

Alcoy, 22.02.2023

H.E. Ms Stella Kyriakides, Commissioner for Health and Food Safety

Dear Commissioner Kyriakides,

The **Spanish Vegetarian Union together with the French Vegetarian Association, Anima Naturalis, Compassion in World Farming Spain, GreenRev Institute, FAADA, Proveg Spain, the Portuguese Vegetarian Association and Generation Vegan** urge the European Commission to cease the authorization of the commercialisation of partially defatted powder of *Acheta domestica* (house cricket) as a novel food in line with its ambition to achieve a sustainable food system following the European Union policy on food security, the fulfillment of the goals established in the Farm to Fork Strategy and the European Green Deal.

The ecological transition of our current production and consumption patterns is one of the major challenges of our times and one of the top priorities of the present European Commission. The recent adoption of the *COMMISSION IMPLEMENTING REGULATION (EU) 2023/5 of 3 January 2023 authorising the placing on the market of Acheta domestica (house cricket) partially defatted powder as a novel food and amending Implementing Regulation (EU) 2017/2470* is but a step back in the European Commission's ambition to achieve the transformation of the current food system towards a sustainable and resilient European food system.

The Farm to Fork Strategy explicitly refers to the need for a transition towards a more plant-based diets both, for our health and for the environment "*Moving to a more plant-based diet with less red and processed meat and with more fruits and vegetables will reduce not only risks of life-threatening diseases, but also the environmental impact of the food system*".¹ Therefore, we, the signatories, consider that the authorisation of consumption of this animal as a novel food is contrary to the EU policies on sustainability and food security, which advocate for the reduction of consumption of proteins of animal origin in favor of a plant-based diet with an increase of plant-based proteins.

Likewise, mass-farmed insects - in this case house cricket - does not exclude an excessive use of resources. To produce 1kg of this insect still, 1.7kg of feed is needed². At the same time, while it is true that insects gain body weight quickly and require less space for rearing than traditional livestock, the use of energy is comparable to pork and chicken farming. This is due to the processing methods used to produce the defatted powder, most mass-farmed

¹ European Commission: "A Farm to Fork Strategy for a fair, healthy and environmentally-friendly food system" Brussels, 20.5.2020, pp 13 https://eur-lex.europa.eu/resource.html?uri=cellar:ea0f9f73-9ab2-11ea-9d2d-01aa75ed71a1.0001.02/DOC_1&format=PDF

² Saara-Maria Kauppi, Ida Nilstad Pettersen & Casper Boks: *Consumer acceptance of edible insects and design interventions as adoption strategy*, International Journal of Food Design, Volume 4, Issue 1, Apr 2019, p. 39 - 62

insects are raised in rooms that are heated in order to stimulate quicker body weight gain, after which they are freeze- or oven-dried, some of the process include grinding and dehydration, which consume a high amount of energy and have a severe environmental impact.

Additionally, some of the practices established in the present regulation to obtain the defatted powder from this animal involve *“a 24 hours fasting period of the insects to allow them to discard their bowel content, the sacrifice of the insects by freezing, washing, thermal processing, drying, oil extraction (mechanical extrusion), and grinding³”* are questionable and contrary to the principles and values of the European Union. While the European Commission commits itself to revise the animal welfare legislation and *“ultimately ensure a higher level of animal welfare⁴”*, at the same time, allows these archaic practices, which are more characteristic of a Europe of the last century.

The commercialisation of the house cricket also entails a risk for consumers. The present Regulation establishes that *“Until the data generated by the research is assessed by the Authority, and considering that, to date, evidence directly linking the consumption of Acheta domesticus to cases of primary sensitisation and allergies is inconclusive, the Commission considers that no specific labelling requirements concerning the potential of Acheta domesticus to cause primary sensitization should be included in the Union list of authorised novel foods”*. This breaches the precautionary principle⁵, leaving the consumer uninformed against possible allergies and jeopardizing their health. Furthermore, consumers are increasingly demanding more transparency and this only makes the already difficult choice even more difficult for those who choose to avoid the consumption of any products or ingredients of animal origin.

It is worth adding that the consumption of insects can put food safety at risk as insects can be catalysts for a number of micro-organisms that are harmful to human and animal health, especially under poorly controlled hygienic conditions⁶.

³ Commission Implementing Regulation (EU) 2023/5 of 3 January 2023 authorising the placing on the market of *Acheta domesticus* (house cricket) partially defatted powder as a novel food and amending Implementing Regulation (EU) 2017/2470

⁴ European Commission: *“A Farm to Fork Strategy for a fair, healthy and environmentally-friendly food system”* Brussels, 20.5.2020 pp. 8

⁵ Article 191, consolidated version of the Treaty on the Functioning of the European Union, 2012 OJ C 326/01

⁶ Food and Agriculture Organisation of the United Nations *“Looking at edible insects from a food safety perspective Challenges and opportunities for the sector”* Rome, 2021, pp. 15

Finally, we believe that this legislation serves the economic interests of a single company and industry and does not look after the safety of European citizens, the environment or the future of the European Union's food system.

We therefore call on the European Commission to:

- Retract its decision to authorise the marketing of *Acheta domestica* (house cricket),
- Promote the production of plant -based proteins for human consumption,
- Make sustainable and healthy diets and foods more affordable, attractive and available to people.

We look forward to a positive response to our request and would be grateful to discuss these topics with representatives of the Commission.

Sincerely,

Signatories:

1. David Román, President of the Spanish Vegetarian Union
2. Élodie Vielle Blanchard, President of the French Vegetarian Union
3. Francisco José Vásquez Neira, President of the Anima Naturalis Foundation
4. Patricia de Rada González, Compassion in World Farming Spain
5. Giovanna Constantini, Communications Manager, FAADA
6. Morgan Janowicz, Board Member, Green Rev Institute
7. Verónica Lizeth Larco Jiménez, Senior Communication Manager, Proveg Spain
8. Nuno Alvim, Board Member, Portuguese Vegetarian Association
9. Naomi A. Hallum, CEO Generation Vegan