Authorization/ Renewal of microbial products minor changes leading to major outcome

BPWG, Brussels, 10-11 June 2024





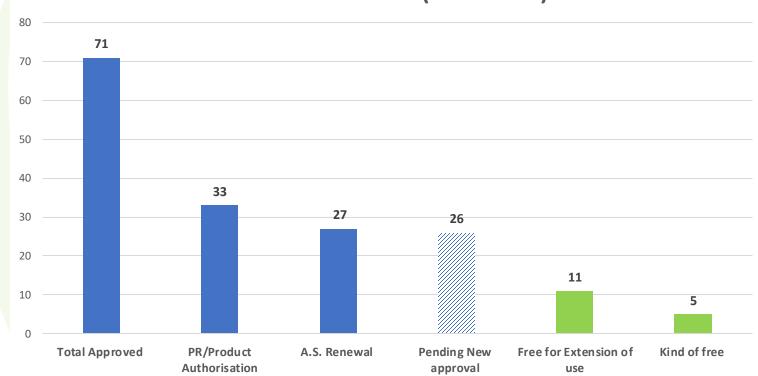


- The EU has 71 microorganism strains approved and about 26 pending approval (June 2024)
- About 60 approved strains (85%) are "locked" in some Renewal process preventing Label Expansions, new formulations and Mutual Recognitions (in most MS). i.e at least 60 products are already authorised and could be expanded to other MS and their Labels extended.
- Pending MPCAs could lead to 26 new products but in the long term (>3-4 years): 20 of the new dossiers in 2 RMSs
 - IUCLID updates are a huge issue for RMS and applicants of MPCA!

85% of MPCAs potential is locked by renewal processes.

Context





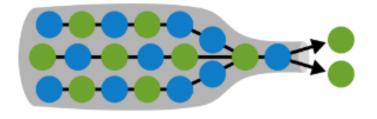
MPCAs in the EU (June 2024)

- Only 17 MPCAs are currently not "locked" by renewal processes;
- Slots for New product applications are extremely difficult to get (MSs busy with renewal processes)
- Extensions of use, new product authorisations and MR often blocked during MPCA and Product renewal processes

85% of potential is locked by renewal processes



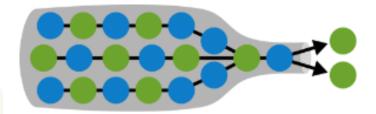
Ampelomyces quisqualis (1 strain) Bacillus amyloliquefaciens (1) Bacillus subtilis (1) Beauveria bassiana (2) Clonostachys rosea (ex. Gliocladium catenulatum) *Coniothyrium minitans* (1) Isaria fumosorosea (1) Metschnikowia fructicola (1) Pasteuria nishizawae (1) Pepino mosaic virus (3) Saccharomyces cerevisiae (1) Trichoderma atroviride (1) *Verticillium albo-atrum (1)*



Very limmited number of MPCA that can be used for new product authorisations and label expansions

Considerations for changes

- Label extensions, New products and Mutual Recognitions during renewal processes of MPCA are crucial to make new products and new uses available to growers in the short term (< 4 years).
- The renewal processes take much longer than the timelines established by Reg. 1107/2009, blocking new application for years → unlikely to change in the short term
- What needs to be (re)assessed during a renewal process and what changes in terms of product safety?
- Consider the sense of Zonal Dossier for MPCA: this is blocking assessments, delaying authorisations/ renewals and increasing the gap of products/uses available to growers across zones



Impact in the short term



- Reduce number of Emergency Uses for MPCA (of registered a.s.): 145 emergency uses in the past 4 years with MPCAs approved (note: if semi-chemicals and plant extracts/oils are looked at, the number of EM could be significantly reduced)
- Allowing Label extensions, New formulations and MR during renewal processes will make existing products available for new uses and new product development
- Give a clear sign to business operators to invest in product development under European agronomic conditions.
- Provide farmers with biocontrol products to use in field programmes and kick start to transition at field level with products with proven safety
- Prevent the collapse of EU biocontrol SMEs, most of which have been funded with public Innovation funds



