



# An industry association perspective

Lisbon 28 april 2021





# Thumbs up for F2F ! Let's make it happen.



## Farm to Fork Strategy

For a fair, healthy and environmentally-friendly food system



The use of **chemical pesticides** in agriculture contributes to soil, water and air pollution, biodiversity loss and can harm non-target plants, insects, birds, mammals and amphibians. The Commission has already established a Harmonised Risk Indicator to quantify the progress in reducing the risks linked to pesticides. This demonstrates a 20% decrease in risk from pesticide use in the past five years. The Commission will take additional action to reduce the

**Reduce use and risk of chemical pesticides by 50 %**

number of steps. It will revise the Sustainable Use of Pesticides Directive, enhance provisions on **integrated**

**Pave the way to alternatives**

mechanical weeding, and will be one of the main tools in reducing the use of, and dependency on, chemical pesticides in general, and the use of more hazardous pesticides in particular. Agricultural practices that

**Enhance provisions on integrated pest management**

on the market of pesticides containing biological active substances and reinforce the environmental risk

**Maintain farmers' incomes**

to overcome data gaps and promote evidence-based policymaking.



# Bioprotection products : 4 categories



Subject to PPP regulation

**MACROBIALS**  
*INVERTEBRATE*  
*BIOCONTROL AGENTS*



Beneficial Insects, mites and nematodes that control other insects and mites

**MICROBIALS**



Micro-organisms that outcompete or control pests and diseases

**NATURAL**  
**SUBSTANCES**



Botanical extracts and minerals

**SEMIOCHEMICALS**



Insect pheromones and plant kairomones that affect the behaviour of specific insects or plants



