



Report 02- Non compliant insects-derived products within the EU

Relevant Information, includes:

- Examples of websites with non-compliant products can be acquired in the EU
- Examples of non-compliant products
- List of companies importing non-compliant products
- Elements from customs
- Anonymous testimony from an importer of non-compliant products in the EU

List of insect products in European market

- **Estimated imported insect products (non-including direct shipping from China through E-trade):** 30 000-40 000 tons (figures given by the CFNA, Chinese organisation of insect producers).
- **Main importer's countries:** Netherlands, Belgium, Germany (+UK)
- **Main markets:** France, Germany, Netherlands, Belgium
- **No importation through French harbours as real custom controls on C3 products from China (High sanitary risk).** But products come to France by truck from Netherlands, Belgium and Germany (and see at the end, starting to come by train from China...).
- **High risk detected in France on insects products coming from China:** Traces of forbidden pesticides + non-authorized substrates used to grow insects in China

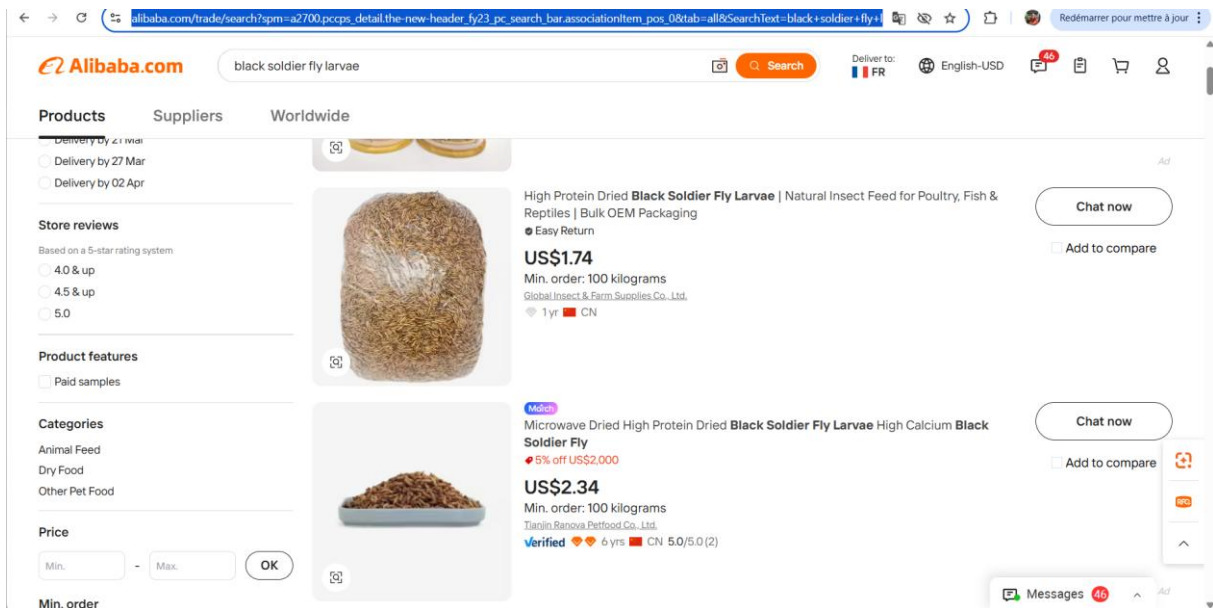
Some products example:

- Free import with no certificate, no rules from Alibaba:

BSF:

https://www.alibaba.com/trade/search?spm=a2700.pccps_detail.the-new-header_fy23_pc_search_bar.associationItem_pos_0&tab=all&SearchText=black+soldier+fly+larvae&has4Tab=true&from=sem

- Example : (for poultry, fish, etc)