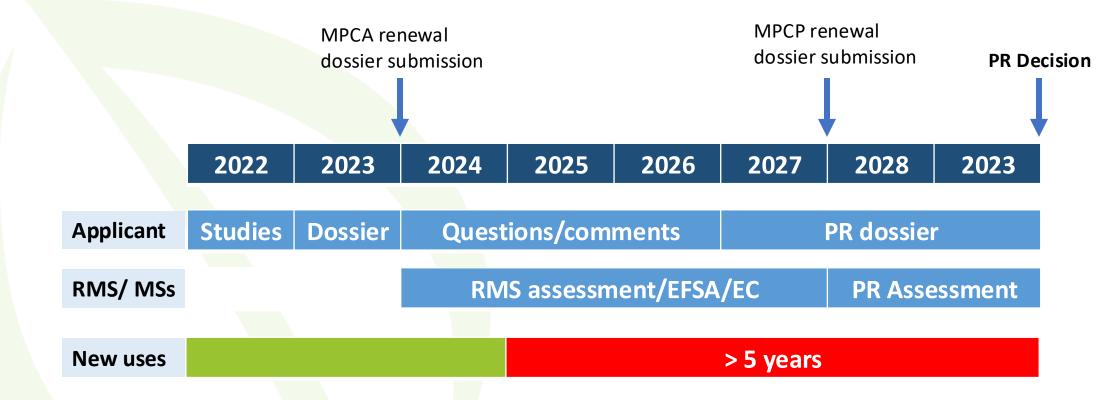
Current Status	2024	2025	2026	2027
33 MPCA (PR/New authorisation)				
27 MPCA (A.S. Renewal)				
17 MPCA				

Possibility of Label Ext, New AT, MR	2024	2025	2026	2027
33 MPCA (PR/New authorisation)				
27 MPCA (A.S. Renewal)				
17 MPCA				

Existing microbial PPPs could deliver >100 new uses to the market within 2 years, many of these targeted at arable crops where gaps in the farmers toolbox are significant

Why are renewals blocking new uses & products

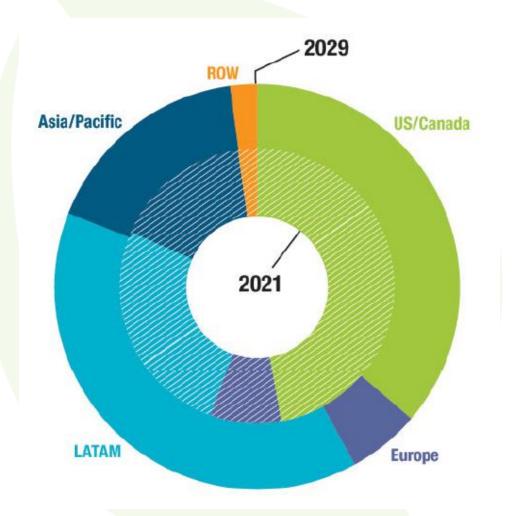




- At least 5-6 years are lost for new uses/ new products
- Assuming 0.5-1 M EUR investment for a MPCA renewal process (zero return for applicants): at least 500-1000 demonstration field trials could be done
- Resources capacity at MSs as well as Applicants are blocked for at least 5 years (no new uses/products)

Europe in the global picture of MPCAs





- Europe has a small market share today (7%) and it is not expected to grow at the same pace (according to market projection) unless major major policy changes are implemented.
- North America (about 50%) and South America (25%) represent the major markets for microbial products and are expected to grow, driven by Brazil and US.
 - Smaller and fragmented markets, longer timelines, highest uncertainty on investment;
 - Development of biocontrol driven by agronomic conditions and challenges happening outside of Europe.

Source: Dunham Trimmer, Global Biocontrol: Market Overview, Trends, Drivers and Insights, 2023.

Conclusion



- The renewal processes (a.s. and products) under Reg. 1107/2009 are blocking extensions of use and new products. 85% of Microorganisms potential is blocked by the procedures and timelines → to continue for many years as the MPCA enters the next renewal cycle.
- Immediate action is needed if MSs want to deliver new uses and new product to the growers (due to the number of microorganisms locked under renewal processes)
- The renewals are driving the investment of business operators:
 - Investment is moving outside of Europe due to the status quo on 1107/2009 procedures
 - Consider the new questions being place, new data requests, the sense of zones for MPCA
 - Investment should be moved to growers' field demonstrations and training programs to improve uptake of MPCP use and its integration in IPM programs for arable crops.

Way forward





"Have you figured out how I can be on the right side of history without being on the wrong side of now?"

- The ZAPID workshop recognized that prioritization is needed at MS level.
- Farmers need tools urgently
- Microbial products exist with many label extension and mutual recognition opportunities
- Renewal process should not delay these opportunities reaching farmers (by using the existing approved endpoints)

Thank you



