



CEUREG 2014 Biological Control Agents – A Manufacturers View

David Cary, Executive Director IBMA





A little bit about our industry



IBMA and it's member companies

- Large number of members
- Diverse membership
- High proportion of SMEs
- Many start-up companies
- High level of interest from multi-national companies
- Repository of most up to date expertise & information
- Rapidly expanding in many directions
- Growing employer in many areas



Current tool categories available from the Biocontrol industry



Microbials

Viruses, Bacteria & Fungal Pathogens



Macrobials

Predatory mites & insects, nematodes



Semiochemicals

Pheromones, Plant volatiles



Natural & Biochemical Products

Plant extracts, Seaweed products & Natural substances



Regulation & Our Industry

The good, the bad and the ugly



EU Regulation of our industry

- IBMA support regulation BUT in a proportionate manner to the risks posed
- Disproportionate regulation to the associated risks
- Always at the end of the queue
- Regulated under regulations that weren't designed for and don't fit our members' products
- Easy to cheat the system with false claims
- Unnecessary delays and timelines
- Lack of predictability
- Lack of consistency and harmonisation
- Costing our whole industry disproportionately

Favourable initiatives in EU Regulation

- General Policy
 - Blessing or Curse is in favour
- Sustainable Uses Directive
 - Good intention to favour alternatives and IPM
 - In practice NAPs offer little hope
- Establishment of expert & working groups
- 1107/2009 Priority for low-risk substances
 - The obvious opportunity for our industry
 - A winning objective to all

Supporting Bodies

- FAO
- OECD bodies
 - Working Group on Pesticides (WGP)
 - Biopesticides Steering Group (BPSG)
- EU bodies
 - DG Envi
 - DG Agri
 - DG Sanco
 - DG Research
- EU Member States
 - France
 - Netherlands
 - Denmark
 - UK



Activities  more sustainable tools available to farmers

- Development of guidance documents
- Participation in expert & working groups
- Low-risk substances and products
- Engagement with partners
 - IOBC
 - ECPA
 - Broader coalitions
 - NGOs
 - Farmer Groups esp. Copa-Cogeca and National Groups



Areas of possible concern for IBMA



Perceptions of sustainability

Sustainability



FM

- Food miles

CF

- Carbon footprint

IPM

- To technical experts?
- To society?

Perceived obstacles to increased use of biocontrol in IPM systems as a part of sustainable agriculture

- Lack of resistance
 - Lack of priority
 - Lack of resources
 - Lack of guidance
 - Lack of harmonisation
 - Lack of appropriate expertise
-
- Unclear terminology
 - Lack of foreseen benefit
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- A flawed approach to empty the toolbox first and delay filling it!
 - The very fact that biological options are in general considered safer!



