



IPIFF POSITION PAPER TOWARDS THE EUROPEAN COMMISSION CONSULTATION ON THE 'EUROPEAN OCEAN ACT'

I. Executive Summary

The European Commission has launched a consultation on the proposed 'European Ocean Act'—an initiative designed to establish an integrated, modernized governance framework for EU marine policy.

The Act is closely aligned with the ongoing revision of the Marine Strategy Framework Directive, which was originally established to protect marine ecosystems and biodiversity. In turn, these ecosystems and biodiversity underpin not only our health and well-being but also a wide range of marine-dependent economic and social activities.

IPIFF, the International Platform of Insects for Food and Feed, welcomes the opportunity to respond to the European Commission's public consultation on the forthcoming European Ocean Act. **As a key initiative of the European Ocean Pact, this Act represents a pivotal moment to establish a unified, integrated framework for managing the EU's marine resources.**

In its response to the European Commission consultation on the Ocean Act, IPIFF underscores the insect sector's strategic role in addressing the Act's core objectives.

1. Insects' contribution to address the Triple Planetary Crisis- climate change, biodiversity loss and pollution

The sector directly contributes to tackling the Triple Planetary Crisis—climate change, biodiversity loss, and pollution—by offering a sustainable alternative to conventional aquafeed ingredients.

Insect farming significantly reduces greenhouse gas emissions, land, and water use compared to traditional livestock or feed crop production, while its circular model upcycles organic waste into high-quality protein, mitigating pollution.

Furthermore, as climate change alters marine ecosystems and increases pressure on wild fish stocks, insect meal provide a resilient, domestically produced solution for aquaculture feed, reducing dependence on imported and climate-vulnerable proteins like fishmeal and soy.

By promoting the adoption of insect-based feed, the insect sector supports the Ocean Act's ambition for climate-smart maritime spatial planning and the creation of a more



sustainable and competitive blue economy that can adapt to new climate realities and sea uses.

2. Insects' contribution to deliver on the Ocean's Pact six priorities

The insect sector is uniquely positioned to directly contribute to the Ocean Pact's six priorities. By producing sustainable, circular, and domestically sourced aquafeed, the insect industry offers concrete solutions to the environmental, economic, and strategic challenges facing the EU's fisheries and aquaculture sectors.

The sector's primary contribution lies in its ability to support the objectives of the Common Fisheries Policy (CFP) – a sectoral policy the Ocean Act aims to complement, not replace – by fundamentally improving the sustainability of the aquaculture feed supply chain.

II. The Insect Sector: A Strategic Partner for the Ocean Act

The European insect sector is a mature, science-backed, and investment-ready industry that can help the EU achieve its goals for a sustainable and competitive blue economy.

1. Contribution to Environmental Sustainability and Conservation of Marine Resources

The Ocean Act must address the critical issue of aquafeed sustainability. Aquafeed accounts for up to 80% of a producer's environmental footprint with the current dependency on fishmeal and soybean meal creating significant pressure on marine resources and biodiversity.

The insect sector provides a direct solution. Using insect meal as an alternative protein source directly reduces pressure on wild fish stocks, promoting more sustainable aquaculture practices. Furthermore, insect farming is a circular economy model, converting underused biomasses and organic by-products into high-quality protein and fertilizer (frass), thereby reducing waste and improving resource efficiency. Independent Life Cycle Analyses confirm that insect-based proteins can significantly lower CO₂ emissions, require less land and water than traditional livestock production, and free up land for nature conservation.

2. Boosting the Competitiveness and Resilience of the EU Blue Economy

The EU faces a significant protein deficit, relying on imports for approximately 70% of its animal feed protein, including fishmeal and soy, leaving the bloc highly vulnerable to geopolitical instability, climate change, and price volatility. Insect meal, produced within



Europe in controlled environments, is a secure, reliable, and circular alternative that enhances the EU's strategic autonomy.

The economic benefits for the aquaculture sector are compelling:

- **Cost Stability:** Aquafeed accounts for up to 70% of production costs. By diversifying feed ingredients, insect meal helps stabilize costs and insulate producers from global market shocks.
- **Job Creation:** The insect sector is a driver of innovation and green jobs. To date, the sector has created approximately 3,500 jobs and is projected to create up to 30,000 jobs by 2030, providing new economic opportunities for coastal communities.
- **Market Confidence:** Major global aquafeed producers like BioMar and Skretting have publicly committed to investing in insect meal, demonstrating the industry's confidence in its role as a key ingredient for a competitive and sustainable future.

3. Supporting Innovation, Scientific Excellence, and Food Security

Decades of peer-reviewed science have validated insect meal as a high-performing and functional ingredient for aquafeed. Over 400 studies demonstrate its high nutritional value, digestibility, and positive effects on fish gut health, immune response, and palatability.

To unlock the sector's full potential, IPIFF calls on the EU to adopt a forward-looking policy framework, including:

- **Mandatory Inclusion Rates:** Introducing progressive mandatory targets for sustainable insect protein in aquafeed, such as 1-2% by 2027, 5% by 2030, and 15% by 2050.
- **A Level Playing Field:** Recognizing insect protein as a key strategic asset to reduce the EU's dependence on imported protein and strengthen food sovereignty.
- **Regulatory Reform:** Expanding the range of authorized circular substrates for insect production, harmonizing regulations for frass as an organic fertilizer, and creating dedicated EU funding to support the sector's scale-up.

III. Conclusion

The European Ocean Act provides an unparalleled opportunity to create a more coherent, resilient, and sustainable ocean governance framework. The insect sector is ready to be a cornerstone of this new framework. We are not a niche industry but a mature, innovative partner capable of directly addressing the Ocean Pact's ambitions for environmental protection, economic competitiveness, and strategic autonomy.



IPIFF urges the European Commission to consider the insect sector as a strategic ally in the implementation of the Ocean Act, recognizing its potential to contribute to a thriving, sustainable blue economy and secure the future of EU fisheries and aquaculture.