

# SPROUT SUPPRESSION 2020

The regulatory landscape

The now and the not yet...

# Perspectives



"I'm not too good at the hurdles."



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# Aims

- Promote common understanding
- Anticipate the coming changes
- Prepare for afternoon sessions



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# Who governs pesticides?

- All EU legislation comes from European Commission
- UK is split between
  - Food Standards Agency
  - Chemicals Regulation Directorate  
(formerly Pesticide Safety Directorate)

# Legislation Affecting Pesticides

BASIS

The Food and Environment Protection Act 1985

USE

RESIDUES

Commodity Substance:  
Ethylene

91/414

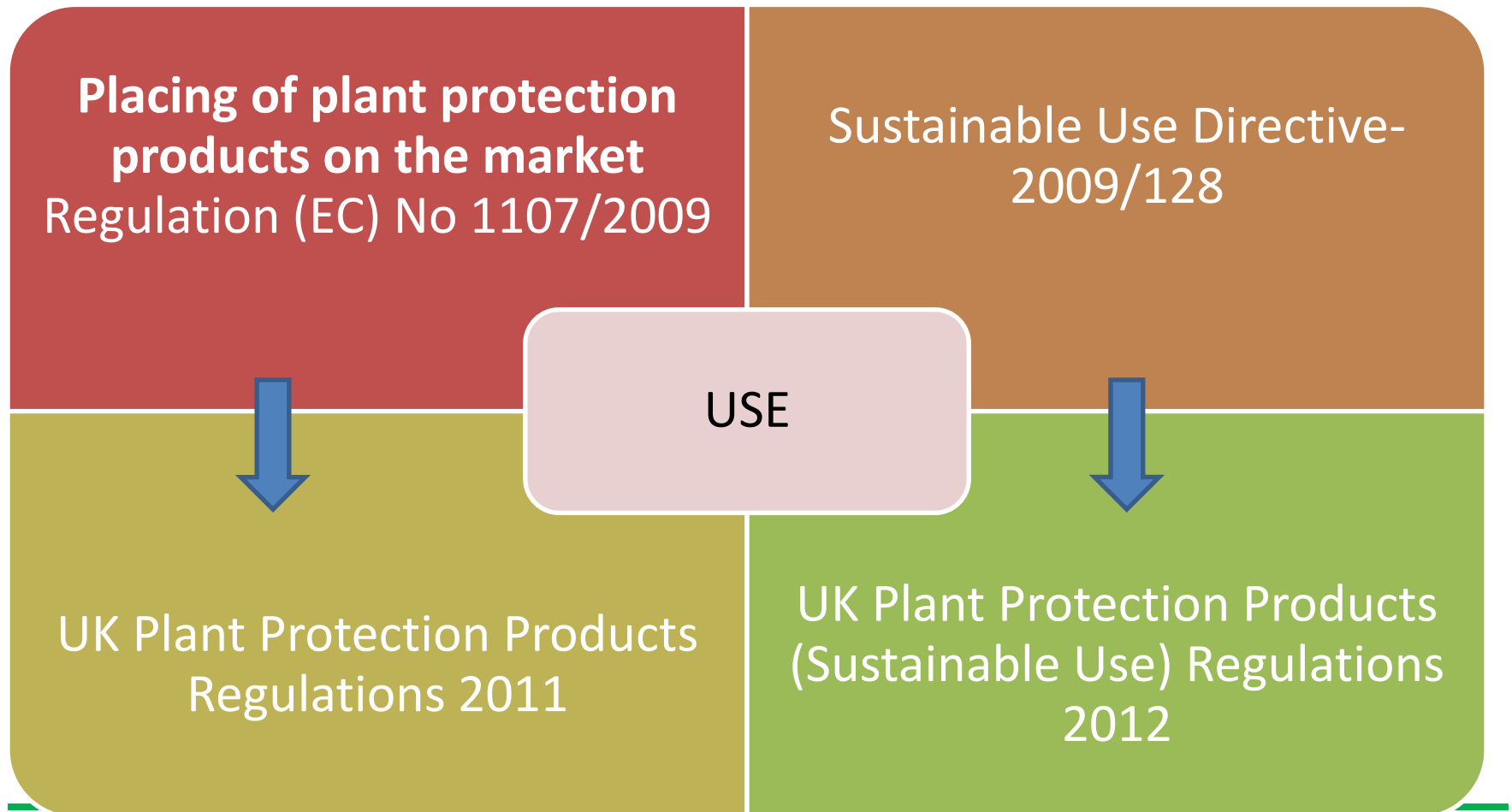
14, 79/895, 86/362,  
86/363, 90/642



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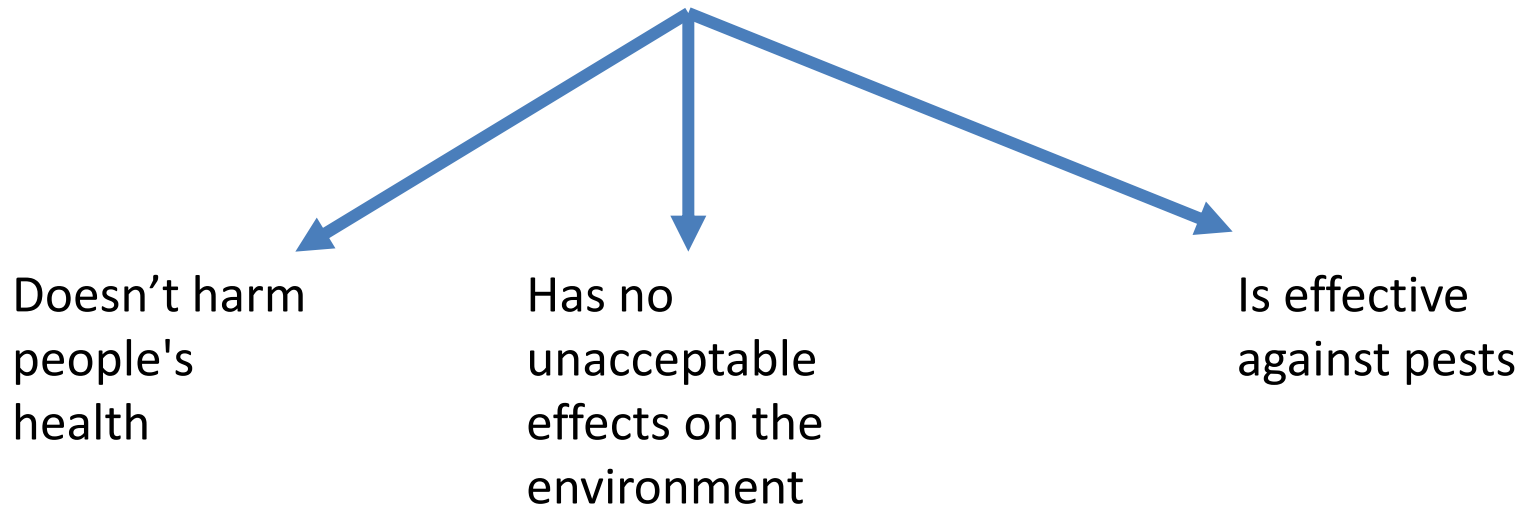
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# 'Thematic Strategy' on The Sustainable Use of Pesticides



# Placing of plant protection products on the market Regulation (EC) No 1107/2009

In order to approve a new pesticide:



