To:
Members of the ENVI and AGRI Committees of the European Parliament

Brussels, 3nd November 2026

Subject: Omnibus X – back to what Parliament already agreed on biocontrol

Dear Members of the European Parliament,

As we have consistently stressed, farmers need a broad toolbox of effective, affordable and safe solutions to protect their crops. Climate change makes this more urgent every season, bringing new pests, shifting disease pressure and less predictable growing conditions. Biocontrol belongs in that toolbox as part of Integrated Pest Management, alongside prevention, resistant varieties, mechanical methods and conventional crop protection. We have to ensure farmers have the tools best suited to their crops conditions, agronomic needs and practices, from conventional to organic.

We call on Parliament to remain consistent with the position it adopted in its own-initiative report (INI), "Ensuring faster registration and uptake of biological control agents", which received broad support across the political spectrum. Several points agreed there are now contested in the Omnibus X negotiations, particularly the proposal to link the biocontrol pathway to low-risk status. Measured against the INI, that proposal would be a step backwards:

1. A definition that fosters innovation. The INI asks for a clear legal definition of biocontrol "with a view to enhancing legal certainty, fostering the EU's innovation efforts, and promoting investment in sustainable alternatives" (para. 1).

2. Different treatment, because biocontrol is different. The INI recognises that biocontrol agents "generally have different risk profiles from conventional chemical PPPs" and asks for risk assessment "adapted to the specific characteristics of biological control agents" (para. 3).

3. A removal of the low-risk condition. The INI calls for the accelerated assessment of "active substances exerting biological control and products solely containing these" (para. 6) and for fast-track procedures for "biological control solutions" (para. 14). It sets no low-risk condition. The low-risk criteria are hazard-based cut-offs designed for chemical substances, rather than a tailored approach to biocontrol. We welcome the Council's choice to keep the definition of biocontrol separate from low-risk status. Making faster procedures, including provisional authorisation, conditional on low-risk status would undermine that distinction and could leave more than half of biocontrol products outside the pathway.

4. Provisional authorisation based on safety, not on low-risk status. The INI asks to allow provisional authorisation "solely for biocontrol PPPs that fulfil the relevant safety criteria" under Article 30, with monitoring and withdrawal if new risks appear (para. 16). Restricting

this possibility to low-risk products, as in the Council text, is a different and much narrower test than the INI envisaged.

5. Low-risk as an extra benefit, not a gate. The INI already gave low-risk status its proper place: a possible additional approval mechanism "for specific low-risk biocontrol categories" (para. 13). Low-risk status can earn extra benefits within biocontrol. It should not decide which products get in.

6. Less burden, not more. The INI warns against "excessive burdens, costs, lengthy approval procedures" (recital K) and asks the Commission to "reduce administrative burdens" (para. 1). Adding a second eligibility test to a simplification package does the reverse.

Safety is not in question. We agree that classification as biocontrol should not, by itself, guarantee market access, as the INI also states (para. 15). But hazard is not the same as risk. Whether a product qualifies as biocontrol and whether it is safe are separate questions. Each substance and product must still undergo a full, science-based assessment under its intended conditions of use, including when an accelerated procedure is used.

The cost of inaction also matters. Although no comprehensive framework captures the full cost of failing to make biocontrol solutions available, the consequences include missed opportunities for innovation, fewer options for farmers, greater difficulty implementing IPM and slower progress towards more sustainable and resilient agriculture. Without faster, more predictable procedures and practical improvements from assessment to authorisation, biocontrol's potential contribution to European agriculture and IPM will remain largely theoretical.

We therefore ask you to:

1. Keep the definition of biocontrol stand-alone and science-based, as the INI asked and as the Council has done.

2. Open fast-track procedures and provisional authorisation to all biocontrol products, without an additional low-risk condition, while retaining a full, science-based safety assessment in each case.

3. Back the definition with practical delivery: predictable deadlines, effective mutual recognition, and advice, training and field demonstrations for farmers.

4. Ensure that Omnibus X strengthens the wider crop-protection toolbox, in line with its original objective.

Every season of delay is another season in which farmers face new pests with fewer tools. We count on you to deliver what Parliament has already agreed.

Yours sincerely,

Organisation logo	Organisation name	Signature – Name and title
ELO European Landowners' Organization	European Landowners' Organization (ELO)	Dr. Jurgen Tack Secretary General 
copa cogeca european farmers european agri-cooperatives	COPA-COGECA - the united voice of farmers and their cooperatives in the European Union	Elli Tsiforou Secretary general 

Letter supported by the following organizations:

Organisation logo	Organisation name	Signature – Name and title
IBMA INTERNATIONAL BIOCONTROL MANUFACTURERS ASSOCIATION	IBMA – International Biocontrol Manufacturers Association	Jennifer Lewis Executive Director 
biocontrol coalition Together for EU ag innovation	Biocontrol Coalition	Kristen Sukalac Secretary General 