



Impact of organic legislation on the biocontrol business in the EU

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1) Introduction to organic farming

Organic farming 1

«Organic», «ecological» and «biological» are **legally protected** terms in the context of **food and feed**.

In the context of plant protection products, fertilizers etc, the terms are **not protected**.

Examples:

- › «organic apple»
- › «organic fertilizer», «biological insecticide»

Produced according to the legislation & certified

not protected

Organic farming 2

Major aims of organic farming:

- › conserving the health of soil, water, plants and animals;
- › maintaining a high level of biodiversity;
- › conserving energy and natural resources;
- › respecting animal welfare;
- › production of high quality foods and other agricultural products.

Much more than «farming without pesticides»!

Organic farming 3

Production rules include a strict regulation of «inputs» used for:

- › **plant protection,**
- › **fertilization,**
- › **disinfection,**
- › **and many other purposes (e.g. feeding, food processing).**

- › **exceptions: next slide**

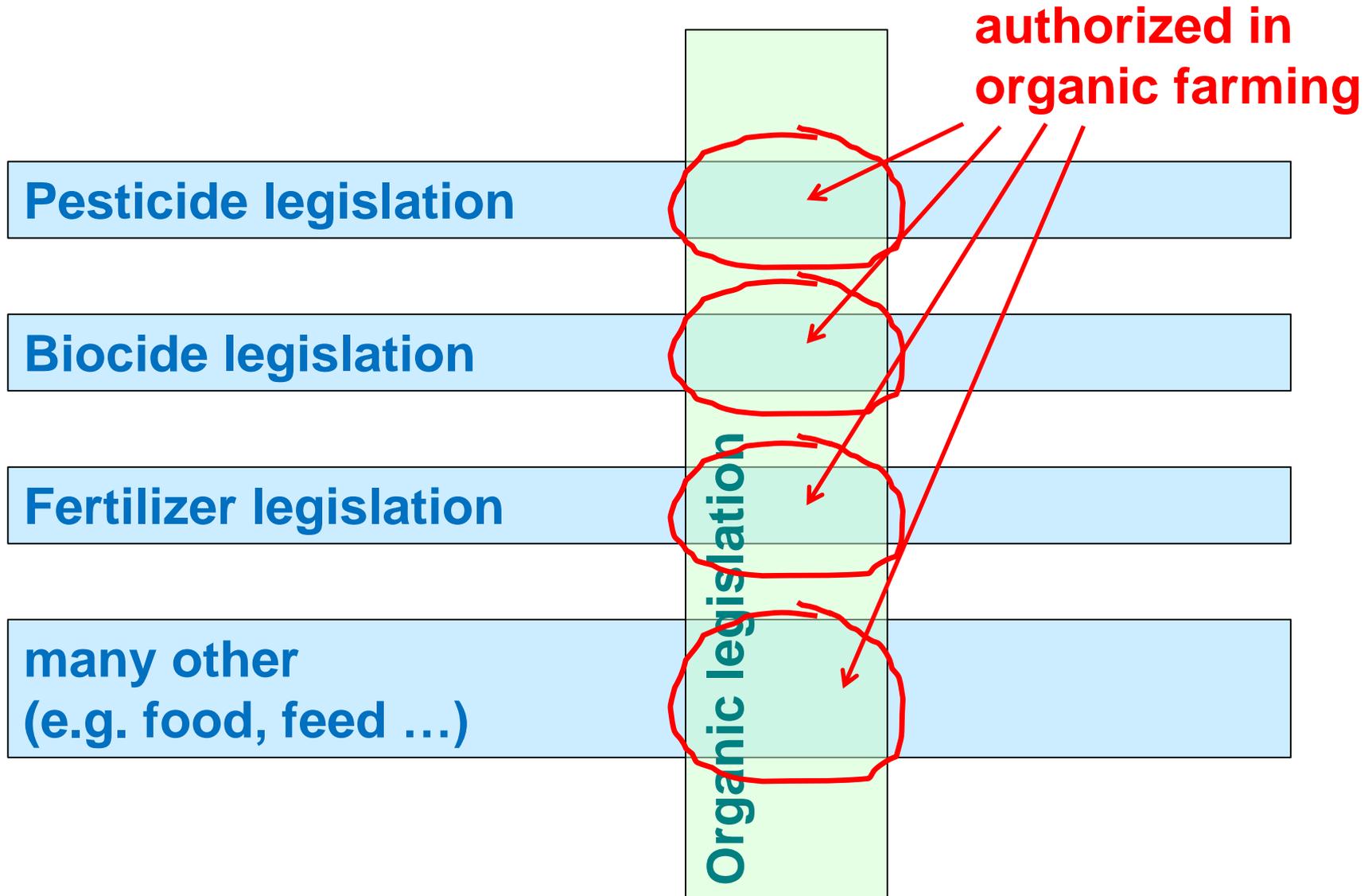
Organic farming 4

Exceptions: not regulated at EU level for the moment (selection):

