



IBMA POSITION
on Revisions to the Directive
for the Sustainable Use of Pesticides
(SUD)





SUMMARY

Bioprotection – biocontrol technologies – make a crucial contribution to the transition to more agroecological farming and so to the realisation of the EU’s overarching Farm to Fork and Green Deal policy goals, including the 50% reduction of use and risk of chemical and more hazardous pesticides, the 25% share of organic farming and the 10% biodiversity areas within agricultural land, by 2030. **IBMA supports the goal of** the SUD of achieving the sustainable use of pesticides by promoting the use of integrated pest management (IPM), but to be effective, this must be through the **mandatory full implementation of IPM.**

IBMA advocates an EU definition of IPM and bioprotection and the systematic monitoring and measurement of the adoption of IPM, using bioprotection as a relevant indicator of adoption. Ambitious and clear adoption targets should be set that farmers and advisers are financially-incentivised to achieve through CAP eco-scheme funding. Training and communication programmes on IPM and bioprotection should be provided to facilitate the adoption of IPM and bioprotection.





The International Biocontrol Manufacturers Association (IBMA), wishes to emphasise that bioprotection – biocontrol technologies – can make a crucial contribution in the realisation of the EU’s overarching Farm to Fork and Green Deal policy goals, such as the 50% reduction of use and risk of chemical and more hazardous pesticides the 25% share of organic farming and the 10% biodiversity areas within agricultural land, by 2030.

The **revision of the Sustainable Use Directive (SUD)** provides an opportunity to enforce more stringent requirements with regard to the use and implementation of Integrated Pest Management and the use of bioprotection as an effective tool in Integrated Pest Management which should be strongly encouraged. Deploying bioprotection has a multiplier effect on pesticide reduction efforts, since growers using bioprotection are maintaining and even restoring biodiversity. Furthermore, restoring biodiversity provides a biological buffering effect that means fewer chemical pesticides are required over time.

The National Action Plans that are developed within the framework of any revised SUD, can encourage further adoption of bioprotection. Compensation mechanisms in National Strategic Plans developed to implement the **Common Agricultural Policy** can further encourage farmers to work with bioprotection in new ways that preserve biodiversity while maintaining pest control and long term farming with sustainable productivity and profitability. Such mechanisms working together can accelerate the full adoption of Integrated Pest Management and the use of biocontrol solutions, so greatly contributing to achieving the biodiversity and chemical pesticide reduction goals in the Green Deal.



KEY MESSAGES

IBMA supports the goal of the SUD of achieving the sustainable use of pesticides by promoting the use of integrated pest management (IPM), but to be effective, this must be through the **mandatory full implementation of IPM** as defined in current article 14. Examples of successful IPM programmes that use biocontrol over thousands of hectares are [available here](#). An appropriate legislative instrument to enable mandatory implementation at national level should include the setting of positive targets for the implementation of IPM and measurement of progress in reaching them.

In short, the SUD needs to “give teeth” to the implementation of IPM.