# Some simple figures

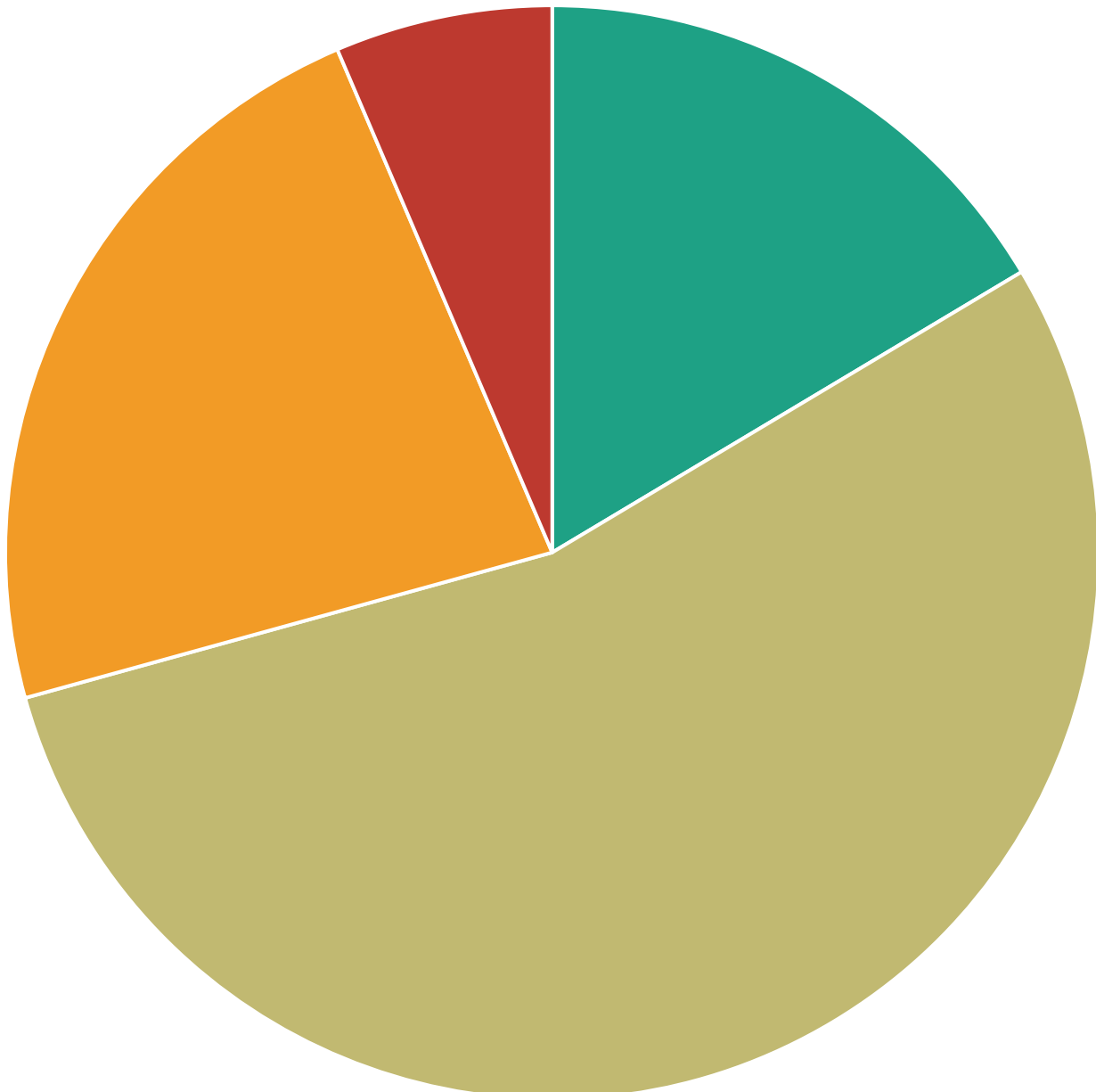


	Bioprotection market	Annual growth
<i>Europe's bioprotection market</i>	~ 1.0 Bio €	23 %
<i>IBMA members bioprotection market (survey)</i>	~ 1.0 Bio €	
