

---

## EU Fit for Future Platform

The Alliance for Biosolutions took lead on a report with concrete recommendations by the EU Fit-4-Future Platform in 2022.

The Fit 4 Future Platform acknowledged the potential of biosolutions and endorsed 10 specific recommendations to the EU Commission.

The recommendations aim at simplifying and easing the regulatory burdens for biosolutions and to recognize the difference of the chemical and fossil paradigm the current legislation is based on.

The Platform consists of all EU Member States and 22 expert stakeholders

---

## Suggestion 1:

### Modifications of the current regulatory framework to speed up the authorisations of microbiological and low-risk products within Regulation (EC) 1107/2009

Today, biosolution companies face timelines of 7-9 years of approval procedures to bring their products to market. While according to Regulation (EC) 1107/2009 the timelines are 30 – 44 months respectively for the approval procedure.



## Suggestion 2:

Further develop legally binding data requirements for other biological control categories than microbial products, namely semiochemicals, natural substances within Regulation (EU) 283/2013 and Regulation (EU) 284/2013 setting the data requirements under Regulation (EC) 1107/2009

Extensive and inappropriate data requirements slow down the approval process for Biocontrol products, as these products are regulated as chemical pesticides, and separate data requirements for microbial active substances and plant protection products.



---

## Suggestion 3:

Adopt fast-track approval procedures for innovative, low-risk biological and sustainability-enabling pesticides

Slow product approval processes add additional costs, lower the economic viability of new biosolutions, and postpone EU decarbonisation.



---

## Suggestion 4:

Allow extension of the use on one crop to all other crops without the addition of upfront efficacy for biological control product under Regulation (EC) 1107/2009.

Allow extension of the use for one crop to all other crops without the addition of upfront efficacy data.

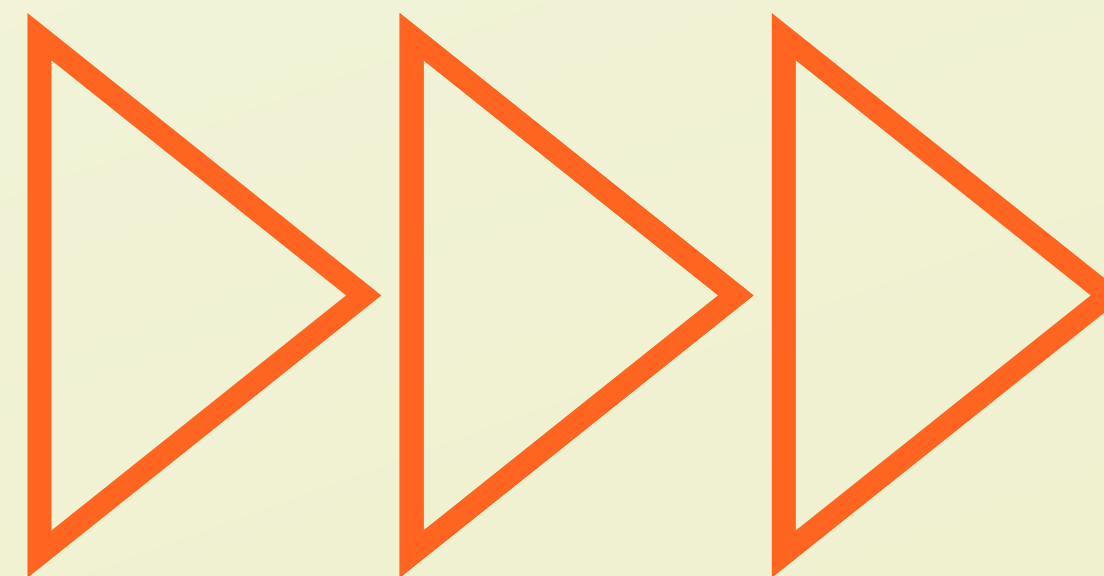


---

## Suggestion 5:

To significantly ease the burdens and simplify rules, there is a need to further develop the legislative framework for biological control products and streamlined provisions

Modifications to current regulatory framework (Regulation (EC) 1107/2009) is a short/mid-term solution that has potential to speed up the authorisations of biological control products.



