

# IBMA position on the biocontrol measures in the EU Commission Food and Feed safety Simplification package omnibus proposal

IBMA Position - 2026.03.11

IBMA welcomes the measures to accelerate biocontrol approvals and authorisations in the Food and Feed safety Simplification Package. This also builds on the political support from the European Parliament for faster access to biocontrol through its [INI Report](#) and related biocontrol measures, successfully voted in November 2025.

As IBMA, we see the following measures as indispensable to ensuring faster availability of biocontrol for European farmers.

## An EU-wide legal definition on biocontrol

Please refer to [IBMA separate position regarding the definition](#) proposed by the European Commission.

### 1. Removal of renewal process for biocontrol active substances and products *Art.5 and 14 of the European Commission proposal - "Unlimited approval"*

#### A key measure to have more biocontrol solutions for farmers

IBMA considers key the removal of costly and burdensome re-registration procedures for biocontrol active substances and products. The renewal procedure for biocontrol is bureaucratic and wasteful of competent authorities and industry resources for no gain in safety evaluation. For biocontrol, the endpoints rarely change in the renewal evaluations, meaning that Member States' resources are wasted in constantly re-evaluating older biocontrol products rather than freeing-up resources to evaluate new active substances so that farmers have more sustainable and safe product choices available. Furthermore, competent authorities often apply a "frozen period" during the renewal process meaning no label extensions or amendments will be evaluated, further delaying farmer access to biocontrol.

Multiple safeguards exist in (EU) Reg. 1107/2009 (article 21 and 56) and the current Simplification Package (Commission proposed amendments to article 18) to call for a renewal procedure at any time for any (biocontrol) active substance or product.

## **IBMA agrees with the European Commission proposal regarding Art. 5, 14 and 18 for bio-control**

IBMA supports the European Commission's proposals to amend articles 5 (first approval), 14 (renewal of approval) and 18 (work programme), with regards to biocontrol active substances; allowing for a **risk-driven indefinite first approval for biocontrol active substances (with no renewal necessary but if it occurs, indefinite in time), with the possibility for the Commission to initiate an assessment or renewal procedure at any point.**

### **IBMA suggestions for Art.32 amendments**

For the Commission's proposal for amendments regarding article 32 (duration), IBMA defends a **risk-driven indefinite approval for biocontrol products** (following the same rationale as with biocontrol active substances), and therefore not limited to 15 years as is the case in the current Commission proposal

### **Alternative proposal**

As an alternative, IBMA would support an **extended first authorisation and renewal periods for biocontrol products of 25 years**, with a process to ensure harmonisation of renewal dates across Member States so that the process is simplified for evaluators and the industry. IBMA defends **adding a provision calling on the Commission to assess the conditions upon which biological control products** that have been shown to have no or negligible risk profile shall **be granted a risk-driven indefinite authorisation**, keeping the existing safeguards in 1107 which already allow to request a renewal process at any point in time [this position is in line with the European Parliament's INI Report on biocontrol (See its point 12), successfully voted across political groups in November 2025].

## **2. Provisional authorisation for biocontrol products**

**Provisional authorisation for biocontrol PPPs should be allowed as soon as possible.**

Biocontrol PPPs are nature-based solutions. The process of provisional authorisation follows the initial evaluation procedure to ensure a robust safety evaluation has been made whilst allowing immediate access for farmers. Currently emergency authorisations are being given by Member States for new biocontrol products, a process that is then repeated every year until full authorisation. Provisional authorisation would last for a period not exceeding 5 years (as in the current Commission proposal) and therefore save Member States time.

**IBMA supports the Commission proposal** in the Simplification Package to amend Reg. 1107 regarding Article 30 (provisional authorisation) for biocontrol products. Effective implementation among Member States is key to achieving effective acceleration of biocontrol product availability.



### 3. Tacit authorisation and mutual recognition for biocontrol products

Current Member States practices mean mutual recognition is at best slow and at worst not performed, further delaying farmer access to biocontrol already approved at EU level and authorised in some Member States. As a consequence, there is not a single market for biocontrol in the EU.

#### First Member State authorisation after the EU approval

**IBMA supports the Commission's proposal** in the Simplification Package to amend Reg.1107 regarding article 37 (period for examination) for applications concerning a plant protection product containing as active substances only biocontrol or low-risk active substances; introducing a **tacit authorisation for biocontrol products if Member States concerned have not adopted a decision after 120 days**. Effective implementation is key to avoid the issuance of negative decisions to by-pass tacit authorisation.

#### Mutual recognition by other Member States in the zone

**IBMA supports the Commission's proposal** in the Simplification Package to amend Reg.1107 regarding article 40 (mutual recognition) and 42 (procedure) for biocontrol PPPs; introducing **tacit authorisation regarding mutual recognition for biocontrol products if the Member State concerned has not adopted a decision after 120 days**. Effective implementation is key to avoid negative decisions to by-pass tacit authorisation.