Areas of future activity for IBMA



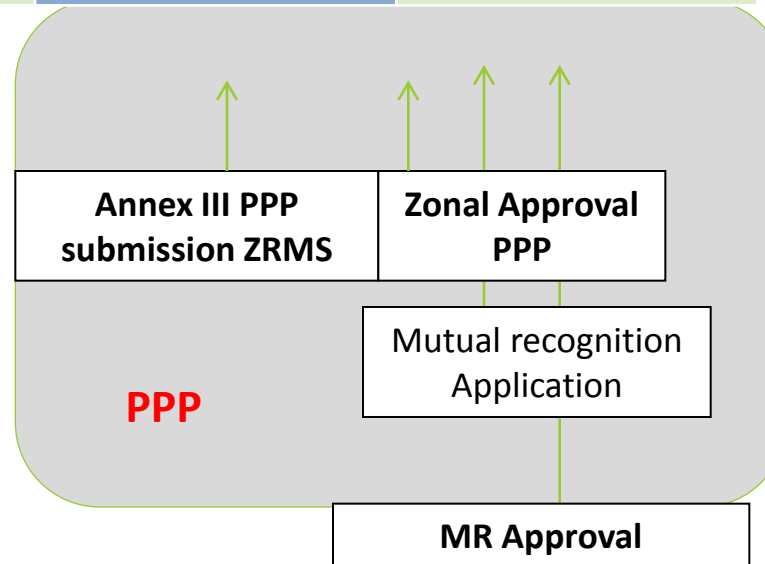
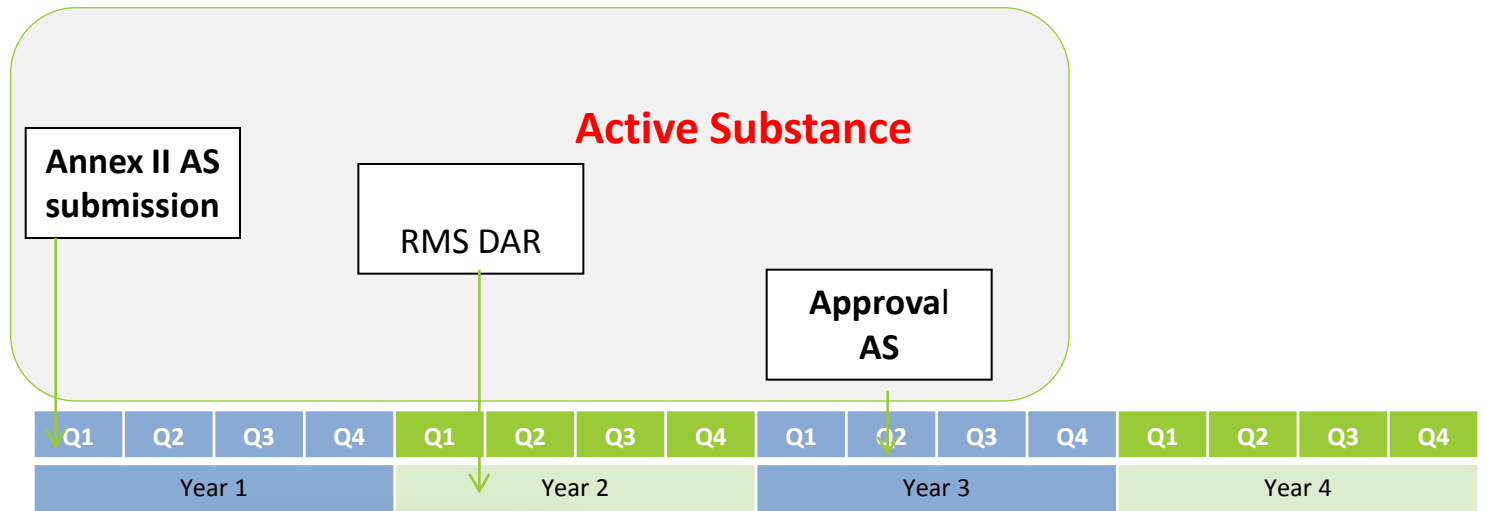
Means of addressing the obstacles

- Continue working on improved guidance
- Work on appropriate tests to address the real risks
- Make solving the problems all stakeholders priority
 - Why is this the regulators priority?
- Education and dissemination
- Harmonisation at all levels
- The very fact that biological options are in general perceived as safer needs to be a plus!
- Create and use perception wisely

Ensuring biocontrol is a major part of EU sustainable agriculture

- Develop a desirable simple image for our industry & products
- Make their increased availability a priority
- Communicate with all of society
- Be strong symbiotic partners with the farming community
- Work with EU and Global organisations for harmonisation
- Seek amendments to legislation to bring low-risk products to market quicker

