



Guide for Operators: Reporting Non-Compliance Insect Products from China to National Authorities

This guide consolidates the findings from the three reports you provided and translates them into a practical, step-by-step process for operators to report suspected non-compliance to their national authorities. It also helps identify the correct authorities in key EU states and includes concrete reporting examples to support your case.

Why this guide exists

- Category 3 insect products (e.g., dried *Hermetia illucens* larvae, mealworms) imported from China are alleged to bypass EU safeguards (EU regs 1069/2009 and 142/2011) through misclassification, non-specific certificates, and data gaps.
- Reports show systematic non-compliance risks at the border (HS codes, certificates, signatures, TRACES data, and transport records) and sanitary concerns (forbidden pesticides, unauthorized substrates).
- Operators have an obligation to report credible non-compliance to national authorities and, if needed, escalate to EU level via relevant channels.



What to report (key non-compliance indicators)

Include all known indicators and the specific examples from the reports:

- **Invalid HS Code**

- **Example:** Documentation uses HS Code 0511 99 90 (raw animal products/waste) while declaring goods as “processed pet food.”
- **Legal impact:** Creates a classification paradox; triggers potential rejection at Border Control Posts (BCPs).

- **Generic ABP Attestations**

- **Example:** Certificates use a generic Animal By-Product template (broad categories: poultry, milk, etc.) with no species-specific guarantees for insects.
- **Legal impact:** Violates traceability and legal certainty; inspectors require insect-specific attestations.

- **Documentation Gaps and Unauthorized Signatures**

- **Examples:**
 - Retrospective issuance: One Certificate of Origin issued after goods departed (ISSUED RETROSPECTIVELY).
 - Unauthorized signatory: Health certificate signed by a “Sales Manager,” not an official veterinarian.
- **Legal impact:** Undermines real-time verification; invalidates safety guarantees.



- **Data Integrity and Traceability**
 - **Example:** Mismatch between Certificate of Origin and Veterinary Certificate about total weight and carton counts.
 - **Legal impact:** TRACES “failure of identity”; grounds for seizure or destruction.
- **TRACES and Identity Issues**
 - **Data mismatches** between origin data and health data; discrepancies can lead to automatic rejection or official controls.
- **Operational/Logistical Irregularities**
 - **Transport:** Reports of non-TRACES registered transport; use of low-scrutiny entry points; indirect routes.
 - **Pricing:** Non-compliant imports reported as €1.60–€1.70/kg DAP, disadvantaging compliant EU producers.
- **Sanitary Risks (evidence of non-compliance with safety standards)**
 - **Forbidden pesticides** detected (e.g., Mancozeb, Glufosinate) due to treated cereals used in insect feed.
 - **Unauthorized substrates** (manure and catering waste) used in China.
- **Market Dynamics and Routes (to understand scope)**



- **Volumes:** 30,000–40,000 tons/year (CFNA data).
- **Entry points:** Rotterdam, Antwerp-Bruges, Hamburg; France avoided due to stricter controls; “Iron Silk Road” via Poland (Małaszewicze) as a redistribution hub.
- **Recent shifts:** France’s January 2026 pesticide ban redirected shipments to low-control ports in the Netherlands/Belgium before entering France.
- **Public/Market Evidence (examples you may cite)**
 - **Examples from public supplier listings** (e.g., Alibaba) showing non-certified products, lack of proper substrates, no safety certificates.
 - **Annex 2 and Annex 3 contain lists of importers and anonymous importer feedback** illustrating industry concerns and practical barriers.
- **Documentation Examples to Attach**
 - **Certificates:** P_057_1344_Projekt_Dokument (1), PO70221185 Health Certificate New (1)
 - **Any related CoO, veterinary certificates, certificates of origin, or movement documents**
 - **Corresponding TRACES entries** or evidence of non-entry in TRACES
 - **Price offers/invoices** showing the €1.60–€1.70/kg DAP range (where available)



Evidence you should collect and preserve

- **Certificates and documents**

- CoO and Veterinary Certificate (including dates, origin establishment numbers, counts, and weights)
- Any certificates marked “Issued Retrospectively” or with signatures of non-official staff
- ABP attestations with species-specific guarantees (or lack thereof)