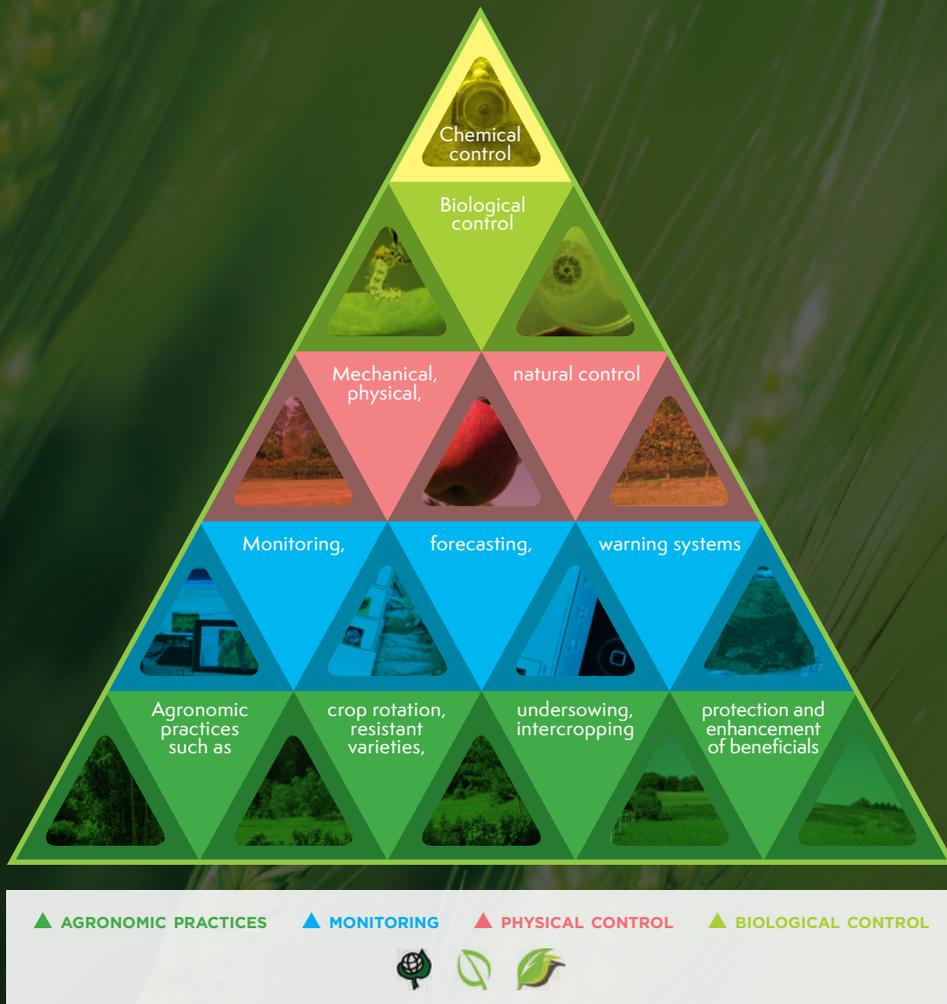


DEFINE IPM AND BIOPROTECTION

IPM means a pest and disease management programme that puts biology first, through agronomic decisions and the use of biocontrol, and uses chemistry only if necessary. IPM is not an “at will” mix of different tools. IPM prioritises non-chemical methods, which include bioprotection so that biodiversity is regenerated and cropping systems are made more resilient (*see the IPM triangle on page 6*).

Biocontrol technologies or bioprotection as a global term for all biotechnologies must be defined at European level and applied in national legislation. IBMA and the French legislation define biocontrol as four categories: microbials, invertebrate biocontrol agents, semiochemicals and natural substances.

Bioprotection as defined by IBMA typically has low impact in terms of human health and the environment. It is noteworthy that today most active substances approved in the EU with low-risk status are bioprotection.



IPM TRIANGLE

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SYSTEMATICALLY MONITOR AND MEASURE THE ADOPTION OF IPM

Measurement of IPM implementation requires relevant parameters. Bioprotection use is a relevant and measurable parameter once a bioprotection definition is established. More detailed appropriate measures are:

- The percentage of EU and national PPP use that is bioprotection
The current “all in one” PPP measurement system is not fit for purpose. Currently experts endeavour to quantify the use of microbial PPPs for statistics, but expressing it in kg does not really allow for comparison with chemicals. A definition of bioprotection at EU level fixes interpretation and allows separating bioprotection from other PPPs, facilitating measuring them by counting methods appropriate to each technology. Measurement of chemical PPPs will allow monitoring of reduction, and measurement of bioprotection will allow monitoring of growth in use as well as allowing use of appropriate units.
- The percentage of crop uses covered by bioprotection
Progress in terms of the number of uses (crop/pest/pathogen combinations) that are covered by bioprotection products can be measured (e.g. the French Ministry of Agriculture monitors this).
- The number of hectares treated with bioprotection
Hectares treated with active substance are recorded at farm level. These records can be linked to CAP eco-schemes and payments.
- Recording the justification of management decisions taken within an IPM programme

Measurement of enabling actions such as availability of bioprotection through provision of a list of available bioprotection authorisations or other non-chemical practices such as invertebrate biocontrol or physical or agronomic practices by crop and use. This can be done through a

national authorisation database that identifies bioprotection or **use of existing independent databases** such as CABI Bioprotection portal which has been populated for Africa, Canada, Brazil and Asia and is now including EU countries. At EU level, bioprotection active substances should be identified in the existing active substance database and progress monitored.

Farmers need tools and need to see progress in availability of non-chemical solutions such as bioprotection. Monitoring the progress in the number of authorised bioprotection products and uses is key for farmers to feel they are being supported.



3 SET SPECIFIC AND AMBITIOUS ADOPTION TARGETS

Create positive targets for bioprotection uptake to complement reduction targets of chemical pesticides. There is a positive social impact of seeing progress against a target that catalyses further uptake and change.

- NAPs need to include a specific relevant target for bioprotection uptake in each MS. This target should reflect the current baseline for bioprotection in the MS.
- IBMA advocates a 75% target for bioprotection at EU level as this is a level that would indicate a successful transition in agricultural practices to widespread adoption of IPM.
- By 2030, 75% adoption is feasible in horticultural and speciality crops, where bioprotection is already well understood and adopted. To achieve this target in arable will, however, require enabling regulation for bioprotection to speed up market access, incentivising bioprotection use by farmers and advisers, and training them in its use.



