

Brussels, 3 April 2024

The **Biocontrol Coalition** is a multi-stakeholder coalition advocating for the European Union to rethink its framework for agriculture and food, particularly for biocontrol, so that the EU proactively fosters innovation whilst ensuring health, safety and environmental protection. We want Europe to become a welcoming, enabling environment for biocontrol innovation.

We appreciate the opportunity to contribute to the Strategic Dialogue on Agriculture and outline our answers to the four questions you posed below.

How can farmers, and the rural communities they live in, be given a better perspective, including a fair standard of living?

From the perspective of the Biocontrol Coalition, a key element of helping growers to farm more profitably is to ensure that they have the richest toolbox possible so that they can choose the right combination of technologies and management approaches for their circumstances. That includes satisfying the requirements of the value chain they produce for (including specific private labels/secondary standards and the corresponding agricultural practices). Farmers should have the freedom to respond to the signals sent by consumers when they choose products grown according to the requirements of a specific label/standard; if policymakers try to dictate which label's guidelines are the right ones, farmers risk having switched to a specific set of practices that satisfy policymakers but that are not met by a sufficient level of demand.

At the same time, consumers may need information to help them better understand some of the new biocontrol tools that farmers are using before they are ready to embrace them.

Growers also need to be agile enough to adapt to an ever-changing and volatile climate. Patterns of pests and disease are shifting while crops are weakened by extreme weather events. Mitigating the economic damage caused by pest and diseases protects farmer profitability. It also helps to ensure a smart use of resources and serve some of the other objectives of the EU's Farm to Fork Strategy. A failed crop means that the resources applied to it were not used effectively. This represents economic losses, but could also have environmental impacts, for example, if there is no longer a crop to take up the nutrients applied to the field.

How can agriculture be supported within the boundaries of our planet and its ecosystem?

There is a gap between Europe's rhetoric on being a champion of sustainable agriculture and realities on the ground due to the bottlenecks for bringing new products to market. To ensure that European agriculture can produce enough food, feed, fibre, bioenergy, and industrial raw materials to meet demand in a sustainable way, Europe's regulatory frameworks need to enable the agricultural technologies that are essential for changing farming practices. We need forward-looking frameworks that favour the Single Market over national

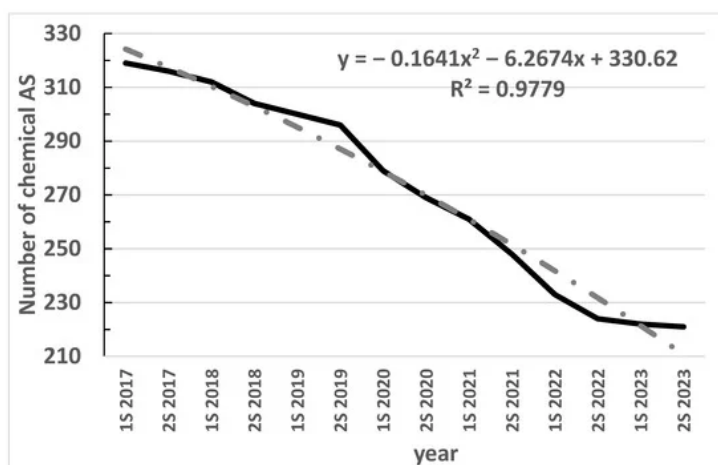
fragmentation and that can easily incorporate new innovations, rather than just regulating yesterday's technologies.

For example, promoting Integrated Pest Management can help increase the resilience of the crop system, reduce pest resistance (which is especially acute when farmers have too few options for fighting a specific pest or disease), and reduce unwanted environmental impacts. Yet only 5-6 biocontrol active ingredients are being approved per year in Europe, a level far below that of the number of chemical active ingredients being retired. As a result, the farmer toolbox for plant protection is shrinking, while pressure from pests and diseases is increasing. At a time when concerns over food security are back in the spotlight in Europe, this approaching crisis should be setting off alarm bells. Neither agriculture nor ecosystems will be served if there is a pandemic crop disease or pest outbreak due to the absence of any approved protective measures.

How can better use be made of the immense opportunities offered by knowledge and technological innovation?

- There are two mindsets that Europe can take to agricultural innovation. The first is to focus only on protection safety, health, and the environment. The second mindset is to focus on promoting innovation that will help achieve broader societal and policy objectives while simultaneously ensuring safety, health, and environmental protection. The shift is subtle but important. The first mindset assumes that innovation and protection of safety, health, and the environment are in conflict. The second believes that not only can a balance be achieved, the two may actually work in the same direction. The first mindset leads to a regulatory architecture that is disproportionate and discourages innovation while the second is flexible and forward-looking.
- Excessively bureaucratic regulatory systems do not affect all companies equally. Small and medium enterprises (SMEs) have less discretionary income to invest in regulatory compliance. Reducing time inefficiencies is one of the easiest ways to lighten bureaucratic loads without compromising protection of health, safety, and the environment. Possible ways to speed up regulatory processes range from the simple (dialogue between regulators and applicants to ensure that dossiers are complete) to more radical (simplifying registration/approval process to a single step).
- The European Union also needs to understand that you can't simply tweak rules that were designed for the chemical-based economy for the bioeconomy. Fit-for-purposes approaches are needed for both. Unlike novel, synthetic chemicals, bio-based substances come with a lot of empirical evidence and information from their presence in biological systems. A fit-for-purpose regulatory system considers how to intelligently make use of that background information. To regulate the bioeconomy more effectively, the European institutions need to hire more biologists; it is not realistic to expect chemists to know the best way to regulate biological systems and innovations.