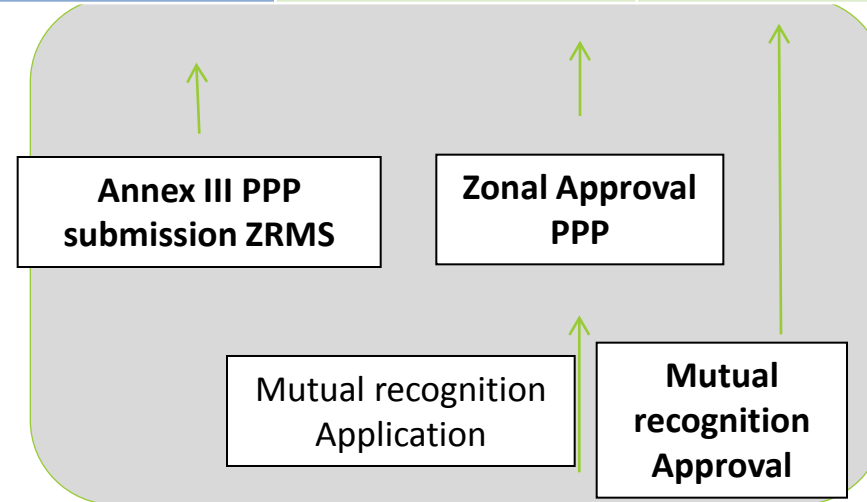
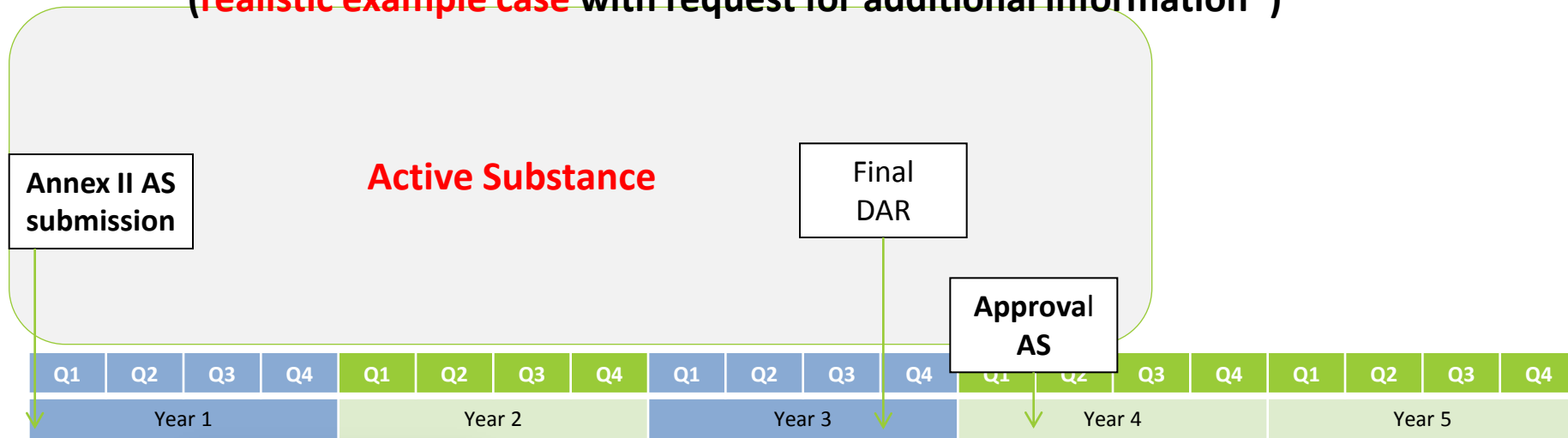
Timelines 1107/2009



* these time lines do not take into account response time to Authority questions. The time Applicant take to answer should be added, realistically add at least another year.

Timelines 1107/2009

(realistic example case with request for additional information*)

