighted the importance of ensuring **coherence between the 'Farm to Fork' strategy and other EU or national initiatives**, such as EU or national protein plans, the Horizon Europe research framework programme, the Common Agricultural Policy or the EU industrial policy.

We plead for the adoption of a holistic approach whereby EU institutions would examine the overall

positive contribution that innovative sectors, such as insect farming, may bring, in particular the boosting of regional and rural economies. Such benefits range from offering diversification/additional income opportunities for farmers to creating thousands of green jobs in European countries.

- We therefore plead for the establishment of an ambitious set of policies or policy frameworks – accompanied with adequate financial support measures – in order to stimulate and harness the multifunctional benefits of insect farming/production activities.

Such a strategy would focus on the following policy frameworks:

- Recognition of the insect sector of part of the **EU Protein strategy**;
- Unlocking funding opportunities under EU (e.g. Horizon Europe) and **National Research & Innovation policy** frameworks;
- Recognition of our sector and setting of incentive measures under the future **EU Common Agricultural Policy**;
- Creating opportunities for tailor-made information/ awareness campaigns under the **EU Agri-Food Promotion Policy**;
- Recognition of the insect sector as a part of the **EU Industrial policy**.

As part of the **EU Green Deal Strategy**<sup>22</sup>, the European Commission emphasised the need for 'massive public investment and increased efforts to direct private capital towards climate and environmental action, while avoiding lock-in into unsustainable practices. Moreover, the EU aims to be at the forefront of coordinating international efforts towards building a coherent financial system that supports sustainable solutions.

Alternative proteins require significant amounts of capital to research and produce at scale. Nevertheless, private capital for alternative proteins lags other sectors. While securing public funding is key to supporting fundamental research and pilot projects (e.g. R&I funds), we consider that a dual public-private funding approach is critical to build market confidence in alternative protein companies (e.g. through public-private partnerships to fund infrastructure that supports alternative protein production and distribution).

Against this background:

- We are supportive of the EU policy efforts towards **recognising green/sustainable sectors** - such as the insect sector and other innovative and alternative proteins - **under EU official classification systems** facilitating **access to private and public funding** that is specifically targeting at sustainable businesses, 'green investments and climate-friendly solutions, e.g. opportunities opened **the EU sustainable finance framework** towards channelling private capital/investments to sustainable initiatives.
- We recommend to explore other existing **EU policy instruments**, which would **incentivise the adoption of climate-friendly solutions** by consumers and European farmers. For instance, **the extension of emission trading scheme to agricultural activities** is an option which our organisation strongly supports: by pricing GHG emissions from agricultural activities, in particular producers and importers of animal feed ingredients, such as insect producers who are upstream of farms in the value chain, the best-performing actors **would be financially rewarded** for reducing their environmental footprint.

*The proposed measures to be included under these frameworks are described in chapter IV, section iii of the present document.*

21. See IPIFF Regulatory brochure (July 2020): IPIFF's Policy Priorities towards 2025 (July 2020) - document available on the IPIFF website through the following [link](#).

22. See aforementioned Communication from the European Commission. [COM \(2019\) 640 final](#)



## IV. IPIFF's Key policy recommendations

We have developed a series of **policy recommendations** that would put IPIFF's vision into action, as well as the IPIFF strategic priorities as outlined under the 3 pillars, previously described in chapter III of the present document.

### i. IPIFF recommendations for establishing a future-proof regulatory framework for the European insect sector ("PILLAR 1 – INCREASING COMPETITIVENESS")

For several years, we have been discussing with the European Commission services the need to push forward a series of key reforms for our sector. Although EU policy makers have taken the policy steps in certain of these areas, we note that **insufficient progress** has so far been achieved in the discussions associated with these policy files. We fear that such **delays may undermine development plans for several actors from the sector**, including by putting at risk the survival of certain companies, and by extension of that – of thousands of European employees.

Our plea to accelerate these regulatory reforms echoes the recommendations contained in the final report from the Strategic Dialogue on the Future of EU agriculture<sup>23</sup>. Notably, the document recommends identifying **faster regulatory pathways for innovative products focused on increased sustainability**.

