

Contribution Paper

IPIFF proposals as regards the classification of certain killing methods in insect production as 'primary production' activities (*amended version*)

Contextual elements

1. Regulatory background

The killing of farmed insects is **not** specifically mentioned under EU food and feed hygiene rules. E.g. Annex I to [Regulation \(EC\) No 852/2004](#) includes references to the 'hygiene slaughtering of animals,' whereas [Regulation \(EC\) No 853/2004](#) (laying down specific hygiene rules for food of animal origin) refers to 'slaughter' and 'killing' activities for the different categories of animals covered under the sections of its annex III. **Farmed insects** are **not** covered under any of the sections of the concerned annex.

By default, the killing of farmed animals is considered as a '**processing activity**', within the meaning of EU food hygiene legislation (*see aforementioned legal texts*). This is due to the absence of specific regulatory provisions - under Regulation 853/2004 - which provide otherwise. This status may entail a **series of consequences for operators** on the ground, namely the followings:

- Units/facilities dedicated to the killing of farmed insects shall be 'physically' separated from the areas where the animals are being killed;
- Operators shall implement and maintain HACCP based procedures at this point of the production chain, in both cases where the derived products are intended for food and feed uses.

The rationale behind the aforementioned classification is that **the killing of farmed insects** leads to '**substantially alter the nature of the product**', within the meaning of Annex I, part A, I. 1 (a) to [Regulation \(EC\) No 852/2004](#).

In its recently published [Guide on Good Hygiene Practices for EU producers of insects as food and feed](#), IPIFF confirmed that the demarcation line provided under EU Law would be consistent with the realities of insect production activities. According to the aforementioned guidance document, '*the killing step leads to a change in the shape and/or structure of the product (...) therefore it 'shall not be considered as 'primary production' activity, even if carried out in the same rearing plant*'¹.

¹ See page 13 of the document.

2. Recent EU discussions on the classification of certain killing methods in insect production as ‘primary production’ activity, and possible next steps

For a couple of months, the European Commission services (DG SANTE) have been discussing with the EU Member States competent authorities the opportunity to **reconsider the legal status of certain ‘killing methods that are currently being used by European insect producers’**, whenever the derived products are intended for use as food.

A questionnaire was circulated to the aforementioned authorities to this end and was followed by a discussion at the **EU Standing Committee ‘Biological Safety of the Food Chain’** on 3 February 2025². To our knowledge, discussions may resume in the course of Spring and could originate in a regulatory proposal to be presented for discussion and approval to the EU Member States authorities at one of the following meetings of the aforementioned Committee.

Objectives of the present document

Today, European insect producers use a wide **variety of killing methods**, such as hot water, boiling vapour, freezing or freeze-drying to mincing. Those techniques **vary according to the produced species**, technical conditions faced by operators, while achieving the **highest level of food safety**. A non-exhaustive list of the concerned practices and safety proceedings followed by operators is provided in the aforementioned [IPIFF Guide](#)³.

The present document **aims to present the views of the European insect producing sector** in order to support ongoing discussions⁴ held between the European Commission services and the Member States’ experts on the aforementioned subject.

To this end, this contribution paper is divided into two main sections:

- The **first section** outlines a series of **general proposals** from our organisation on the aforementioned subject.
- The **second section** draws some **perspectives on the consequences associated with the proposed legal changes** (e.g. food safety and economic aspects) and includes some key recommendations from the European insect sector in that context.

The content of the present document has been **slightly amended** (see notably the section *‘IPIFF detailed recommendations towards the implementation of the proposed measures’*), following bilateral meeting held between the IPIFF delegation and the DG SANTE services (European Commission) on 19 May 2025. The concerned amendments have been endorsed by the IPIFF General Assembly and appear in **red colour** throughout this document.

² see item A.06 of the draft agenda, which can be found through the following [link](#) as well as the outcome of the discussion which can be found through [the minutes](#) of the meeting.

³ For further details, see page 74 and followings of the document.

⁴ It follows bilateral discussions held with the DG SANTE services DG SANTE asked the IPIFF Secretariat whether our organisation /its members consider that freezing and/or other methods that are commonly applied by insect breeders could be classified as ‘primary production’ under the EU food hygiene legislation



IPIFF general proposals

IPIFF welcomes the opportunity to comment and provide its input on this subject.

IPIFF and its company members are of the view that the use of the ‘freezing’ should be classified as a ‘primary production associated operation’ similarly to those other operations listed in annex I Part A 1. to [Regulation \(UE\) No 852/2004](#) (e.g. transport, storage and handling of the products). Although this method would inevitably lead to ‘change the nature of the product’ (the use of freezing might lead to crystals formation and potential cellular and tissue damage), this **step would not ‘significantly alter the shape and/or structure of the product’**. Its classification as ‘primary production’ associated operation would therefore **be justified**, in line with the definition foreseen under Regulation (EC) No 852/2004.

We consider appropriate to investigate the possibilities to **categorize other methods than freezing as ‘primary production’ associated operations**. Our organisation created a dedicated ‘discussion forum’ (forum composed of companies producing insect food products) with the view to further examine this matter. We will be happy to share our conclusions with EU and national competent authorities in due time.

A contrario, several other methods that are currently being used by European insect producers (e.g. freeze-drying or mincing) do **lead to substantially alter the nature of the products** and shall **therefore be excluded** from being regarded as ‘primary production associated operation’.

IPIFF detailed recommendations towards the implementation of the proposed measures

The EU insect sector is particularly attentive to the ongoing discussions between the European Commission and Member States’ authorities, since these would entail important consequences for the concerned operators. Options to be prioritised by the EU public authorities **would indeed heavily impact on procedures and protocols to be followed by European insect producers** on the ground, e.g. exemption from establishing and maintaining HACCP based procedures, and permission for insect producers to perform breeding and killing activities in the same production unit or producing establishment.

Against this background, we **welcome the efforts initiated by EU Legislator towards alleviating any ‘unnecessary burden’** for insect producing companies (the sector being exclusively composed of SMES) that **only focus focusing on breeding and ‘primary production’ associated operations**.

Owing to the above, we consider that establishing a ‘physical demarcation’ line between breeding and killing operators would **not be duly justified**, in case operators are applying killing methods which do not substantially alter the nature of the product (as above outlined).

Finally, one should acknowledge that any of the currently used killing methods will inevitably **lead to change some characteristics** of the animal/concerned product and impact on microbial content of the larva, thereby **possibly altering the safety the end-product**. This is notably the case when these killing methods are not being followed by appropriate processing/ post treatment steps.

These **potential adverse impacts should therefore be carefully considered**, in particular in scenarios where the product is being placed on the market without being subject to subsequent treatments, e.g. when used for direct sale or purchased by a second processor. Consequently, famed insects which have been killed through freezing shall **not** be placed on the market for human consumption, unless they **underwent a post killing step** (e.g. through the intervention of a second processor) thereby allowing to **mitigate the safety risks of the end products**

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Finally, **any potential changes in the classification** should not lead to **unjustified/different treatment** between actors who are 'exclusively active' at breeding and killing stage and operators who cover the entire production chain.