

Competition & Antitrust and Trade

SFA Consults on Proposed Regulation of Insect and Insect Products for Human Consumption and Animal Feed

Introduction

Singapore currently does not permit the import and sale of insects as food for human consumption. Presently, only animal feed can contain insects, which is subject to restrictions under the Feeding Stuffs Act 1965. After examining the regulatory position for insects and insect products, the Singapore Food Agency ("SFA") proposes allowing the import, local farming and processing of insects and insect products for human consumption and animal feed, subject to specific conditions and requirements. SFA is conducting a [consultation exercise](#) to obtain feedback on the following proposed conditions and requirements:

- Import conditions, for insect and insect products for human consumption and animal feed imported into Singapore;
- Additional pre-licensing requirements, for local insect farming for human consumption and animal feed; and
- Additional pre-licensing requirements, for processing of insects for human consumption.

This Update provides an overview of SFA's key proposed conditions and requirements. Feedback should be submitted to SFA before **6 p.m., 4 December 2022**.

Rationale for Regulation

Presently, there are no international standards regarding using insects as food or animal feed by the Codex Alimentarius Commission or the World Organisation for Animal Health (WOAH). The basis for SFA's proposed import conditions for import and additional pre-licensing requirements for farming and processing in Singapore are primarily to ensure safety of the use of insects and insect products. They relate to ensuring the following: (i) safety of the insect species for human consumption; (ii) prevention of the introduction of diseases and contaminants; (iii) that substrate used do not impart contaminants to the insects; and (iv) safety of the final product for consumption.

Import Conditions for Insect and Insect Products

Subject to specific proposed requirements and conditions, insects and insect products may be imported for varying purposes, such as for human consumption, animal feed, farming for human consumption, or



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farming for animal feed. Depending on what is specifically being imported and/or its purpose, different conditions and requirements will apply.

For example, health certificates must be submitted to make certain certifications, such as that insects are not harvested from the wild. This applies regardless whether the import is for human consumption or animal feed, or for farming.

Where the import is for human consumption, it will also be subject to more stringent requirements than import for use as animal feed. Among other things, insect species imported for human consumption must only be those listed in the List of Insect Species Approved for Human Consumption ("**Approved List**") that is set out at Table A to the Annex to the consultation ("**Annex**"), available [here](#), failing which it must first be subject to SFA's assessment as novel food. The declaration of the insect species imported will be required as part of the import permit approval.

Where the import involves insects and insect products for direct human consumption (e.g. ready-to-eat products), health certificates must be submitted to certify that they have been subjected to sufficient heat treatment and are safe for consumption, amongst other things.

Table 1 of the Annex sets out details of the specific conditions for the respective purposes of import.

Additional Pre-Licensing Requirements for Local Insect Farming

Insect farming for human consumption

In Singapore, there are various *existing* regulatory requirements that must be complied with for starting a farm. This includes obtaining a Farm Licence which requires the satisfaction of certain requirements, such as the submission of a Farm Plan, amongst others.

In addition to these existing pre-licensing requirements, SFA has proposed that insect farming for human consumption shall be subject to additional pre-licensing requirements. The proposed additional pre-licensing requirements are set out at Table 2 of the Annex, and these include the following:

- Insects' species farmed must be those listed in the Approved List, failing which such species must first be subject to SFA's assessment as novel food;
- The substrates used for feeding of insects must not be contaminated with substances unsafe for humans; and
- Post-harvest, insects are subject to sufficient heat treatment.

Insect farming for animal feed

Similarly, the manufacture and processing of animal feed is subject to various *existing* pre-licensing requirements and conditions. This includes obtaining an Animal Feed Licence.

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SFA has proposed that insect farming for animal feed shall be subject to additional pre-licensing requirements, which are set out at Table 2 of the Annex, including the following:

- The insects must not be harvested from the wild;
- There are restrictions on what can be used as substrates (for instance, manure, decomposing organic material etc. cannot be used without prior approval from SFA);
- There are post-harvest requirements that must be implemented to ensure good hygiene to prevent cross-contamination.

The above requirements are also applicable for insect farming for human consumption.

The existing and proposed additional pre-licensing requirements will also apply to the processing of insects for animal feed.

Additional Pre-Licensing Requirements for Processing of Insects for Human Consumption

Food processing establishments in Singapore are subject to various regulatory and licensing requirements, including specific requirements that must be satisfied before obtaining a licence. Details of these requirements may be found [here](#).