<i>Europe's total crop protection market</i>	~ 10 Bio €	Flat

# And what they tell us

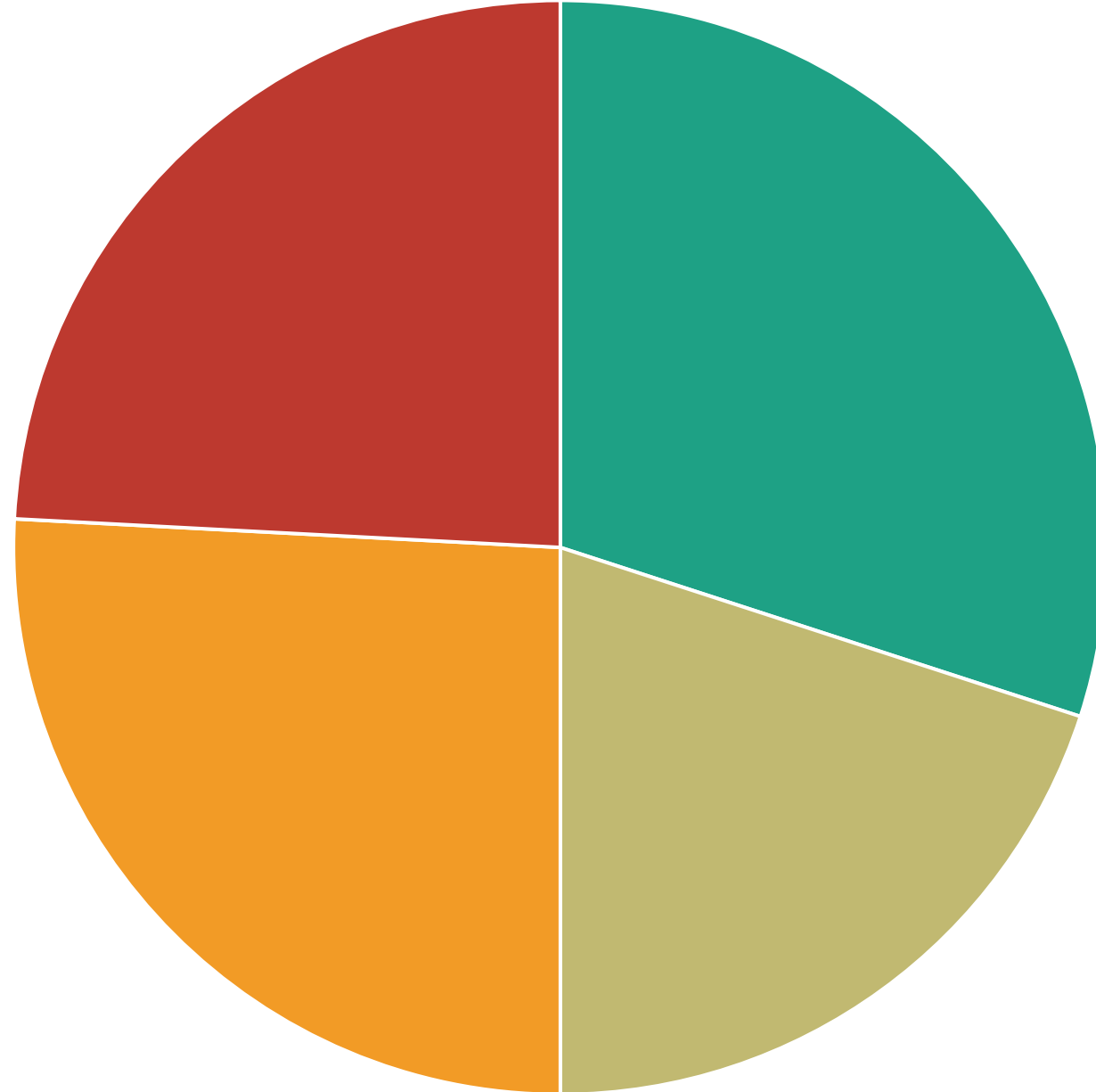
Bioprotection reached significant critical mass	IBMA highly representative
Bioprotection has strong momentum	There is a lot to do by 2030

