Dear [Ministry],

I am contacting you on behalf of [name/organisation], representing biological control manufacturers in [country]/ I am contacting you on behalf of [name/organisation], producing/ biological control, member of IBMA Global, the association representing biological control manufacturers, regarding the **European Commission’s proposal on the Sustainable Use of Plant Protection Products Regulation (SUR)** which was published by the Commission in June 2022.

Since then, negotiations in both the European Parliament and Council of Member States have continued to progress and the recent positive vote by the European Parliament ENVI Committee was a very welcome step forward. The SUR is essential for making biological control available to farmers and providing the possibility for additional measures to accelerate market access of new biological control solutions. In other words, for biological control to become readily available to farmers, the SUR needs to progress.

**We believe this piece of legislation is crucial to implement the Farm to Fork and Biodiversity Strategies, as well as the Zero Pollution Action Plan and is therefore key to delivering on the objectives of the European Union’s Green Deal.** It will be a key step towards achieving resilient farming systems capable of securing food production, protecting the environment, and achieving a toxic free environment to manage current and future crises. The [McKinsey report on the agricultural transition](https://www.mckinsey.com/industries/agriculture/our-insights/the-agricultural-transition-building-a-sustainable-future) released in June this year conveys the same message: dedicated on-farm actions will be critical to a successful transition to decarbonize in line with a 1.5°C pathway.

**Concerns have been raised about the availability of alternatives to chemical pesticides,** the administrative burden for farmers and the definition of sensitive areas. However, we believe significant steps have been made to alleviate these concerns and they should be considered moving forward.

Regarding alternatives, the European Commission **released a study recognising the potential of alternatives, including biocontrol, as a key contribution to achieving pesticide reduction targets. Many solutions are already available for which label extensions and mutual recognition could be applied with a further 75 active substances in the pipeline at EU level.**

The recently voted ENVI Committee compromise amendments provided provisions for speeding up market access for biocontrol. The EU COM report of 5th July recommended several ways to speed up access, the most immediately impactful being to allow provisional authorisation for biological control products. By allowing provisional authorisation for biological control, companies have certainty in the reduction of timescales to market and therefore incentives to invest in Europe. This will help ensure the continued competitiveness of Europe in the green agricultural economy.

**This is why we call on [Agriculture/ Health / Environment Ministers /] to continue finding a compromise on the SUR.**

As the [organization, association] representing the biocontrol industry, we would be more than happy to provide you with additional information on the biocontrol market in [ country]. We hope this will be helpful for your discussions at [country level/ Member State level /] to continue the negotiations on this crucial piece of legislation.

With your help, we can and will maintain leadership in biological control, the world’s most rapidly growing segment of the crop protection industry. Our companies will continue to deliver innovation, economic growth, employment, and economically viable solutions for farmers in the EU and around the globe to ensure food security through sustainable agriculture.

**We trust you will ensure that the SUR moves forward to ensure the environmental goals of the Green Deal are addressed properly, to protect the health and environment of European citizens, to make agriculture more resilient for farmers and ensure food security for European citizens in the long term.**

Best regards,

**Additional points**

Here you will find additional information that may be of importance for your member state.

* Regarding sensitive areas, the Commission has reconsidered its initial proposal to ban the use of all plant protection products in sensitive areas. It shared [a non-paper on sensitive areas](https://food.ec.europa.eu/system/files/2023-01/pesticides_sud_sur-non-paper_en.pdf) addressed to the Council and the European Parliament on 15 November 2022 outlining possible options for co-legislators to consider and takes account of key concerns in relation to sensitive areas, including the definition and the total ban on of all plant protection products. **We therefore call on [relevant members of your Ministry/ colleagues at European level] on the basis of the non-paper to try to find a common position on this issue so that it can go into trialogue and be finalized before the European elections.**
* We understand that **the topic of additional** **burden to European farmers** is another key concern in several Member States. This relates to the rules applying to Integrated Pest Management (IPM) and the obligation contained in the Commission’s initial proposal for Member States to adopt legally binding crop-specific rules for the implementation of IPM. In its [progress report](https://data.consilium.europa.eu/doc/document/ST-9803-2023-INIT/en/pdf) on 26 June 2023, the Swedish Presidency managed to strike a compromise allowing Member States the flexibility to adopt either crop/sector specific guidelines, or crop/sector specific legally binding rules. This option would give Member States the possibility to keep their national binding rules that they already have, or to adopt such new rules on a voluntary basis. This provides a solid basis for further progress in the Council and should be considered as an important step to alleviate the concerns of co-legislators related to the administrative burden posed by the SUR.
* The European Commission study recognises the potential of alternatives, including biocontrol, as a key contribution to achieving pesticide reduction targets**.** This recognition of the importance of the role of biocontrol is aligned with the conclusions from the McKinsey report, which shows that out of 28 possible GHG mitigation measures on farm (which together have the potential to reduce annual GHG emissions by 2.2 Gigatonnes of CO2 equivalents globally), biologicals (including biocontrol) rank as the second most effective measure to support decarbonisation bringing other biodiversity benefits.