In addition to these existing requirements, SFA has proposed that processing of insects for human consumption shall be subject to additional pre-licensing requirements, including the following:

- Insects' species processed must be those listed in the Approved List, failing which such species must first be subject to SFA's assessment as novel food;
- Insects used for processing must not be harvested from the wild;
- The applicant must ensure that the processed insect products are in compliance with microbiological and chemical standards for food under the SFA Food Regulations and submit laboratory analysis test results from accredited laboratories in its licence application to evidence this; and
- Insects for human consumption must have been subjected to sufficient heat treatment and be safe for consumption.

These proposed additional pre-licensing requirements are set out at Table 3 of the Annex.

Compliance with Food Regulations (for Human Consumption)

Where the purpose of import, farming, processing and/or sale of insect and insect products is for human consumption, it must be noted that in addition to the proposed import conditions and additional pre-licensing conditions for farming and processing activities, the SFA's Food Regulations must be complied with.

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Our Comments

This is a significant development that opens up opportunities for the import and sale of insects for human consumption that is presently not permitted. From the trade law perspective, businesses interested or considering the import, sale, locally farming and/or processing of insects and insect products should review the proposed conditions and pre-licensing requirements and consider the potential impact and compliance implications.

From the consumer protection law perspective, there will also be knock-on implications. For example, businesses must be able to accurately represent their products and not inadvertently make misstatements to consumers as to the constituents or quality of the product being sold. Businesses must be cognisant that such compliance obligations to the consumer are equally applicable in this context.

If you have any queries on the above development or would like to submit any feedback on the consultation paper, please feel free to contact our team members below who will be happy to assist.

For more information, please refer to the [consultation document](#), as well as the [Annex](#) to the consultation that sets out the detailed conditions and requirements (available on the SFA website).

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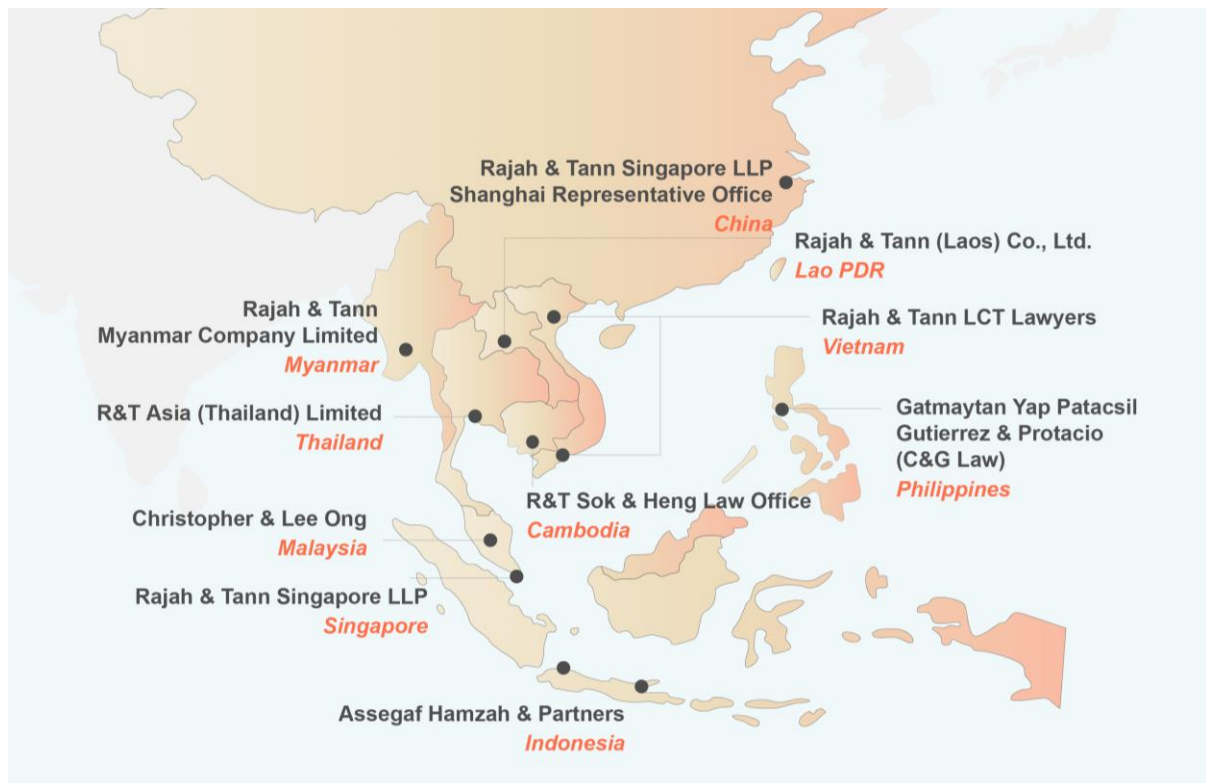
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