4 PROVIDE INCENTIVES FOR PROGRESSING TOWARDS AND REACHING TARGETS

IPM implementation must be incentivised for farmers and progress reported and measured. National Strategic Plans can be used to incentivise IPM by including the use of bioprotection in the CAP eco-schemes. To do this bioprotection, or biocontrol solutions, must be defined at European level and the definition applied in national legislation.

Advisory services also need incentivising to recommend IPM and bioprotection. This could be done through the professional qualification scheme (e.g. as done in several MS).



5 TRAINING AND COMMUNICATION ABOUT IPM AND BIOPROTECTION

Farmers and advisers need training in the implementation of IPM and the use of bioprotection and other non-chemical methods.

To raise awareness and inform decision makers of the wider benefits of IPM, bioprotection, and other non-chemical methods, the environmental benefits should be highlighted. These benefits can be a link to farm certification schemes. Farm Certification Schemes which define agroecological agricultural practices may create new marketing opportunities for produce and in so doing incentivise IPM implementation.

IBMA Position by SUD Article

ARTICLE 3: DEFINITIONS

- Create and add a definition of bioprotection that encompasses the 4 categories of bioprotection: microbials, semiochemicals, natural substances and invertebrate biocontrol agents. The definition of non-chemical can be expanded to explicitly include bioprotection – see **Appendix 1** (at the end of this document) for IBMA definition. ([Available online.](#))
- Integrated Pest Management (IPM) must explicitly refer to placing biology first and using chemistry only if essential. This can be illustrated by reference to a diagram, [available here](#).

ARTICLE 4: NATIONAL ACTION PLANS

With quantitative targets, objectives, measures and timetables to reduce risks and impacts. NAPs must include:

- Positive targets for uptake of bioprotection because of the biodiversity and soil health benefits of bioprotection.
- Indicators for IPM such as presence of pollinators and beneficial invertebrates.
- Database that is open access showing the uses of products covered by bioprotection and other non-chemical uses.
- Use of bioprotection on a field should be rewarded through a CAP payment, thus linking the NAP to the CAP National Strategic Plan.

ARTICLE 5: TRAINING

Annex I should be reworked to specifically mention training in low-risk and bioprotection, including:

- Benefits of bioprotection for biodiversity and soil health.
- Best pest control results are achieved by bioprotection when considered within an IPM framework putting natural mechanisms and biology first according to the IPM triangle, (see page 6).
- Create or adapt the national authorisation database of products to identify and facilitate searching for biocontrol solutions and make this part of NAP (see article 4). This should include all 4 categories of bioprotection.
- Individual crop programmes with bioprotection uses should be developed and included in the training (e.g. Le Contrat de Solutions in France).
- Additional training of advisers in IPM.
- Incentivising advisers to attend such training through conditional renewal of professional advisory qualification or use of continuous professional development (CPD) points.
- Mandatory training on IPM and bioprotection within tertiary education and CPD programmes.

ARTICLE 6: REQUIREMENTS FOR SALES OF PESTICIDES

Distributors should be required to:

- Provide information on any special conditions of use that enhance

the effectiveness of bioprotection including their role in IPM programmes.

- Sell a proportion of PPPs that are bioprotection.
- The sales of bioprotection could be incentivised through a financial mechanism, where a tax is applied if the proportion of chemical pesticides sold is above the targeted proportion.
- Provide evidence through mandatory IPM advice records to justify the treatment programmes used.
- Ensure the independence of any advice given by their advisers.

ARTICLE 7: INFORMATION AND AWARENESS-RAISING

Highlight the environmental benefits of bioprotection, IPM and other non-chemical alternatives to raise awareness and inform decision making. The broader environmental and human health benefits of bioprotection should be promoted, possibly through linkage to farm certification schemes (e.g. Haute Valeure Environnementale), which in themselves can be an incentive for farmers to transition to new farming methods especially if the certification is recognised in the price of the final produce. In addition, publicly funded communication programmes to raise the awareness of the broader benefits of IPM and bioprotection should be targeted at consumers.

ARTICLE 8: INSPECTION OF EQUIPMENT

No comment.

ARTICLE 9: SPECIFIC PRACTICES AND USES - AERIAL SPRAYING

Definitions refer only to plane and helicopter. Care should be taken that for drone (UAV) application of all bioprotection technologies should be permitted. Today, drones are successfully used for invertebrate biocontrol agents in arable crops in EU. This must continue and not be hampered by any PPP legislation impacting drones.