In the case of the insect sector, these aims would translate into the following regulatory steps:

- The definition of a **regulatory pathway** towards the future **EU authorisation for feeding farmed insects with meat and fish containing former foodstuffs**. Such a reform is pivotal for unleashing the bioconversion potential of our sector, thereby efficiently tackling food waste issue, whilst reducing the environmental footprint of our food and feed systems. To this end, we urge the competent services from the European Commission to mandate the European Food Safety Authority to develop a scientific opinion to ascertain the absence of safety risks associated with such regulatory scenario. IPIFF urges EU policy makers to immediately broaden the range of inputs with **"meat and fish containing Former Foodstuff"** (FF), such as food losses from supermarkets and discarded products originating from agri-food industries to those farmed insects whose **derived products** (e.g. processed animal proteins derived from farmed insects, insect oil) are intended for **non-food producing animals (such as petfood)** and/or for **technical uses** (e.g. production of bio-based fuels, fertilizers or cosmetic products). Currently available scientific evidence, as well as the safety and technical measures implemented by European insect-producing companies, should pave the way for such an authorisation.
- **Registration of processed insect frass** under the **EU fertilisers legislation**, guaranteeing wide EU access of the valuable nutrients by EU crops producers and gardeners<sup>24</sup>. Such a reform would directly support the European Commission's endeavours to increase the availability of EU-based of bi-base fertilisers, thus accelerating the transition to a fully decarbonised economy<sup>25</sup>.
- The **securing of additional commercial outlets** for insect frass producers, e.g. through the establishment of an EU legal base guaranteeing the possibility of **using processed and unprocessed frass** in **biogas production**, for **compost** and **combustion** as well as **exports outside the European Union**, in view of their possible reuse as bio-based fertiliser in these regions.

23. 'Strategic Dialogue on the future of EU agriculture' (September 2024) : 'To ensure that innovation can benefit food system actors, regulatory procedures need to be streamlined (See report, recommendation n° 13 on 'better access to and better use of knowledge and innovation')

24. See the IPIFF Contribution Paper on the inclusion of insect frass as part of the EU fertilisers' Regulation (2 December 2022), which is available on the IPIFF website, through the following [link](#).

25. See European Commission Communication on 'ensuring availability and affordability of fertilisers' (9 November 2022) - [COM/2022/590 final/2](#)

## ii. IPIFF recommendations and proposed policy instruments to incentivise the use of insect food and feed products (PILLAR 2 - "PROMOTING DEMAND")

IPIFF and its members request the following reforms to be initiated and/or completed by EU policy makers

- ▶ The establishment of **EU tailored rules** – in the framework of the EU animal by-products legislation – in view **authorising the use of whole dried larvae as feed for food-producing animals**. These products indeed present advantages when used as feed for livestock production (e.g. feed complement) and/or notably due to its enticing properties (e.g. used as environmental enrichment in poultry husbandry for its similarity to invertebrates eaten naturally by such animals) or beneficial effects on the health and welfare of farmed animals<sup>26</sup>.
- ▶ The approval of **conventionally produced insects** as feed in **organic aquaculture**<sup>27</sup>. Insects could complement the growing demand for organic aquafeed products, in line with the natural diet of such fish species – whilst also contributing to easing the pressure in the protein feed market<sup>28</sup>.
- ▶ The development of **EU regulatory standards** for the **organic certification of insect production activities**. This reform would indeed effectively contribute to the growth of the organic sector on both food and feed segments<sup>29</sup>.
- ▶ The establishment of **mandatory origin/provenance indication on the label of insect food products**: In our view, reference(s) to 'EU' and 'non-EU' geographical indications relating to insects should be made mandatory, both for those insects commercialised as single-ingredient products as well as for insect ingredients incorporated into a final product<sup>30</sup>.
- ▶ **The reinforcement of border controls on insect food and feed products originating from non-EU countries**, ensuring a level playing field between European insect producers and their counterparts from third countries.
- ▶ The establishment of **tailored standards** to ensure that the use and consumption of insects and other sustainable protein sources will remain the preferred option by EU consumers and customers. Different set of policy measures could be envisaged, both at EU and national level, to this end, including notably the followings (non-exhaustive list):
  - Revision of **EU Public procurement policies**, by introducing a general mandatory requirement of procuring sustainably with a clear reference to the environmental, social-health dimension or by providing a legal base for the setting of national minimum targets, with corresponding timelines.
  - Setting of a **mandatory EU sustainability label** to consumers applicable to all food and feed products. Such mandatory labelling system would apply for all EU and imported food and feed products.
  - **Establishing binding standards** through which feed /food users would be required to incorporate insect and other sustainable alternatives in their products (when those are available).

26. See the IPIFF position paper on the use of insect larvae as feed for food producing animals (16 September 2021) – document available on the IPIFF website, through the following [link](#).

