



IPIFF

European Regulation & Ipiff position

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1. Introduction: IPIFF & it's members
2. Insects as food & EU 'novel food' legislation
3. IPIFF general position on Regulation 2015/2283
4. IPIFF priorities on the use of insects as animal feed
5. IPIFF vision on food safety management & GHP project

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1. INTRODUCTION : IPIFF & ITS MEMBERS

WHAT IS IPIFF? *'International Platform of Insects for Food & Feed'*

- Originally founded in **2012** and formally established in 2015.
- The **'voice of insect producers'** & **'key European players'** towards the European institutions & other relevant stakeholders.
- Association composed of **37 members**, present in **15** different **countries**.

IPIFF OBJECTIVES - *'Building a responsible sector'*

- **Promoting insects** as top-tier source of nutrients for food & feed.
- Consolidating **dialogue with EU public authorities** & advocating for appropriate legislative frameworks.
- Support members in the effective **implementation of food & feed safety legislation**.
- Promotion and/or development of **shared standards** & best practices.

1. INTRODUCTION: IPIFF & ITS MEMBERS

The Netherlands: Protix, Koppert, Proti-Farm.

Belgium: Topinsect, Provivam, Nusect

France: Ynsect, Micronutris, Jimini's, nextProtein, Entomo Farm, NextAlim, Mutatec, Innovafeed.

Spain: MealFood Europe

Lithuania: Insectum

Sweden: Hakunamat

Denmark: Danish Technological Institute

Poland: HiProMine

Germany: Hermetia, Snack Insects

Switzerland: 4Ento, Entomos, ProteinSynergy, Essento

Italy: Italbugs, Diptera, University of Parma, Nutrinsect

Ireland: Andromeda

UK: IMBT Ltd



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EU GENERAL RULES ON INSECTS AS FOOD



- **Principle of general food law** (Reg. 178/2002): food shall not be placed on the market if it is unsafe.
- **Food hygiene Regulation** (Reg. 852/2004) applies to all Food Business Operators. General requirements on **safety, hygiene and traceability**.
- **Novel Food Regulation**. Under existing Reg 258/97, NFD required. Does not apply to whole insects, dried & grinded insects.

2. INSECTS AS FOOD & EU NOVEL FOOD LEGISLATION



OLD' (CURRENT) NOVEL FOOD REGULATION – Reg 258/97 (until 31 December 2017)

Principle of general food law (Reg. 178/2002)

Food shall not be placed on the market if it is unsafe

Food Hygiene regulation (Reg. 852/2004)

Acts to ensure general requirements on safety, hygiene and traceability

NFR Food not used for human consumption to a significant degree before 15th of May 1997 fall under current NFR

Insects – whole and dried/grinded do not fall under this regulation

'NEW' NOVEL FOOD REGULATION – Reg 2015/2283 (from 1 January 2018)

NFR - Food not used for human consumption to a significant degree before 15th of May 1997 fall under new NFR

Insects are explicit Novel Foods

- Despite already being on the market in eg. BELG & NL
- Also whole and dried/grinded fall under this regulation