ARTICLE 10: INFORMATION TO THE PUBLIC

No comment.

ARTICLE 11: SPECIFIC MEASURES TO PROTECT AQUATIC ENVIRONMENT AND DRINKING WATER

No comment.

ARTICLE 12: REDUCTION OF PESTICIDE USE OR RISKS IN SPECIFIC AREAS

This article should be reworded to only permit the use of bioprotection and low-risk PPPs in these specific areas. Derogation facilities exist in Reg. (EU) No 1107/2009 for emergency use of chemical pesticides.

ARTICLE 13: HANDLING AND STORAGE OF PESTICIDES AND TREATMENT OF THEIR PACKAGING AND REMNANTS

An addition to this article should ensure consideration of any specific handling requirements for bioprotection e.g. temperature,

and where necessary, separation for bioprotection products from other pesticides.

ARTICLE 14: INTEGRATED PEST MANAGEMENT

IBMA welcomes this paragraph and agrees with the wording of IPM.

- (1) Specific reference to bioprotection should be made here because of the biodiversity and ecosystem service benefits of this technology.
- (2) Specific reference to bioprotection should be made here because of the biodiversity and ecosystem service benefits of this technology, [available here](#).
- (4) To ensure that the general principles set out in annex III are implemented by all professional users, a legal and financial basis for implementing IPM needs to be included in the SUD and the NAP. Financial incentives should be developed for advisers to recommend bioprotection. Since using bioprotection for the first time in a field or use is a change to the farming system and could bear a risk to the profit on that field for the farmer and to the credibility of the adviser, then a financial incentive is also required for the adviser (e.g. the French use CEPP points).
- (5) Incentives for IPM should include reward for the use of bioprotection within the CAP eco-schemes in National Strategic Plans. (NSPs). To do this, a European

definition of bioprotection is needed and a listing on the registration portal. This links to the training point in article 5.

ARTICLE 15: INDICATORS, REPORTING AND INFORMATION EXCHANGE

2c. Identifying priority areas such as active substances, crops, regions or practices that require particular attention or good practices that can be used as examples in order to achieve the objectives of the Directive.

Bioprotection use is an indicator of IPM implementation. Bioprotection should therefore be prioritised in the authorisation process. This would require a definition for bioprotection.

The prioritisation options for authorisation are:

- Through a fast-track procedure and a provisional authorisation for bioprotection products that are based on low-risk active substances. To fast-track bioprotection applications would require a definition of bioprotection at EU level, so that qualifying submissions can be fast-tracked.
- To allow for rapid extension of use for bioprotection to be used on a crop or region requiring particular attention, for which it is not currently authorised by allowing extrapolation from existing efficacy data or other environmental data from existing crop uses, pending generation of a complete data package.

- Derogation under Reg. (EC) No 1107/2009 Article 53 allowed only for bioprotection.
- Under the HRI proposed in Annex IV, MS are penalised for allowing derogations. These parameters should be amended to penalise for derogation of chemical PPPs only. This would require a definition of bioprotection.

NEW ARTICLE: MEASUREMENT AT NATIONAL LEVEL

The measurement should include the following:

- Percentage of bioprotection within the overall PPP usage at national and EU level.
- Percentage and number of crop uses covered by bioprotection.
- Number of hectares treated with bioprotection.
- Justification of the IPM decision made – can be done via flow charts based on underlying concept of the IPM triangle.

ANNEX I: TRAINING SUBJECTS TO LEAD WITH IPM AND BIOPROTECTION

See article 5 on page 10.

ANNEX III: GENERAL PRINCIPLES OF IPM

The underlying principles should be illustrated using the IPM triangle, (see *page 6*).

ANNEX IV: HARMONISED RISK INDICATORS

In 2019 new Harmonised Risk Indicators were established based on pesticide sales data. Active substances are divided into 4 groups and each group is given a weighting. Derogated products carry the highest weighting (64 points) to discourage the use by MS. Derogations are not differentiated between low-risk, bioprotection and chemical PPPs. It is important to note that in IPM a broad variety of PPPs are needed to ensure the “least possible disruption to agro-ecosystems” and it is therefore necessary to seek uses of low-risk and bioprotection that may not be authorised for a given crop/pest/disease combination. In such circumstances, farmers may wish to use a bioprotection product under derogation. Such a use should not be penalised but should be encouraged. It widens IPM use, encourages learning new methodology and adapting it to the farm situation and accelerates the adoption of low-risk and bioprotection while not posing additional risks to human health and the environment. It is worth noting, that the absence of a bioprotection registration for a particular use is often due to commercial reasons, where a small market at the time of product development means the business case was not viable.



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