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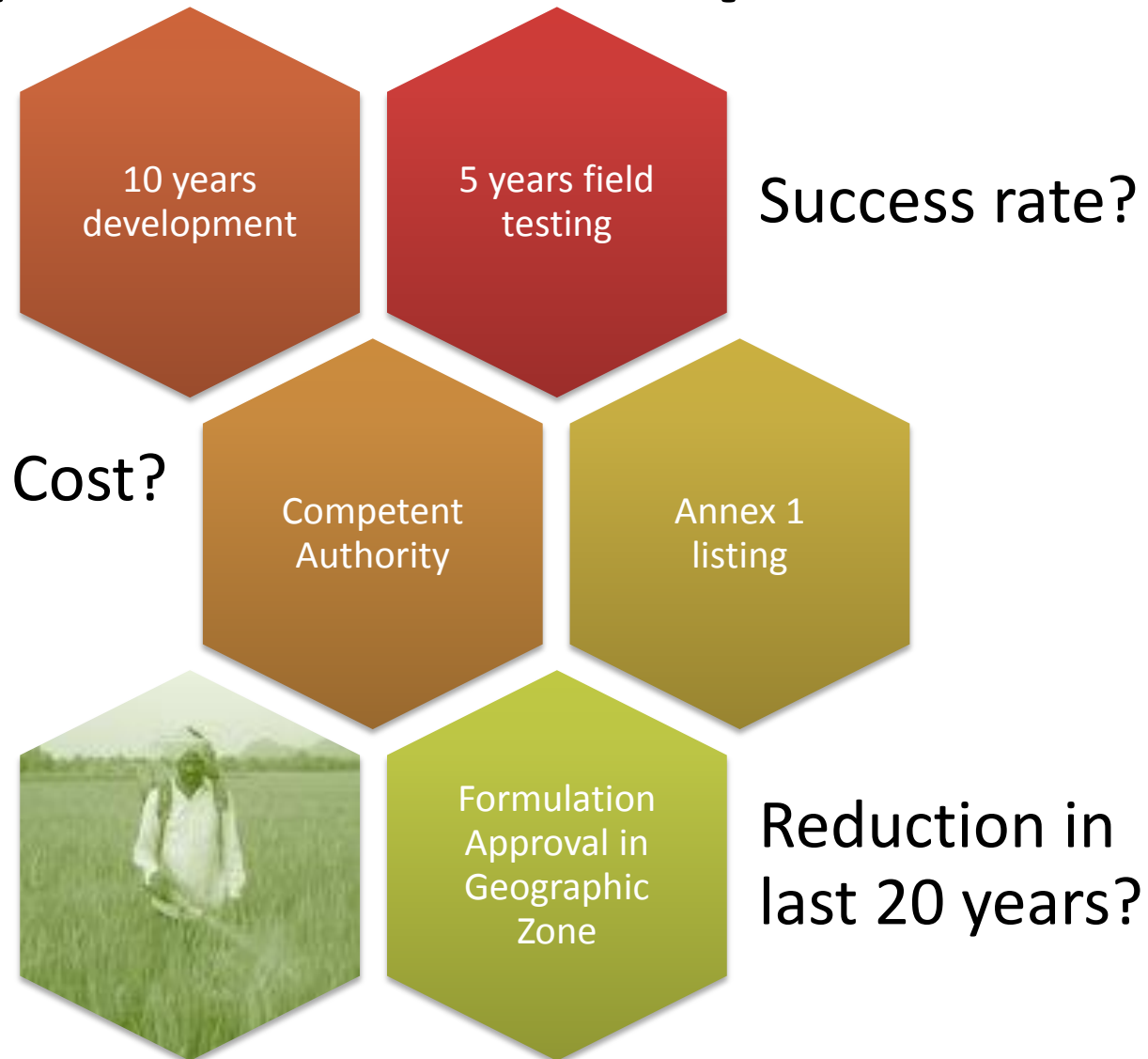
# Move to 'hazard-based' approval system - potential to cause harm

**Risk** -potential for harm from exposure to the hazard  
You need both hazard and exposure for there to be a risk.

Can be mitigated by

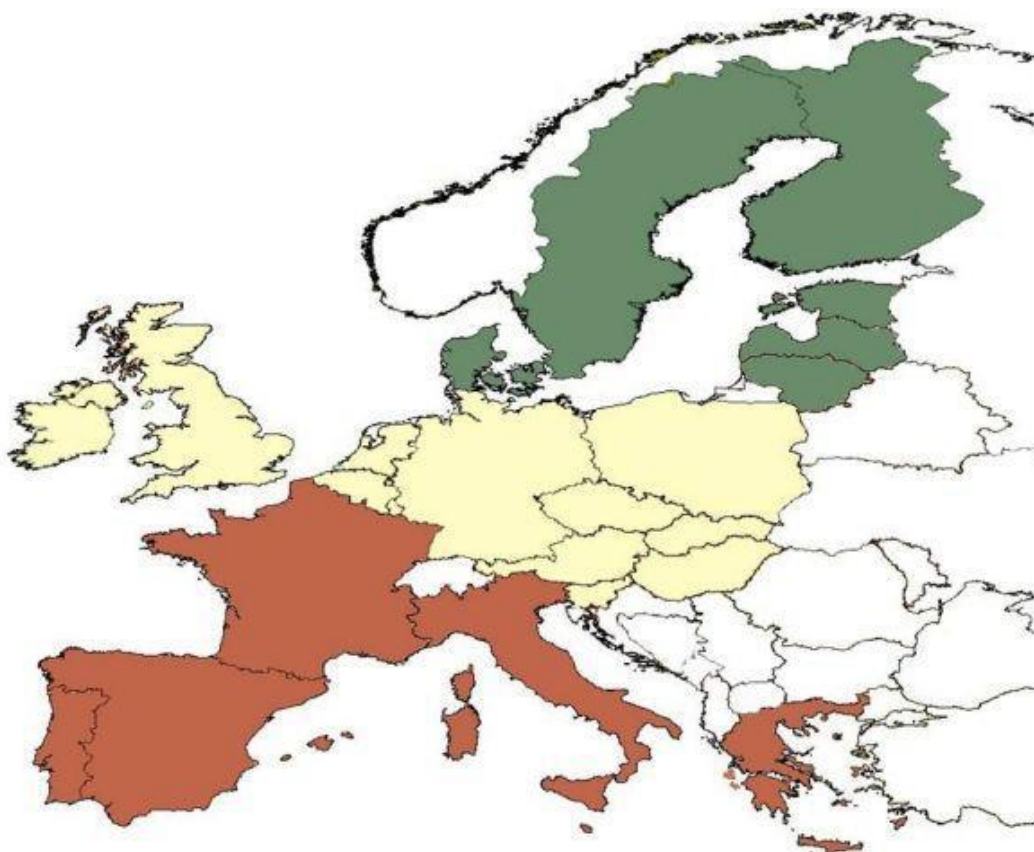
- Elimination
- Substitution
- Engineering control
- Operational procedures
- PPE

