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BIOECONOMY RESEARCH

European Commission

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Call for Evidence for an Initiative on Food and feed safety – simplification

This initiative aims to increase the competitiveness of EU farmers and the food and feed industry, as well as reduce the administrative burden on Member States authorities related to marketing authorizations of products. It will:

- accelerate access to the EU market for biocontrol substances and products.
- simplify and clarify regulatory requirements on plant protection products, biocidal products, feed additives, food hygiene and official controls as well as other measures to simplify EU food law.

Feedback period: 16 September 2025 - 14 October 2025

Commission adoption of the initiative is planned for the fourth quarter of 2025.

Comments from The Norwegian Institute of Bioeconomy Research (NIBIO)

NIBIO, an independent research institute, is to contribute to food security and safety, sustainable resource management, innovation and value creation through research and knowledge production within food, forestry, and other biobased industries.

Professional assessments at NIBIO are coordinated by Research Professor Dr Ingeborg Klingen, Dr Nina Trandem, Research Professor Dr Hanne Skomedal and Dr Tore Bonge Hansen in the division for biotechnology and plant health.



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Generally, NIBIO is positive about initiatives that aim to reduce unnecessary regulatory burdens while maintaining high standards for food and feed safety, for human and animal health, and for environmental protection. NIBIO will, nevertheless, comment on relevant aspects related to plant protection, plant border control and accreditation for reference laboratories related to plant protection.

Below please find our more specific comments to the initiative on:

A.1. Political context

A.2. Problem the initiative aims to tackle

B.1 What the initiative aims to achieve and how

B.2. Likely impacts

B.3. Future monitoring

A.1. Political context

EUs legal framework for plant protection is implemented by Norway. According to NIBIO's assessment, the political context described in this initiative is in line with Norwegian governance. We would like to point out that the following areas are of specific interest to us:

- 1) Authorisation and renewal procedures for plant protection products and biocidal products.
- 2) Clarifications related to terminology and transitional measures for the setting of maximum residue levels for pesticides, the modification and renewal of authorisations of pesticides.
- 3) Flexibility in official checks of plant consignments at border control posts.
- 4) Accreditation requirements for reference laboratories.
- 5) More targeted pesticide application by drones under safe conditions.

A.2. Problem the initiative aims to tackle

Plant protection products: We do agree with most of the description here, including the major problem with the shrinking toolbox. We would, however, like to emphasise that targeted/precision pesticide application is not mainly conducted by drones but rather by other technological platforms such as robots and precision equipment attached to the spray equipment that the farmer already has. For some examples see here: <https://www.kiltersystems.com/ax1> and here <https://www.dimensionsagri.no/> The precise use of pesticides by drones would first require a building and standardization of drones, nozzles etc that may be used for precise pesticide application in specific crops. For more about this see here: <https://nibio.brage.unit.no/nibio-xmlui/handle/11250/3171081>

Biocidal Products Regulation: First time the expression “Biocidal Products” is used, please define what kind of products these are to distinguish them from plant protection products.

Official Controls Regulation: Currently, border control posts cannot release the compliant part of a consignment if another part still needs further checks. This often leads to unnecessary delays, especially for plant consignments made up of different batches with varying control requirements.



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Also, the accreditation rules for reference laboratories are too rigid and do not consider the specific needs of areas like plant pests or feed additives, causing ongoing compliance issues.

Since Norway do not always hold back consignments at the border, but perform controls at the import site, NIBIO do not agree to the release of parts of the consignments. Errors in the release procedure may occur, leading to the spread of plant pests into the country. We do, however, agree to the suggested rules for accreditation and the lesser need for accreditation of methods that are seldom used.

B.1 What the initiative aims to achieve and how

Plant protection products: We do agree in most of the description but would like to make two important points: **1)** When you suggest implementation across member states NIBIO thinks it is important to say something about how climatic zones should be considered. **2)** As mentioned above: We emphasise that in Data Driven IPM precision plant protection is not mainly conducted by drones but rather mainly by other technological platforms such as robots and precision equipment attached to the spray equipment that the farmer already has. For some examples see here: <https://www.kiltersystems.com/ax1> and here <https://www.dimensionsagri.no/> The precise use of pesticides by drones would first require a building and standardization of drones, nozzles etc that may be used for precise pesticide application in specific crops. For more about this see here: <https://nibio.brage.unit.no/nibio-xmlui/handle/11250/3171081>

Official Controls Regulation: The initiative aims to allow partial clearance of consignments of plants and plant products at border control posts. This responds to practical challenges in cases where phytosanitary certificates cover diverse batches requiring different types of checks; Member States have consistently called for flexibility to avoid trade delays when only part of a consignment is held up. The proposal also considers introducing a limited derogation from accreditation requirements for reference laboratories. This would address compliance issues, better reflect technical specificities, and respond to repeated requests from Member States and the European Commission's Joint Research Centre, while preserving the integrity of EU rules.

B.2. Likely impacts

We do agree in most of the description but would like to make three important points: 1) As mentioned above in Data Driven IPM, precision plant protection is not mainly conducted by drones but rather mainly by other technological platforms such as robots and precision equipment attached to the spray equipment that the farmer already has. 2) The described changes in control regulation of plants could also increase serious plant pests (pathogens, invertebrates and weeds) to spread across borders and zones. 3) The exemption of accreditations could also result in errors in identification of substances (pesticide residues) and identification of plant pests (pathogens, invertebrates and weeds) with different sensitivity, specificity and accuracy across different laboratories.



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B.3. Future monitoring

According to NIBIO's assessment, this part is very important, and we assume that details regarding further monitoring will be well communicated, beyond what is described in the call for evidence.

Kind regards

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Research director, NIBIO.