- **Data and traceability**

- TRACES entries (or gaps where TRACES is not used)
- Weight, carton counts, and shipment details (to compare across documents)

- **Transport and routes**

- Transport documents (carrier names, vehicle IDs, port of entry, entry points)
- Evidence of non-TRACES registered transport, or use of low-control ports



- **Sanitary and substrates**
 - Evidence of pesticide residues (if available) and substrate materials used (e.g., treated cereals, manure, catering waste)
- **Market and product examples**
 - Listings from e-commerce or suppliers (e.g., Alibaba) showing non-compliant products or lack of certificates
- **Market impact**
 - Price data and offers showing unusually low costs versus EU-compliant production costs
- **Anonymized testimonies**
 - Any importer feedback or industry concerns (as in Annex 3) that corroborate observed non-compliance patterns
- **Anonymized importer/list of CAT 3 insect product importers**
 - Use Annex 2 as a reference for known CAT 3 insect importers in the EU (for awareness, not for targeting)
- **Ensure all evidence is stored securely, time-stamped, and clearly linked to a specific shipment or batch.**



Which national authorities to contact (exemplified countries)

The following is intended as practical guidance for some common EU states referenced in the reports. Always begin with your national competent authority for animal by-products, animal feed safety, and import controls, and use the national rapid alert system (RASFF) where appropriate.

- **Netherlands (NL)**

- **Primary national authority:** NVWA (Nederlandse Voedsel- en Warenautoriteit)
- **Related channels:** Dutch customs (Belastingdienst Douane) for import controls
- **Suggested action:** Report non-compliance through NVWA channels; reference TRACES discrepancies and HS code misclassification; use RASFF if urgent
- **Industry link:** Dutch National Association of Insect Producers (for coordinated reporting)

- **Belgium (BE)**

- **Primary national authority:** FASFC (Federaal Agentschap voor de Veiligheid van de Voedingsketen)
- **Related channels:** Belgian customs for import controls



- **Suggested action:** Report non-compliance through FASFC and/or customs; include HS code issues, ABP attestations, and TRACES data gaps
- **Germany (DE)**
 - **Primary national authority:** BVL (Bundesamt für Verbraucherschutz und Lebensmittelsicherheit)
 - **Related channels:** German customs (Zoll) for import controls
 - **Suggested action:** Report to BVL and Zoll; provide documentary evidence of HS code misclassification, retrospective issuance, and transport non-compliance
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- **France (FR)**
 - **Primary national authority:** DGAL (Direction générale de l'Alimentation) and DGCCRF (Direction générale de la concurrence, de la consommation et de la répression des fraudes)
 - **Related channels:** French customs (Douane) and national rapid alert system
 - **Suggested action:** Given the stated high sanitary risk and pesticide ban, escalate to DGAL/DGCCRF and Douane; include pesticide residue concerns and postal/truck routes
- **Other EU Member States**



- **General approach:** Identify the national competent authority responsible for animal by-products, feed safety, and import controls, plus the national RASFF contact points
- **If you're unsure:** use the EU-wide Rapid Alert System for Food and Feed (RASFF) national contact points page to locate the correct authority in your country; you can begin with the national feed/safety agency and customs authority

Quick tip: The European Commission notes that enforcement is largely done by Member States, and you can file complaints about member-state enforcement to the Commission if needed. Use the national RASFF contact points for rapid alerts.

How to report: step-by-step workflow

1. Gather and verify all evidence

- Compile the certificates (including the two specific documents mentioned: P_057_1344_Projekt_Dokument (1) and PO70221185 Health Certificate New (1)).
- Assemble HS code references, ABP attestations, signatures, and any indications of retrospective issuance.
- Collect TRACES data and any transport documentation; capture any discrepancies in weight, carton counts, or origin.