27. Presently the EU organic legislation allows the use of inputs that cannot be per se certified organically (such as marine-derived ingredients from sustainable sources)

28. For further details about the IPIFF position on this subject, you may refer to the aforementioned position paper

29. See IPIFF Contribution Paper – EU organic certification of insect production activities (19 July 2021) – document available on the IPIFF website, through the following [link](#).

30. See IPIFF's Contribution Paper to the call for feedback on the revision of food labelling rules with regards to origin labelling – document available through the following [link](#)

### iii. IPIFF policy recommendations and proposed support measures in favour of the insect sector (PILLAR 3 - "CATALYSING FINANCING")

We urge EU policy makers to consider the following proposed actions:

- ▶ Recognition of **the insect sector** of part of the **EU Protein strategy**.
- ▶ We advocate for **innovation and research funding** to be **secured under relevant EU** (e.g. Horizon Europe – cluster 6) and **national frameworks**. Such opportunities would serve to unlock research projects which would contribute to **deepening our knowledge** of the potential of the insect sector, and to harnessing the opportunities that it can bring to European consumers and businesses<sup>31</sup>, including when used alongside other innovative protein sources, such as yeast, algae and fermentation products<sup>32</sup>. These efforts could also contribute to **supporting further regulatory advancements of the sector**, in the long term, beyond the regulatory priorities identified in chapter III of the present document.
- ▶ IPIFF also pleads for a future **Common Agricultural Policy** that can promote **the complementarity of existing and new farming activities - such as insect production** - at local and regional levels, while simultaneously being able to foster their synergetic contribution to the EU protein diversification strategy, sustainability and the vitality of European regions and rural economies<sup>33</sup>.

More concretely, we recommend the development of **the following measures** under the **future CAP post 2027**:

- ▶ The establishment of measures, promoting access to **investment** among European farmers who decide to (i) **diversify their production towards innovative and sustainable practices** (e.g. insect farming or (ii) to **include insect ingredients in their feed**, replacing unsustainable protein and lipid sources causing deforestation and loss of biodiversity (and/or contributing to the **circular economy strategies** (upcycling of agricultural co-products through insects), thereby **supporting the transition to a low emission agricultural sector**.
- ▶ The setting up of a framework and **financial support mechanisms** for **education programmes** focusing on 'new' production sectors (e.g. insect farm) and associated **knowledge transfer** (e.g. through support measures institutional structures such as chambers of agriculture and/or other innovation hubs), thereby contributing to **generational renewal in agriculture**.
- ▶ The development of **incentivisation initiatives** to connect **local agricultural supply chains in rural areas in Europe**, e.g. support for initiatives in favour of **circular approaches**/valorising local and regionally available biomass and contributing to the creation of **innovative and 'green' jobs in rural areas**, in line with the [EU Bioeconomy Strategy](#).

To achieve these goals, **regional authorities** must be able to **design their own region-level CAP implementation plans**, which are to be included as part of the respective **national strategic frameworks**. We firmly believe this to be the best possible way to support more efficiently farmers' specific needs in different regions, while benefiting from each region's best contribution<sup>34</sup>.

31. Those priorities are described in IPIFF brochure '[research priorities of the European insect sector](#)' (June 2022). The document is currently being updated and will be subject to amendments.

