



EU Registry for Plant Biostimulants (PB) and Agronomic Fertilisers Additives (AFA)

Feedback from March presentation



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Feedback required following March meeting

1. Grouping of PB and AFA
2. Definition proposed by Arcadia for PB
3. Exemptions (e.g. water, CO₂) for PB
4. Negative list
5. Test runs with ECHA
6. Procedures
7. AOB

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1. Grouping

Suggestions were made reg. name of group:

- "Products of special action in agriculture"
- "Special products"
- "Supplementary fertilizing substances"

PB and AFA are playing different roles so why grouping?

Ok, if both definitions are delimitating the group³



2. Definitions

- **Arcadia proposal :**

" A plant biostimulant is any **substance** or microorganism, in the form in which it is supplied to the user, applied to plants, seeds or the **root environment** with the intention to stimulate natural processes **of plants** benefiting nutrient use efficiency and/or tolerance to **abiotic stress**, ~~and/or crop quality~~, **regardless of its nutrients content**, or any combination of such substances and/or microorganisms intended for this use."

" An agronomic fertiliser additive is any substance or microorganism, in the form in which it is supplied to the user, added to a fertiliser, soil improver, growing medium with the intention to improve the agronomic efficacy of the final product and/or to modify the environmental fate of the nutrients released by the fertilisers, or any combination of such substances and/or microorganisms intended for this use."



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2. Definitions(2) (Remarks on plant biostimulants)

- "root environment" à "soil and any other substrates"
- "abiotic stress" à "~~abiotic~~ stress"
- "abiotic stress" à "~~abiotic~~ stress"
- "substance" definition – not adapted: shall refer to the origin (" based on natural substances") and extraction method when relevant
- "regardless of its nutrient content": clarify the action !
- "independently...": useful for distinguishing from nutrients action but how to measure it?



2. Definitions(3) (Remarks on plant biostimulants)

- "substance": "~~active~~" à "stimulating or acting"
- "natural processes of plants": to include microorganisms improving soil nutrients availability
- "crop quality" : to be maintained but specified (see also EBI presentation)
- "living microorganisms"
- ? Compost aids ?



2. Definitions(4) (Remarks on AFA):

- Shall include products concerned categories such as "chelating agents, complexing agents, ..."
- ?? "slow-release"??



2. Definitions (5)

- **A proposal to integrate both definitions :**

"A plant biostimulant is any substance or microorganism, in the form in which it is supplied to the user **alone or added to a fertiliser, soil improver, growing medium, applied to plants, seeds or the root environment** with the intention to stimulate natural processes of plants benefiting nutrient use efficiency and/or tolerance to abiotic stress **and/or to improve the agronomic efficacy of the final product and/or to modify the environmental fate of the nutrients released by the fertilisers**, regardless of its nutrients content, or any combination of such substances and/or microorganisms intended for this use."



2. Definitions (6)

- **Another proposal ('by default definition'):**

"A plant biostimulant is an organic material that enhances plant growth and development such that the response cannot be attributed to the application but cannot be attributed to the function of fertiliser, plant protection product and/or biocide"

"A fertiliser additive is a material added to fertilisers to adjust the chemical or biological characteristics of soil to facilitate the uptake and use of nutrients but cannot be attributed to a function as fertiliser, plant protection product and/or biocide."



3. Exemptions

- Water, CO₂ from registration
- List of "basic substances"
- PB already listed in organic farming Reg.
- PPP definition shall exclude plant biostimulants
- Elicitors = PPP so excluded as well from PB
- All well known substances (e.g. already included chelating agents,...)
- Keep a list of active substances exempted



4. Negative list

- Alternative to exemption list
- Avoid by-passing of PPP authorisation duties
- Automatic prohibition of PB if banned under PPP not recommended:
 - Only risk assessment did not lead to a conclusion that a safe use is possible
 - Not if PPP dossier was abandoned, incomplete,...



5. Test runs with ECHA (on hold)

- EFSA is better placed for risk assessment due to relation btw. PB and PPP
- Good idea but data will be "require-able" by ECHA although not identified by MS
- Data protection?
- Shall be an helpdesk for SMEs to prepare applications
- Need an indicative list of data first !



6. Procedures

- Complex : need an helpdesk for SMEs
- Expensive : fees are too high, annual fees are not well justified
- Unaffordable for SMEs : data requirements too demanding, not fitting with the nature of materials (exemptions)
- Joint submission in case of multiple applicants : access to data
- Efficacy data: sufficient but not too much field data



7. AOB

- Dual claims = registration as PB and autorisation as PPP ?