# Approval of a new pesticide



# Product authorisations

- The EC is divided into three zones- Northern, Central, Southern



# Legislation relating to residues

Maximum residue levels of pesticides in or on food and feed of plant and animal origin  
**REGULATION (EC) NO 396/2005**

Non-statutory (Codex) MRLs

RESIDUES

Pesticide (MRL) Regulations 2008  
A general default **MRL of 0.01 mg/kg** applies where an MRL is not specifically set

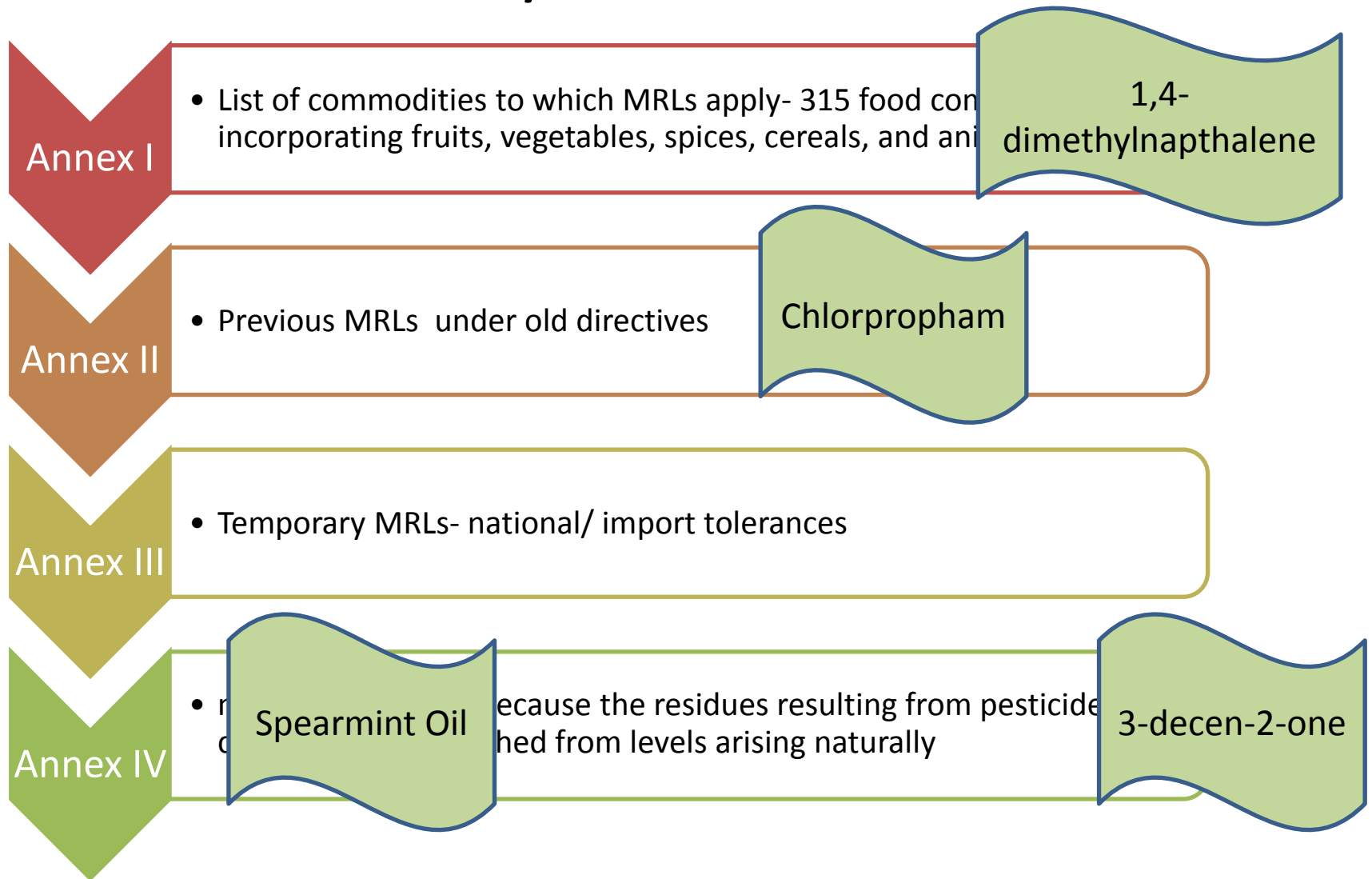
The Codex Alimentarius Commission is an international body that aims to protect the health of consumers, ensure fair trade practices in the food trade,