- Farmers are heading towards a cliff concerning the ability to protect crops from pests and diseases. Between 2013 and 2020 pesticide use in the EU declined by 60% according to Harmonised Risk factor 1 (measuring both the use and risk of pesticides)¹ Since 2017, the number of chemical active substances in the EU has dropped by one-third² (see figure), but biocontrol products are not filling the gap; over the same period when 100+ chemical active substances were “lost”, only about 5-6 biocontrol active ingredients were approved per year³ (roughly 35 at best). The picture is worse if you look at specific segments: bio-control products mainly focus on specific crops (like gardening, viticulture, and arboriculture) leaving other crops (cereals, arable crops or horticulture) with limited options. Finally, even for the crops where biocontrol substances exist, most of the time, they perform best when combined with conventional PPPs within the context of Integrated Pest Management (IPM).



- EU policymakers should encourage partnerships among the diverse innovation ecosystem in sectors like biocontrol (start ups, universities, SMEs, multinational corporations, etc.). This may take the form of funding and financial incentives or non-financial measures such as match-making platforms.
- Innovation is dependent on four factors: research and development, an enabling regulation framework, and incentives (both positive and negative) within a specific sector or policy area and then coherence among the various relevant policies. While it is important to support research, scrutiny shows that the most significant barrier to bringing the fruit of R&D in biocontrol to market in Europe today is regulatory⁴. If supporting additional research only doubles the number of potential products stuck in a regulatory backlog, then it will not help European agriculture become sustainably competitive. Between inappropriate data requirements, the long time to market, and the fragmentation of the European Union market into 27 national markets requiring separate authorisations, the return on investment for bringing biocontrol products to

¹ FARM Europe Sustainability Radar <https://www.farm-europe.eu/uncategorized/sustainabilityradar/>

² Marchand, P.A. EU Chemical Plant Protection Products in 2023: Current State and Perspectives. *Agrochemicals* 2023, 2, 106-117. <https://doi.org/10.3390/agrochemicals2010008>

³ COPA-COGECA “The SUR Gap” brochure. October 2023.

⁴ The 2022 Final Opinion on Biosolutions of the Commission’s own Fit for Future Platform notes that while recent tweaks provide a short/mid-term solution, they are “insufficiently conducive to achievement of the Farm to Fork targets.”

https://commission.europa.eu/document/download/f30d08c8-9054-467b-b2ff-3ddcc65d776c_en?filename=Final%20opinion%202022_SBGR3_08%20Biosolutions_fup.pdf

market in Europe is 30% lower than the global average. In that context, it is only rational that manufacturers prioritise other markets over Europe.⁵

- Once products are on the market, capacity building is important to facilitate their use. Technical institutes and advisors can play a key role in accompanying farmers as they adjust their growing practices to incorporate new tools such as biocontrol technologies. This assistance may take the form of training or advice.

How can a bright and thriving future for Europe's food system be promoted in a competitive world?

A key aspect of ensuring that agricultural production in Europe is both sustainable and competitive is to shift the mindset of regulation and policy from sticks and carrots to enabling desired changes. Plant protection is a domain where there have been many aspirations, targets, and constraints placed on farmers, but no examination of whether the regulatory framework sets farmers up for success or failure.

- Today, there is no Single Market for biocontrol products. Farmers across the Union are not operating on a level playing field since it is logical that biocontrol producers will prioritise larger markets (both geographical markets and specific market segments) when deciding how to use limited resources for placing products on the market. The fragmentation into 27 national markets increases the costs and time of bringing products to market (and also multiplies the drain on public authorities who could pool their resources if they worked together).
- It currently takes 2-3 times longer to bring biocontrol products to the market in Europe than in Brazil or the United States. This places Europe's farmers at a competitive disadvantage because they have access to fewer biocontrol products.
- To a large extent, the reasons for this delay are baked into the Union's regulatory architecture: the two-step registration of active ingredients at the European level followed by product authorisation at the national level is longer by design than a one-step process just because there are two different waiting periods (without even considering how long it takes each dossier to be evaluated once it is opened). The fragmented regulation also opens the door for divergent interpretations at national level, which then creates additional delays as conflicting interpretations need to be resolved.

⁵ EY Switzerland, What levers should be used for a better EU agriculture system?
www.ey.com/en_ch/innovation/what-levers-should-be-used-for-a-better-eu-agriculture-system