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

- Completeness Check
- DAR Publication
- EFSA Conclusion
- Decision
- Possible Totals

Time in months

Longest
Shortest
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

- **Natural Products**
- **Semio-chemicals**
- **Microbials**
MS Rapporteurs and what lies behind the figures

- Member States noted as rapporteurs
  - 2014: BE/ CZ/ ES/ DE/ FR/ IT/ 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
** 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
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 let's 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!