### 4. One regulatory zone for biocontrol products

**IBMA supports Commission proposals** for amendments to Reg 1107/2009 regarding articles 3 (definition) and 33 (Application for authorisation or amendment of an authorisation); allowing a regulatory one-zone approach for biocontrol.

### 5. Priority lane for biocontrol active substances and products

A priority lane for biocontrol active substances and products will allow Member States to deliver these alternatives to the market faster providing farmers with the choice to use biocontrol and allowing the ongoing competitiveness of European farmers. Farmers in the rest of the world already have access to biocontrol. **Prioritisation of the biocontrol evaluations within the authorisation procedure in Brazil greatly increased the number of biocontrol products on the market within one year.**

Biocontrol is a valuable tool in reducing the development of resistance of existing conventional pesticides when used together in integrated crop protection programs.

**IBMA supports the Commission's proposal** in the Simplification Package to amend Reg.1107 regarding articles 11 (draft assessment report) and 37 (period for examination), to **prioritise the approval and authorisation of biocontrol active substances and products, as is the case in some EU competent authorities.**

### 6. Reinforcing EFSA's resources and role with regards to biocontrol

Reinforcing EFSA's resources and role with regards to biocontrol contributes to reducing bottlenecks and enhancing predictability. IBMA defends the need for profiles in EFSA with pragmatic knowledge of agriculture and biocontrol.

**IBMA supports Commission proposals** for amendments to Reg 1107/2009 regarding articles 7 (application) and 11 (draft assessment report); **allowing EFSA to provide more expert resources for evaluations of active substances including as rapporteur Member State**. IBMA welcomes that the strengthening of EFSA's role comes with **additional funding for EFSA.**

## 7. EU wide data protection for test and study reports on biocontrol active substances and products

A revised data protection framework, as proposed in Art.59 of the simplification package, could facilitate the assessment process for both authorities and companies.

Nevertheless, IBMA questions how this could be implemented in practice, particularly at the **product authorisation level when new data is submitted for a product**. IBMA would like to understand how data protection would be applied in such cases.

## 8. [new] Commitment to evaluate the appropriateness of the simplification measures for biocontrol and the need for a new stand-alone regulation for biocontrol in the longer-term

Post 2035, biocontrol is expected to be the dominant type of pest and disease control. In this context, a regulatory framework wholly adapted to biologicals is required. This necessitates a fundamental review of the existing framework. Such revision is needed to maintain the competitiveness and resilience of the agricultural and crop protection markets in Europe.

**IBMA defends the introduction of an amendment to article 82 (review clause), where “by 31 December 2028, the Commission shall evaluate the appropriateness of the current legislative framework to bring biological control products in the EU market, inter alia, in terms of data requirements, approval criteria and process and mutual recognition. The Commission shall consider, if appropriate, whether to accompany that evaluation with a proposal to amend this Regulation via a standalone regulation for biocontrol, including the conditions upon which a centralised authorisation approach may apply, to better tailor the assessment, approval, and authorisation procedures for biocontrol solutions.”** [this position is in line with the European Parliament’s INI Report on biocontrol (See its point 19), successfully voted across political groups in November 2025.

## 9. Article 4(7) Clarification on changed wording on derogation conditions biocontrol in the longer-term

The change from “other available means” to “other reasonable means” in Art 4 (7) needs clarification. There have been varied interpretations between MS on the historical wording. Clarification on appropriate interpretation of the final wording is necessary, while ensuring that the provision continues to support the transition towards more sustainable plant protection solutions, including biocontrol, without unnecessary reversion to less preferred options.

## 10. Overall Comment on Duration of authorization process in EU

IBMA strongly supports the acceleration of biocontrol approval and authorisation in the EU. To enhance the attractiveness of the European market for innovative biocontrol solutions and reinforce EU competitiveness in this fast-growing sector, the approval and authorisation process should be brought within a 2-3 year timeframe. The ongoing simplification of Regulation (EC) No 1107/2009 should facilitate adherence to clear and realistic legal timelines. Effective implementation support and appropriate mechanisms to ensure timely decision-making will be key to achieving these shared objectives.

Overview of IBMA's recommendations for biocontrol with regards to the Simplification Package (please refer to IBMA separate communication for IBMA's recommendations on the biocontrol definition proposed by the Commission)

<b>Articles supported by IBMA</b>	Articles 5, 14 and 18, for biocontrol	Approvals of (biocontrol) active substances
	Article 30	Provisional authorisation for biocontrol products
	Articles 37, 40 and 42	Mutual recognition of biocontrol products
	Articles 3 and 33	One regulatory zone for biocontrol
	Articles 11 and 37	Priority lane for biocontrol active substances and products
	Articles 7 and 11	Reinforce EFSA's resources and role with regards to biocontrol
<b>Articles where IBMA suggests Amendments</b>	Article 32	Approvals of (biocontrol) PPPs
	Article 59	Data protection
	Article 4 (7)	Derogation conditions
<b>New provisions recommended by IBMA</b>	New Article 82.a	Commitment to evaluate the appropriateness of the simplification measures for biocontrol and need for a new stand-alone regulation for biocontrol in the longer-term



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