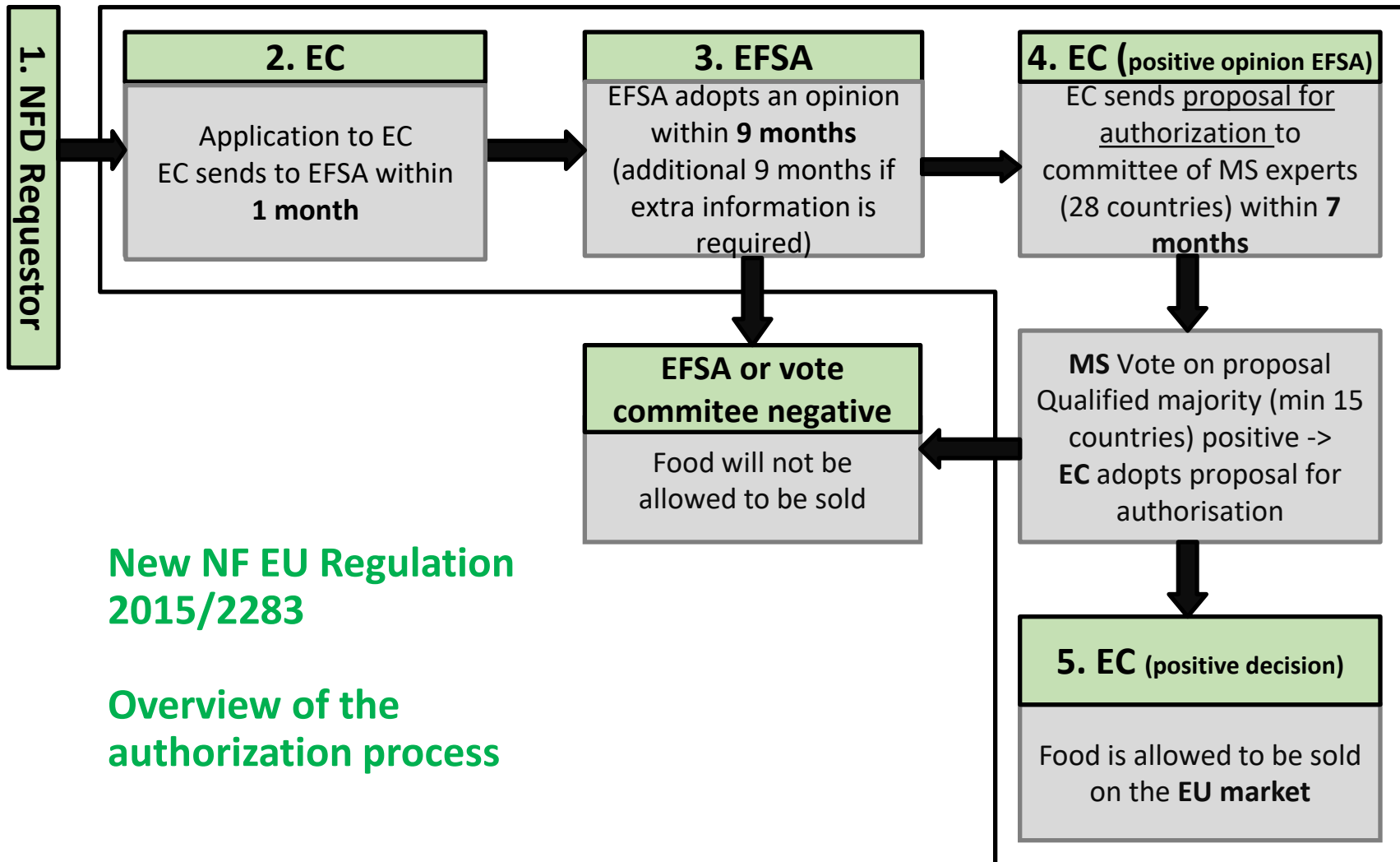
2. INSECTS AS FOOD & EU NOVEL FOOD LEGISLATION



MAIN CHANGES

Item	Detail
Faster procedure	Authorisation process centralized and led by EFSA, expected to be reduced to 12/18-24 months
Reduced cost	No (EFSA) application fee
Certainty	About the whole procedure, no transfer of files between current and new procedure
Data protection	5 years upon request (data will not be published)
Transitional period	“Products legally placed on the market” before 1 Jan 2018 can continue to be sold until 1 Jan 2020 if an application has been submitted before 1 Jan 2020

2. INSECTS AS FOOD & EU NOVEL FOOD LEGISLATION



New NF EU Regulation
2015/2283

Overview of the
authorization process

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IPIFF position – implementation of the EU Novel Food legislation (29 November 2016)

- ‘IPIFF considers that the establishment of **harmonized rules** for the marketing of insect products is a ‘step in the right direction but emphasises, the importance for EU authorities to establish **‘workable’ rules** & to provide **guidance at implementation stage**’
- **The 2-year transition period measure** foreseen in the text is particularly valuable for the insect sector, since it guarantees that operators are not ‘forced’ to discontinue their production process, whilst preparing a Novel Food application’.