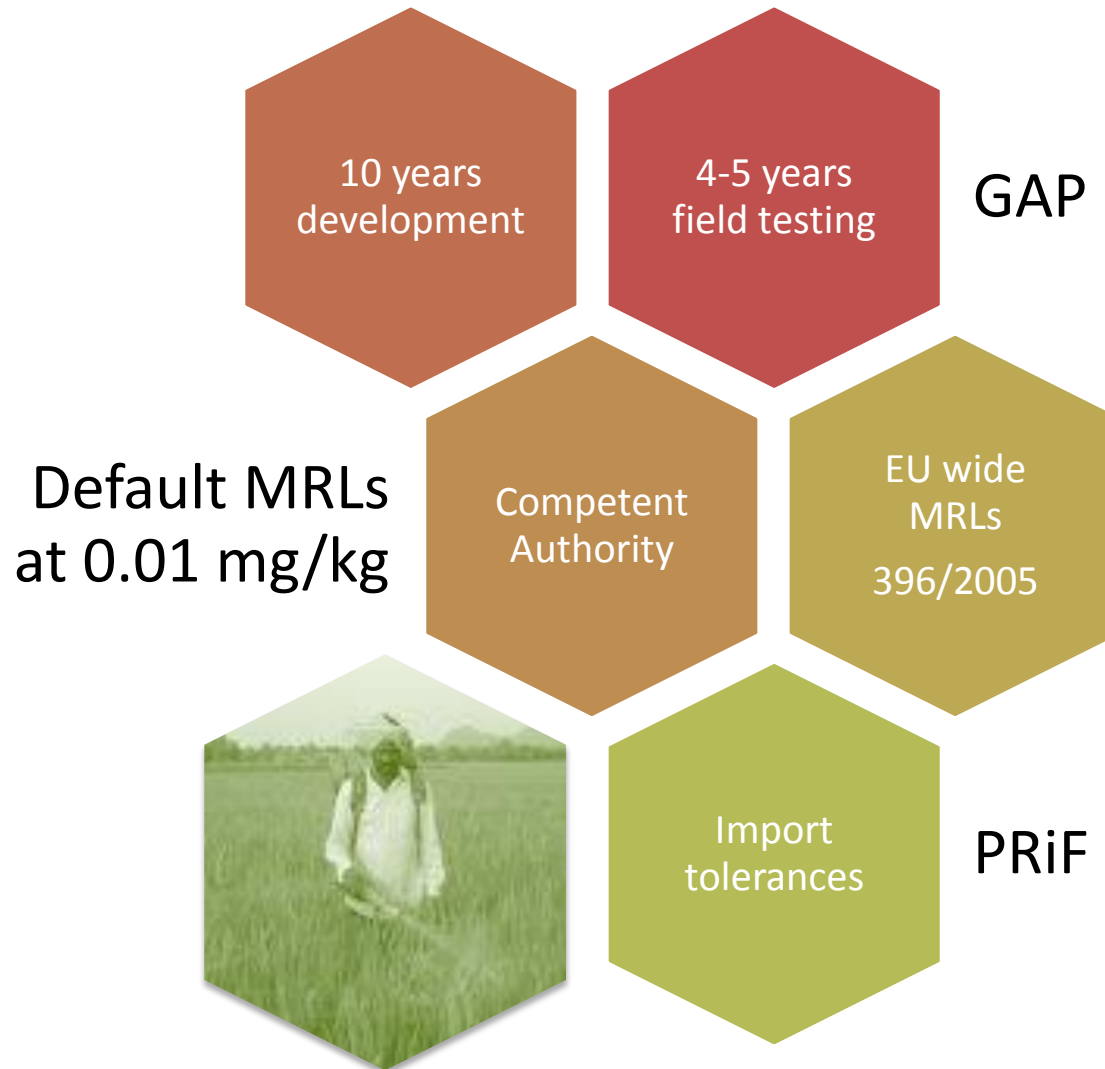
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# Harmonised MRLs - Regulation 396/2005