---

## Suggestion 6:

Analyse opportunities and challenges when revising existing relevant legislation to focus on the potential risk pertaining to the product itself rather than the production process employed.

The EU GMO Directive sets up the same requirements for 'traditional' genetic modification as newer genetic technologies. An approach that was developed in the 1980s before biotechnological innovation accelerated in more recent years.

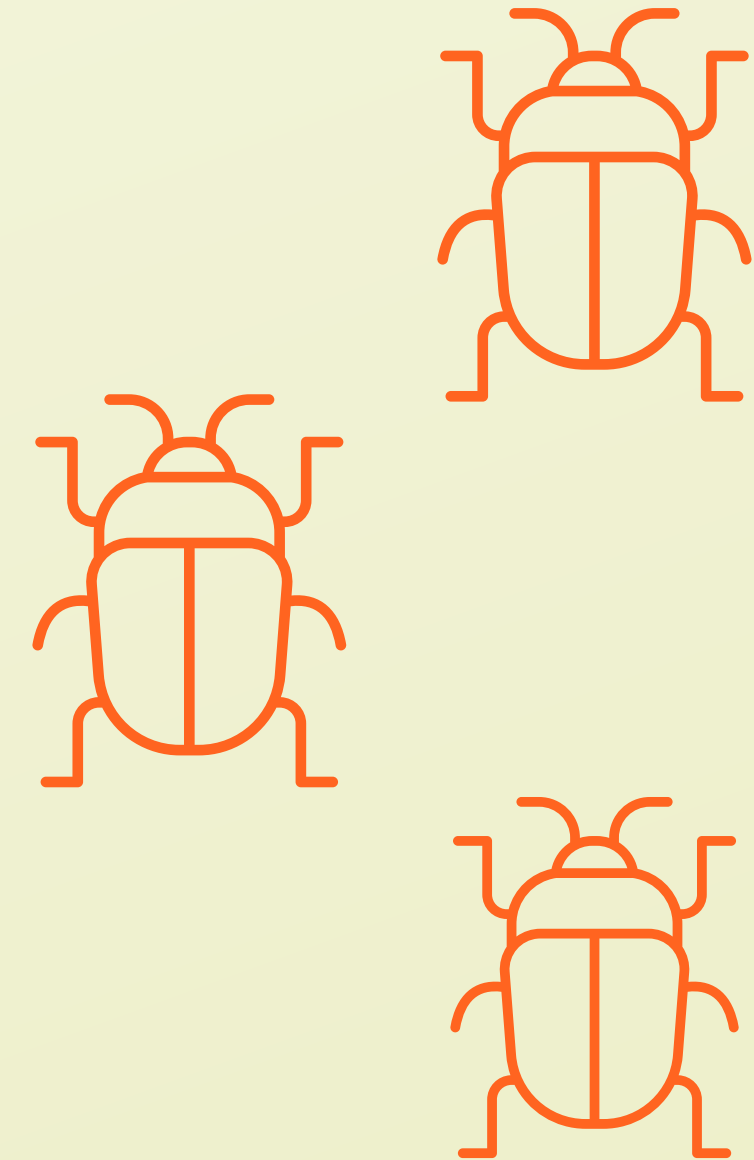


---

## Suggestion 7:

# Support adoption of novel food products while ensuring food safety

The main barriers for novel foods are time and expenses and can be reduced by decreasing the application is submitted until a product is approved as a novel food.





---

## Suggestion 8:

Improve the harmonization of the use of the term 'probiotics' in the context of the health claims across the EU Member States to provide clarity for industry and consumers.

According to the Commission Guidance documents, the term 'probiotic' is considered a health claim. The regulation does not per se prohibit the claim if it is supported by scientific evidence.



---

## Suggestion 9:

# Develop industry guideline for food cultures as food ingredients

The use of food cultures as ingredients in food that are not traditionally known as fermented should not be regulated under Regulation (EC) 1333/2008 on food additives.



---

## Suggestion 10:

### Update EU NACE codes

The EU's industrial NACE codes are used for general statistical classification and reflect the many different types of economic activities that take place.

