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
SUD : IBMA welcomes SUD
IPM putting biology first
Bioprotection Definition - a key enabler

**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.
...Enabling CAP rewards; Target setting and measurement

2. 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.

3. 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.

4. 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.

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.

Impact of F2F pesticide use and risk reduction targets

EU COM Policy Options

- Aspirational Targets
- To be binding targets at EU
- To be binding targets at EU and MS
- Different national starting points
- Burden-sharing
- Consequences or future Commission actions if targets not met

IBMA Response

- Set binding targets at EU and MS
- Consequences
  - Understand and address reasons in case of failure to achieve targets eg too long to register biocontrol, lack of MS capacity or competence to evaluate alternatives
- Incentives
  - Link to CAP ecoschemes
  - Bioprotection use to qualify for ecoscheme payment
- Farmers
  - Make it easy to measure targets
  - Digital tools – smartphone app to say what doing
- Organics easy to measure
  - Create certification targets for IPM at national level eg HVE France
Consider potential costs and benefits of reducing pesticide use and risk

EU COM Policy Options

- Costs/Savings/Benefits to pesticide users
- Costs/Savings/Benefits to wider society and environment
- Results for other impact assessments – universities/stakeholders
- Stakeholders welcome to share such data/study results

IBMA Response

- **Costs/Savings/Benefits to pesticide users**
  - System change comes at a cost in the first instance
  - This cost of change (learning how to use biocontrol, optimising the farm to work with a more biological approach) takes time and should be supported within CAP.

- **Biocontrol/bioprotection benefits to society and environment**
  - Biodiversity - maintains and enhances biodiversity
  - Soil health – DNA profiling shows healthy microbiome benefits following biocontrol use
  - Carbon cycling supported by healthy microbiome

- **Importance of independent impact assessments**

- **Pilot studies on transition to a biology based system in The Netherlands**

- **Measures of DNA Profiling and impact of other systems on soil microbiome**
Integrated Pest Management (IPM)

EU COM Policy Options

• Record-keeping by professional users as IPM enforcement tool

• Clarifications to current IPM principles to specify new tech and precision farming

• Use mandatory crop-specific standards as basis for future controls and enforcement – CAP incentive link

• More training of advisors for IPM

IBMA Response

• Biocontrol/Bioprotection definition as enabler for IPM enforcement through record keeping
  • Biocontrol/bioprotection definition to enable evidence of hierarchy of methods used in IPM

• IPM Principles
  • Formalise definition of IPM
  • 8 principles with decision making in hierarchy as per triangle
  • Biocontrol – key enabler of IPM and transition
  • Define bioprotection/biocontrol eg Code Rural – France

• Crop specific standards link to CAP
  • YES
  • Examples:
    • (i) Crop profiles from Canada: [Crop profiles - Agriculture and Agri-Food Canada (AAFC)]
    • (ii) IOBC integrated production [https://www.iobc-wprs.org/ip_integrated_production/IP_practical_guidelines.html]

• Training of advisors for IPM
  • YES
  • But for all giving advice
  • Farmers, Advisers, Distributors, Food company agronomists ....
  • Cost of advice – provide CAP support for IPM advice

• CAP Support and IPM
  • Where a biocontrol solution is available for a certain problem, the use of chemistry only to deal with that same problem should disqualify the crop from being under IPM
Clarification of current IPM principles to specify new tech and precision farming

EU COM Policy Options

• Clarifications to current IPM principles to specify new tech and precision farming

IBMA Response

• IPM Principles – the IPM Triangle
  • Hierarchy of decision making
  • Decision making still has to go through the steps even if precision pesticide application is used

• Potential new technologies and Precision Farming
  • Specify all non chemical technologies in IPM principles
  • Specifically include biocontrol/bioprotection
  • Biocontrol/bioprotection is a cornerstone of IPM and real system change
  • Decision support systems to optimise timing and use of biocontrol for best efficacy are available – eg INRAE work on microbial Decision support systems
  • Monitoring soil health through DNA profiling to optimise biocontrol applications to enhance biodiversity
  • Precision farming helps pesticide reduction, it can be used to precisely apply biocontrol
National Action Plans (NAPs)

**EU COM Policy Options**

- **NAPs** - Commission develops further guidance and templates to try to make them more effective and useful
- Link to reporting annual MS progress towards achieving Farm to Fork Strategy targets
- Alternatively potential deletion of requirement for NAPs to reduce administrative burden on MS, to be replaced by these annual Farm to Fork target progress updates and links to CAP National Strategic Plans

**IBMA Response**

- **NAPs to contain positive targets for increase in bioprotection use**
  - Positive target has social benefit for advisers and users – farmers see the objective to increase tools available and feel more supported in making positive progress
  - Share the costs between EU and MS of NAP implementation, in particular IPM training and measurement
  - Targets can be set on:
    - Biocontrol use by farming area
    - Range of crop uses covered with biocontrol authorisations
  - Encourage industry to apply for widest range of uses eg France reduced fees for biocontrol irrespective of number of uses applied for
  - Setting targets requires a biocontrol definition
- **Targets linked to CAP National Strategic Plans**
  - **YES**
  - Create financial incentives/rewards for farmers to use biocontrol – financial support for system and operational change because any change is a business risk
  - Requires definition of biocontrol
- **Pesticide Application Equipment**
### Training and Advisory Systems

