

# COST 850 - WG 3 and 5 Meeting

Kiel - 5 to 7th November , 2004

Evaluation of Risks

Requirements for the Registration of IBCAs

THE ROLE OF IBMA



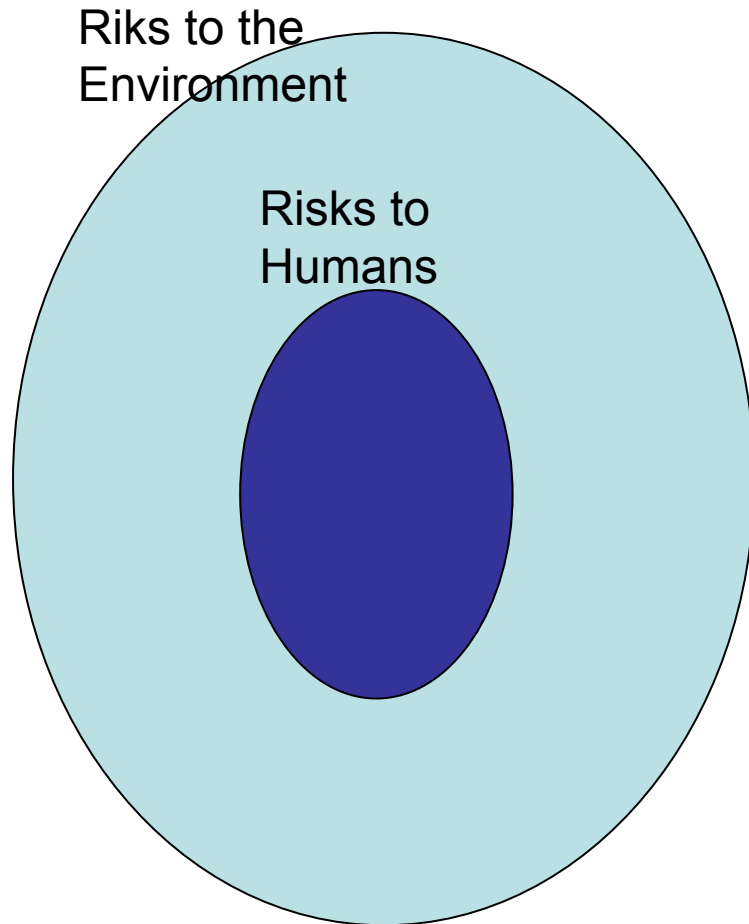
IBMA

International Biocontrol  
Manufacturers Association

# IBMA History

- 1994 : expert group of the « Industry-FAO Supply Task Force » drafting the « FAO Code of Conduct for the Sales and Release of Exotic BCAs »
- 1996 IBMA grounded as a world industry association with 4 aims:
  - to create a worldwide link amongst the biocontrol manufacturers
  - to set high quality internal and external industry standards
  - to speak « one voice » to regulators and officials
  - to promote BCAs business
- 1996: starting consultations with European Commission
- 1997: member of the OECD Working Group on pesticides
- 1999: Creation of the OECD Biopesticides Steering Group
- 1999: member of the WHO International Forum on Chemical Safety
- 2000: Permanent expert to the World Bank
- 2002: accreditation to the European EnvironmentAgency  
Associated member EUREPGAP
- 2004: Invitation refused by IBMA to become member of BIAC

