



Novel Food – Invitation for Expressions of Interest in Collective Commissioning of Generic Approval Applications

The Woven Network is working with the International Platform for Insects for Food and Feed and the Asian Insect for Food and Feed Association to establish the best way to secure approvals for insect products under the EU Novel Food Regulations that are changing in January 2018 to require products containing whole insects to be formally approved.

We have agreed that we will share information about good practice in dossier preparation and intelligence from communications with the European Commission.

The costs of preparing an individual approval application dossier are hard to predict but will definitely run into the tens of thousands of Euros. If a generic approval for one insect is secured then everyone in the industry benefits. In order to move this forward, therefore, we need to create a means of spreading the cost and bringing in as wide a group of interested bodies as possible.

The Woven Network is planning to commission the preparation and submission of generic approval applications for insect species containing no proprietary and protected content and that would enable a broad range of products containing insects and possibly insect flour to be put on the market.

We aim to benefit the sector by

- creating an informal “consortium” of companies and other bodies with an interest in seeing insects being available for consumers and who are willing to contribute to the costs of preparing approvals.
- Securing the finance to cover the costs involved, through a series of requests for funds.
- Identifying, with the consortium members, a set of specific approval application dossiers for different insects and product types
- Prioritising these and determining which ones could be submitted under the third country consumption route
- Commissioning at the lowest cost consistent with a high quality dossier being prepared, the work of creating the dossiers

- Securing the services of legal experts and health and safety experts to assist and advise consortium members collectively – we will create an online forum where consortium members can post questions and our experts will respond
- Maintaining a good flow of information to consortium members so they are aware of progress, any changes to the legal status and expectations of when approvals might be granted

Defining the specific scope of any one application will be a key consideration. We will need to know the insect species and types of food product that will be of interest to each consortium member to help with prioritising and assess if there are enough interested in each potential dossier.

If we have more members the cost per member will go down.

We will also welcome the participation of supporters, students, etc. who will be invited to make whatever contribution they can afford towards this cause.

In the first instance we are asking people to express interest in joining this. Once we know how many respond we will calculate an initial membership fee and invite those who expressed interest to join and pay that fee. We will then work with the consortium via a steering group to determine the first dossier(s) to commission. We will seek the best value consultants to do this. According to the cost we will then invite those in the consortium who expressed interest in that insect variety to contribute their share. Once the finance is secured we will commission the work. Further dossiers will be prepared as things develop.

At this stage you are not committing any finance.

If you are interested in joining this consortium and would be willing to make a financial contribution to this going forward in order to ensure that insects can continue to be traded in the European Union (whether you are based in the EU or not), please complete our survey.

<https://www.surveymonkey.co.uk/r/MS6S5WS>