<table>
<thead>
<tr>
<th>EU COM Policy Options</th>
<th>IBMA Response</th>
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</thead>
<tbody>
<tr>
<td>• Require training for those using and applying PPP instead of purchasing PPPs</td>
<td><strong>Training in PPP use and application and mutual recognition of certification</strong></td>
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<tr>
<td>• Require mutual Recognition of training certificates from different MS</td>
<td>• YES</td>
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<tr>
<td>• Require that advisory services be independent from an economic intention selling PPPs or PAE</td>
<td>• All training should include special application and use conditions of biocontrol</td>
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#### Separation of advice and supply

- **MAYBE**
  - Manufacturers and their trained distributors know their products best
  - This applies to biocontrol and chemical PPPs
  - Different MS have a different approaches
    - NL – no separation
    - FR – separates advice and supply
  - There should be no commercial incentive for advisers to sell more of a particular product
**EU COM Policy Options**

- Amend definition of aerial spraying to confirm (again) that aerial spraying be via any airborne device including drones, not just planes and helicopters.
- Within certain parameters, TBD in a future legislative Annex, derogation would be required for aerial spraying by drones if demonstrating reduced overall use and risk.
- Allow spraying without prohibition and without derogation if spraying instrument is <2m from the crop being sprayed.

**IBMA Response**

- **Drones make targeted application for biocontrol**
  - Relevance of crop height in terms of risk mitigation and use unclear
- **Use of drones with invertebrate biocontrol**
  - Drone application of invertebrate biocontrol agents is facilitating and increasing the use of biocontrol in broad acre crops
  - Important that this remains outside the PPP legislation
Health and environmental monitoring, data, indicators

**EU COM Policy Options**

- Collect more data on use of PPPs, acute and chronic poisoning incidences health and environmental monitoring as a basis for development possible future additional risk indicators

**IBMA Response**

- **Definition of Biocontrol**
  - Define and separate biocontrol from chemical PPPs. With biocontrol included with other PPPs we cannot measure decline in chemical PPPs and increase in use of alternatives such as biocontrol.

- **Measure sales data of biocontrol**
  - Agricultural statistics must separate biocontrol from chemical PPPs
  - Measure use of biocontrol – area
  - Measure biocontrol progress as number of uses covered by biocontrol (crop/pest or disease combinations)
  - Measurement of biocontrol separately to chemical PPPs allows progress against pesticide reduction targets and positive biocontrol targets to be monitored
  - Measurement units adapted to the relevant biocontrol eg Microorganisms versus chemical PPPs can be used if biocontrol and chemical PPPs are measured separately

- **Additional risk indicators**
  - Focus should be on measurement of basics
Restrictions on PPP sales and use

**EU COM Policy Options**

- Only professional users to purchase most hazardous PPPs (PPPs containing active substances that meet cut-off criteria in 3.6.2 to 3.8.2 of 1107).
- Require prescription to purchase and use more hazardous PPPs.
- Prohibit use of most hazardous PPPs in sensitive areas.
- Prohibit use of all chemical PPPs in sensitive areas.
- In line with Biodiversity Strategy for 2030.

**IBMA Response**

- **Microbial PPPs should be excluded from these restriction criteria**
  - Micro-organisms have particular low risk criteria Annex II 5.2.
- **Definition of PPP use**
  - Definition of a chemical PPP according to 1107 – anything that is not a microbial.
  - Biocontrol definition to include microbials, semiochemicals and natural substances to allow separation of sales and use from chemical PPPs.
- **Risk Assessment should be based on risk not hazard**
  - Current focus on hazard in 1107 evaluation of PPPs.
  - Quality risk assessment conducted on biocontrol is key to progressing authorisations of biocontrol.
  - Competent authorities to be resourced to complete biocontrol evaluations.
  - Current biocontrol products ready for submission will wait until
    - 2024 for MS slot for evaluation
    - 2029-2032 for finalisation of EU authorisation.

- **RISK - NO COMPLETED NEW BIOCONTROL EVALUATIONS BEFORE 2030**
The SUD review can help the agricultural transition

SUD is a great tool – it describes Integrated Pest Management within the biology first context

**Definition of Biocontrol**
- Enables Targets
- Enables separation in approach
- Enables measurement
- Enables link to CAP National Strategic Plans

**Integrated Pest Management is rewarded in CAP**
- Reward IPM and biocontrol in CAP through Ecoschemes in the National Strategic Plans

**Include Biocontrol Targets and measure**
- Create National Targets for biocontrol uptake.
- Within the new National Action Plans and monitor and measure

**Train Farmers and Advisers in IPM**
- Training for advisers and farmers in IPM and Biocontrol
Biocontrol is an effective alternative to pesticides that offers more to sustainable agriculture

Read IEEP report on IBMA website
F2F : together we can make it happen

IBMA
International Biocontrol Manufacturers Association AISBL
Rue de Treves 61, 1040 Brussels, Belgium
WWW.IBMA-GLOBAL.ORG

EXECUTIVE DIRECTOR
Jennifer Lewis
jennifer.lewis@ibma-global.org

REGULATORY CONSULTANT
Ulf Heilig
ulf.heilig@ibma-global.org

ADVOCACY AND COMMUNICATION MANAGER
Isabelle Pinzauti Babrzynski
isabelle.pinzauti@ibma-global.org

ADMINISTRATION
Louisa Puschel
administartion@ibma-global.org
Britta Schnittger
Britta.Schnittger@ibma-global.org