



IPIFF Position Paper

In Response to the Call for Evidence: Food and feed safety - simplification omnibus

Subject: Strategic Simplification for a Sovereign European Bio-Economy: Harnessing the Insect Sector's Potential

I. Who are we?

The [International Platform of Insects for Food and Feed \(IPIFF\)](#) is the umbrella organisation of the European insect-producing sector towards European institutions. Bringing together 54 members - most of which are European insect-producing companies - IPIFF promotes the use insects and insect-derived products as a top-tier source of nutrients for human consumption, animal feed and plant nutrition.

The insect industry has emerged as one of the fastest-scaling sectors among industrial start-ups and innovations in Europe, offering a promising pathway to meet Europe's ambitious goals of reindustrialisation and transitioning to a climate-responsible economy. EU support measures should be stepped up to address the specific needs of the sector during its critical phase of scaling up. We believe that simplification, standardization, predictability and modernization of regulatory framework on animal feed are fundamental for the scaling-up of our sector and for the EU to achieve a leading role in the World bioeconomy market.

II. Introduction: A Strategic Partner for a Simpler, Stronger EU

IPIFF welcomes the European Commission's cross-cutting simplification initiative. The European insect sector—a beacon of circular bio-innovation with over **€1.5 billion invested** and **3,500 jobs created**—is a ready-made solution for achieving the EU's Green Deal, strategic autonomy, and reindustrialisation goals.

However, regulatory complexity and outdated rules hinder our ability to scale and fully deliver on this promise. This omnibus proposal is a unique opportunity to implement targeted simplifications that contribute to gradually unleash our sector's potential, enhancing Europe's competitiveness and resilience without compromising its world-leading safety standards.

We understand and agree that the purpose of this initiative is to eliminate red tapes and amend a number of provisions in a way that enables to deliver the same high level of food and feed safety with less administrative constraints. **In this respect, the examples of provisions deserving simplification mentioned in the Call For Evidence are all relevant in our views.**

However, it is also clear for us that an omnibus with a limited scope should not exonerate the EU Commission from proceeding to further amendments or even recasting of certain outdated feed and food legal acts.



This is the case in particular for the feed additives Regulation (EC) No 1831/2003, whose evaluation, which started in 2017, has shown an imperative need for modernisation. We acknowledge and welcome the EU Commission intention to address some of the issues identified in this evaluation but there are more to tackle beyond the administrative simplification, in particular to support the transition to more sustainable feeding practices, to encourage applications for authorisation of generic feed additives, etc.

Likewise, we see a clear case for a general reflection on how to align more the feed legislation with the new policy priorities in terms of circularity and food security. This would concern in particular the Animal By-Products Regulation (EC) No 1069/2009 and certain restrictions to access to certain materials for example in Regulation (EC) No 999/2001 on TSE and annex III of Regulation (EC) No 767/2009 on the marketing of feed.

➤ **A catalogue of potential measures to improve feed circularity is available [here](#).**

Finally, a significant part of the administrative burden for operators lays in the way the EU food & feed standards are enforced. Although we acknowledge that enforcement is not in the scope of this omnibus, we believe that a more harmonised, risk-proportionate enforcement of the existing safety standards is needed and that the EU Commission should play a role in this.

III. Core Recommendations for Immediate Impact

We present concrete amendments addressing key bottlenecks, designed to directly support the Commission's goals of reducing administrative burdens and strengthening the single market.

A. Feed Additives Regulation (EC) No 1831/2003: From Costly Renewals to Sustained Innovation

- **Problem:** The mandatory 10-year renewal for authorised insect proteins and oils imposes disproportionate costs on our SME-driven sector, creating uncertainty and diverting resources from scaling and innovation.
- **Concrete Measure:** Introduce a **simplified, low-cost renewal procedure** or extend validity for products with a proven history of safe use. A single, permanent authorisation after a successful first renewal is the optimal outcome for proven, novel products like ours.
- **Alignment with Consultation:** We strongly **endorse** the Commission's identified need to simplify renewal requirements, as highlighted in the 2024 evaluation of the Feed Additives Regulation.