# The circles of influence (1)

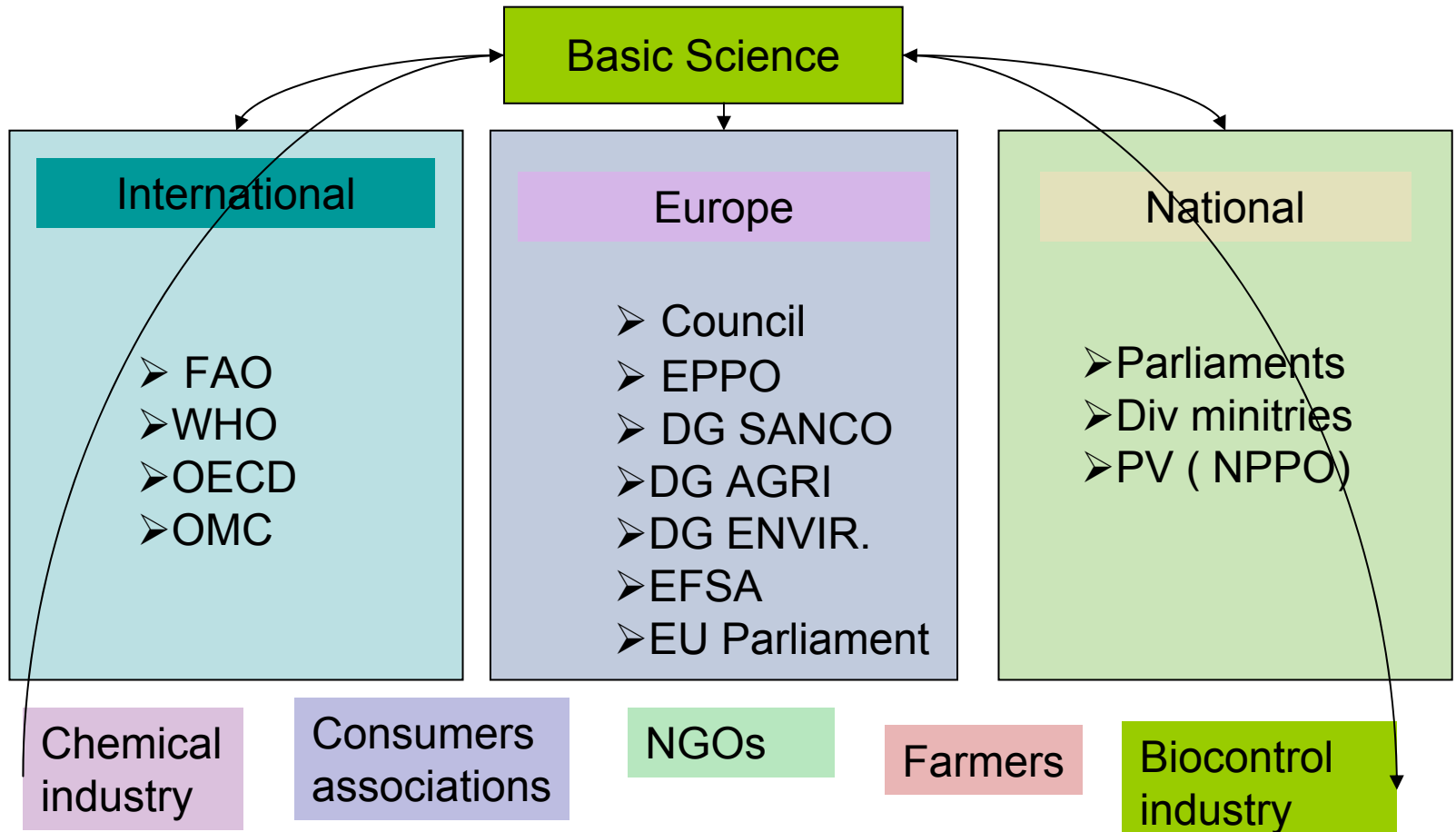


## WHO TAKES CARE ?

- ✓ Research institutions
- ✓ Public/Consumers
- ✓ Traders/Super markets
- ✓ Politicians
- ✓ Regulators
- ✓ Industry