- › **Predators and parasites**
- › **Control of storage pests**
- › **Pest monitoring**
- › **Pruning agents, trunc paints**
- › **Veterinary medicine, control of ectoparasites**
- › **Mulching materials, biodegradable pots**

Note: some certifiers / input lists regulate also these topics.

Organic farming legislation in the EU 1



Organic farming legislation in the EU 2

No 834/2007
«Framework Regulation»

«Implementing Rules»

No 889/2008

- **Production**
- **Control**
- **labelling**

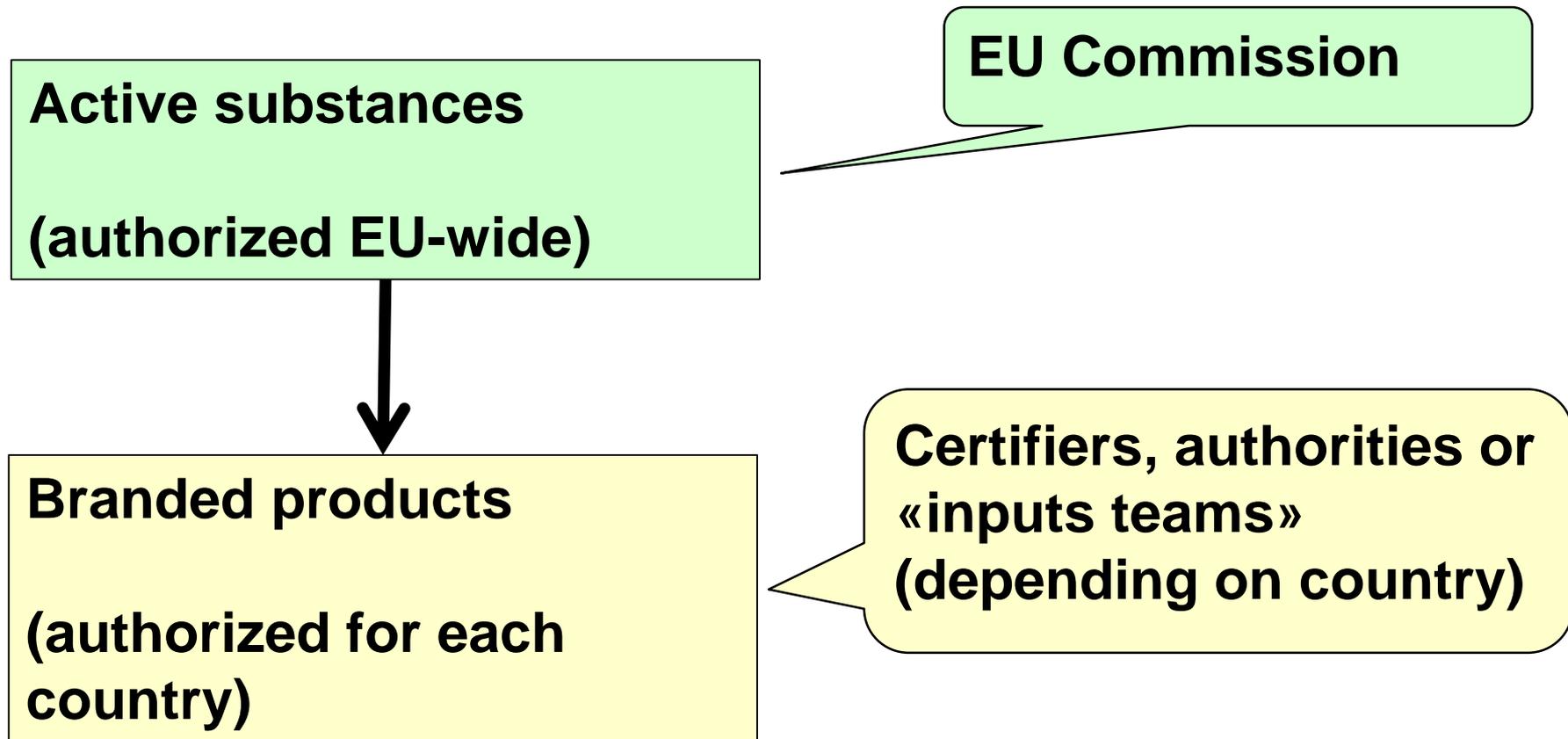
No 1235/2008

- **Import into EU**

**Lists of permitted
active substances**

2) Authorization of pesticides for organic farming

Authorization of pesticides 1



Authorization of pesticides 2

Active substance
explicitly mentioned in
Reg 889/2008



Authorization of branded
products is a routine
procedure

Examples:

- Azadirachtin
- Pyrethrum
- Quassia
- Lecithine
- Spinosad
- Ferric phosphate
- Copper fungicides
- Potassium bicarbonate
- Fatty acid potassium salts
- Paraffin oil
- Sulfur, lime sulfur

