

Dear DG GROW Fertilising Products team,

On behalf of the European Biostimulants Industry Council (EBIC), we would like to express our **support for the proposal from the chair of the Coordination Group of Notified Bodies under the FPR on a procedural option for the future development of CMC 7** [\[proposal\]](#) and [draft offering letter](#) related to item 4.4 of the agenda of the meeting of the Commission Expert Group on Fertilising Products (CEG-FP) from November 2024].

Given the ongoing discussions within the CEG-FP, particularly in relation to procedural options for the future development of CMC 7, EBIC sees merit in exploring a clear, predictable, and agile assessment framework. This is essential to ensure timely market access for microbial plant biostimulants while maintaining regulatory compliance.

EBIC supports further exploration and refinement of the approach suggested by the chair of the Coordination Group of Notified Bodies to ensure it aligns with existing regulatory requirements and contributes to a pathway to market that keeps pace with the speed of innovation in the plant biostimulants industry. Our members believe that it is crucial to ensure procedural clarity, independent assessments of microorganisms or strains, and regulatory certainty in any future system. While recognising that the Commission retains the authority to adopt delegated acts under Article 42(4) of Regulation (EU) 2019/1009 and that any solution must work within this legal framework, our members are concerned about resource constraints within the CEG-FP for the continuous update of CMC 7.

Discussions around this proposal also aligns with broader EU policy objectives. The [EU Soil Strategy for 2030](#) underscores the need to restore soil fertility and resilience, and microbial plant biostimulants can play a key role in achieving this goal. Additionally, the [EU Competitiveness Agenda](#) highlights the importance of innovation-driven regulatory frameworks that enhance Europe's leadership in sustainable agriculture and biotechnology. Ensuring a practical and efficient process for updating CMC 7 is directly linked to these priorities.

EBIC would like to encourage further discussion of this proposal to develop a workable and effective solution that supports innovation while maintaining the integrity of the regulatory framework.

Thank you for your consideration. We look forward to further engagement on this crucial matter.

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EBIC is the European Biostimulants Industry Council, the trade association for plant biostimulants in Europe. Founded in 2011, our vision is sustainable agriculture supported by the global adoption of plant biostimulants. We are dedicated to fostering the growth, development and fair regulation of our industry. We promote plant biostimulants as essential to advanced food systems, providing education, advocacy, and support to members, policymakers, and farmers.