



DG SANTE, European Commission

By email: 

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Brussels, 12 July 2022

Ref.nr.: 22.39599

Dear 

Thank you very much for your letter of 27 June 2022 in response to our letter of 23 May 2022. Please find attached a detailed review of matters that your second letter has left insufficiently addressed or untouched (attachment 1). This overview does not mean we do not appreciate your effort to take our positions seriously – we simply try to assist all stakeholders with the best possible solutions for human health, the environment, and indeed agricultural production.

We strongly believe in the unique strength of democracies to promote and deliver compromises between a variety of interests. We are impressed by the statements of both European Commission Executive Vice President Frans Timmermans and Health Commissioner Dr Stella Kyriakides to uphold the European Union’s Green Deal and Farm to Fork strategies despite major challenges. This encourages us to once more call on you to secure legitimate science-based input in your proposals for new Regulations that include provisions for market access of Microbial Plant Protection Products (MPPPs). This is particularly relevant as the Commission already agrees that those who prepared the drafts at several Member States and EU Brussels levels are yet to be trained on and gain experience with these biological alternatives to the potentially damaging chemical pesticides. This will enable them to become aware that the newly proposed use-oriented regulations will truly *not* speed up MPPP access to the market.

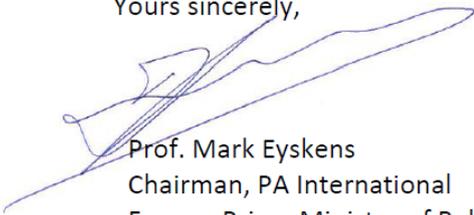
Still, you call on us to just accept what has been developed so far and focus at the upcoming Guidelines, whilst your letters explicitly point at your agreement with our basic tenets on securing fast market access for MPPPs. In spite of the enormous and enormously costly time overruns and delays of the past 13 years we intend to follow your call on us to accept the current draft Regulations; instead of fighting for further improved and more inclusive texts we shall now call on all institutional actors, i.e.:

- on the European Parliament with its *five consecutive yet ignored vast majority-adopted Resolutions for a separate fast market access authorization procedure for MPPPs*;
- on the European Union Member States, *several of which have explicitly or implicitly called for the same*;
- on the European Council and on the European Commission *to include the key elements of the text of our proposal for a new European Commission Communication on Reg (EC) 1107/2009 in the new Guideline that you are now to establish*. We are fully at your disposal for direct consultations as an input to that new Guideline in support of the Green Deal and Farm to Fork strategies.

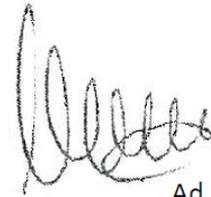
It is noteworthy that this text is drafted by the scientific experts of our Task Force jointly with former top functionaries and experts of the European Commission and top experts in European law, ensuring considerable scientific, legal and political legitimacy and credibility. We hope you can agree to that.

The President of the European Council of Young Farmers (CEJA), Ms Diana Lenzi, has stated: "to broaden the toolkit for farmers is absolutely essential" (attachment 2). She represents the next generation of Europe's farmers. We represent the future of low-risk microbial plant protection products. We thank you in advance for taking these positions seriously so that the new Guideline will bring about tangible progress for all.

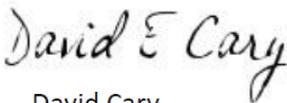
Yours sincerely,



Prof. Mark Eyskens
Chairman, PA International
Former Prime Minister of Belgium



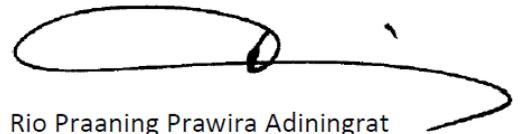
Ad Melkert
Vice-Chairman, PA International
Former UN Under-Secretary-General



David Cary
Board Member, PA
International
Board Member, PAN
Europe



Dr Willem Ravensberg
Corporate Sr Regulatory and
Governmental Affairs
Manager, Koppert BV
Member of the Task Force



Rio Praaning Prawira Adiningrat
Secretary General, PA
International Foundation

CC:

- Herman Van Mellaert, President, IBMA
- Diana Lenzi, President, European Council of Young Farmers (CEJA)

Attachments:

1. Overview of outstanding issues between the European Commission and the Task Force
2. Speech of Diana Lenzi, President of CEJA, press conference 31 March 2022

www.microbialPPPtaskforce.eu