Authorization of pesticides 3

Active substance
generically authorized by
Reg 889/2008

- **Micro-organisms**
- **Plant oils**
- **pheromones**

Authorization of branded
products is a routine
procedure

Authorization of pesticides 4

Active substance
not authorized by Reg
889/2008

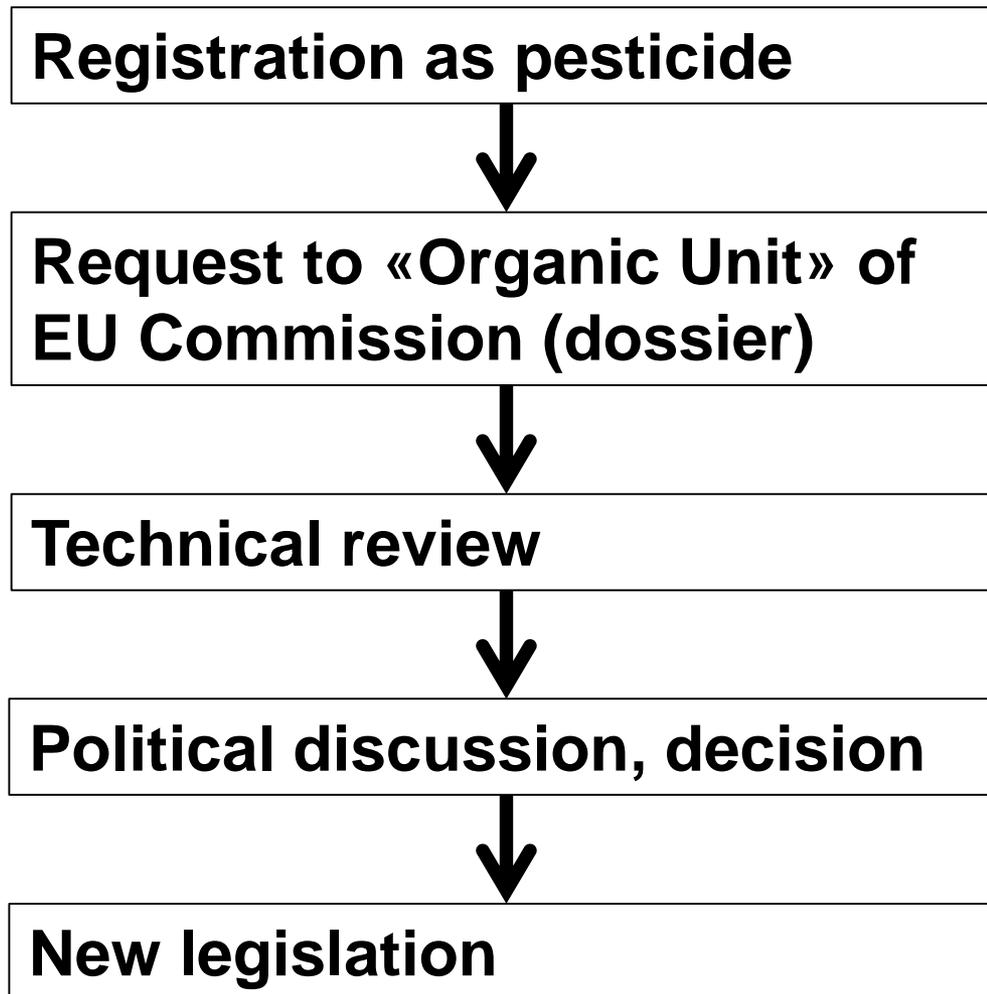


Authorization of branded
products **not possible**

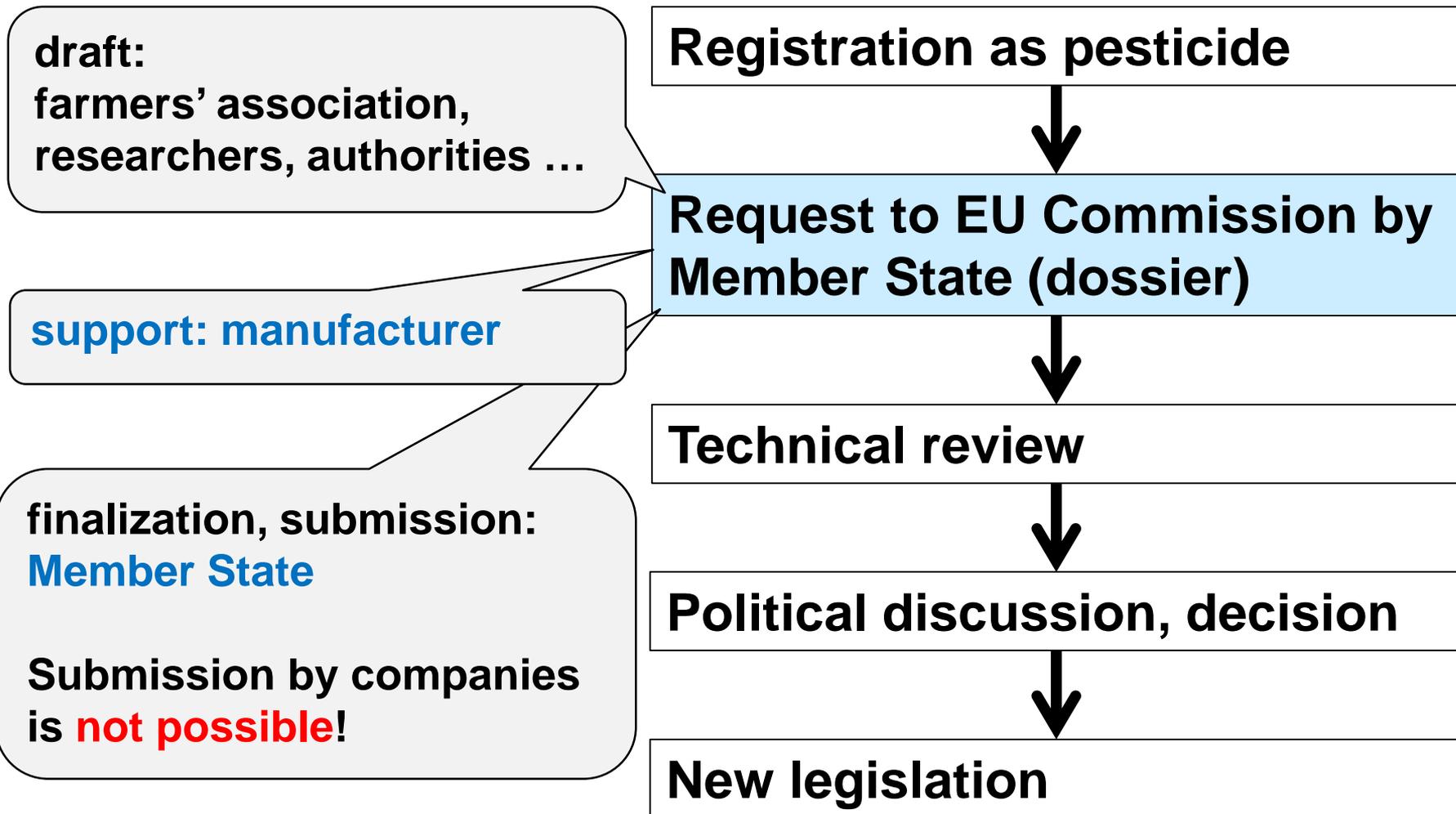
**Need to change the
legislation first**