# Residues



# Derivation of MRLs

Use of Good Agricultural Practice

- Maximum rate
- Maximum number of applications
- Minimum spray interval between applications
- Shortest Harvest/ Withholding Interval

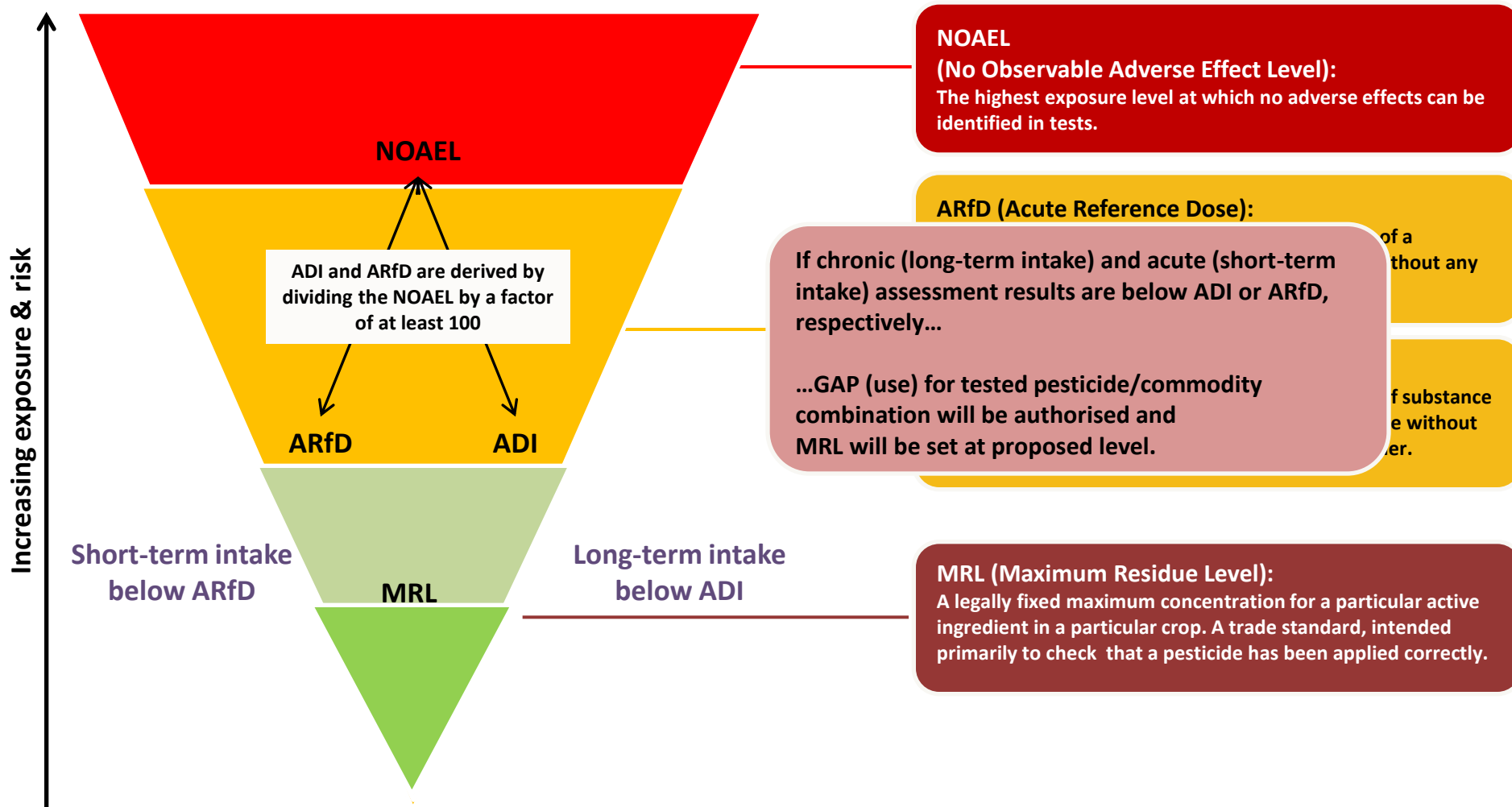
Defined number of residue trials (8 or 16)

Use of statistical tools (eg OECD calculator)

Consumption habits (all consumers- short & long term)