# Ready for the challenge : innovation pipeline & ecosystem



140 Products awaiting Authorisation across EU

- Large co's > 50 Mio
- SME 10 – 50 Mio
- SME 2-10 Mio
- SME < 2 MIO



120 Products pre-development not yet submitted

## What about the regulation ?

# F2F success dependent on key regulatory sites”

“construction



## SUD



The “framework” to promote good practice

## BCA’s



Invertebrate Biocontrol Agents  
No EU regulation  
Outside scope of 1107/2009 ; not PPP’s

## Other bioprotection products



PPP’s under 1107/2009



SUD : promoting good practice



**IBMA POSITION**  
**on Revisions to the Directive**  
**for the Sustainable Use of Pesticides**  
**(SUD)**





# IPM to put biology first



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## DEFINE IPM AND BIOPROTECTION

IPM means a pest and disease management programme that puts biology first, through agronomic decisions and the use of biocontrol, and uses chemistry only if necessary.

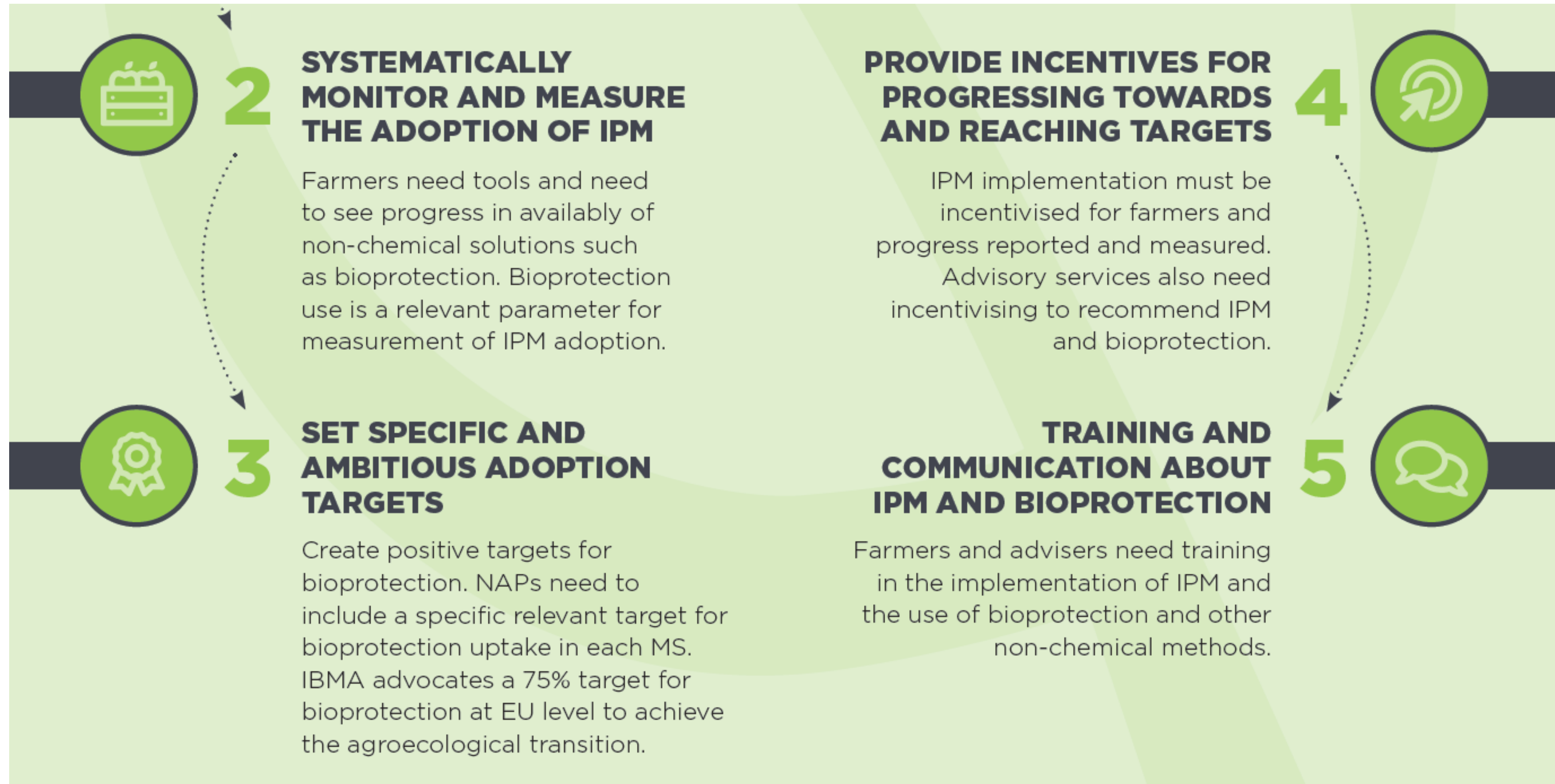
IPM prioritises non-chemical methods, which include bioprotection so that biodiversity is regenerated and cropping systems are made more resilient.

Bioprotection or biocontrol solutions must be defined at European level and the definition applied in national legislation.





# Make agroecological practices the norm



Full IBMA position on

<https://ibma-global.org/latest-news-2/ibma-position-on-revisions-to-the-directive-for-the-sustainable-use-of-pesticides-sud>



# Invertebrate BCA's on the agenda



Trigger : control of invasive pest by introducing an exotic natural enemy that can “establish” (“classical biocontrol”)

