



Brussels, 21st of October 2022

IPIFF contribution

Draft Commission Delegated Regulation

supplementing Regulation (EC) No 1069/2009 as regards the determination of end points in the manufacturing chain of certain organic fertilisers and soil improvers

General remarks

IPIFF welcomes this EU policy initiative.

This proposal, initiated by the European Commission, aims to **widen the range of animal-by products** which can be **upcycled as fertilising products** across the **European Union (EU)**, thereby reintroducing valuable materials into the food production chain - as alternative to linear models that would end with their disposal (incineration or landfilling) or 'lower value uses' (energy recovery) - while offering sustainable solutions for European farmers and/or gardeners.

In line with the Circular Economy principles, and in the context of reduced availability of mineral fertilisers, we do believe that **these efforts should be prioritised**, while ensuring compliance with appropriate safety standards.

The proposed Regulation will contribute to unleash the 'circularity' potential of the insect sector.

Against this background, the **creation of an 'end point' under the EU Animal By-Products legislation is of strategic importance for European insect producers**. In addition to the main outputs generated through insect production activities (i.e. whole insects, proteins or fats), insect frass indeed has great potential to be upcycled as fertilising products (e.g. organic fertiliser, compost material or soil improver)¹. Yet, many EU insect producers are not today in a position to valorise these materials efficiently, due to **the absence of fully harmonised standards at EU level**.

In that sense, we **very much support the proposal** from the European Commission to define an **'end point' for processed insect frass** - for use as organic fertilisers and soil improvers - as such reform would contribute to bolster the competitiveness and overall growth of the sector, while **enhancing its 'circularity potential'** and contributing to generating complementary revenues for insect producers.

In our view, this proposal should pave the way to the **future integration of insect frass in the EU fertilisers' legislation** - e.g. through the creation of a Component Material Category (CMC) under Regulation (EU) 2019/1009 - thereby allowing its **marketing as fertilising products across the European Union**, in line with the 'general objectives' of this legislation.

¹Mainly used in nurseries, viticulture, by professional or amateur horticultors as well as by arable farmers, insect frass constitutes a valuable alternative to today's fertilising products: In addition to its interesting NPK profile (i.e. nitrogen, phosphorus and potassium), insect frass contains certain beneficial bacteria that act as plant growth microorganisms.

In line with the European Commission's objective included in the **Organic Action Plan** to improve soil health across Europe by promoting complementary solutions, this Regulation should also bring **new solutions for organic farmers active in crop production across the EU**, who will now be able to incorporate insect frass as part of their fertilisation strategies.

The regulatory conditions for the safe use of insect frass as organic fertilisers have been defined by the EU legislator

According to the legal text tabled by the European Commission, the defined 'end point' would equally apply to **processed insect frass (directly) intended for use as organic fertiliser** (or soil improver) and to insect frass which was subject to a **subsequent composting or biogas transformation step** (i.e. biogas digestion residues), provided that the product fulfils the **production standards** defined in the European Commission Regulation (EC) No 142/2011 (e.g. the product shall undergo a heat treatment of 70 °C for 60 minutes).

We do indeed consider that **the latter requirements constitute an appropriate benchmark for establishing an 'end- point' for the commercialisation of processed insect frass as organic fertiliser and/or soil improver**. A recent study developed by the organisation KU Leuven documented the impact of heat-treating insect frass from black soldier fly larvae, at 70 °C for 60 min². Furthermore, a few years ago, the French Agency for Food, Environmental and Occupational Health (ANSES) conducted a full safety assessment of insect frass derived from mealworm larvae³. Its conclusions confirmed the above findings.



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² ['Impact of heat treatment on the microbiological quality of frass originating from Black Soldier Fly Larvae \(Hermetia Illucens'](#) - Noor Van Looveren, Dries Vandeweyer and Leen Van Campenhout, 24 December 2021; MDPI. Notably the authors concluded that *'the proposed heat treatment on frass of Black Soldier fly larvae (i.e. heat treatment at 70 °C for one hour) is likely appropriate to meet the legislative microbiological regulations for insect frass for the application as plant fertilizer or soil improver'*.

³ This assessment intervened in the context of an application for marketing authorisation submitted by an insect producing company (i.e. the company Ynsect).