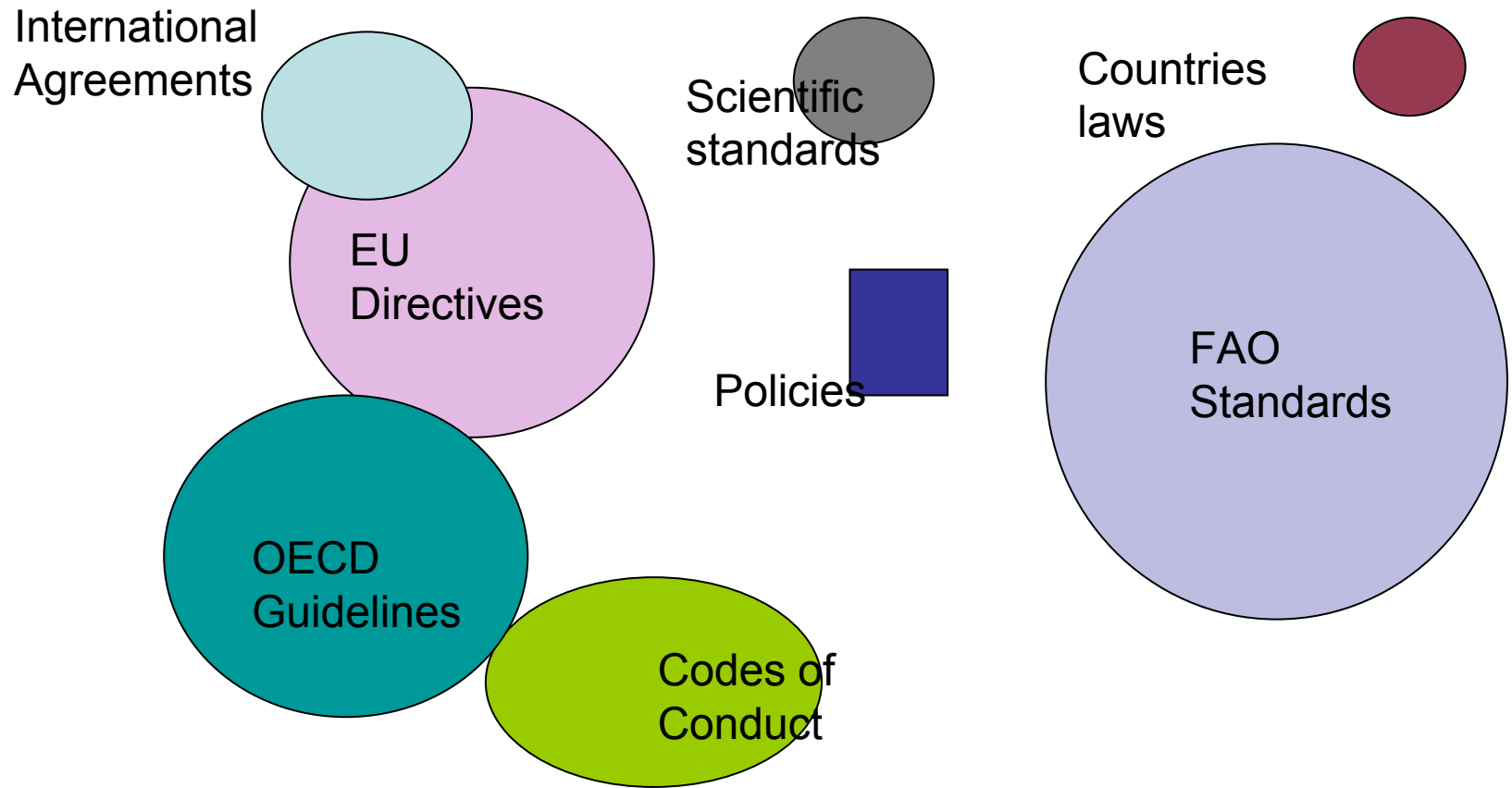
# The circles of influence (2)