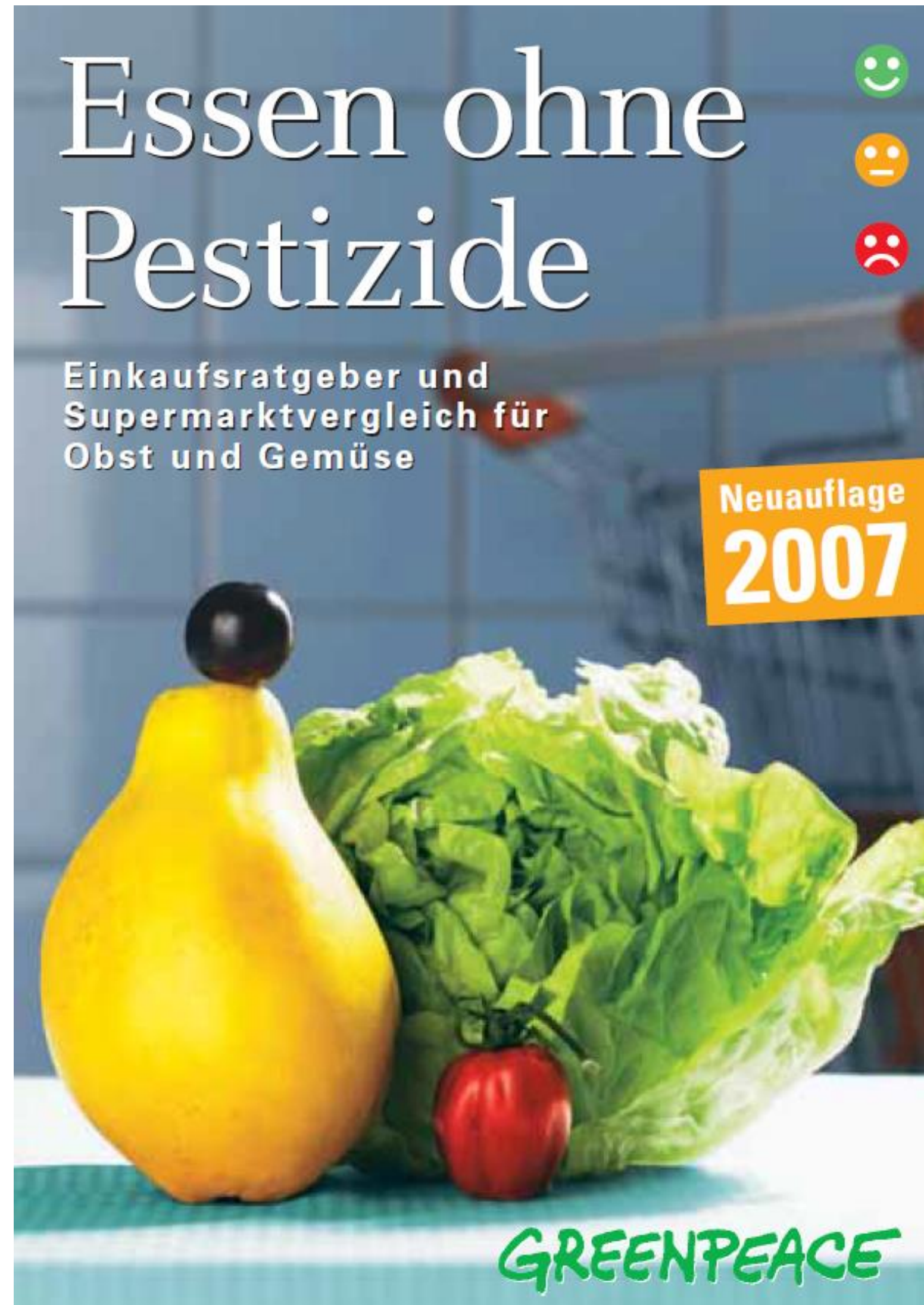
- Ensure use to full potential
- Harmonize between EU countries
- Protect biodiversity
- Encourage SME participation
- Avoid unnecessary hurdles and obstacles

Biocontrol industry most often works with species of natural enemies that are native species (“augmentative biocontrol”)





# Invertebrate BCA's : a strong track record



If it ain't  
**B R O K E**  
Don't fix it !

Quality

Auto-regulation

Efficacy

Delivers !