2. Prepare a concise report for your national authority

- Create a factual, non-accusatory report with:



- A clear executive summary: what is alleged and why it matters
- Specific, document-backed findings (with references to the sections 3.1–3.4 and 4.1–4.2 from the consolidated report)
- The exact shipments involved (dates, ports, HS codes, certificate numbers)
- A list of suspected non-compliances
- Requested actions (verification, border checks, possible seizure, or audit)

3. Identify the correct national channel

- Use your country's national contact points for the import-control and food/safety authority (see section 4).
- If possible, coordinate with your national association (e.g., Dutch Association of Insect Producers for NL) for alignment and to consolidate a formal report with national authorities.

4. Submit the report through official channels

- **Primary:** National competent authority responsible for import controls, animal by-products, and feed safety.
- **Affected border control posts (BCPs)** may be directly notified if immediate risk is identified.
- **For urgent risk signaling, use the national RASFF contact points** to issue a rapid alert.



5. Document the submission

- Save a copy of the submission, the date/time, and the contact person.
- If available, obtain an acknowledgment or reference number from the authority.

6. If no action from national authorities

- Escalate at EU level via IPIFF (International Platform of Insects for Food and Feed) to request a formal European Commission investigation.
- Continue to monitor and report any new evidence or updated documents.

7. Ongoing surveillance and follow-up

- Maintain a log of all follow-up communications.
- If TRACES integrity remains an issue, request a formal audit of the TRACES entries for the concerned shipments.
- Consider market surveillance actions against non-compliant importers if allowed by national law.



Reporting templates you can use

A) National Authority Report — Template (fill in with country name)

Subject: Report of suspected non-compliance in Category 3 insect product imports from China

- **Summary**
 - Product: Category 3 insect-derived products (Hermetia illucens, larvae, mealworms)
 - HS Code usage: e.g., 0511 99 90 vs. 2309.90
 - Key findings: Retrospective CoO; generic ABP attestations; unauthorized signatures; TRACES data gaps
 - Suspected risks: Pesticide residues, unauthorized substrates, data integrity failures
- **Evidence (attach documents)**
 - Certificate copies: CoO, Veterinary Certificates (including dates and numbers)
 - TRACES entries and transport documents
 - Substrate and pesticide data (if available)



- Market offers showing price ranges
- **Shipments involved**
 - Ports of entry: Rotterdam, Antwerp-Bruges, Hamburg; France routes; Iron Silk Road via Poland
 - Volume indicators: ~30,000–40,000 tons/year (as per CFNA data)
- **Requested actions**
 - Immediate border checks and potential seizure if non-compliance is confirmed
 - Formal investigation and cross-border coordination
 - Documentation audit and corrective measures for future imports
- **Reporter details**
 - Name/Organization
 - Contact information
 - Relationship to the supply chain



B) Quick email to the National Authority (example)

Subject: Urgent report of suspected non-compliance for Category 3 insect products from China

Dear [Authority Name], Please find attached evidence regarding suspected non-compliance of Category 3 insect products imported from China, including HS code misclassification (0511 99 90 vs. 2309.90), generic ABP attestations, retrospective issuance, unauthorized signatures, data integrity issues in TRACES, and possible pesticide/substrate violations. We request immediate border verification and an official investigation.

Attachments:

- Certificate copies (CoO, Veterinary Certificate)
- TRACES documentation
- Market price offers
- Evidence of non-TRACES transport and routes

Please provide an acknowledgment and reference for follow-up, and advise on any rapid alert procedures.



Kind regards, [Your Name] [Organization] [Phone/Email]

Annex: Key examples to reference in your report

- **HS Code and product classification**
 - “HS Code 0511 99 90” used while declaring goods as “processed pet food” (paradox)
- **Attestations and signatures**
 - Generic ABP attestations that do not isolate insect-specific guarantees
 - Certificates issued retrospectively
 - Certificates signed by non-official personnel (e.g., Sales Manager)

- **Data and identity**
 - Mismatches between Origin and Health data in TRACES (weight, carton counts)
 - Lack of TRACES transport registration



- **Sanitary and substrate concerns**

- Evidence of forbidden pesticides in insect feed
- Use of unauthorized substrates (manure, catering waste)

- **Market and route indicators**

- Redirection of shipments due to national pesticide bans (France Jan 5, 2026)
- Main entry points and redistribution hubs (Rotterdam/Antwerp/Hamburg; Małaszewicze in Poland)

- **Public/market examples**

- Alibaba listings showing non-certified products or lack of proper certificates

- **Annex 2: CAT 3 insect importers (illustrative list)**

Pet International Ltd (Belgium), Artemia Koral GmbH (Germany), Vaesen Quality Seeds & Feeds (Belgium), Kiezebrink (The Netherlands), CJ Wildlife (Netherlands), AviCentric (Netherlands), Kuijpers Petfood B.V. (Netherlands), Versele-Laga (Belgium), etc.

