



## IPIFF Position Paper

### "Organic production - targeted updates and simplification"

#### The urgency of measures to unlock the potential of insects

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Submitted by: IPIFF, the International Platform of Insects for Food and Feed

#### 1. Executive Summary and Key Demands

We welcome the European Commission's initiative to update and simplify the EU organic production rules. This review is a critical opportunity to align the regulation with scientific progress and market realities, particularly concerning the integration of the insect production sector.

To fully unlock the potential of insects in contributing to the EU's organic goals—such as increasing the share of organic farming to 25% by 2030 and enhancing the circularity of agri-food systems—**we urge the Commission to prioritize the following actions in this revision:**

1. **The finalization and publication of the delegated act establishing EU organic production rules for farmed insects.** This will end the current regulatory uncertainty and allow insect producers to access the organic market. Since the Publication of the [EGTOP Report](#) on the 30th of April 2025, the European Commission has left the dossier unattended. This is unacceptable.
2. **Introduce a temporary derogation allowing the use of non-organic (conventional) insects in organic aquaculture feed, following the [Recommendations of the Aquaculture Advisory Council](#).**
3. **Introduce a symmetrical temporary derogation allowing the use of non-organic (conventional) insects in organic poultry feed.**

These demands are essential to address the severe shortage of organic protein, support the growth of the organic livestock sector, and maintain the competitiveness of EU farmers, as highlighted by the European Aquaculture Advisory Council (AAC) and demonstrated by recent research.

#### 2. Context and General Remarks

The EU organic sector is growing, but its development is hampered by a structural lack of high-quality, locally produced organic protein feed. As Copa-Cogeca has noted, this is especially critical for monogastric animals like poultry and for carnivorous fish in aquaculture.



Insect-derived products, such as Processed Animal Proteins (PAPs) and insect oil, offer a perfect solution. They are highly nutritious—rich in digestible proteins, essential amino acids, and beneficial fats like lauric acid—and can be produced locally on agri-food by-products, perfectly aligning with the circular economy principles enshrined in the EU organic regulation. Recent research confirms that insect meal, for example from black soldier fly larvae or *Tenebrio Molitor*, can effectively replace conventional ingredients like fishmeal and soybean meal in feed.

### 3. However, two major barriers prevent the insect sector from contributing to the organic feed supply:

1. The absence of EU organic certification standards for insect production itself.
2. The lack of a transitional pathway for organic aquaculture and poultry producers to use insect meal while the organic insect sector is being established.

#### 3.1. The Urgent Need for Derogations to Use Conventional Insects

The principle of using non-organic feed ingredients is already established in the EU Organic Regulation ([Reg. 2018/848](#)) for certain sectors and transition periods. We call for the application of this same principle to insects used as feed.

#### 3.2. Creating an Exception for the Use of Conventional Insects in Organic Aquaculture

We strongly urge the European Commission to introduce a temporary derogation permitting the use of non-organic (conventional) insect meal in feed for organic carnivorous aquaculture species.

- **Alignment with the Aquaculture Advisory Council (AAC):** This demand is fully aligned with the recommendations of the Aquaculture Advisory Council. In its July 2023 recommendations on Organic Aquaculture, the AAC explicitly reiterates that the use of conventional insects could strengthen the sector's competitiveness by providing complementary feeding options for producers. We echo the AAC's call to the Commission to act on this advice.
- **International Precedent:** Such a measure is not unprecedented. As IPIFF has noted, the [use of conventional insects in organic aquaculture is already authorized in other countries with developed organic sectors, such as Canada](#). The EU should not lag in providing its farmers with competitive and sustainable tools.
- **Scientific and Practical Justification:** The organic aquaculture sector faces a critical shortage of protein. Fishmeal from sustainable sources, while permitted, is a finite and increasingly expensive resource. Insect meal presents a sustainable, circular alternative that mimics the natural diet of many fish species. A temporary derogation is necessary to bridge the gap while the organic insect production sector scales up to meet demand. Without it, the growth of EU organic aquaculture will be stifled.



### 3.3. Extending the Derogation to Organic Poultry Production

Symmetrically, we call for the same temporary derogation to be applied to the use of conventional insects in feed for organic poultry (broilers and layers).

- **Protein Self-Sufficiency and Upcoming Deadlines:** The organic poultry sector is facing increasing pressure. As highlighted by research from the [LEGMEME](#) project, from 2026 onwards, the exception allowing up to 5% conventional protein-rich feed in the ration of young poultry will lapse. This will exacerbate the existing challenge of finding organic protein sources, particularly for essential amino acids like methionine, which are restricted in organic systems.
- **Demonstrated Potential:** The [LEGMEME](#) project demonstrated that replacing 5% of soybean meal with insect meal in layer feed resulted in positive outcomes, including a higher laying percentage and heavier eggs. This proves not only the feasibility but also the potential benefits of insect meal in organic poultry rations.
- **Sustainability Imperative:** Currently, the organic poultry sector relies heavily on imported soybean meal, which raises sustainability concerns regarding deforestation and long supply chains. Locally produced insect meal, even if from non-organic sources during a transition period, offers a more sustainable and circular alternative, reducing the EU's reliance on imported feed proteins.

## 4. The Necessity of EU Organic Certification Standards for Insect Production

While derogations for the *use* of conventional insects are urgently needed as a short-term measure, the long-term solution is to establish EU organic production rules for insects. We strongly urge the Commission to finalise the procedures and publish these standards without further delay.

- **Unlocking the Sector's Full Potential:** The absence of EU organic standards for insect farming prevents operators from accessing the organic market and securing premium prices for their products. Developing these standards, as called for in the [2021 IPIFF paper](#), is necessary for the insect sector to unlock its full potential and contribute fully to a sustainable food system.
- **Aligning with Organic Principles:** Many insect farmers already adhere to principles aligned with organic production, such as using non-GM feed and avoiding veterinary drugs. Establishing clear EU rules would provide a formal framework for these practices, ensuring consumer confidence and a level playing field.
- **Feasible Framework Proposals:** Building on the groundwork laid by stakeholders like IPIFF, the Commission has a solid basis to develop these rules. Key elements should include:
  - **Substrates:** Acknowledging the reality that 100% organic feed for insects is currently unavailable and unaffordable, the rules should include a phased approach or a percentage-based derogation for the use of certain non-organic agri-food by-products, as proposed by IPIFF. This is consistent with the circularity principle of using low-value co-products.



- **Breeding Stock:** Provisions for the use of non-organic breeding stock, with limits on renewal percentages, to allow the sector to establish itself, mirroring rules in other livestock sectors.
- **Enabling Circularity:** Unblock regulatory barriers impeding circular fish feed to be produced in the EU.
  - Please refer to [EU Feed Circularity Catalogue Outlines Barriers and Solutions for Advancing Circular Animal Feed](#), from FEFAC, IPIFF and 6 other EU umbrella organizations.
  - Please refer to the [Aquaculture Advisory Council Recommendations on Circularity in Fish Feed](#).
- **Welfare and Killing Methods:** Standards based on science and best practices, such as rapid killing methods (freezing, mincing) and welfare principles adapted to insects.

## 5. Conclusion

The revision of the organic production rules is a pivotal moment. By finalising the organic standards for insect farming, and by introducing temporary, targeted derogations for the use of conventional insects in aquaculture and poultry feed, the European Commission can deliver on the ambitions of the Farm to Fork Strategy. These measures will stimulate a new agricultural sector, solve a critical protein shortage for organic farmers, and enhance the sustainability and resilience of the EU's organic food system.

**We urge the Commission to adopt these proposals and look forward to a constructive dialogue on their implementation.**