



IPIFF POSITION PAPER

CAP MID-TERM EVALUATION AND CAP POST-2027

INSECTS: A STRATEGIC, SUSTAINABLE, AND INCLUSIVE PATH FOR THE COMMON AGRICULTURAL POLICY (CAP)

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Executive Briefing

The CAP must recognise and mainstream insect farming as a legitimate, supported farming activity within the EU, spanning animal feed, human food, and soil fertilizers, so that it contributes to a resilient, sustainable, and circular European food system.

IPIFF calls for the CAP Post-2027 to explicitly include insect farming in its delivery model, with regional authorities empowered to design regional CSP elements and with clear provisions to reduce administrative burdens while increasing EU added value.

The paper builds on IPIFF's prior CAP position and Roadmap for the CAP, integrating structural changes to governance, funding, regulation, and market development to align with the EC's mid-term evaluation call for evidence (2023-2027 CAP mid-term evaluation) and the forthcoming CAP framework post-2027.

Overall aim: ensure the CAP delivers on incomes, food security, environmental/climate objectives, rural development, and regional cohesion while enabling a scalable, safe, and innovative EU insect sector.

Key asks include:

- **Dedicated organic and fertilizer standards** tailored to insects and their by-products.
- **Transitional, pragmatic rules enabling the use of insect frass as fertilizer.**
- **A coherent European protein diversification strategy that embeds insects into CAP and related policies.**
- **Targeted funding and financing** (public-private) to scale up insect production.
- **Procurement and marketing innovations** to open markets for insect-based products (e.g. animal feed; soil fertilizer)
- **A robust data and indicators to monitor the sector's performance** within CAP performance framework.



Context & Rationale

The CAP's 2023-2027 framework introduces a modernised delivery model linking payments to performance and results, with stronger environmental and climate ambition. The interim mid-term evaluation (Article 141(4) Regulation 2021/2115) seeks evidence on effectiveness, efficiency, relevance, coherence, and EU added value.

The insect sector offers a tangible pathway to address several CAP objectives:

- Protein diversification and resilience of EU protein supply.
- Circular economy through upcycling of co-/by-products and former foodstuffs.
- Reduced land, water, and resource use relative to conventional livestock systems.
- Local and regional development in rural areas.

However, current EU rules classify insects in ways that can constrain upscaling (e.g., certain animal by-products rules; nutrition and organic standards not fully tailored to insects). A policy framework that recognises insects as a strategic agricultural activity is needed.

IPIFF Core Position

- **Insects should be fully included in CAP Post-2027** as a legitimate farming activity alongside traditional sectors, with dedicated arrangements under CSPs and regional strategic plan implementation.
- **Regional empowerment:** EU Regions must be empowered to co-design and implement regional CSP components, ensuring policy coherence and a fit with local agrifood systems.
- **Policy coherence and EU added value:** Insect farming should be promoted for its EU-level benefits (protein autonomy, circularity, rural employment) while respecting subsidiarity and national/regional specifics.
- **Regulation alignment:** Tailor and modernise rules governing organic certification, fertilisers, and animal feed to reflect insect realities, while ensuring safety and sustainability.
- **Market access and procurement:** Use public procurement, marketing standards, and labelling to build demand and consumer trust in EU-produced insect products.
- **Financing:** A mix of CAP funding, Horizon Europe research, and public-private finance is needed to scale the sector, de-risk investments, and create stable markets.
- **Data and measurement:** Integrate insect sector indicators within the CAP performance framework to monitor impacts on incomes, sustainability, and rural development.

Key Policy Proposals (integrated by topic)

I. CAP DELIVERY MODEL, REGIONS, AND ADMINISTRATIVE BURDEN

- **Include insects as a distinct but integrated farming activity within CSPs**, with dedicated indicators (production volumes, number of operations, regional investment in insect farming, use of insect-derived inputs).
- **Regional-level CAP implementation:** Regions to design regional CSP elements, contributing to national strategic plans, enabling tailored approaches to different agro-ecological zones and market access conditions.
- **Simplification and burden reduction:** Build on 2024 simplification measures, harmonise reporting requirements for insect producers, and streamline registrations (feed operators, organic certification qualifications, fertiliser approvals) with a risk-based, proportionate approach.
- **Data collection:** Create a dedicated module in Data for Monitoring and Evaluation to capture insect sector data (production, inputs, outputs, environmental footprints, and circular economy metrics).

II. ADDED EU VALUE AND COHERENCE WITH OTHER POLICIES

- **Position the EU as a leader in protein diversification** by embedding insect farming into the EU Protein Strategy, Farm to Fork objectives, and the EU bioeconomy agenda.
- **Align CAP, CFP, and Horizon Europe to support cross-sector synergies:** insect feeds with aquaculture, livestock, and pet food; frass-based fertilisers with organic farming and soil health strategies; and R&I funding with practical deployment on farms.
- **Support the transition risk-management lens by ensuring CAP tools are adaptable to shocks** (climate, price volatility, geopolitical disruptions).



III. RELEVANCE: INSECTS TO ADDRESS CURRENT NEEDS AND EMERGING CHALLENGES

- **Farm incomes and risk management:** new revenue streams for farmers (insect-derived feed, fertilisers, and niche food products) help diversify incomes.
- **Food security and resilience:** domestic protein sources reduce reliance on imported proteins; improved soil health via frass supports long-term productivity.
- **Environment and climate:** lower land, water, and energy intensity; potential GHG reductions through circular inputs and efficient feed systems.
- **Rural development and generational renewal:** new skills, jobs, and business models in rural areas; potential for youth and gender-diverse participation.

