



Biological control is essential for the transition towards sustainable regenerative agriculture, in order to meet the EU Green Deal goals.



1

EU DEFINITION OF BIOLOGICAL CONTROL

IBMA welcomes the recognition of biological control as a specific form of plant protection through an EU definition of **'biological control'** including the four categories of biocontrol (Article 3(23)). These categories are: invertebrate biocontrol agents, microbials, semiochemicals and natural substances. The definition of 'biological control' should read as follows: 'biological control' means the control of organisms harmful to plants or plant products using natural means of biological origin or substances identical to them, such as microorganisms, semiochemicals, extracts from plant products as defined in Article 3(6) of Regulation (EC) No 1107/2009, **and other natural substances**, or invertebrate macro-organisms.

2

SENSITIVE AREAS

In the current proposal all PPPs are banned. **IBMA advocates for the use of biological control - including invertebrate macro-organisms - to be permitted in sensitive areas.** In fact, biological control solutions are needed in sensitive areas, in particular in the farming areas and public spaces.

3

POSITIVE TARGET FOR BIOLOGICAL CONTROL

In the proposal, an indicative positive target for biocontrol should be included in the Member States NAPs (Article 9). IBMA recognises the reduction targets and asks for an equivalent positive target to provide legal clarity for investment in biocontrol in Europe. **IBMA advocates that a 75% positive target for biocontrol at EU level would be necessary to achieve the full agro-ecological transition.**

4

IPM DEFINITION

The definition of IPM is still considered **not strong enough** as it should explicitly refer to prioritise biological control and using chemicals only as last resort. Furthermore, while article 13 of the SUR does recall the eight principles of IPM defined, it fails to rank them. **It is considered essential to apply a preventative approach, working with nature, in line with the IOBC, IBMA and PAN Europe triangle on IPM.** It is recommended that the definition of IPM reflects that IPM is 'an ecosystem-based strategy' rather than just a number of different measures.

5

HARMONISED RISK INDICATORS (HRIS)

In the current SUR proposal the **calculation of HRI 1** will be based on statistics on the quantities of active substances placed on the market in plant protection products.

IBMA asks that HRI 1 measurement is adapted for biological control based on area treated, not volume.

It is crucial that the HRIs provide a measure of progress towards chemical pesticide reduction targets and indicate the growth of alternative methods such as biological control. This is only possible if biological control is clearly separated from chemical PPPs so they can be measured separately.

Furthermore, **the calculation of HRI 2 should be adapted for biological control.** It is recommended that biological control and low-risk products should be treated similarly regarding the calculation for Harmonised Risk Indicator 2 (number of emergency authorisations, Annex VI) as these types of products should preferably be used.