- **Annex 3: Anonymous importer feedback highlights**



- Perceived heterogeneity in EU member-state checks
- Calls for harmonized EU procedures and stronger alignment with China
- Value of upgrading procedures to achieve compliance in exchange for market access
- **Annex 1: Customs/Maritime context (for context in reporting)**
 - Northern Range entry points; rail transit via "Iron Silk Road"
 - Unit volumes per container; typical shipment sizes
 - France pesticide ban context and its impact on routing

Practical tips to increase the effectiveness of your report

- **Be precise and objective**
 - Attach verifiable documents; avoid unverified assertions
 - Quote exact HS codes, certificate numbers, and dates
- **Align with national and EU channels**



- Use the national authority as the primary channel
- If appropriate, submit through the national RASFF contact points for rapid alert
- **Coordinate with industry associations**
 - Engage your national insect producer association where available (to consolidate reporting)
- **Maintain a clear chain of evidence**
 - Link each document to a shipment, file, or certificate number
 - Preserve all correspondence and acknowledgments from authorities
- **Consider EU-level escalation if needed**
 - If national authorities do not act promptly, refer to IPIFF and request an EU-level investigation via the European Commission



ANNEXES- COMPILATION OF EVIDENCE

Section A: Adding "Market Evidence" to Your Dossier

Evidence Type	What It Proves	How to Use It
Live product listings (Alibaba)	Products are openly sold with no certificate, no rules, using forbidden substrates (manure, catering waste)	Screenshot and archive. Attach to complaint as proof of *systematic* non-compliance at origin
Retail products found in EU	Physical products on EU shelves with no safety certificate, no EU-compliant substrate declaration	Photograph labels and packaging. Request authorities to seize and test
Importer testimony (Annex 3)	Confirms fragmented enforcement, garage-box importers evading controls, price distortion (€1.60-1.70/kg vs. compliant €5.80-5.90/kg needed)	Quote directly in complaint. This is an insider admission* that the system is broken

Section B: How to Use the Company List (Annex 2)



The Guide asked operators to report non-compliant products. This report 01 provides a list of 15+ importers who are bringing these products into the EU.

Strategic action:

1. Cross-reference this list with your national trade data. Which of these companies operate in your Member State?
2. Include the relevant company names** in your complaint to the national authority.
3. Request that the authority:
 - a. Inspect pending consignments from these importers
 - b. Audit their TRACES declarations
 - c. Verify their veterinary certificates against the criteria in Report 1 (invalid HS codes, unauthorized signatories, retrospective issuance)



Example (for a Dutch operator reporting to NVWA):

We request that NVWA prioritize inspection of consignments imported by the following Netherlands-based companies identified in industry reporting as active in Chinese Category 3 insect trade: Kiezebrink, CJ Wildlife, AviCentric, Kuijpers Petfood B.V. These companies are named in Annex 2 of a consolidated industry report on systemic non-compliance.

Section C: Documenting Customs Evasion (Annex 1)

The report reveals a deliberate diversion strategy

"Due to the French decree of January 5, 2026 (pesticide ban), shipments are being diverted to Rotterdam and Antwerp, then entering France by truck."

What this proves:

- Importers are aware of strict controls in France
- They are ****actively bypassing**** those controls by using low-scrutiny ports
- This is regulatory shopping – a deliberate evasion tactic, not accidental non-compliance



How to use this in your complaint:

"Evidence shows that Chinese Category 3 shipments are systematically routed through Member States with weaker border controls (Netherlands, Belgium) before being trucked to end-markets in France and Germany. This constitutes deliberate regulatory shopping under Article 116 TFEU and demands harmonized enforcement action."