IV. SPECIFIC REGULATORY AND STANDARDS PROPOSALS

- **Organic production standards for insects:** develop tailored EU organic rules for insect production that reflect species differences, husbandry needs, feed considerations, and labelling. Ensure compatibility with Regulation (EU) 834/2007 framework and avoid unrealistic stand-alone requirements.
- **Fertilisers and soils:** proactively register insect frass as a fertiliser input on the EU Fertilising Products Regulation once compliant with heat-treatment and safety criteria; maintain transitional provisions to enable upcycling of frass in the interim (as endorsed by EU 2021/1925 baseline standards and 2023/1605 end-point clarifications).
- **Substrates and circularity:** extend allowable substrates (including certain former foodstuffs and controlled processed animal by-products) for insect rearing under strict safety and traceability conditions; work with EFSA to continuously assess safety risks and update rules.
- **Animal feed and Novel Foods:** maintain and streamline approval pathways for insect-derived feed ingredients (PAPs, proteins, etc.) and edible insects, ensuring that EFSA risk assessments guide market authorisations without unnecessary delay.
- **Labelling and marketing standards:** propose sector-specific marketing standards, including origin/provenance declarations for EU-produced insect products to bolster consumer trust and to support CAP objectives and the EU's internal market.
- **Public procurement:** introduce binding sustainability criteria and minimum procurement targets for insect-derived products to create lead markets and demonstrate demand pull for the sector.



- **Protein diversification targets:** consider a formal mechanism to incorporate insects into EU-driven protein diversification goals (e.g., milestones for inclusion rates of sustainable protein in animal feed under CAP/CFP frameworks).

V. INSECT-DRIVEN MARKET DEVELOPMENT & PUBLIC SUPPORT

- **CAP funding:** ensure insects are eligible for CSP-based support, eco-schemes, and possibly targeted rural development operations; integrate insect-related investments into EAFRD and EAGF financing where appropriate.
- **Promotion and market access:** leverage CAP and Agrifood Promotion policies to raise awareness and accelerate uptake of insect-based products in EU markets and in third-country trade relations.
- **Financing and risk-sharing:** encourage public-private funding models, venture-support mechanisms, and Horizon Europe consortia to move R&I outcomes toward scaled production and commercial deployment; lower barriers for SMEs and start-ups.
- **Lead markets and standards:** use procurement and performance standards to accelerate the adoption of insect-based ingredients in feed, food, and biobased products across EU value chains.

VI. INNOVATION, R&I, and GOVERNANCE

- **R&I alignment:** coordinate CAP, Horizon Europe, and the EU bioeconomy initiatives to fund research on breeding efficiency, feed safety, automation, insect frass processing, and life-cycle assessments.
- **Governance:** establish a standing IPIFF-EC stakeholder mechanism to oversee CAP Post-2027 engagement with the insect sector, regional authorities, farmers, and processors; ensure regular updates to policy reforms as new evidence emerges.
- **Preparedness:** embed resilience clauses to address crises (conflict, climate events, market shocks) by maintaining scalable production paths and diversified input sources.

I. Short Term Actions

- **Immediate (within CAP Mid-Term Evaluation framework):**
 - **Recognise insects as a strategic farming activity within CSPs;** publish a clear guidance note on the sector's eligibility and indicators.
 - **Initiate regional capacity-building pilots to demonstrate regional CSP integration of insect farming,** co-located with existing CSPs where feasible.
 - **Develop a tailored organic certification framework for insects and insect inputs (feeds and fertilizers)** to reduce implementation burdens and unlock market access.
 - **Establish transitional provisions to allow regulated use of processed insect frass as soil fertiliser** while formal fertilizer rules are updated.
 - **Create sector-specific marketing standards and origin indications for insect food products** to improve consumer trust and intra-EU trade.
 - **Launch procurement pilots** that set binding targets for insect-based products in public procurement to stimulate demand.

II. Medium Term Actions (2027-2030)

- **Fully integrate insect farming into CAP Post-2027 governance** with regional CSP contributions, and monitoring indicators aligned to the CAP performance framework.
 - **Implement a European protein diversification strategy that includes insects, algae, and other sustainable alternatives** as recognised inputs in animal feed and aquafeed under CAP/CFP frameworks.
 - **Scale up financing via public-private partnerships, dedicated EU funds, and Horizon Europe consortia** to accelerate commercialization and farm-scale adoption.
 - **Continue refining standards for frass and insect-derived inputs,** ensuring safety, traceability, and environmental sustainability.
 - **Expand organic and regenerative agriculture uptake** with incentive structures that reward circular inputs such as insect frass and insect-derived feeds.



CONCLUSION

IPIFF believes the CAP Mid-Term Evaluation and the CAP Post-2027 framework present a pivotal opportunity to recognise insects as a strategic agricultural asset within the EU.

By integrating a regionalised, evidence-driven, and market-oriented approach, the EU can leverage insect farming to strengthen incomes in rural areas, enhance food security, reduce environmental footprints, and accelerate the transition to a circular bioeconomy.

The proposals outlined in this Position Paper are designed to ensure coherence with the EC's evidence-gathering process while advancing a practical, scalable path for the insect sector to contribute meaningfully to the Green Deal, Farm to Fork, and the EU's broader resilience objectives.

We look forward to continued dialogue with the European Commission, Member States, regional authorities, and stakeholders to refine and implement these proposals for a stronger, more sustainable CAP.