



FVE comments to the EU Commission Draft Regulation providing for the authorization to feed non-ruminants with ruminant collagen/gelatine and with proteins from insects, pigs and poultry

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FVE welcomes the Commission proposed legislation to reintroduce porcine PAPs in poultry feed, avian PAPs in pig feed and introducing insect PAPs in pig and poultry feed. This proposal is based on the scientific evidence and on the EFSA advices.

Porcine and avian PAPs represent a valuable source of highly digestible proteins and may contribute in reducing the reliance of the EU livestock feeding system on alternative proteins from third countries while advancing the EU circular agriculture. As regards insect PAPs, FVE would like to emphasize the following:

➤ **Definition**

A definition of “farmed insects” should be taken into account. Such definition should be as broad as possible since many more insects may serve as feedstuff and as a foodstuff soon;

➤ **Feeding insects**

It should be considered that insects could also be fed with insect PAPs. This can be done perfectly respecting the intra-species feeding ban (e.g., black soldier fly is a feedstuff for mealworms). The most interesting species like crickets, black soldier fly and mealworms are omnivorous while some local species of insects (e.g., grasshopper *Ruspolia differens* in East-Africa) grow much better in captivity if they prey on other insects.

➤ **EURL validated method**

Detection methods for insect PAPs are under development. Any validated method needs to be put in place in advance of any legislation adoption. FVE believes that more research & development should be supported in creating protocols for molecular verification of permitted insect species and confirmation of the absence of unpermitted species using, for example, real-time PCR or sequencing technologies to complement or replace the use of light microscopy.

➤ **Cross-contamination**

Keeping feedstuff production for ruminants and non-ruminants apart remains crucial. Therefore, when a slaughterhouse operates both types of animals - amendment, p. 5 (1) - FVE suggests considering applying appropriate hygiene and safety measures (e.g., FBOs should change

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clothes, gloves, boots, apron and utensils need proper cleaning and disinfection).

➤ **PAPs processing lines separation**

Keeping insect PAPs production lines separated from porcine and avian PAPs production lines are crucial (Section F (a) p. 5).

A further precaution would be applying a separation between insect pure PAPs processing lines and those other than insect PAP processing lines. This would enable larger manufacturing enterprises to produce insect PAP properly. While FVE welcomes the opportunity to consider the improved use of insect protein, particularly in animal feed, appropriate HACCP processes must be incorporated, as for other food/feed supply network operations.

➤ **Market distortions**

By allowing insect PAPs for pig/poultry there might be a shift in the EU market and competition. This may increase the demand for insect PAPs for poultry and pig or even increase the supply of pig/poultry meat compared to other livestock supply meat. Insect and avian/porcine PAPs potential importers into the EU should also comply with the EU production and control regime.

Besides, the ability of operators and of processors to comply with any further legal requirements and to manage the costs should be duly considered.

Further readings

- [The Official Veterinarian's role in food hygiene: an essential public good](#)
- Berlin principles on One Health – [Bridging global health and conservation](#)

Notes to Editor

The Federation of Veterinarians of Europe (FVE) - representing around 300,000 veterinarians across 39 European countries - aims to enhance animal health, animal welfare, and public health and to protect the environment by promoting the veterinary profession.