



**Location:** Online  
**Date:** 18/02/2026  
**Time:** 15h00-16h00 (CET)

**Participants**

Carlotta Totaro Fila (Alia Insect Farm), Vasco Teixeira Esteves (Tecmafoods), Niek Steeghs (VANIK), Jeremy Burks (NutriEarth), Nina Mircheva (Nasekomo), Victoria Giráldez Sánchez (Protiberia), Ljubinka Francuski (Protix), Marcel Jansen (Green Cycle by Prezero), Francesco Ianelli, Giovanni Lomonaco (Universitat Basilicata), Bärbel Girardin (Illucens)

IPIFF Secretariat: Steven Barbosa (SB)

## Meeting Notes & Action Points

### IPIFF Task Force on Novel Foods

18<sup>th</sup> February 2026

#### 1. Introduction: Welcome and Introductory points - *Points for INFORMATION & DECISION*

The IPIFF Secretary-General, Steven Barbosa (SB), opened the online meeting and gave the word to each one of the participants to introduce themselves.

#### 2. The unlawful delay of the discussion and vote of a Commission Implementing Regulation authorizing the Novel Food application of Italian Cricket Farm - *Points for INFORMATION & DECISION*

➤ Please refer to [Background Document 05-IPIFF letter to Commissioner on Heath and Animal Welfare NF](#)

SB addressed the long-delayed Novel Food authorisation of an IPIFF Member application since its EFSA Positive Safety Opinion dated from July 2024.

#### - The Commissioner's conduct breached Article 7 of the Regulation on Novel Foods

SB recalled that on the 29th of July 2024, the European Food Safety Authority (EFSA) issued its positive scientific opinion, confirming the product's safety under the proposed uses and use levels. According to **Article 7 of the Regulation on Novel Foods**, this positive scientific assessment should enable the product's inclusion in the Union list, as it presents no risk to human health.

SB informed that in accordance with **Article 12(1) of the Novel Foods Regulation**, the Commission was required to submit a draft implementing act to the relevant committee within seven months of the publication of EFSA's opinion. This deadline has now been exceeded without legal justification or communication for over a year.

- **The Commissioner's conduct disregarded the opinion of the European Parliament**

SB recalled the support expressed by the European Parliament ENVI Committee following the overwhelming rejection of two non-binding resolutions objecting the authorisation of *Ancheta domesticus* Novel food application.

- **The Commissioner's conduct disregarded the rightful role of the Member States in the procedures**

SB mentioned that despite the draft implementing act being included on the agenda for the Standing Committee on Plants, Animals, Food and Feed (PAFF) Section Novel Food and Toxicological Safety of the Food Chain of its meeting on the 27 February 2025, the Commission postponed it without explanation or consultation, as evidenced by the PAFF Committee Summary Report.

- **The Commissioner's conduct breached Article 12 (1) Regulation on Novel Foods**

SB recalled that the EC before opening discussion or holding a vote—and after only one Member State had spoken—the Commission denied other Member States their rightful role in the procedure, by unilaterally postponing the discussion without presenting any legitimate factors relevant to the application under consideration. Therefore, it did not comply with the legal procedures set out in Article 12 (1) of the Regulation, once the draft implementing act was not discussed nor voted by the Member States.

- **The Commissioner's conduct breached Article 296 of the TFEU**

SB continued by explaining that following different inquiries on behalf of Member States represented at the PAFF Committee on Toxicology and Novel Foods, with no response from DG SANTE, after informal inquiries from IPIFF to DG SANTE and different communications on behalf of IPIFF and of the IPIFF member applicant company to the Commissioner cabinet, with no right of response, IPIFF sent a letter to the Commissioner on Health and Animal Welfare informing of the different legal procedures and timelines which were not respected by the Commission.

In conclusion, the postponement was neither explained nor grounded in any of the extension provisions under **Articles 216 or 227 of the Regulation**. The Commission by not invoking any of the legal framed justifications, clearly breaches the duty to state reason (**Article 296 TFEU**).

