

Address by David Cary, Executive Director of IBMA (International Biocontrol Manufacturers Association), during the 'Public Health and the Food Chain' information session on biological low-risk pesticides, antimicrobial resistance and listeria, 5 October 2017

I would like to thank you all for providing the opportunity to address you this evening on the important issue of low-risk Plant Protection Products (PPPs).

With regards low-risk, some positive actions have occurred, particularly noteworthy being the revision of low-risk criteria, although some guidance in two areas still needs to be produced but will be completed shortly. The establishment of the EU Sustainable Plant Protection Group and subsequent development and publication by the EU Council of Ministers of a forty-point action plan for IPM and the accelerated introduction of low-risk PPPs will have a lasting effect.

I have just returned from participating in the 3rd Global Minor Use Summit in Canada where whilst listening to Klaus Berend (Head of Pesticides Unit, DG SANTE) I could almost believe that 1107/2009 is an example of perfectly functioning legislation. Having reflected on this, Klaus indeed succinctly described what was intended by European Commission, European Parliament and Member States many years ago, a regulation that was harmonised, gave access to the single market and protected human health and the environment. Also, when combined with the Sustainable Use Directive we should have a sustainable agriculture rich with alternatives and IPM standard practice. I ask you, isn't reality somewhat different? The legislation is failing these intentions in several areas including for low-risk active substances and products the majority of which are biopesticides. We rely more and more each day on a list of Candidates for Substitution and a growing number of Emergency Authorisations often of substances that either have been removed or awaiting substitution.

A clear demonstration of the fact that the legislation is not delivering was shown at a stakeholder workshop co-ordinated by the European Commission and the appointed consultants for conducting the REFIT exercise. At that meeting and in public meetings prior to the REFIT launch it has been made very, very clear that no corrective measures will be taken or even proposed during the REFIT exercise as per standard practice using the REFIT process. If any recommendations come and there is no commitment for this, it will be as a result of follow-up activities if and when they may be initiated.

Why are the emergency permits granted growing year on year? I will tell you why, we have not delivered low-risk biological replacements! SME industry and farmers cannot wait for this to maybe take place. Luc Peeters (Chair Copa and Cogeca, Phytosanitary Working Group) eloquently explained at the same GMUS 3 conference in Montreal mentioned earlier that 1107/2009 is failing to deliver the tools farmers need. IBMA and Copa and Cogeca have produced position papers highlighting this issue. Did you know that 80% of IBMA members are SMEs? This week alone we had 3 new applications and they were all from SMEs.

The European Parliament has previously acknowledged this and have proposed and passed with near unanimity the Motion for Resolution for fast tracking low-risk solutions for European farmers. On the 6th June, a EP debate was hosted by Pavel Poc MEP for CZ and attended by Commissioner Andriukaitis. Prior to this, we have been assured not once but twice by Commissioner Andriukaitis himself that bringing more low-risk biopesticides on our EU market would be prioritised. A consensual desire to deliver more of these tools in an expedited timeframe was expressed by the European Commission, patients' groups, human health experts, environmental NGOs, farmers and farmer groups, researchers, conventional and biological PPP industry and SMEs. Unfortunately, there was one dissenting voice in that of the European Commission believing this can be delivered within

REFIT. I ask you to reflect on this. How long will or should a need expressed by such a broad coalition take to implement? Is it a strong enough commitment given the emphatic demand from the democratically elected European Parliament across the political spectrum? Is it a strong enough commitment given civil society have called with one voice for his change? Do views of FAO and even the conventional chemical Plant Protection Products industry association remain unanswered? European farmers and genuine innovative small companies need these tools to be on the market now not in 10, 15 or even 20 years' time. Such a delay will mean they will not be around to celebrate the availability of these new safe green solutions! The rest of the experts gathered in the 6th June debate reflecting all of society believe we cannot risk yet further procrastination and delay. We cannot NOT expedite access to products deemed safe to human health and the environment. Broad consensus says we need to act now and not wait for the possibility REFIT may or may not come up with a recommendation that Copa and Cogeca, IBMA and the European Parliament have already identified. Proposals for a simple repair to legislation have been made, we are ready and willing to work with the European Commission to adapt these if and where necessary. These simple repairs are available for discussion and implementation now – why on earth should we wait to possibly start on it in 3 to 5 years. I stress European farmers, small and medium sized innovative companies and our society cannot afford to wait for such a hope and a prayer with no firm timeline or even a commitment to any actions. Member States need to demonstrate as has our directly elected European Parliament we can deliver effective green safe tools for our farmers to use ensuring our consumers eat the safest food in the world and we have a great environment for our children and grandchildren to inherit. Surely you as Member States, Commission, stakeholders and members of society can accept this challenge and acknowledge its urgency! I know I do and feel at least I can see a better Europe and after all 510 million Europeans deserve your support for simple and immediate actions without delay!