... see next slides

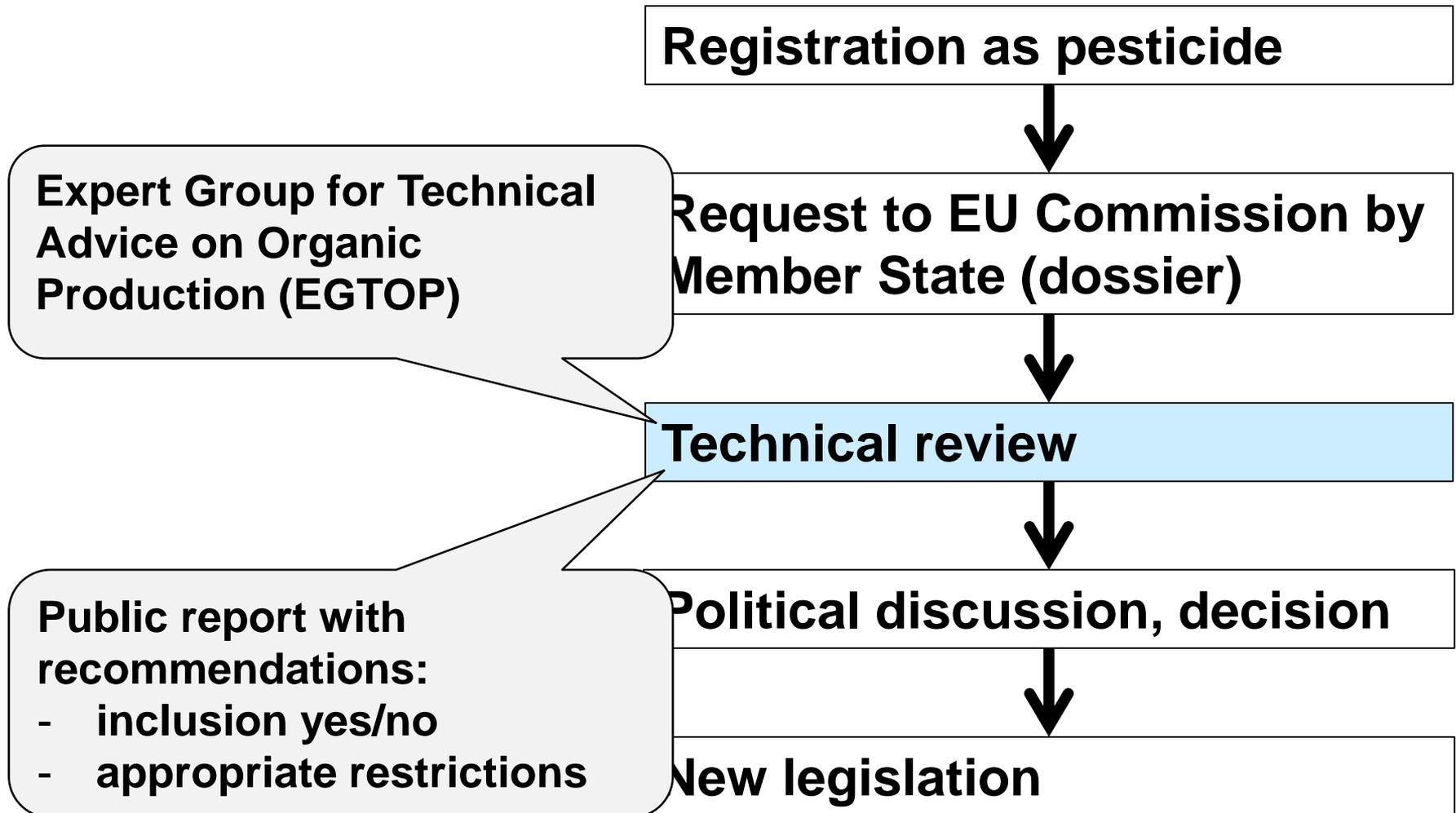
Authorization of a new active substance



Preparation of the dossier



Technical review



Technical review

Registration as pesticide



Request to EU Commission by Member State (dossier)



Technical review



Political discussion, decision



New legislation

Standing Committee on Organic Farming (SCOF).
=Member State delegates

Political decision, based on
- technical review
- political interests

Authorization criteria

Inclusion of **new active substance** in Reg 889/2008

- **Necessity**
- **Plant, animal, microbial or mineral origin***
- **Consistency with objectives & principles of organic farming.**

