

# Practical consequences of the Sustainable Use Regulation and the four Implementing Regulations for biocontrol and what else is needed

José Carvalho, PhD  
 IBMA Microbial Professional Group Chair  
 & Certis Biologicals  
 jcarvalho@certisbio.com



European Parliament, Brussels;  
 Thursday, 13 October 2022

1

## The Sustainable Uses Regulation (SUR)



- IBMA welcomes the current SUD (Directive) being upgraded to a Regulation.
- An EU definition of 'biological control'
- Positive Targets for biocontrol



2

2

## The SUR opportunity



- The SUR is a unique opportunity to make European Agriculture more sustainable and a crucial legislative tool **to ensure food security in Europe**, which can only be achieved with a healthy ecosystem for growing our food. **Biocontrol technologies are key for the food security in Europe.**
- Biocontrol products should be available to growers, at a faster pace. The EU Legislation to bring these products to the market (Reg. 1107/2009), currently discourages innovation and investment by industry in new technologies.

3

3

## EU current challenges for industry



The EU Registration Framework (Reg. 1107/2009) sets the same procedures and timelines for Synthetic Chemicals and Biocontrol technologies approvals (with a separate set of data requirements but just for microorganisms).

- The EU has the most uncertain Regulatory environment for Biocontrol products registration, with an outdated regulation from pre-2009 agreements, which led industry to invest in other geographies for first registrations of new products (and damaging the EU-based SMEs companies without access to non-EU markets).
- Investment in the EU has shifted to:
  - 1) keep the currently registered biocontrol technologies (re-registration programs);
  - 2) registering similar technologies to the existing ones (less uncertainty for industry).

4

4

## Bringing Innovation back to Europe



- **IBMA welcomes the EU Commission revision of the Microorganism Data Requirements and Approval Criteria in 2022.** The industry is looking forward to a change in the way these technologies are currently assessed.
- A **"fast-track" procedure is needed for Biocontrol Technologies** if we want to meet the targets of the F2F strategy and provide confidence to citizens in the EU Policies.
- **Provisional authorisations:** they are crucial for industry and farmers to gain experience with new products under EU conditions and agriculture practices.
- **Smart allocation of resources for re-registration:** consider the time waste of the "re-registration" programs for Biocontrol Technologies (Reg. 1107/2009): the current investment, money and time, is spent on keeping reassessing the same technologies rather than bringing innovative solution to EU farmers hands. This "waste" of resources applies to Industry as well as MS Agencies and EFSA. Note: innovation is happening nonetheless, just elsewhere.
- **Expertise** in assessing biocontrol technologies, including microorganism, is needed within Competent Authorities: more investment/budget is needed at MS Regulators. (Better Training for Safer Food is a great step in this direction).

5

5

## Growers are waiting, Biocontrol technologies are there.



José Carvalho, PhD  
 IBMA Microbial Professional Group Chair  
 & Certis Biologicals  
[Jcarvalho@certisbio.com](mailto:Jcarvalho@certisbio.com)  
 +49 176 56980708



Source: The New Yorker, March 24<sup>th</sup>, 2014

6

6