#### **Highways and byways!**

# Anticipated Biocontrol regulatory submissions and issues experienced from the IBMA Members Regulatory Surveys

by David Cary- IBMA



Why highways and byways?

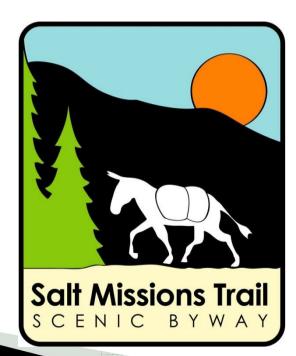
Is there a difference?





-In theory?

-In practice?







### Where are the highways and byways?

#### Intended Highways

- Sustainable Use Directive
- Separate adapted information requirements
- Reg 1107/2009 Guidance Documents
- List 4 Reviews Green Track
- Reg 1107/2009 Low-risk substances

#### Additional Byways

- Inappropriate requirements in regulation directed at very different substances for similar uses
- Lack of knowledge and resources at several levels
- Requirement to constantly negotiate & support exemptions / alternative treatment
- Authorities priorities set for and resources allocated to other issues
- Uncertainty for young SME dominated growth industry



### Timelines for a.s. as reported by members



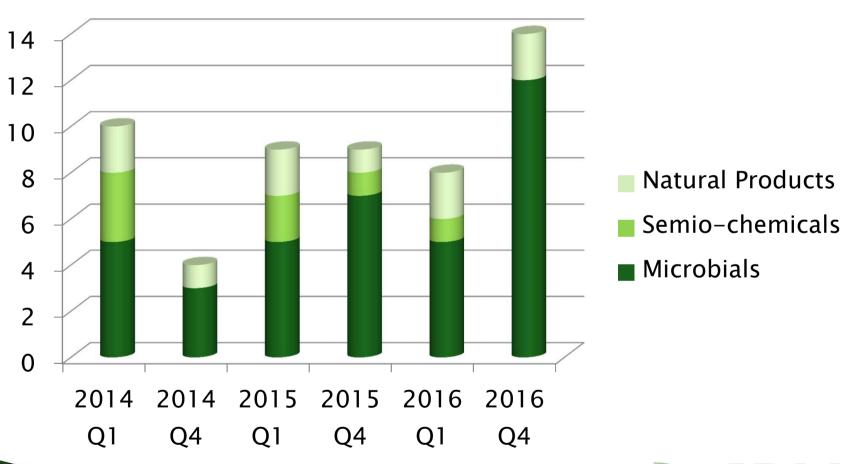
#### The future priorities

- If we wish to honour the intentions of EU Parliament, Council & Commission by delivering a greater selection of biological tools to farmers we need to:
  - Provide more certainty to an SME rich industry
  - Prioritise not penalise green products
  - Add to, replace and offer choice of tools in the farmer's toolbox not just remove them
  - Provide more appropriate incentives for the producers of these innovative green products
  - Do not block innovation to secure knowledge

Ensure that highways are truly highways by ensuring intentions are met and unintended consequences are avoided!



### Anticipated submissions of biocontrol a.s. in the EU over the next 3 years





### MS Rapporteurs and what lies behind the figures

- Member States noted as rapporteurs
  - 2014 BE/ CZ/ ES/ DE/ FR/ IT/ NL/ UK
  - 2015 AT/
     CZ/ ES/ DE/ FR/
     NL/ UK
  - 2016
     CZ/
     DE/ FR/ IT/ NL/ UK
- Assumptions taken behind the figures
  - Need to be multiplied as represent a small number of members
  - Issues with Semio-chemicals
    - Delay of EFSA Conclusions and thus, Commission proposal and Standing Committee [SCFCAH] decision
    - Uncertainty of future approval need for further SCLPs
  - Delays in acceptance of dossiers by MSs
  - Resourcing issues
  - Shift in priority from EU to other regions



## Current construction of highways and avoidance of byways

- Under Reg 1107/2009 ensure that low-risk substances and products criteria and incentives are developed as a highway for biocontrol solutions to satisfy intentions under Reg 1107/2009 and the SUD
- When implementing ABS\* under CBD\*\* ensure that green growth is not stifled and SME companies overwhelmed with additional requirements by creating another byway

\* Access & Benefit Sharing

<sup>\*\*</sup> Convention on Biological Diversity



### 2 key messages from this young rapidly expanding industry?



Innovative products need innovative regulation



If we share our pests then we should also share our biocontrol against these pests

#### **Diapositive 9**

The coccinalla spp looks like Harmonia. Maybe you could use one of Johannettes pictures of the cover slide on ABS of the Monheim meeting?

Ulf Heilig; 03/12/2013

Thank you and lets ensure whilst we all work towards achieving "Greening the CAP" & "OECD Green Growth" strategies that we are not unintentionally depriving society and farmers by hampering green growth industries!

Create more highways and let's not let them turn inadvertently into byways!

