

**Comments of the International Biocontrol Manufacturers Association (IBMA)
and the Biopesticide Industry Alliance (BPIA)**

Docket Identification (ID) EPA-HQ-OPP-2004-0415 [Submitted via email: June 6, 2006]

To Whom It May Concern:

The International Biocontrol Manufacturers Association (IBMA) is the worldwide association of biocontrol industries producing microorganisms (“microbials”), macroorganisms, semiochemicals and natural pesticides (“biochemicals”) for plant protection and public health.

IBMA was created in 1995 in order to represent the views of these biological control producers, who are SMEs what is this??, perhaps spell it out with limited resources but also specialized branches of international crop protection groups. With members throughout the World, IBMA is a worldwide organization for biological crop protection, sustainable soil management, animal health and public hygiene.

The Biopesticide Industry Alliance (BPIA) is the North American industry association dedicated to fostering the use of biopesticide technology. Our mission is to increase the awareness and use of biopesticides as effective products, realize further improvements to the global regulatory process, and provide networking opportunities for our members and affiliates.

IBMA appreciates the opportunity to comment. The IBMA fully supports and endorses the positions of BPIA submitted separately in BPIA’s comment letter.

IBMA in partnership with BPIA commend EPA for its leadership in establishing a regulatory framework specific to biochemical and microbial pesticides. This framework has served as a model for regulators world wide to consider when grappling with how to assess the safety of these kinds of products. By using a tiered testing approach to evaluate biochemical and microbial pesticides, EPA ensures the quality of their risk assessments while permitting lower risk pesticides to reach the market in a faster and more cost efficient manner. We believe this benefits all stakeholders. We also compliment EPA for taking this opportunity to bring the data requirements into closer alignment with current practice – reflecting statutory requirements, or Scientific Advisory Panel recommendations – generally without imposing significantly new or broader requirements, the cost of which could stifle innovation and development of biopesticides.

In addition to the BPIA comments in its letter, IBMA would recommend that vegetable oils including canola (rape) oil, sunflower oil or palm oil continue to be regulated as biochemicals. Since vegetable oils can kill arthropods by suffocation, it is not clear if they would continue to be considered biochemicals under EPA’s new definition of biochemicals. From the IBMA viewpoint, it is difficult to understand how a product can have a “non-toxic mode of action” if in the end the target pest has been killed. In this regard, we strongly support the BPIA position on the biochemical definition.

For your information, in a guidance document agreed upon between the European Commission services and Competent Authorities of EU Members States for the Biocidal Products Directive 98/8/EC (Doc-Biocides 2002/06-Rev2 of 12.12.2005) the physical blocking of the breathing tubes of insects by mineral oil leading to suffocation is not regulated as a biocide (i.e. exempt from regulation).

In conclusion, on behalf of the IBMA and BPIA members, we appreciate the opportunity to comment on Part 158. If you have any questions or need additional information please feel free to contact Mr. Olav Messerschmidt at BPIA by phone at (517) 881-0601 or by email at bpia@comcast.net or Mr. Bernard Blum at IBMA at bjblum.ibma@bluewin.ch.

Sincerely,

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Vice-President, IBMA

Olav Messerschmidt
Executive Director, BPIA

Details on IBMA, its members, organization, charter and objectives are given on the website: <http://www.ibma.ch/>

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