# BCA Biodiversity/environmental framework for non-native species important



- Currently subject to **national legislation** : no harmonized EU approach
- **Transnational framework** already provided by European and Mediterranean Plant Protection Organisation (EPPO)
- Legislation of many EU countries builds on **EPPO guidance** and **EPPO “positive list”**
- **EU Commission study**
  - Useful overview of national legislation & its impact
  - IBMA ready to give input & industry perspective on **best practice** & **specific areas of concern/pitfalls**



# IBMA perspective on areas of concern



## Regulatory “redundancy”

- Safety and fast market access can & should go hand in hand
- Does this add relevant protection of farmers/consumers/environment justifying additional constraints in time and cost ?
- Value of “product registration” for native / authorised species ?
- Risk of cumulating regulatory layers

## Legislating beyond species level

- Lack of taxonomical clarity (subspecies, local strains,...)
- National borders = relevant ecological zones
- No cost-effective reliable solutions for farmers without critical mass in BCA production



# IBMA views in summary



- Supports **effective and proportional BCA regulation** focused on protecting **biodiversity and the environment** before introduction of **non-native species**
- Believes product **quality and efficacy** well addressed by sector **auto-regulation**
- Welcomes a **more harmonious approach** with greater alignment of Member States with **EPPO guidance**
- Sees value in **sharing experts and expertise** between EU member states
- Any form of harmonisation should **leverage full BCA potential to contribute to F2F** and maintain conditions for strong **SME participation**



# Bioprotection products – regulated as PPP's



Bioprotection

*One size*

*Doesn't fit all*



Chemical pesticides



## IBMA's 2018 White Paper in a nutshell

- Bioprotection needs a tailor-made regulatory system (biology-based) by 2020
- Until then, use Reg 1107/2009 wisely



**IBMA WHITE PAPER**  
NEW EU REGULATORY FRAMEWORK  
FOR BIOPROTECTION AGENTS  
IBMA Vision on how to improve  
regulation in the European Union



**IBMA**  
INTERNATIONAL BIOCONTROL  
MANUFACTURERS ASSOCIATION



## 2020 Situation in a nutshell



- F2F sets high ambitions for alternatives to chemical pesticides
- No progress on bioprotection-specific regulation
- Implementation of Reg 1107/2009 increasingly burdensome



# Bioprotection products – regulated as PPP's



LOW RISK





# F2F to “pave the way” for alternatives



New Product candidates

2021



Evaluation slots  
(MS competent authorities)

Before 2024 ?

Assessing biology  
with a chemistry mindset

Before 2030 ?

Safe natural  
Solutions for farmers



## Product renewal process under 1107/2009 : Threatening to turn into killing fields for bioprotection products

- Bioprotection products on the verge of being refused renewal : new data requirements.
- Bacillus thuringiensis, widely used insect biocontrol agent - decades of safe and effective use

Discussion on setting MRL and PHI values : a precedent for  
microbials that will negatively affect the future of an entire and  
essential bioprotection category



## In conclusion



- IBMA, the bioprotection industry association, ready for F2F
  - Improving the EU regulatory system for bioprotection crucial for F2F
  - SUD revision can provide a supportive framework
  - Portugal's BCA initiative can help unlock full BCA potential
- Other bioprotection products classified as "PPP's" : 1107/2009 implemented without biology-focus hampers innovation & stands in the way of F2F without any proportional gain in risk mitigation



# F2F : together we can make it happen !

## Muito obrigado

### **IBMA**

International Biocontrol Manufacturers  
Association AISBL

Rue de Treves 61, 1040 Brussels, Belgium

[WWW.IBMA-GLOBAL.ORG](http://WWW.IBMA-GLOBAL.ORG)



#### **EXECUTIVE DIRECTOR**

Jennifer Lewis

[jennifer.lewis@ibma-global.org](mailto:jennifer.lewis@ibma-global.org)



#### **REGULATORY CONSULTANT**

Ulf Heilig

[ulf.heilig@ibma-global.org](mailto:ulf.heilig@ibma-global.org)



#### **ADVOCACY AND COMMUNICATION MANAGER**

Isabelle Pinzauti Babrzynski

[isabelle.pinzauti@ibma-global.org](mailto:isabelle.pinzauti@ibma-global.org)



#### **ADMINISTRATIVE ASSISTANT**

Louisa Puschel

[administartion@ibma-global.org](mailto:administartion@ibma-global.org)

