



Brussels, 19<sup>th</sup> of February 2025

**IPIFF Feedback to the Net-Zero Industry Act**  
**List of net-zero technology final products and their main specific components**  
**(implementing Act)**

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

**IPIFF welcomes the European Commission Proposal for a Net-Zero Industry Act - list of net-zero technology final products and their main specific components.**

**IPIFF congratulates the aim of the Net-Zero Industry Act to enhance European manufacturing capacity for net-zero technologies and their key components, addressing barriers to scaling up production in Europe and to increase the competitiveness of the net-zero technology sector, attract investments, and improve market access for clean tech in the EU.**

**IPIFF acknowledges the importance of the ambitious objectives set by the Act for net-zero manufacturing capacity to meet at least 40% of the EU's annual deployment needs by 2030, providing predictability, certainty and long-term signals to manufacturers and investors and that by 2030, the act aims to create a Union market for CO2 storage services.**

**Considering the above, IPIFF welcomes the Proposal of a list of net-zero technology final products and their main specific components to include in its Annex, under Sustainable biogas and biomethane technologies the possibilities offered by the authorized use of Sustainable biogas plants and methane-Anaerobic digesters /Fermentation tanks and Biomethane and upgrading units. Such a reference enables the production of biogas by EU insect producers.**

**Nonetheless, we enjoy this opportunity to call the attention of the European Commission to the potential contribution of the EU insect sector towards these objectives, which can be achieved through an amendment to [Regulation \(EU\) No 142/2011](#), with the view of clarifying the possibility to use processed frass, as 'starting material for composting or biogas transformation'.**

The European insect sector is at a turning point in its development as production is ramping up, e.g. IPIFF forecasts that European insect producing companies should **produce over 120.000 tons of insect feed products by the end of 2025**. Increased insect ingredients production will go hand in hand with growing quantities of insect frass - insect excrements/dejecta - generated, i.e. we forecast that over **400.000 tons of insect frass** should be produced by European insect producers in 2025<sup>1</sup>.

Anticipating significant output growth, the **European insect sector** is currently investing in **building the necessary capacities and tailored production standards** in view of its **commercialisation as fertilising product** on the EU market, in line with the EU regulatory standards adopted in 2021 - i.e. standards embedded in Annex XI, chapter I, section 2 to [Regulation \(EU\) No 142/2011](#)<sup>2</sup>.

In this context, the expected future **registration of processed frass** - frass subject to a heat treatment process of at least 70° for at least one hour as above-mentioned - **under the EU fertilisers' legislation** (i.e. through its inclusion under CMC 10 of [Regulation \(EU\) 2019/1009](#)) would be **instrumental to ensuring the viability and competitiveness of European insect producing companies**, especially at a critical time of the ramping up of our industry. Moreover, such reform would contribute to supporting the European Commission's endeavours to increase the availability of EU bio-based fertilisers and accelerate the transition to a fully decarbonised economy<sup>34</sup>.



Along with the use of frass as fertilising product, **European insect producers are exploring avenues to efficiently upcycle the produced frass** through their use in biogas and/or composting plants.

Echoing the demands IPIFF made to the European Commission Directorate-General on Health and Food Safety (DG SANTE), the **European Commission tabled a regulatory proposal** amending [Regulation \(EU\) No 142/2011](#), with the **view of clarifying the possibility to use processed frass**, as ‘**starting material for composting or biogas transformation**’, while setting a legal basis in order to allow imports of such materials. The draft text received a favourable opinion by the EU Member States at the PAFF Committee meeting organised on 23 January 2025, prior being submitted to the European Parliament and Council of the EU, in accordance with the Regulatory procedure with scrutiny<sup>6</sup>.

We end by stating that the EU insect sector can and wishes to be an ‘active’ contributor towards the objectives of the Net-Zero Industry Act and for such, request the conditions to be provided by the European Commission to do so.

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<sup>1</sup> 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](#).

<sup>2</sup> E.g. section 2 (b) of the legal text annex foresees that frass shall have been subjected to a heat treatment process of at least 70 °C for at least 60 minutes, in view of its commercialisation as organic fertiliser.

<sup>3</sup> See European Commission Communication on ‘ensuring availability and affordability of fertilisers’ (9 November 2022) - [COM/2022/590 final/2](#).

<sup>4</sup> In its [resolution](#) dated from 16 February 2023 (Resolution 2023/C 283/12), the European Parliament highlighted that frass is ‘*currently not used to the fullest (...) and that ‘it can play an important role in meeting soil nutrient requirements*’. Having regard to the above considerations, the European Parliament ‘*calls on the Commission (...) to incentivise the use of frass by removing unnecessary legislative and administrative burdens as soon as possible*’

<sup>6</sup> Further information about the status of the proposal concerned can be found on the following [EU portal](#)

<sup>7</sup> For further details see document ‘*Draft policy Priorities of the European insect sector: IPIFF’s recommendations for the EU Strategic Agenda 2024-2029*’ (21 November 2024) available on the IPIFF website through the following [link](#).

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