***exceptions possible only if there is no direct contact with edible crop parts**

Data requirements

Inclusion of **new active substance** in Reg 889/2008

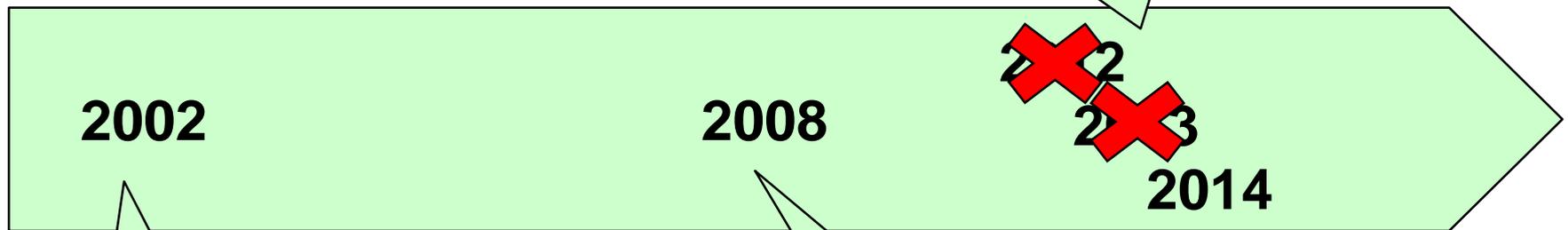
- Most data are available from pesticide registration.
- **Additional data:** natural occurrence.
- Discussion must be focused on needs and traditions of organic farming.

See «dossier templates» on the EGTOP website*.

* http://ec.europa.eu/agriculture/organic/eu-policy/expert-recommendations/expert-group_en

History of authorizations

- Laminarin (stimulator of natural defences)
- Kaolin (insecticide)
- Sheep fat (repellent)



- Copper: limitation to 6 kg/ha/y
- Metaldehyde: phased out
- Ferric phosphate: authorized

- Spinosad
- Potassium bicarbonate
- Copper octanoate
- Ethylene (sprout inhibition Potatoes & onions)

Future authorizations: the queue

- Laminarin
- Kaolin
- Sheep fat

Review completed, inclusion likely,
but delayed (discussed later)

2014

??

- Potassium bicarbonate (as insecticide)
- Diatomaceous earth (insecticide)
- Potassium phosphite (fungicide)

New requests, not yet reviewed

3) Experiences of the biocontrol industry

Experiences of the biocontrol industry 1

**Active substance
authorized by Reg
889/2008**



**Authorization of branded
products is a routine
procedure**

- **uncomplicated**
- **predictable for the company**
- **(relatively) fast**
- **cheap**

Experiences of the biocontrol industry 2

Inclusion of **new active substance** in Reg 889/2008

- process unusual for company
- outcome not certain
- required time not predictable; **often very slow**
- hardly any costs

Why is inclusion currently delayed?

A personal interpretation

- › Organic Regulation contains a few substances such as Quassia.
 - not authorized as pesticide any more, but
 - hope for re-authorization as a low-risk substance.
- › As long as there is hope for re-registration, organic sector is opposed to deletion in Reg 889/2008.
- › Commission is opposed to modifying pesticides Annex of Reg 889/2008, as long as it contains non-authorized substances.
- › **No inclusion of new substances possible, until this problem is solved.**

How strict is the technical review?

Technical reviews are available* for:

- › Laminarin
- › Kaolin (insecticide)
- › Sheep fat (repellent)
- › Sodium hypochlorite (seed disinfection)
- › UV light (in crop production)

*see «final report on plant protection products» of 5-6 Oct 2011 on the EGTOP website.

http://ec.europa.eu/agriculture/organic/eu-policy/expert-recommendations/expert-group_en

Useful websites

Inclusion of active substances: EGTOP website

- **Templates for new requests**
- **Pending requests**
- **Reports on already evaluated substances**

http://ec.europa.eu/agriculture/organic/eu-policy/expert-recommendations/expert-group_en

Authorization of branded products in Switzerland / Germany / Austria:

- www.betriebsmittelliste.ch
- www.betriebsmittelliste.de
- www.betriebsmittelliste.at

