An industry association perspective

Lisbon 28 April 2021
Thumbs up for F2F! Let’s make it happen.

Farm to Fork Strategy
For a fair, healthy and environmentally-friendly food system

Reduce use and risk of chemical pesticides by 50%

Pave the way to alternatives

Enhance provisions on integrated pest management

Maintain farmers’ incomes

to overcome data gaps and promote evidence-based policymaking.

The use of chemical pesticides in agriculture contributes to soil, water and air pollution, biodiversity loss and can harm non-target plants, insects, birds, mammals and amphibians. The Commission has already established a Harmonised Risk Indicator to quantify the progress in reducing the risks linked to pesticides. This demonstrates a 20% decrease in risk from pesticide use in the past five years. The Commission will take additional action to reduce the number of steps. It will revise the Sustainable Use of Pesticides Directive, enhance provisions on integrated pest management on the market of pesticides containing biological active substances and reinforce the environmental risk assessment tools.
Bioprotection products: 4 categories

MACROBIALS
INVERTEBRATE BIOCONTROL AGENTS

Beneficial Insects, mites and nematodes that control other insects and mites

MICROBIALS

Micro-organisms that outcompete or control pests and diseases

NATURAL SUBSTANCES

Botanical extracts and minerals

SEMIOCHEMICALS

Insect pheromones and plant kairomones that affect the behaviour of specific insects or plants

Subject to PPP regulation
## Some simple figures

<table>
<thead>
<tr>
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<th>Bioprotection market</th>
<th>Annual growth</th>
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<tbody>
<tr>
<td>Europe’s bioprotection market</td>
<td>~ 1.0 Bio €</td>
<td>23 %</td>
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<tr>
<td>IBMA members bioprotection market (survey)</td>
<td>~ 1.0 Bio €</td>
<td></td>
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<tr>
<td>Europe’s total crop protection market</td>
<td>~ 10 Bio €</td>
<td>Flat</td>
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## And what they tell us

- Bioprotection reached significant critical mass
- IBMA highly representative
- Bioprotection has strong momentum
- There is a lot to do by 2030
Ready for the challenge: innovation pipeline & ecosystem

What about the regulation?

140 Products awaiting Authorisation across EU

120 Products pre-development not yet submitted

What about the regulation?
F2F success dependent on key regulatory sites

SUD

The “framework” to promote good practice

BCA’s

Invertebrate Biocontrol Agents
No EU regulation
Outside scope of 1107/2009; not PPP’s

Other bioprotection products

PPP’s under 1107/2009
SUD: promoting good practice

IBMA POSITION
on Revisions to the Directive for the Sustainable Use of Pesticides (SUD)
IPM to put biology first

**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 prioritises non-chemical methods, which include bioprotection so that biodiversity is regenerated and cropping systems are made more resilient.

Bioprotection or biocontrol solutions must be defined at European level and the definition applied in national legislation.
Make agroecological practices the norm

**SYSTEMATICALLY MONITOR AND MEASURE THE ADOPTION OF IPM**

Farmers need tools and need to see progress in availability of non-chemical solutions such as bioprotection. Bioprotection use is a relevant parameter for measurement of IPM adoption.

**PROVIDE INCENTIVES FOR PROGRESSING TOWARDS AND REACHING TARGETS**

IPM implementation must be incentivised for farmers and progress reported and measured. Advisory services also need incentivising to recommend IPM and bioprotection.

**SET SPECIFIC AND AMBITIOUS ADOPTION TARGETS**

Create positive targets for bioprotection. NAPs need to include a specific relevant target for bioprotection uptake in each MS. IBMA advocates a 75% target for bioprotection at EU level to achieve the agroecological transition.

**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.

Invertebrate BCA’s on the agenda

Trigger: control of invasive pest by introducing an exotic natural enemy that can “establish” (“classical biocontrol”)

• Ensure use to full potential

• Harmonize between EU countries

• Protect biodiversity

• Encourage SME participation

• Avoid unnecessary hurdles and obstacles

Biocontrol industry most often works with species of natural enemies that are native species (“augmentative biocontrol”)
Invertebrate BCA’s: a strong track record

If it ain’t BROKE
Don’t fix it!

Quality
Auto-regulation
Delivers!

Efficacy
BCA Biodiversity/environmental framework for non-native species important

- Currently subject to national legislation: no harmonized EU approach

- Transnational framework already provided by European and Mediterranean Plant Protection Organisation (EPPO)

- Legislation of many EU countries builds on EPPO guidance and EPPO “positive list”

- EU Commission study
  - Useful overview of national legislation & its impact
  - IBMA ready to give input & industry perspective on best practice & specific areas of concern/pitfalls
IBMA perspective on areas of concern

Regulatory “redundancy”

• Safety and fast market access can & should go hand in hand
• Does this add relevant protection of farmers/consumers/environment justifying additional constraints in time and cost?
• Value of “product registration” for native / authorised species?
• Risk of cumulating regulatory layers

Legislativing beyond species level

• Lack of taxonomical clarity (subspecies, local strains,...)
• National borders = relevant ecological zones
• No cost-effective reliable solutions for farmers without critical mass in BCA production
IBMA views in summary

- Supports effective and proportional BCA regulation focused on protecting biodiversity and the environment before introduction of non-native species.
- Believes product quality and efficacy well addressed by sector auto-regulation.
- Welcomes a more harmonious approach with greater alignment of Member States with EPPO guidance.
- Sees value in sharing experts and expertise between EU member states.
- Any form of harmonisation should leverage full BCA potential to contribute to F2F and maintain conditions for strong SME participation.
Bioprotection products – regulated as PPP’s

Bioprotection

Chemical pesticides
IBMA’s 2018 White Paper in a nutshell

• Bioprotection needs a tailor-made regulatory system (biology-based) by 2020

• Until then, use Reg 1107/2009 wisely

2020 Situation in a nutshell

• F2F sets high ambitions for alternatives to chemical pesticides
• No progress on bioprotection-specific regulation
• Implementation of Reg 1107/2009 increasingly burdensome
Bioprotection products – regulated as PPP’s
F2F to “pave the way” for alternatives

New Product candidates

Evaluation slots
(MS competent authorities)

Assessing biology
with a chemistry mindset

Safe natural
Solutions for farmers

2021

Before 2024?

Before 2030?
Product renewal process under 1107/2009:
Threatening to turn into killing fields for bioprotection products

- Bioprotection products on the verge of being refused renewal: new data requirements.

- Bacillus thuringiensis, widely used insect biocontrol agent - decades of safe and effective use.

Discussion on setting MRL and PHI values: a precedent for microbials that will negatively affect the future of an entire and essential bioprotection category.
In conclusion

• IBMA, the bioprotection industry association, ready for F2F
  • Improving the EU regulatory system for bioprotection crucial for F2F
  • SUD revision can provide a supportive framework
  • Portugal’s BCA initiative can help unlock full BCA potential

• Other bioprotection products classified as “PPP’s” : 1107/2009 implemented without biology-focus hampers innovation & stands in the way of F2F without any proportional gain in risk mitigation
F2F : together we can make it happen!

Muito obrigado

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