# Consumer Safety Assessment

## Toxicological limits



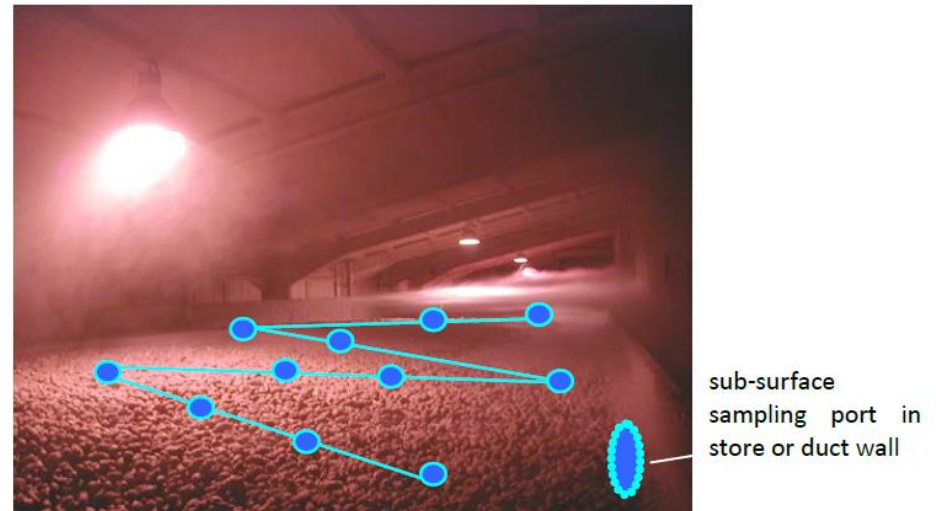
# Building in safety to the evaluations

- Risk assessment- it is assumed that:
  - ALL of the crop has been treated
  - ALL of the crop has a residue at the MRL
  - The person is a high consumer of the crop (97.5th percentile)
- No account is taken of peeling (eg banana) or cooking (eg potato) which will reduce the residue the exposure

# Representative samples

- Defined **2002/63/EC**  
'intended to be representative of the lot in respect of its pesticide residue content'
- To generate reliable residue information sampling must be representative
- Important that all samples- industry and statutory are truly representative

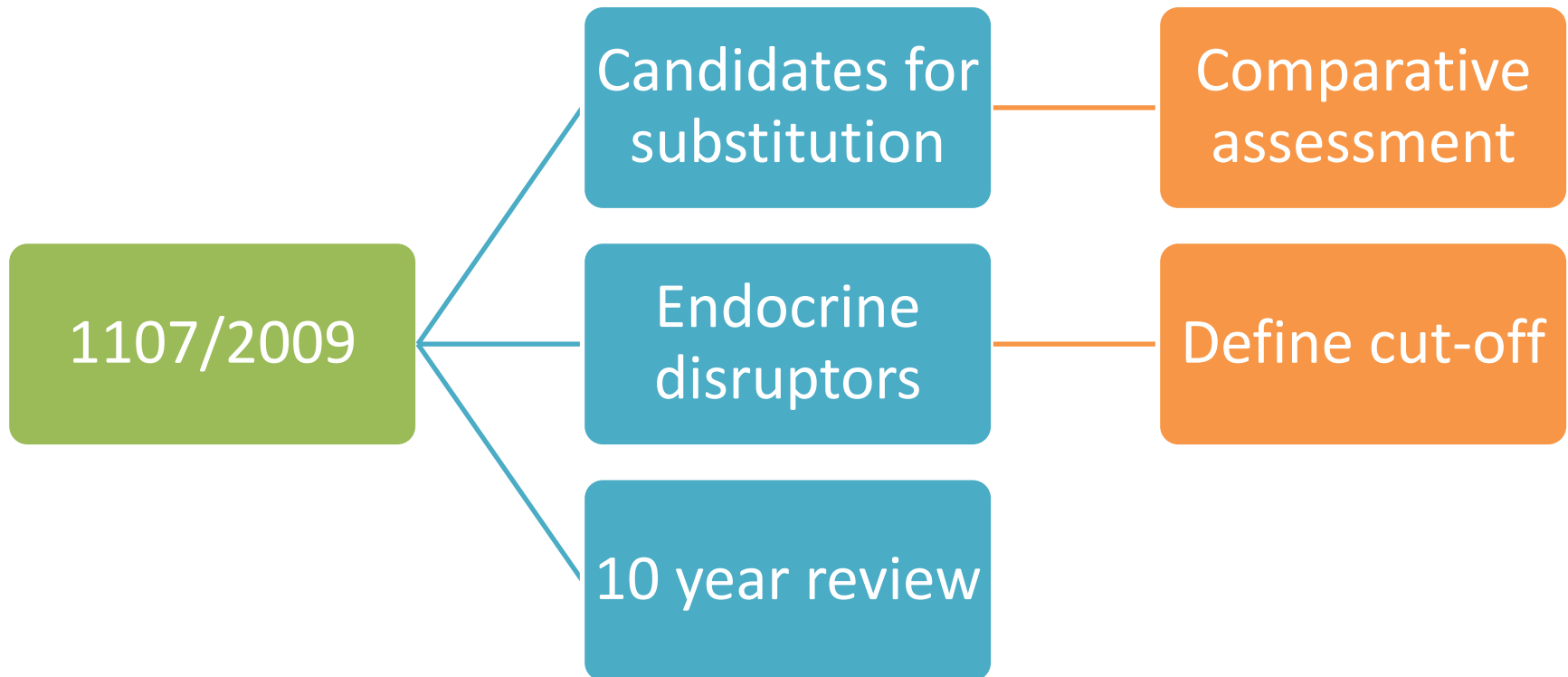
- Consist of a minimum of 12 tubers (EU guidance 10)
- For lots over 500kg, tubers must be obtained from at least ten different places.
- Weigh a minimum of 1.2 kg (EU guidance 1kg)
- All the potatoes that make up a sample must be from the same batch number/lot.
- The sample must be tubers of the same variety.