Section D: Veterinary and Health certificates

According to reported evidence of veterinary and health certificates for Chinese *Hermetia illucens* imports reveals a consistent pattern of non-compliance across four critical areas, creating grounds for immediate rejection at EU Border Control Posts (BCPs). Please report to your national authority, accordingly:

Area of Failure	Finding	Legal Impact
3.1. Invalid HS Code	Documentation uses HS Code 0511 99 90 (raw animal products/waste) but declares goods as "processed pet food."	Creates a legal paradox. A product cannot be classified as both raw waste and a processed retail feed. This mismatch triggers automatic rejection at BCPs.
3.2. Generic ABP Attestations	Certificates use a generic Animal By-Product template listing broad categories (poultry, milk) without isolating guarantees for insects.	Violates legal certainty and traceability. EU inspectors require species-specific attestations, which the generic template fails to provide.



3.3. Documentation Gaps	Retrospective Issuance: One Certificate of Origin was issued after the goods departed China, creating a traceability gap. Unauthorized Signatory: A health certificate was signed by a "Sales Manager," not an official veterinarian.	Retrospective issuance undermines real-time verification of safety standards. An unauthorized signature invalidates the entire safety guarantee under EU law.
3.4. Data Integrity	Mismatch between Certificate of Origin and Veterinary Certificate regarding total weight and carton counts.	Constitutes a "failure of identity" under the TRACES framework, providing legal grounds for seizure or destruction of the consignment.

Section E: Strengthening the Anonymous Testimony (Annex 3)

*This importer's testimony is critical evidence because it comes from *inside* the trade. Quote it directly.*

Key quotes to embed in your complaint:

Quote	Legal/Policy Argument
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<p>If you start a new company from a local garage-box and import 1 container a year... there must be an issue with the documents</p>	<p>Small, under-regulated entities evade TRACES scrutiny. Request increased surveillance on small-volume, high-risk importers.</p>
<p>We compete with companies... that can buy a container, put a margin of €500 and resell it. With much check-up or control</p>	<p>Proves market distortion. Compliant operators cannot compete with non-compliant ones</p>
<p>You may wonder how long it would be interesting for bigger companies... to continue with the import of mealworms. It's hardly beneficial</p>	<p>The current system is driving compliant operators out of the market – a market failure requiring intervention</p>
<p>The only way to make China comply is assuring that it benefits to upgrade their procedures in exchange for the opportunity to export (or otherwise not export)</p>	<p>Supports the first report's recommendation to use market access leverage</p>

Section E: Updated Reporting Template (Integrating New Evidence)

Combine the legal arguments from the first guide with the market evidence from this report.



Revised opening paragraph for your complaint:

Pursuant to Regulation (EU) 2017/625, we hereby formally report systemic non-compliance in Chinese Category 3 insect imports.

Evidence includes:

1. Invalid veterinary certificates (unauthorized signatories, retrospective issuance, incorrect HS codes);
2. Live product listings on Alibaba openly selling insects grown on manure and catering waste (forbidden in the EU);
3. Physical non-compliant products found on EU retail shelves with no safety certificates;
4. Deliberate routing of shipments via low-control ports (Rotterdam, Antwerp) to evade French pesticide bans.
Anonymous importer testimony confirming garage-box evasion, price distortion (€1.60-1.70/kg vs. compliant €5.80-5.90/kg), and fragmented enforcement across Member States.
Fifteen named importers (see Annex) are identified as active in this trade. We request immediate inspection of their pending consignments and RASFF notification to all Member States.**



Quick reference: glossary of terms

- **Category 3 ABP:** EU category for animal by-products not intended for human consumption; strict rules apply for substrates, processing, and traceability.
- **HS Code 0511 99 90:** Classification for “Other” animal products not elsewhere specified; often misused to hide non-compliant products.
- **HS Code 2309.90:** Pet food preparations (example of a compliant code to align with product use).
- **TRACES:** EU Trade Control and Expert System for traceability of animal products; “failure of identity” occurs when data in documents do not match the physical lot.
- **Retrospective issuance:** Certificate issued after products have left origin; raises traceability concerns.
- **RASFF:** EU rapid alert system for food and feed safety; national points manage notifications.