A complicated system of power sharing

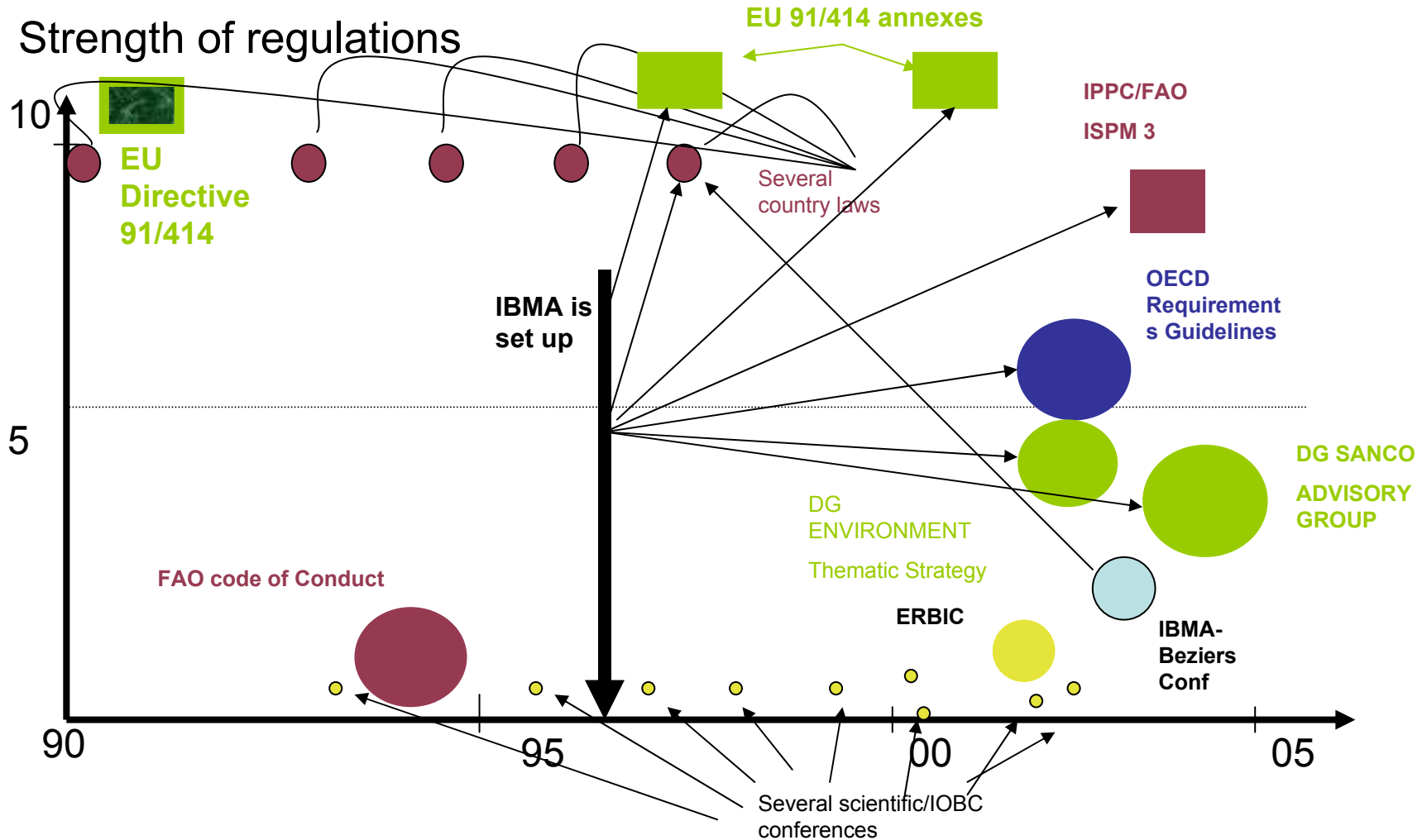


# The circles of influence (3)

Obligations , Recommendations or Agreements ?



# The Strength of Laws



# IBMA Position

- Not against any regulation, but
- Must be specific ( not extrapolated from chemical pesticides)
- In current and foreseen regulations risks are exaggerated or even not relevant
- No accountability
- Fees are too high
- Decisions take too much time
- Regulations are hampering instead of facilitating

# IBMA Strategy ( 1997)

- **OBJECTIVE:**  
To convince the EU Commission to modify the Directive 91/414/EEC
- **ACTIONS:**
  - Permanent dialogue with DG Agriculture/SANCO
  - Meeting with the Commission president (J.Santer)
  - Influence EU parliament ( hearing)
  - Coordination IOBC/IBMA (decision 1999)

# RESULTS

- Directive cannot be modified, but only revised
- IBMA regularly consulted in the frame of regulating « pesticides » ( and biologicals)
- Specific procedures for microbial, natural products and pheromones
- Special consideration for « minor uses »
- Registration through « task Forces »
- IBMA consulted for the Thematic Strategy for the Sustainable use of Pesticides ( DG ENV)
- IBCAs are not concerned ( for the time being)
- IBMA invited to be member of the SANCO Advisory Group for Plant Health

# ADDITIONAL IBMA STRATEGY

- TO EXERCISE AN INTERNATIONAL INFLUENCE THROUGH OECD AND FAO
- TO INFLUENCE NPPOs directly
- Member of the OECD WGP and setting up the BPSG ( DG SANCO is also part of it)
- Close contacts with NPPOs in the USA, UK, France etc ( local associations)



# HOWEVER

- Need a lot of efforts
- Coordination difficult
- Requires resources
- Many « uncontrolled » initiatives
- Several « goodwill » actions introduce confusion in the mind of the regulators



1. IBCAs become regulated without harmonisation
2. No clear and consolidated position from the industry
3. « chacun pour soi » amongst the industry ( and research)
4. NPPOs reluctant to support our suggestions

# Conclusion

- Regulation is one important, but not the only one obstacle to Biological control adoption ( Biocontrol needs a special support for development: cf action I.Deutz)
- IBMA has been **successful** as Industry spokesman :  
made step by step progresses
- IBCAs are still **under discussion**
- IBCAs are already partly and will be even more regulated
- In order to be successful, **we need a concept**
  - CLEAR,
  - REALISTIC
  - TOTALLY SUPPORTED ( industry + IOBC + NPPOs)

# PROSPECTS

- To make clear cut between endemic and exotic IBCAs
- To set a positive list
- Specific regulation associated to IBCAs classes, properties and uses
- Alert public, media, politicians
- Permanent relation with regulators