IPIFF response to draft implementing Regulations on 'novel food' 15/08/2017

- IPIFF requires **'timely adoption of the 'implementing rules' (concrete steps on what needs to be in the NFD)** is needed for the insect companies to be able to finalize and submit their application before the first of January 2018
- IPIFF is glad that the text leaves **certain flexibility for operators to single out the type of evidence & materials** to be included in their application
- IPIFF regrets that the draft implementing Regulation **does not include detailed guidance on the presentation of the applications.**
- IPIFF regrets that the deadline for submitting applications has been brought forward to the date of **1 January 2019** this means that several insect producers will have **more limited time to prepare and submit their application.**

3. IPIFF GENERAL POSITION ON REGULATION 2015/2283



IPIFF NOVEL FOOD TASK FORCE PRIORITIES

SIMPLIFICATION

- Support the establishment of a **simplified & shorter EU procedure** for authorisation
- **Reduce administrative burden** for the preparation of applications for authorisation

COOPERATION

- Ensure a **smooth transition** between the 'new' and the 'old' Regulation
- Enforcement of the transitional measure of **art. 35(2)** (i.e. Regulation 2015/2283) by **national authorities** (get all MS to agree to the transitional period for 2 years)
- Facilitate possibilities for **'joined applications' (advice/guidance)**

GUIDANCE

- Give guidance on **pieces of evidence (eg tox studies)** required by EFSA used for assessing applications covering insect products, we collaborate with EFSA
- Give guidance on scope and conditions of the **data protection** rules (art. 26 of Reg. 2015/2283)

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4. IPIFF PRIORITIES ON THE USE OF INSECTS AS ANIMAL FEED



EU legislation - insect production in the EU



- *General requirements for food hygiene and animal Health apply to insect production* (Reg (EC) No 178/2002 (General Food Law) and 183/2005 (Feed Hygiene))
- Insects kept in the EU for the production of food, feed or other purposes are '**farmed animals**' (Regulation (EC) No 1069/2009 (Animal By Products))
- Invertebrates excluded from Directive 98/58/EC : **no EU welfare rules**

4. IPIFF PRIORITIES ON THE USE OF INSECTS AS ANIMAL FEED



Aqua feed authorization as from 1st July 2017



- Based on the EFSA opinion and the investigations of the EURL for Animal Proteins, EU member States voted in favour of **authorizing the use of insect PAP in aquaculture** (13 December 2016)
- The authorization is limited to a short **‘positive list’ of 7 species**
- The authorization is limited to substrates currently authorized for farmed animal feed (e.g. vegetal substrates)
- Only **integrated establishments** of insect production and processing are allowed. These must be approved by the competent authority of the MS (‘Method 7)
- Specific certificates for insect PAPs produced in third countries have been established with analogue requirements about **insect species** and **substrates**

Substrates - Eligible feed materials



- Regulation (EC) No 767/2009: animals in the EU may be only fed with safe feed & prohibition of feeding **faces** and separated digestive tract content.
- ABP legislation prohibits to feed insects for feed use with **manure** or **catering waste** and unprocessed **former foodstuffs** containing meat or fish.
- Regulation (EC) No 999/2001 prohibits to **feed insects with any PAPs**, except fishmeal.
- EU residue **limits for contaminants** (Directive 2002/32/EC) apply to feed for insects and insects as feed materials.

4. IPIFF PRIORITIES ON THE USE OF INSECTS AS ANIMAL FEED

‘IPIFF position on the use of insect proteins as animal feed’ (24 April 2017)

- The IPIFF members are committed to ensure the **full implementation of the aqua feed authorisation** (e.g. development of an EU guidance on good hygiene practices)
- Following the availability of validated detection methods, IPIFF pleads for authorising the **use of insect PAPs in feed for other non-ruminant livestock animals** (pigs and poultry)
- Investigations for extending the possibilities for using **‘former foodstuffs’** or **food losses originating from restaurants or catering establishments** could be envisaged (mandating of the European Food Safety Authority)

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Compliance with general EU Food safety legislation

Responsibility

- Every operator is responsible for the safety of the food and feed product placed on the market

Traceability

- ‘One step back – one step forward’

Cooperation

- Information sharing between authorities and operators about potential risks of products under their control

Objectives of the IPIFF Guidance project on good hygiene practices – ‘dedicated’ Task Force

- Assist insect producers in the **effective application** of EU food & feed safety legislation
- Step up towards **minimum standards** in the industry
- The document will cover both **food and feed production** activities as well as **all production steps** up to final delivery of the product.
- Document to cover **food/feed safety measures** as well as measures against **environmental risks**



THANK YOU FOR YOUR ATTENTION!