



EUROPEAN ALGAE
BIOMASS ASSOCIATION

InnovProtein EU Alliance

Contribution to the Call for Evidence on the European Biotech Act (COM (2025) 1022)

I. Introduction

The InnovProtein EU Alliance, represented by the [European Algae Biomass Association \(EABA\)](#) and the [International Platform of Insects for Food and Feed \(IPIFF\)](#), welcomes the European Biotech Act and support the Commission's objective of strengthening the Union's biotechnology and biomanufacturing ecosystem, reducing regulatory complexity, accelerating innovation and enhancing European competitiveness.

The InnovProtein EU Alliance particularly welcomes the proposal's focus on biotechnology and biomanufacturing, reducing time-to-market, supporting strategic projects and strengthening the innovation framework for biotechnology.

At the same time, several provisions could benefit from clarification to ensure that algae and insect biotechnology are fully recognised within the scope and objectives of the Act.

II. Recommendations

1. Clarify that algae and insect biotechnology fall within the biotechnology and biomanufacturing ecosystem addressed by the Act

Relevant provisions

- Recitals 1, 2, 4, 20 and 28
- Article 2(1), points (1), (3), (4) and (5)
- Article 3(1)

The InnovProtein EU Alliance welcomes the broad definition of biotechnology and biomanufacturing. However, the proposal predominantly refers to health biotechnology, biological medicines, ATMPs and biosimilars. This creates a risk that biotechnology platforms based on algae and insects may receive less visibility, despite being established biotechnology and biomanufacturing technologies contributing to food safety, nutrition, feed innovation and public health objectives.

The InnovProtein EU Alliance therefore suggests clarifying, where appropriate, that biotechnology platforms based on microalgae, macroalgae and insects are among the technologies that can contribute to the objectives of the Act particularly where they support food safety, nutrition, health food security and sustainable biomanufacturing.

Such clarification would be consistent with:

- the broad biotechnology definition in Article 2;
- the Act's references to food and feed legislation;
- the One Health approach; and
- the recognition of biotechnology's contribution to food security and sustainable food systems.



EUROPEAN ALGAE
BIOMASS ASSOCIATION

2. Welcome the EFSA reforms and encourage broad implementation for algae and insect-derived products

Relevant provisions

- Recitals 107-113
- Amendments to Regulation (EC) No 178/2002

The InnovProtein EU Alliance strongly welcomes the proposed expansion of EFSA pre-submission advice to include scientific matters such as study design and testing strategies. This responds directly to challenges identified by stakeholders regarding regulatory complexity, high compliance costs and uncertainty.

This measure is particularly valuable for algae and insect-derived innovations, where applicants often face scientific questions relating to nutritional composition, production processes and safety assessment requirements.

EABA and IPIFF also support:

- the strengthening of EFSA's role;
- efforts to improve consistency between scientific panels;
- the reduction of procedural delays; and
- measures intended to improve the quality and completeness of applications before submission.

These changes should help create a more predictable environment for innovative biotechnology-derived food and feed products.

3. Remove the Exclusion of Novel Foods from Regulatory Sandboxes

Relevant provisions

- Recitals 113-116

The InnovProtein EU Alliance strongly welcomes the introduction of regulatory sandboxes in food and feed legislation as a valuable tool to facilitate innovation, generate evidence under controlled conditions, and support the development of new biotechnology-enabled solutions.

However, we are concerned that novel foods are explicitly excluded from the scope of the regulatory sandbox framework.

This exclusion risks significantly limiting the effectiveness of the proposed measure for the food biotechnology sector. A substantial proportion of biotechnology-derived food innovations, including many algae-based and insect-based ingredients and applications, are regulated under the Novel Food Regulation and therefore fall outside the very mechanism designed to support innovation and regulatory learning.



EUROPEAN ALGAE
BIOMASS ASSOCIATION

The rationale provided in Recital 115 does not appear to justify a blanket exclusion of novel foods. On the contrary, novel foods are often among the most innovative products entering the EU food system and are precisely the type of technologies that could benefit from controlled experimentation, data generation and early regulatory dialogue.

Excluding all of them may reduce opportunities to improve scientific understanding, facilitate market entry and support the objectives of the Biotech Act to accelerate innovation and strengthen European competitiveness.

The InnovProtein EU Alliance therefore calls for the removal of the exclusion of novel foods from the regulatory sandbox framework. At a minimum, the Commission should allow novel food applicants to participate in regulatory sandboxes under appropriate safeguards, ensuring that food safety and consumer protection remain fully guaranteed while enabling innovation-friendly regulatory approaches.

Including novel foods would make the sandbox framework more coherent with the overall objectives of the Biotech Act and better support Europe's biotechnology innovators in bringing sustainable and scientifically validated products to market.

4. Recognise the importance of algae and insects in the strategic mapping exercise

Relevant provisions

- Recitals 20 and 21

The InnovProtein EU Alliance strongly supports the strategic mapping of the Union biotechnology ecosystem. This exercise will play an important role in identifying industrial capacities, dependencies, infrastructure gaps and investment needs.

We encourage the Commission to ensure that algae and insect biotechnology, as well as their respective biomanufacturing sectors, are adequately reflected within this mapping exercise, including:

- cultivation and rearing capacity;
- fermentation-based production platforms;
- pilot and demonstration facilities;
- food and feed applications; and
- biotechnology clusters active in marine, algae and insect innovation.

This would contribute to a more complete understanding of the Union biotechnology ecosystem and its strategic capacities.

III. Conclusion

The InnovProtein EU Alliance supports the objectives of the European Biotech Act and welcome the proposed measures to strengthen Europe's biotechnology and biomanufacturing ecosystem.

To ensure the Act fully delivers on its ambitions, we encourage the Commission to:



EUROPEAN ALGAE
BIOMASS ASSOCIATION

- explicitly recognize algae and insect biotechnology and biomanufacturing within the scope of the Act;
- implement the proposed EFSA reforms in a way that benefits algae-derived and insect-derived food and feed innovations;
- remove the exclusion of novel foods from the regulatory sandbox framework; and
- ensure that algae-related and insect-related activities, infrastructure and value chains are adequately reflected in the strategic mapping of the European biotechnology ecosystem.

These targeted improvements would help ensure that the Act supports the full diversity of European biotechnology innovation and strengthens the EU's competitiveness, resilience, and food and feed security.