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Basel, March 3<sup>rd</sup>, 2022

Attention: [REDACTED]  
Unit E.4 - Pesticides and Biocides  
DG SANTE  
European Commission  
Directorate General for Health and Food Safety  
B - 1049 Brussels  
BELGIUM

**Enabling innovation and the definition of biological controls in a revision of the Sustainable Use of Pesticides Directive**

Dear [REDACTED],

Syngenta, as a company which is fully committed to European agriculture and bringing innovation to farmers, fully understands societal concern and demand for reduced reliance on chemical pesticides in the EU. Scientific advances have helped to reduce pesticide use by 95% over the last 60 years, so the industry is already a long way along that path. Syngenta is also committed to further reducing the use and risk of chemical pesticides in line with the European Commission's Farm to Fork strategy. Syngenta welcomes the revision of the Sustainable Use of Pesticides Directive (2009/128/EC) and the opportunity it presents to reinforce the application of the principles of Integrated Pest Management (IPM) and encourage the use of biological controls, physical and other non-chemical methods in combination with or in preference to chemical pesticides as agronomic conditions indicate.

It is imperative that EU farmers continue to have access to a wide toolbox of innovative biological and chemical control solutions to fully implement Integrated Pest Management (IPM) at Member State level.

However, in the context of the many policy initiatives above, and ensuring that farmers are still able to grow sufficient, safe food for people everywhere, it is necessary to ensure that the definition of biological controls in the revision of the Sustainable Use of Pesticides Directive considers the exciting innovations in active substances of biological origin. Syngenta wishes to ensure that the eventual definition should not be too narrow in its scope, nor should it unnecessarily exclude many new and innovative technologies of biological origin.

Syngenta respectfully suggests that the use of **the following definition** of biological control to ensure the revision of the Sustainable Use of Pesticides Directive enables innovation and does not create unintended barriers to achieving our shared ambitions for increased use of biological controls.

*“Biological control” means the control of organisms harmful to plants or plant products using micro-organisms, or compounds thereof produced during fermentation, biological polymers such as peptides, proteins and RNA, semiochemicals or extracts from animal products or plant products as defined in Article 3(6) of regulation (EC) No 1107/2009, or invertebrate macro-organisms.*

Yours Sincerely,

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