



Food and Feed Safety Omnibus: Definition of biocontrol substances under Regulation (EC) No 1107/2009

25 May 2026

Dear Permanent Representatives to the European Union,

As representatives of crop protection innovation providers and the farmers using these solutions, we are writing to express our support for the European Commission's proposal to introduce a dedicated definition of biocontrol substances under Regulation (EC) No 1107/2009.

A clear and workable definition is essential to give farmers faster access to safe and effective biocontrol solutions. These tools are already an important part of integrated pest management and organic farming systems, helping farmers respond to pest pressure, resistance development, climate challenges and the continued loss of active substances.

The Commission's proposal is a welcome step. It gives biocontrol a clearer regulatory identity while maintaining the same high safety standards that apply to all plant protection products in the EU.

We strongly encourage policymakers to preserve a definition that is broad, future-proof and science-based. In particular, the definition should remain clearly separated from the existing low-risk criteria. Low-risk classification serves a different regulatory purpose and using it for defining biocontrol would make the definition too restrictive and could exclude many recognised biocontrol solutions already used by farmers, including in organic production.

At the same time, we recognise the need for appropriate safeguards to ensure that categories such as "functionally identical" and "structurally similar" are applied in a clear and proportionate way to ensure it is not misinterpreted. This should be addressed through practical guidance built into the existing assessment system, rather than by narrowing the legal definition itself. Such guidance would support consistent, science-based application across Member States while preserving the flexibility needed for innovation.

The Food and Feed Safety Omnibus is an important opportunity to make the EU regulatory framework more enabling, without compromising safety. A workable biocontrol definition is central to that objective.

We stand ready to provide further input and practical examples from farmers, cooperatives and innovation providers.

Yours sincerely.