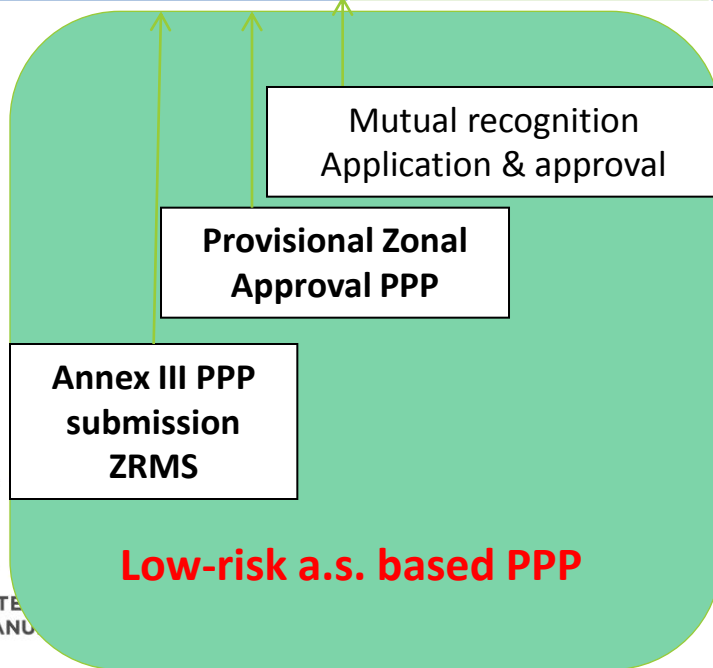
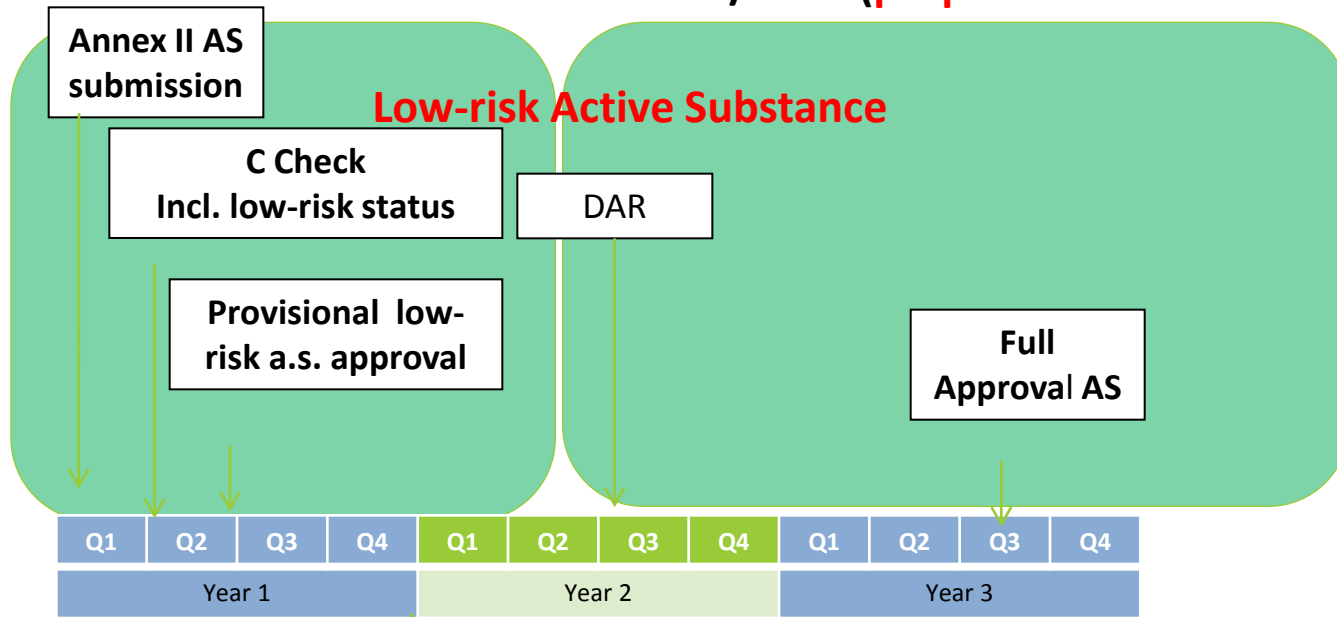


PPP

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* For 3 years only by the RMS. Zonal applications procedures?

Timelines 1107/2009 (proposed low-risk case)



What is it about our industry that encourage you to work with us

- The people
- The fit to Political & Societal policy - Greening programmes
- It is a growing employer
- It's use requires expertise which generates further employment
- It is a systems based approach
- The diversity of the companies that are within is a plus
- There are now more biological substances being submitted than conventional substances

- We need the help of policy makers & regulators but equally you need ours
- We all need to work together now to fill the farmer's toolbox



Thank you for your attention