- **The Commissioner's conduct breaches Article 41 of the EU Charter of Fundamental Rights.**

Despite the Commission's clear departure from established legal procedures and timelines, the applicant company, Società Agricola Italian Cricket Farm S.r.l., has formally enquired with the Commissioner's cabinet as to why these requirements were not being followed. This initial inquiry was followed by multiple further attempts on behalf of the company and IPIFF. Until

the present day, neither the company nor IPIFF has received any response from the Commissioner's office. This lack of communication violates the applicant's right to be heard and the principle of good administration under **Article 41 of the EU Charter of Fundamental Rights**.

- **The only way forward: Legal litigation**

SB has informed that following several exchanges with MEP's, (Members of the European Parliament) Member States and officials of DG SANTE, the only possible avenue was for the IPIFF member applicant company to enter a litigation process against the European Commission.

SB further informed that an advocacy strategy was being pursued to create a favourable supporting environment where Member States and MEPs are being invited to address the Commissioner to the need to comply with predictable legislative framework and furthermore IPIFF is to address President of the Commission denoting the clear disregard for EU legislation and policy procedures.

- **The experienced delay on this Novel Food Application may be experienced by other NF applicants**

Participants of the meeting noted that other insect novel food applications have recently received a Positive Safety Assessment by EFSA (Nutri Earth), and others are in the pipeline to receive an EFSA Opinion (Italian Cricket Farm).

SB reiterated that the present situation affecting a particular IPIFF member Novel Food applicant also applies to other recent Novel Food applications which have received positive safety assessments by EFSA, referencing to the two Novel food applications on behalf of BIF, the Belgian Insect Industry Federation.

SB also recalled the importance of this meeting once this unprecedented unlawful situation, due to the Commissioner's personal and political stance on the sector and in specific to insect food products, may replicate similar obstructions to the compliance of the adequate legal procedures in what concerns other insect Novel food applications.

SB reinforce that the main purpose of the meeting was to coordinate efforts to demand the Commissioner's office to respond in regards to the unlawful delay on the discussion and vote by the Member States on a Commission Implementing Regulation authorizing the placing in the market of the Novel Food product of *Acheta domesticus*.

SB highlighted that through engagement with Portuguese authorities, the respective national representatives to the PAFF Committee on Novel Foods and Toxicology had already requested information from DG SANTE to explain if there were any legal or scientific basis for the delay on the discussion and vote within the PAFF committee of this novel food application. SB informed that the Portuguese representatives had no response by the European Commission services.

SB proposed the different IPIFF member companies to leverage the model from Portugal. The IPEF Secretariat will share a template letter, previously sent to the Commissioner, to support IPIFF members in outreaching their national authorities. Thus, different EU Member States exerting pressure on the Commissioner.

## I. Action Points- IPIFF Secretariat Novel Food Application

1. **SB** to share, once again, the letter addressed to the Commissioner on Health and Animal Welfare informing him of all the legal provisions he has violated or has not complied with.
2. **SB** to send a letter on behalf of IPIFF to the President of the European Commission Legal Adviser, drawing attention to the Commissioner's lack of compliance and denial of the right of reply, referencing our previous correspondence.
3. **SB** will send a new letter on behalf of IPIFF to the Commissioner's cabinet to notify that Italian Cricket Farm has been advised to pursue legal action and that the Legal Adviser to the President of the European Commission has been informed.
4. **SB** will proactively engage with all Members of the European Parliament taking part of the ENVI Committee to address written and oral questions to the Commissioner on the unlawful delay of the discussion and voting of the proposed Commission Implementing Regulation.
5. **Italian Cricket Farm** will inform the Commissioner that without the scheduling of a discussion and vote for a proposal for a Commission Implementing placing in the market of *Acheta domesticus*, will start the legal proceedings against the Commissioner.