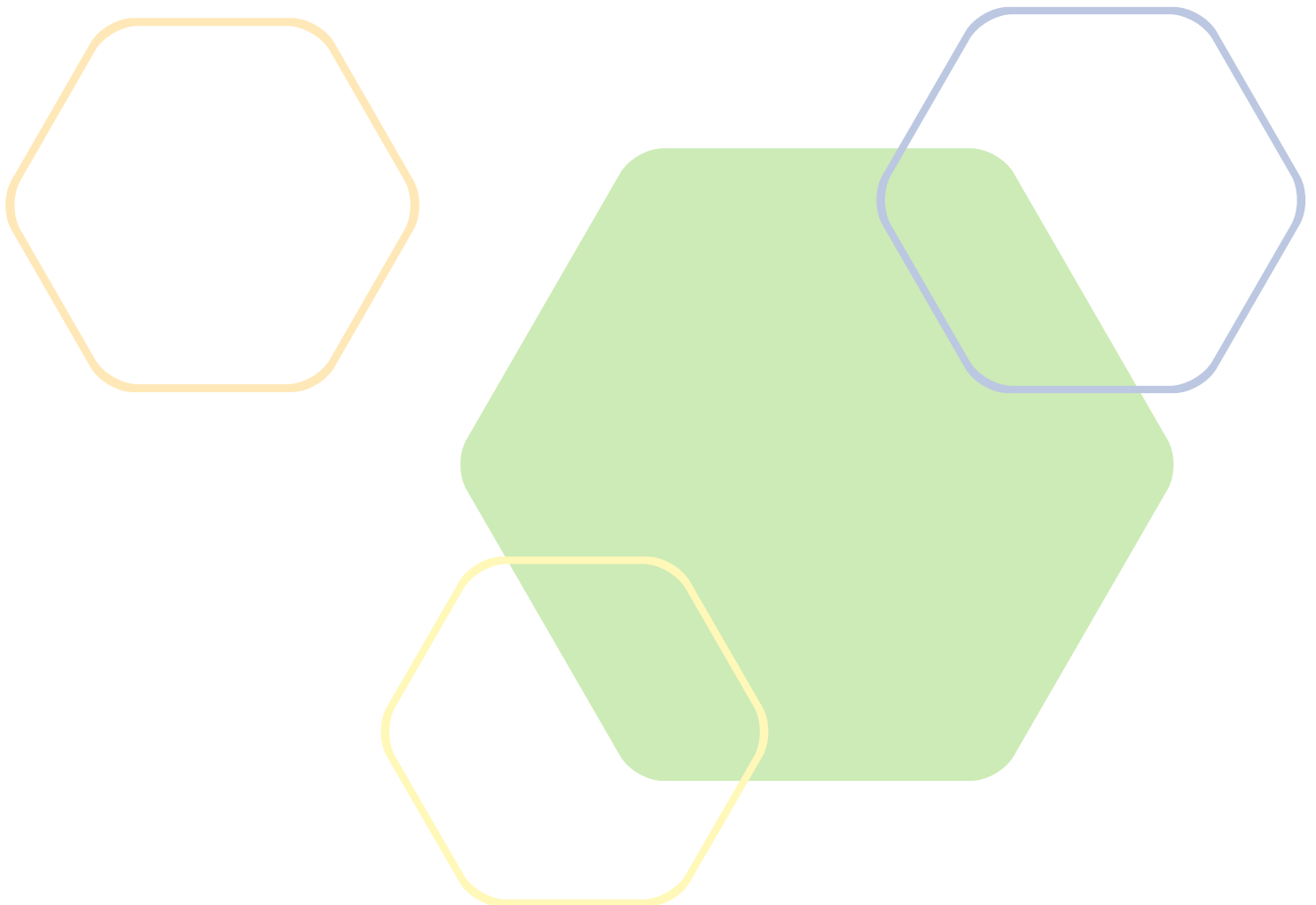
32. See InnovProtein EU Alliance – Joint Policy Roadmap 2023-2027' (September 2024) – document available on the IPIFF website through the following [link](#).

33. IPIFF Contribution Paper on 'The Future of the Common Agricultural Policy' (21 March 2024) - document available on the IPIFF website through the following [link](#)

34. See aforementioned Contribution document.

- ▶ Moreover, we request the inclusion of **novel and innovative sectors**, such as insects, algae and yeast products, **as part of the EU Agri-Food Promotion Programme**. Including these products as part of these Policy's support measures can indeed have a significant impact on the growth of our sector. On the other hand, it would provide additional instruments to bolster the competitiveness of livestock producers, create new jobs and stimulate economic growth within EU regions<sup>35</sup>.
- ▶ The positive contribution that the insect could bring towards achieving the objectives of **the EU Industrial Policy** should be recognised as the sector' contribution is aligned with European Commission ambitions to **invest** in EU **sustainable competitiveness**, notably by building **a Clean Industrial Deal** to **decarbonise** and bringing down **energy prices** or by putting research and innovation at the heart of our economy'.
- ▶ **Inclusion of insect production activities** for food and feed under **the EU Taxonomy classification system**, thereby allowing investors to identify/recognise insect production as environmentally sustainable.
- ▶ **Extension of the EU emission trading scheme to agricultural activities**, thereby incentivising climate mitigation action along the agri-food value chain, including by producers and importers of animal feed ingredients, such as insect feed producers. The latte would therefore become accountable for the overall **sustainability performance** of their products and **environmental impacts** generated by their production activities.

35. See aforementioned InnovProtein EU alliance Joint Policy Roadmap





International Platform  
of Insects for Food and Feed

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