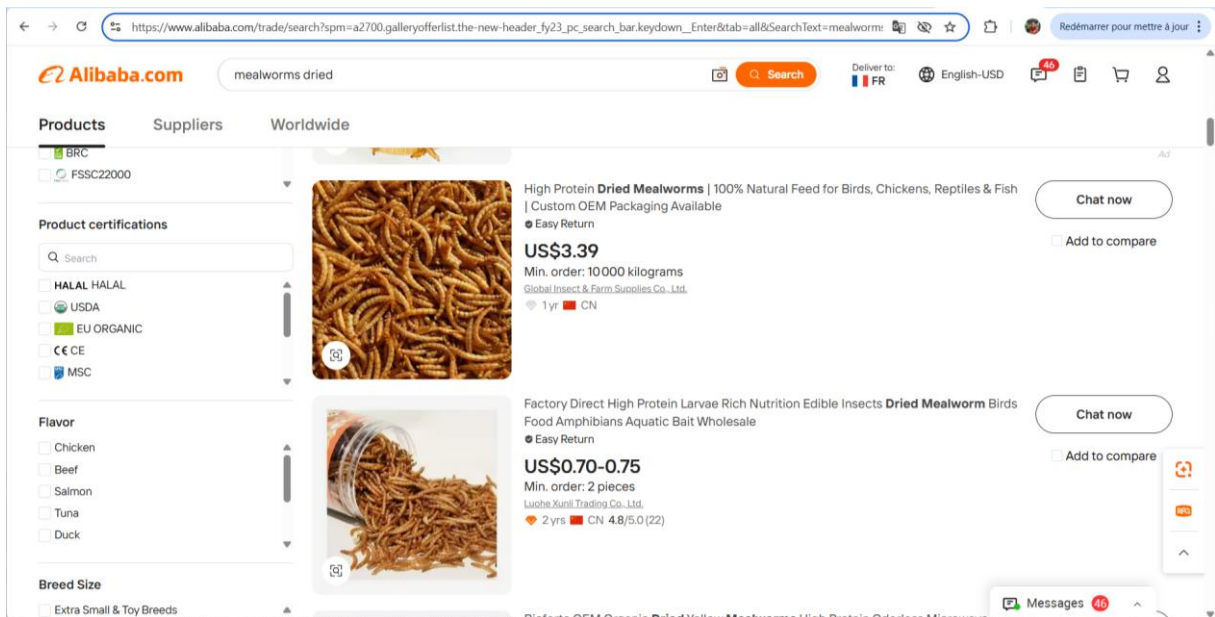


- **Feed BSF in China: Manure, catering food waste : both totally forbidden in Europe**

Mealworms:

https://www.alibaba.com/trade/search?spm=a2700.galleryofferlist.the-new-header_fy23_pc_search_bar.keydown_Enter&tab=all&SearchText=mealworms+dried&has4Tab=true&from=sem

- **Example: (for poultry, fish, etc)**



Example of Chinese products found in retail.

No safety certificate, not complying with EU regulation (substrates, microbiology analysis, heavy metals analysis)

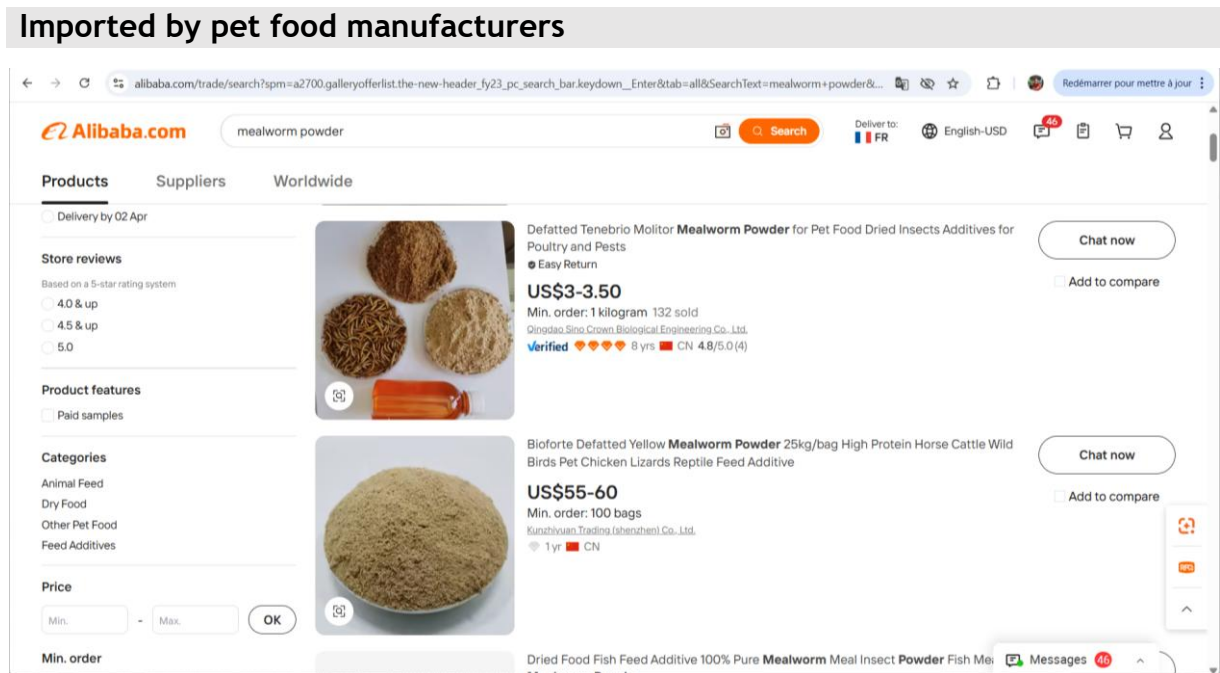


| | |
|-----------|----------------------------------------------------------------|
| Mealworms | Black Soldier Fly (grown in China on Non-authorized substrate) |
|-----------|----------------------------------------------------------------|

Processed Animal by-products of insects (stronger regulation): (deffated powder for chicken)



https://www.alibaba.com/trade/search?spm=a2700.galleryofferlist.the-new-header_fy23_pc_search_bar.keydown_Enter&tab=all&SearchText=mealworm+powder&has4Tab=true&from=sem



To recall: 30 to 40 000 tons of insects imported in Europe from China, most of them with no correct control at the EU border control, while the application of EU regulation for EU producers is compulsory.