### I.I Action Points- Collective, involving IPIFF Members Novel Food Application

It was agreed that each IPIFF member will use this letter to formally request their respective national authorities (relevant ministries representatives to the European Commission PAFF Committee on Novel Foods and Toxicology) to submit an official inquiry to DG SANTE on the existence of any legal or scientific reasons for the non-discussion and voting of the novel food application between the European Commission and the Member States in the aforementioned PAFF Committee.

The collective efforts led by the IPIFF Secretariat—applying direct pressure to both the Commissioner and the President of the European Commission, engaging directly with ENVI Committee Members of the European Parliament who opposed the two Motions for Resolution objecting to the Novel Food authorization, and reinforcing the pressure already exerted by certain Member States requesting legal justifications for procedural delays—will, when combined with targeted engagement by IPIFF members with their respective national authorities, serve as a powerful advocacy tool to compel the Commission to take appropriate action.

Despite the collective endeavours of outreaching different Member States, both **SB** and **Vasco Teiweira Esteves (VE)** highlighted that according to previous contacts with Portuguese authorities, better pressure would be exerted by having Italy, as the origin country of the applicant's company, to directly question the Commissioner's office.

**The objective is for a coalition of Member States to pressure the Commission into proposing a compromise. This would facilitate discussion and a vote within the PAFF Committee on a draft Implementing Regulation to authorize the novel food product.**

The following IPIFF members have compromised to engage with their respective national authorities:

- **PORTUGAL**-Vasco Texiera Esteves (VE) ensured that would continue the already initiated contact by IPIFF with Portuguese national authorities. VE already has the contacts of the responsible persons from the Portuguese authorities represented in the PAFF Committee on Novel Foods and Toxicology.
- **NETHERLANDS**-Niek Steeghs (NS) informed that VANIK has an already planned meeting with the Netherlands' national authorities and that would raise the request for the respective national representatives to the PAFF Committee on Novel Foods and Toxicology to address a request for information to DG SANTE.
- **NETHERLANDS**- Ljubinka Francuski (LF) informed that Protix is in direct contact with Dutch national authorities and will address the same request.
- **BULGARIA**- Nina Mircheva (NM) informed that would articulate internally, as to support this initiative towards the Bulgarian national authorities.
- **GERMANY**- Bärbel Girardin (BG) also informed that Illucens would strive to enter in contact with German national authorities.
- **FRANCE**- Jeremy Burks (JB) also expressed his willingness to outreach to French representatives but would need support in identifying the respective contact point from France authorities.
- **SPAIN**- Considering the attendance of an IPIFF member company from Spain, Victoria Giráldez Sánchez (Protiberia), SB mentioned that it would be helpful to also count with the support of this member company to outreach to Spanish national authorities.
- **ITALY**- Carlota Totaro Fila (CF) informed that she would like to have information of the national contacts to whom Italian Cricket Farm has reached out to regarding their application. Furthermore, she highlighted the fact that she did not know the name of the representative on behalf of Italy in the PAFF Committee. CF further informed that she would not only wishes to enter in contact with Italian authorities on its own, but together with researchers. She also informed that she would like to promote an information session together with researchers. SB highlighted that considering that representatives of the University of Basilicata were attending the meeting, joint endeavours could be pursued.

### Support from IPIFF Secretariat

- SB offered support by engaging with different national authorities as to identify the respective national representatives in the EC PAFF Committee on Novel Foods and Toxicology.
- SB informed that through contacts with Portuguese officials represented at the PAFF Committee in question, he was informed that the Italian representative dealing with Novel Foods had been replaced.
- SB highlighted that despite its commitment to identify the respective national representative, Portuguese officials have previously informed that this was considered confidential information.

## II. Action Points- Collective IPIFF Secretariat & IPIFF Members- Coalition of EU MS to support the sector

The objective is to have IPIFF members engage directly with their respective national authorities. This dual-purpose engagement aims to address other sector-relevant regulatory matters while simultaneously building a coalition of Member States to demand a strategic vision for the sector within the Council of Agriculture and Fisheries.

