



**Actual challenges
to maintain the availability of
substances traditionally used in
organic farming**

Jutta Kienzle

**Chair of the PPP TaskForce
of ifoam EU group**

Traditional „Organic Products“ and Registration

The First Precautionary Approach for the Evaluation of Inputs for Organic Farming Systems: **Avoid incalculable risks**

“Given the incomplete understanding of ecosystems and agriculture, care must be taken”



The registration system is based on risk assessments
= calculable risk

Traditional „Organic Products“ and Investment

The First Precautionary Approach for the Evaluation of Inputs for Organic Farming Systems: **Avoid incalculable risks**

“Given the incomplete understanding of ecosystems and agriculture, care must be taken”



IP can be protected

Limited possibilities to protect IP

IP can be protected



Traditional „Organic Products“ and Categories in Legislation

Example: List of substances traditionally used

Mode of action	Mark the appropriate category with a cross
Improvement of crop quality	X
Improvement of nutrient efficiency	x
Improvement of tolerance of abiotic stress	X
Foliar Fertilizer	X
Direct effect on pest or disease	x
Indirect effect on plant health (induced resistance etc.)	X

Organic substances are often „multiple actors“

Before 1107/2009 was implemented

- National registration of organic PPP
- Registration process very much adapted to „synthetics“, often difficult, depending very much of the single MS
- National „short registration concepts“ for traditional natural „soft or low risk products“ :
 - These products were very often „common“ substances or foodstuffs or substances with high natural background as rockpowders
 - They had often rather low efficacy and **multiple modes of action**

Example: plant strengtheners in Germany, corroboranti in Italy

- These products are also allowed in OF at national level

After 1107/2009 was implemented

Registration of organic PPP at EU level:

- + Guidance documents for specific points in the registration of different categories of natural substances
 - + for Microorganisms
 - + for Semiochemicals
 - + *for some Botanicals*
 - ? *for mineral substances*
 - no solution at EU level for the previous MS concepts for the „soft or low risk“ products
 - no solution at EU level for a good category for the „multiple actors“ with rather low efficacy and a rather small market
- We loose traditional substances
- Innovation for substances with small market potential is nearly stopped

Is this in the sense of the thematic strategy?

Possible approaches for solutions

There are 3 approaches at EU level that claim to aim to be a solution



1. Low Risk Criteria (1107/2009)

2. Basic substances (1107/2009)

3. Draft for a biostimulant regulation in the new EU regulation for fertilization

1. Low Risk Criteria (1107/2009)

- Evaluation of the criteria in the frame of the normal registration process
For substances with low market potential no one will invest in this process
- The criteria follow registration criteria developed for „synthetic“ substances and do not consider the potential uncalculable risk
- Risk assessment depends often also on the quality of the studies presented
→ low investment = high risk??
- No approach for „multiactors“ since efficacy must be high

No solution

2. Basic substances (1107/2009)

+ SANCO was really engaged to find solutions for substances that are on the market and useful in plant protection

- The actual implementation is difficult

+ First time that users or public/private institutions can apply for a registration

The products used in PPP are no longer limited to the products where a company sees a chance to make money!

We can discuss a different concept of minor use!!

The concept can be a chance for traditional and multiactor products with low market potential but public interest

.... **if it is developed further**

3. Draft for a biostimulant regulation in the new EU regulation for fertilization

- Registration process actually drafted completely unsuitable for most of the naturally occurring substances and the traditional organic products
 - Self preparation not discussed at all
 - Borderlines to PPP often nearly impossible for the „multiactors“, *If it is just decided to sort them in one category, for the extension service it is difficult to explain farmers how to use them best*
 - We have no time to wait, farmers need the continuous availability of the products and the small companies need perspectives now!
- ⇒ For some organic products (algae) with high market potential the market will concentrate on few companies that have the capacities of investment in an expensive registration process
- For the other substances traditionally used in OF it is no solution**

Possible approaches for solutions

There are 3 approaches at EU level that claim to aim to be a solution



1. Low Risk Criteria (1107/2009)

No solution *but an incentive for microorganisms and semiochemicals!*

2. Basic substances (1107/2009)

Might become a solution if it is developed further. Activities?

3. Draft for a biostimulant regulation in the new EU regulation for fertilization

No solution

Possible approaches for solutions



There are 3 approaches at EU level that claim to aim to be a solution

1. Low Risk Criteria (1107/2009)

No solution *but an incentive for microorganisms and semiochemicals!*

2. Basic substances (1107/2009)

Might become a solution if it is developed further. Activities?

3. Draft for a biostimulant regulation in the new EU regulation for fertilization

No solution



No money, no lobby, no solution?

What will be the issue for the success of the thematic strategy?