Category 3 animal by-products, one of the highest levels in regulation, and we are flooded with Chinese products that go to the consumer through EU importers.

CONCLUSION: All category 3 products coming from China must be controlled to enter Europe and comply with EU regulation (substrate, analysis, heavy metals, non-authorized pesticides). **No distinction must be made between dried larvae and processed larvae as they are both Category 3 products in terms of regulation, and must undergo the process of category 3 products entering Europe.**

Products coming from China and end in the feed and food chain in the EU without complying with applicable legislation.



Annex 1

Elements from customs/maritime transport:

1. Volumes and Routes of Flows (2025-2026)

China remains the world's leading exporter of dehydrated mealworms for the European wild bird market (pet food), despite an overall decline in Sino-European trade in early 2026.

- **Main Ports of Entry:** Containers (often 20- or 40-foot HC) arrive primarily through ports in the Northern Range: Rotterdam, Antwerp-Bruges, and Hamburg.
- **Rail Transit:** A growing share of the flow passes through the "Iron Silk Road" (China-Poland). Poland (via Małaszewicze) has become a major redistribution hub for bulk mealworms destined for Germany and France.
- **Volume type:** A 40-foot container can hold approximately 10 to 15 tons of dehydrated mealworms packaged in 5 or 10 kg bags.

2. The January 2026 Blockade (Pesticide Ban)

- **The decree of January 5, 2026 (in France)** suspended the importation of foodstuffs from third countries containing residues of certain pesticides (such as Mancozeb or Glufosinate).
- **Impact:** Many shipments of Chinese mealworms were blocked or delayed in the first quarter of 2026, as these insects are often fed with cereals treated with these substances. **This led to some shipments being diverted to other European ports with less restrictive regulations than French ports (e.g., transit through the Netherlands before entering French territory by truck).**
- **Market analysis:** A redirection of shipments is currently being observed. Due to the accumulated health controls on China, some European importers are beginning to favour Vietnam and Thailand, whose container flows have increased by 12% in the last six months of 2025 (insect production coming from China anyway).

Annex 2

Short list of CAT 3 insects' importers:

- *Pet International Ltd (Belgium)*
- *Artemia Koral GmbH (Germany)*



- Vaesen Quality Seeds & Feeds (Belgium)
- Kiezebrink (The Netherlands)
- CJ Wildlife (CJ WildBird Foods Europe BV The Netherlands)
- AviCentric (The Netherlands)
- Kuijpers Petfood B.V. (The Netherlands)
- Versele-Laga (Belgium)
- Grizo Bird Food (Belgium)
- Laroy Group (Belgium)
- Welzhofer GmbH (Germany)
- GEVO GmbH (Germany)
- Kessler GmbH (Kessler Aqua) (Germany)
- Claus GmbH (Germany)
- WormUp / Insektenliebe (Germany)
- Bello-Mieze & Co (Germany)

Annex 3 Anonymous Reporting from a major importer in the EU

- Legislation not specific enough

'The legislation gives too much space for interpretation, leading to differences on all kinds of levels'.

- Different interpretations of the EU legislation

- *'Even between control officers in the same country'*

- Differences between members in EU

- *'Some countries do not comply with checks and controls concerning Cat.3 items'.*
- **For example, tolerance of Enterobacteria on mealworms is far lower than on most seeds, grain, pulses**
 - *'In principle if the raw material is safe, it's safe for all end-products. But 90%, abt. 300 mts, of mealworms end*



up in a garden (out and open) under all kinds of influences and weather conditions’.

- Differences for different sized companies

‘As a large importer from the Netherlands we are checked frequently, but if you start a new company from a local garage-box and import 1 container a year, even within the Netherlands, there must be an issue with the documents at arrival’.

- Price is a result of costs, availability and demand

‘The price from China is low due to the lack of demand from USA, the product at lower value (and often quality) potentially being of interest in the EU.

Actually, for the risk we take, as importers, might need a price of EUR 5.80-5.90/kg (higher the price) but we can’t. We compete with companies from other EU-members, people working from their living room or garage box that can buy a container, put a margin of EUR 500 and resell it. With much check-up or control.

If we are very honest and realistic, you may wonder how long it would be interesting for bigger companies, in countries that are under more control, to continue with the import of mealworms. It’s hardly beneficial.

In Europe we are not going to change to Chinese procedures.

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)

In import duty is mostly a measure to effect demand, not necessarily quality being offered.

I think we in the EU for this cat.3 items mostly work in protective and defensive mode.

But I think we can speed up good EU initiatives and as well create safer imports if we go in a more proactive and aggressive mode, but only works if the EU acts together, and not individual actions by EU Member States’.