



The importance of sales with advice for plant protection products

SUR objective on sales and advice

The Sustainable Use Regulation proposalⁱ aims to reduce chemical pesticide use and risk by 50% through Integrated Pest Management. Recital (31)ⁱⁱ proposes a way to achieve this target: professional users shall regularly seek advice from trained and independent advisors on pest management to guarantee a well-planned approach to harmful organism control techniques over several growing seasons. This is aimed at reducing the use of chemical plant protection products to the minimum and ensuring the proper implementation of integrated pest management, so that chemical plant protection products are only utilised as a last resort.

The role of pesticide advisors

According to the SUR proposal, an “advisor” means any person who advises on integrated pest management and the safe use of plant protection products, in the context of a professional capacity or commercial service, including private and public advisory services” (Art 3 (9)).

Strategic advice

The SUR proposal states that “each Member State shall designate a competent authority to establish, oversee and monitor the operation of a system of independent advisors for professional users.” These advisors should be free from any conflict of interest. Professional users shall consult an independent advisor at least once a year for the purposes of receiving the **strategic advice** (Art 26). IBMA understands that this provision shall not prevent farmers from relying on the advice of biocontrol manufacturers and their distributors (on top of the independent advice).

However, IBMA understands that the **independent strategic advice** as proposed in the SUR, not only concerns advice on preventive control techniques and the implementation of IPM but also **advice on the use of non-chemical methods** (article 26 (4), point d)ⁱⁱⁱ. IBMA understands that the latter could cover advice on biocontrol solutions which are typical non-chemical methods.

Art. 17 (1) point b states that **a plant protection product authorised for professional use may only be used by a professional user who uses the services of an independent strategic advisor**^{iv}. As we understand that the strategic advice could include the use of biocontrol solutions, IBMA is concerned that the provision set up in article 17 could limit the farmers’ ability to **(i) use *circumstanced* specific advice provided by biocontrol advisors in specific situations that have not been foreseen by the global strategy defined by the strategic advisor, (ii) use *ad-hoc* specific advice provided by biocontrol advisors along the whole growing season, to continuously adapt elements of the global strategy according to the evolution of the cropping system.**

The key role of biocontrol advisers

Professional advice is usually provided by biocontrol manufacturers or distributors specialised and trained in biocontrol solutions. As biocontrol products are natural solutions that develop with the surrounding nature and work better embedded in an IPM context, advice is key to ensure their optimal use and maximal efficacy. Biocontrol manufacturers and their distributors have technical experts trained in biological control in each country of operation. These advisors have a trusted relationship with farmers and visit farms regularly to walk

crops, and tailor the solution to the pest, disease and crop conditions that develop. **These industry advisors are experts in the mode of action of their products, their optimal use and how they interact with other factors in the cropping system. This is a key element in the correct implementation of IPM to ensure optimal pest and disease management within the conditions that prevail in the whole cropping system.** This in-depth knowledge of biocontrol solution advisors of their product and the implementation of IPM is further reinforced by training and by experience continuously gathered in advisor's daily practice in the field with farmers.

Potential pitfalls of the separation of sales and advice for specific advice

France implemented a complete separation of sales and advice in 2021. In a similar way to article 17, the French decree only allows the use of plant protection products by farmers who have received independent strategic advice. Indeed, to renew their official plant protection products user certificate, Farmers must now justify having received two strategic advice sessions within each 5 year period (with an interval of 2 to 3 years between the two sessions). The government decree's objective is to offer **two types of independent advice** to professional users: (i) **a mandatory strategic**, multi-year advice based on a farm diagnostic; and (ii) **an optional targeted advice** which responds to a **specific need** (during the growing season). These two types of independent advice must contribute to reducing the use, risks and impacts of plant protection products. They must also respect the principles of integrated pest management.^v The French decree required suppliers of plant protection products to choose between their sales activity and their advisory activity. As a result, most suppliers of plant protection product have decided to retain their commercial activity and closed their advisory activity. IBMA is concerned that farmers will continue to seek specific advice from their usual suppliers with whom they have built a strong relationship. This could lead to advice being provided unofficially, in an oral way. Reports suggested that this was common practice in France in the year following the separation of sales and advice.

Currently the Dutch government is working on creating a structure for periodic strategic advice alongside the current day-to-day advice which has been in place for decades and has contributed to the near 100% implementation of IPM by vegetable producers in the horticultural sector. The day-to-day advisers will be required to gain more in-depth knowledge on the principles and practicalities of IPM but will also be benchmarked in order to reach the targets of the SUR. This arrangement will maintain the use of specific advice provided by biocontrol companies and their distributors.

IPM principles consider curative solutions as a last resort which minimises the recourse to conventional plant protection products. Biocontrol companies and their distributors are advising farmers successfully on the implementation of IPM principles as a pre-requisite to ensure the optimal use and maximal efficacy of their products. Biocontrol advisors may also provide advice on the use of chemical plant protection products but only in last resort when all sustainable solutions are exhausted. In that respect IBMA believes that biocontrol advisors are working within the principles and objectives of the SUR proposal. Furthermore, **expert advisors in biocontrol and IPM are desperately needed to enable the transition to more agroecological practices.** Any proposal separating sales and specific advice could therefore be counterproductive and detrimental to reaching the objectives of the Farm to Fork strategy.

Conclusion

The SUR objective of separation of sales and advice aims at minimising the inappropriate use of chemical plant protection products. Biocontrol companies and distributors of biocontrol products are advising farmers on the implementation of IPM along with the reasoned use of any plant protection products. IBMA is concerned that the provisions of art. 26 and art. 17 could limit the possibility of biocontrol advisers to advise farmers on specific ad-hoc issues throughout the season. In consequence, an indiscriminate complete

separation of sales and advice for specific advice is expected to be detrimental to reaching the objectives of the Farm to Fork strategy as it would reduce the farmer's access to key knowledge on sustainable farming and the use of biocontrol products. **Therefore, IBMA advocates to ensure that specific advice provided by biocontrol companies and distributors should be available to grower at all times.**

ⁱ https://food.ec.europa.eu/plants/pesticides/sustainable-use-pesticides_en

ⁱⁱ SUR proposal - Recital (31) *"In order to ensure a planned approach to harmful organism control techniques across a number of growing seasons with a view to minimising the use of chemical plant protection products as much as possible and to ensure a proper implementation of integrated pest management, professional users should be required to regularly consult trained, independent advisors on pest management, so that plant protection products are only used as a last resort."*

ⁱⁱⁱ SUR proposal - Article 26 (4) – *"An advisor [...] shall provide strategic advice on the following subjects: (a) application of relevant control techniques to prevent harmful organisms; (b) implementation of integrated pest management; (c) precision farming techniques, including use of space data and services; EN 59 EN (d) use of non-chemical methods; (e) where chemical plant protection products are necessary, measures to effectively minimise risks to human health and the environment, in particular to biodiversity, including pollinators, from such use, including risk mitigation measures and techniques."*

^{iv} *A plant protection product authorised for professional use may only be used by a professional user who: [...] (b) uses the services of an independent advisor in accordance with Article 26(3).*

^v <https://agriculture.gouv.fr/produits-phytosanitaires-separation-de-la-vente-et-du-conseil-partir-du-1er-janvier-2021>