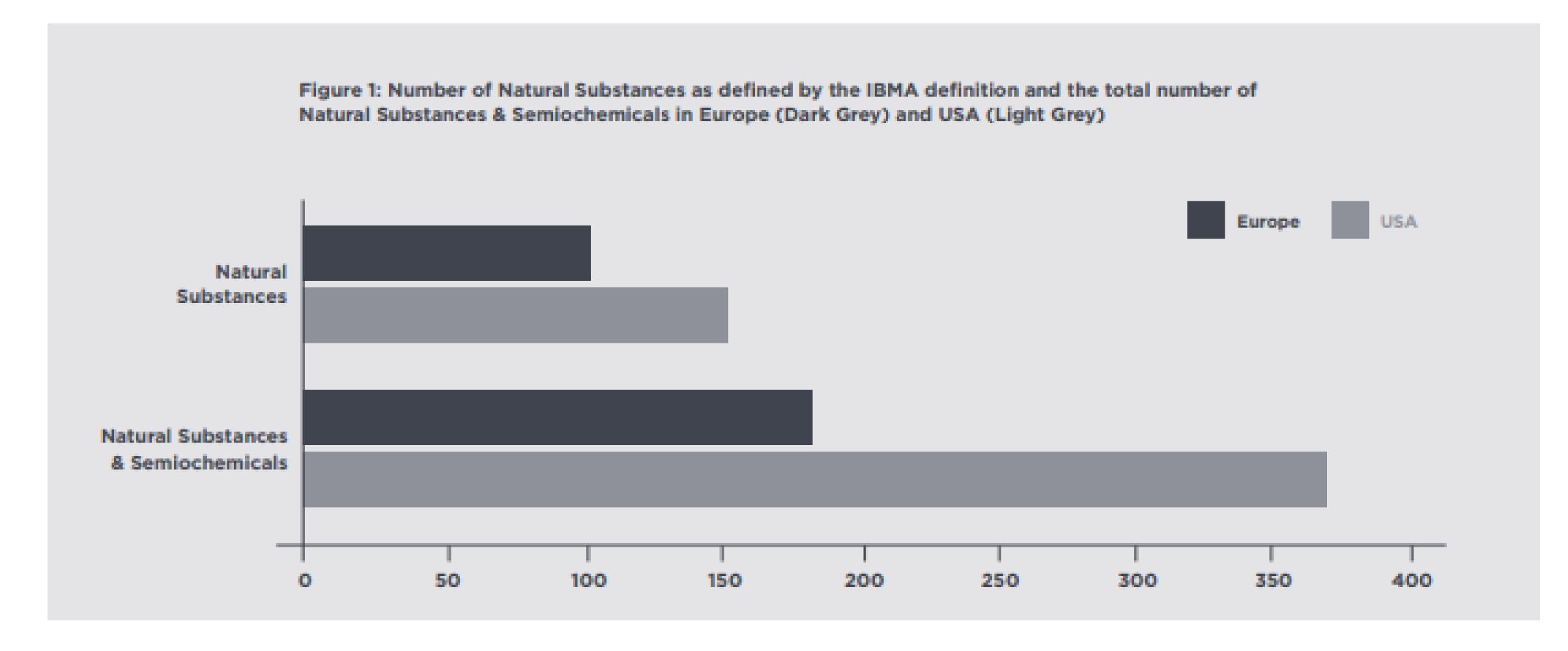


## NATURAL SUBSTANCES AS PLANT PROTECTION PRODUCTS: EUROPE IS LAGGING BEHIND

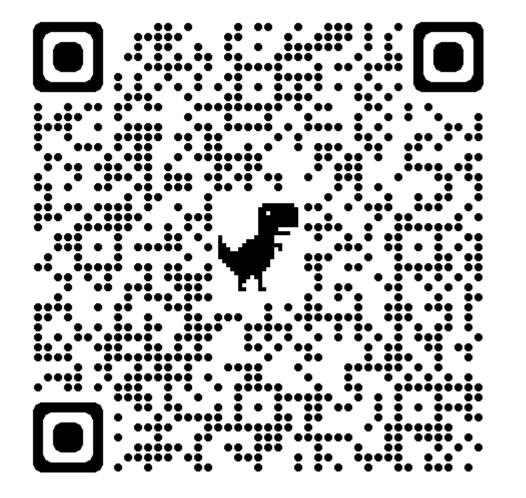


IBMA natural substances regulatory group –Presented by Iain Watt of TSG

The aim of this poster is to highlight some conclusions IBMAs natural substances regulatory group made when reviewing regulatory framework for Natural Substances used as bioprotectants in Australia, Brazil, the European Union, and the United States. The analysis shows that the EU is the only region without clear data requirements and evaluation procedure specifically for registration of Natural Substances. This reflects negatively in the number of crop protection solutions that are available to farmers (Figure 1).



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Based on these findings the following recommendations are proposed for the EU policymakers

- Clear regulatory definitions and processes to identify, classify and proportionately evaluate Natural Substances are needed. In the literature overview conducted to compare different requirements, and then reviewing the different regulatory schemes, it became clear that there are globally different definitions for Natural Substances. Some definitions are based on mode of action, some on origin, some on risk, some on a mixture of parameters. Some jurisdictions have no clear definition of Natural Substances, like the EU. We recommend internationally harmonized definitions of the different classes of bioprotectants, for which the IBMA definitions would be a good starting point.
- EU guidance for Natural Substances. The EU lacks a regulatory pathway for Natural Substances. Natural Substances can only be evaluated under Regulation (EC) No 1107/2009 and Part A of the associated data requirements i.e. through the same evaluation channel as conventional chemical pesticides. This needs attention for an urgent solution. We propose a quick and long-term solution. First as quick fix and using the soon to be published IBMA Decision Tree as an intermediate tool we recommend development of a Natural Substance guidance document. As a long-term solution to avoid the current guidance bottlenecks which are experienced for Semiochemical and Botanicals, we recommend a detailed set of data requirements as part of a dedicated biocontrol substance regulation.

The entire analysis has been made available online as green paper by scanning the above QR code