B. Feed Additives Regulation (EC) No 1831/2003: Streamline Production and Boost Circularity by Authorising Whole Insects in Feed

Currently, the authorisation of insect-based feed is unnecessarily limited to specific processed forms like defatted meal. This ignores a more efficient and sustainable alternative: the use of whole insects. We urge the Commission to explicitly authorise whole (non-ruminant) insects for poultry, aquaculture, and pig feed. This simple regulatory change would deliver immediate benefits:



- **Reduce Costs and Environmental Impact:** Eliminating energy-intensive processing steps like drying and defatting lowers production costs and the sector's carbon footprint, enhancing competitiveness.
- **Maximise Nutritional Value:** Whole insects offer a complete nutritional package, often with a superior profile due to retained bioactive compounds, supporting animal health and reducing the need for supplemental additives.
- **Enhance Circularity:** This creates a more direct and efficient "farm-to-feed" loop, seamlessly converting organic side streams into valuable nutrients with minimal processing waste.

This measure is a straightforward simplification that strengthens the EU's bioeconomy.

C. Hygiene & Animal By-Product Rules (Regulation (EC) No 853/2004): Unlocking Circularity

- **Problem:** Inconsistent interpretation of rules on former foodstuffs and certain agri-food by-products creates legal uncertainty and prevents the development of a true EU-wide circular value chain for insect feed.
- **Concrete Measure:** Explicitly **recognise and define safe categories of former foodstuffs** (e.g., bakery waste with minor egg/milk content) suitable for insect farming within Annex I of Regulation (EC) No 853/2004.
- **Strategic Impact:** This directly unlocks the sector's potential to upcycle **5-10 million tonnes of organic waste annually**, reducing dependency on imported feed materials and creating a more resilient agricultural model.

D. Novel Food Regulation (EU) 2015/2283: Ensuring Predictable Market Access

- **Problem:** A critical "regulatory gap" of often over a year between a positive EFSA opinion and final market authorisation stifles investment and penalises first movers.
- **Concrete Measure:** Introduce a **legally binding six-month timeframe** for the Commission to adopt an implementing act following a positive EFSA opinion.
- **Alignment with Consultation:** This measure directly addresses the initiative's core aim to "streamline the EU regulatory framework" and "reduce unnecessary regulatory burdens," bringing much-needed predictability.

E. Official Controls Regulation (EU) 2017/625: Building Resilient Supply Chains

- **Problem:** The inability for border control posts to perform partial clearance of consignments poses a significant risk of spoilage and financial loss for insect producers relying on imported substrates.
- **Concrete Measure:** We **strongly endorse** the proposed flexibility for partial clearance of plant consignments and recommend its application be extended to other categories of non-risk materials critical to our operations.
- **Strategic Impact:** This prevents unnecessary trade disruptions, strengthens supply chain resilience, and aligns with the goal of a more efficient single market.

IV. A Forward-Looking Strengthening: Incentivising Circularity

Beyond simplification, we propose a strategic strengthening of the framework to fully harness the insect sector's circular model.



- **Proposal: Authorise a Wider Range of Circular Substrates.** We urge the Commission to use this opportunity to expand the list of permitted substrates to include certain **Category 3 Processed Animal Proteins (PAPs) from non-ruminants** and a broader, positively listed range of agri-food by-products. This aligns with the science-based, proportionate approach advocated for in other areas of this initiative.

V. Conclusion and Call to Action

By incorporating these targeted, evidence-based recommendations, the "simplification omnibus" will deliver a triple win for the European Union:

1. **It will directly achieve its simplification mandate**, reducing administrative burdens for innovative SMEs.
2. **It will boost EU competitiveness** by creating a predictable and efficient regulatory environment for a leading global industry.
3. **It will strengthen strategic autonomy** by enabling a circular, home-grown source of protein and fertiliser, directly contributing to food security.

We urge DG SANTE to integrate these proposals into the forthcoming legislation. IPIFF stands ready to provide detailed technical expertise to support their effective implementation.