### Structural dialogue with EU MS to advance the sector

The group agreed that this advocacy should not be a one-off effort. The coordinated engagement with national authorities also presents an opportunity to build support for a broader, strategic vision for the insect farming sector at the EU level. The aim is for these national authorities to carry that vision forward by requesting it from the European Commission within the Council.

- **ALIGN PORTUGAL IN A STRATEGIC & HOLISTIC SUPPORT FROM A NUMBER OF EU MS TOWARDS THE SECTOR**
  - VE and SB further complemented that the endeavours being pursued towards national authorities would address this specific matter but as well as other ongoing regulatory matters and to gather the official support from Portugal towards a strategic vision for the sector within the Agriculture and Fisheries Council;
- **ALIGN NETHERLANDS IN A STRATEGIC & HOLISTIC SUPPORT FROM A NUMBER OF EU MS TOWARDS THE SECTOR**
  - SB and NS complemented, by informing the remaining members of an articulated effort to address the Dutch authorities in this specific matter but as well as to gather their support towards other regulatory dossiers and to strategic support towards our sector within the Agriculture and Fisheries Council.
  - SB and LF complemented, by informing the remaining members of an articulated effort to address the Dutch authorities in this specific matter but as well as to gather their support towards other regulatory dossiers and towards a strategic support towards our sector within the Agriculture and Fisheries Council.
- **ALIGN GERMANY IN A STRATEGIC & HOLISTIC SUPPORT FROM A NUMBER OF EU MS TOWARDS THE SECTOR**
  - SB complemented that would be in close contact with Bavarian Ministers and would try to articulate together with BG a coordinated strategy to gather support from Germany's national authorities in this specific matter but as well as in other regulatory matters

SB informed that other contacts have been pursued towards other EU Member States and IPIFF continues to engage with them. These include Finland, Sweden, Malta, Danmark and others. **Notwithstanding, the already established contact with Portugal, Netherlands and Germany, the opening of new windows of dialogue between IPIFF members and their respective Member-States (IT, FR, SP) would reinforce a holistic strategy to support the sector.**

## Summary of the Action Points

1. **SB** to share, once again, the letter addressed to the Commissioner on Health and Animal Welfare informing him of all the legal provisions he has violated or has not complied with.
2. **SB** to send a letter on behalf of IPIFF to the President of the European Commission Legal Adviser, drawing attention to the Commissioner's lack of compliance and denial of the right of reply, referencing our previous correspondence.
3. **SB** will send a new letter on behalf of IPIFF to the Commissioner's cabinet to notify the Commissioner that Italian Cricket Farm has been advised to pursue legal action and that the Legal Adviser to the President of the European Commission has been informed.
4. **SB** will proactively engage with all Members of the European Parliament taking part of the ENVI Committee to address written and oral questions to the Commissioner on the unlawful delay of the discussion and voting of the proposed Commission Implementing Regulation.
5. **Italian Cricket Farm** will inform the Commissioner that without the scheduling of a discussion and vote for a proposal for a Commission Implementing placing in the market of *Acheta domesticus*, will start the legal proceedings against the Commissioner.
6. **All Task Force Members (in FR, IT, ES, PT, NL, DE)**: Using the template letter, contact respective national authorities to formally request information from DG SANTE on the delay of the *Acheta domesticus* Implementing Regulation.
7. Continue direct engagement with Portuguese authorities, presenting a unified message alongside the national association-  
**VE & SB- Ongoing**
8. **NS** will convey the same message to Dutch authorities during regular scheduled meetings
9. **SB** will Identify and share contact details of IT and FR representatives of the PAFF Committee on Novel Foods and Toxicology.
10. **SB & All Task Force Members** will ensure all advocacy messaging includes the broader request for a strategic vision for the sector from the European Commission.