**AND THE NOT YET...**

# Review of pesticides



# Candidates for substitution

- Hazard criteria based on intrinsic properties
- Required to identify '**Candidates for substitution**'
- January 2015 Standing Committee agreed that all currently approved and considered safe
- Evaluate if they can be replaced (substituted) by other adequate solutions (chemical and non-chemical)

Not Chlorpropham

# Endocrine disruption (1107/2009)

- Distinguish between

- **Endocrine active substances**- interact with our endocrine system WITHOUT causing adverse effects, i.e. a benign interaction. These can be natural (eg coffee, soya)

- **Endocrine disruptors (ED)**- substances able to interact with our hormones resulting in adverse effects (under conditions of use).

At the most strict definition (66 ai) could be lost including **Chlorpropham**. New data for re-registration supports the case it is not an ED.

Public consultation to define of scientific criteria with likely conclusion mid-end 2016

# 10 year review

- Evaluation by a rapporteur member State and peer review by EFSA
- Approval conditions are specified, including new **hazard criteria** based on substances' intrinsic properties. These are:
  - Mutagenic
  - Carcinogenic or have Reproductive Toxicity 'negligible')
  - Persistent Organic Pollutants (PoPs)
  - Persistent Bio-accumulative and Toxic (PBT)
  - Very Persistent / very Bio-accumulative (vPvB)

Chlorpropham review  
in 2017

# Water Framework Directive (2000/60/EC)

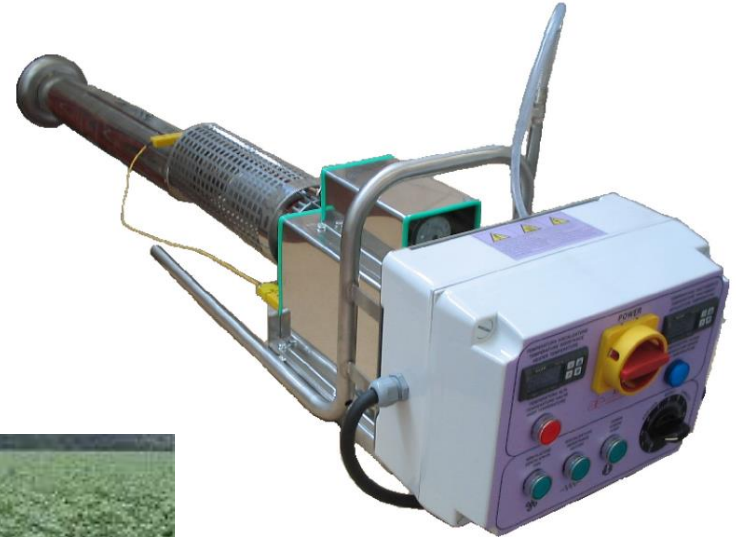
- Implemented in UK by Water Environment (WFD) Regulations 2003
- requires all rivers, lakes, ground and coastal water to reach **good** ecological and chemical status
- sets limits on the amount of pesticides and other chemicals that are allowed in drinking water

Priority Substances Directive- 45 chemicals are on the current list- Priority Hazardous Substances (PHS) and 'Priority Substances' (PS) eg chlorpyrifos, isoproturon, bifenox and cypermethrin

# 2009/128/EC Sustainable Use Directive



26 Nov 2015



26 Nov 2016



Immediately



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# Summary

- Fewer pesticides will be available
- Risk to hazard based approach for review
- CIPC will be reviewed in 2017 and data package is already submitted
- Legislation supports integrated approaches combining chemical and non-chemical methods



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