Seed treatment in Europe: What’s left? And what’s next?

Lisbon 13.10.2014  Section SOF
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2nd Draft of the Guidance Document for the Authorisation of Plant Protection Products (PPPs) for Seed Treatment (January 2014)

Purpose:
- Provide for a harmonised implementation of the different provisions of the Reg. (EC) 1107/2009 that are related to seed treatment

The draft document was shared with
- Member States
- Stakeholders
Intentions of the Guidance Document

Guidance Document covers

- placing on the market and labelling of treated seeds
- guidance for the performance of the Risk Assessment for the authorisation of the PPPs for seed treatment
Main points of interest of ESA

- Maintain free movement of treated seed in the EU
- Provide access to PPPs authorised for ST in all EU
- Assure possibility of treatment of seeds for export outside the EU with PPPs not authorised in the EU
- Simplify and harmonise labelling of the treated seeds
- Have ESTA accepted as a suitable quality assurance scheme for seed treatment processes and the treated seeds

ESA Board WG STAT commented in the Guidance Document → confirmed its position

In detail...
Provide access to PPPs for treatment in all MS

**Guidance Document:** Treatment to be done ONLY in the MS where the PPP is authorised

**ESA position:** Automatic extension of the authorisation of a PPP that is already authorised for seed treatment in one Member State
Assure possibility of treatment of seeds for export outside the EU with PPPs not authorised in the EU

**Guidance document:** Full authorisation is required even for treatment of seeds that are intended to be exported outside the EU

**ESA position:** facilitated authorisation needed for exports
Simplify and harmonise labelling of the treated seeds

Guidance document:

- Need to distinguish between the labelling of PPPs and treated seeds which is not currently provided by 1107/2009

Proposal:

- Name of PPP
- Name of Active Substance
- Only S-phrases relevant to seeds
- Only risk mitigation measures set in the authorisation of the PPP that are relevant for seed

ESA Position: need for particular provisions concerning reduced labelling obligations for small packages
Have ESTA accepted as a suitable quality assurance scheme for seed treatment processes and the treated seeds

Guidance document: *Guidance documents should be used to assess:*

- the quality of the seed treatment process
- the quality of the treated seed

Rules developed at national level or by stakeholders - Appendix X: ESTA

ESA position: commitment for the implementation of the ESTA scheme
Guidance document: what is next?

European Commission:

- second version of the Guidance Document: has taken into account some comments of ESA
- meetings with representatives of the Member States
- third version of the Guidance Document → ?
- workshop → presentation of the third version and discussion with the stakeholders
Ban of CNIs and fipronil

March & August 2013

- Restricts the use of 3 neonicotinoids and fipronil for seed treatment
- The restrictions apply as of 1 December 2013/1 March 2014
- Review of the conditions of approval of the products in 2015 (CNIs)

HOWEVER...
Ban of CNIs and fipronil

European Commission- *October 2014*

- the timing of review has not been defined
- Bee Guidance Document should first be in place
Art. 53 – Emergency authorisations in plant protection

- 120 days
- Limited and controlled use of a PPP
- OSR, maize, sunflower
- Seed treatment, use of stocks
Art. 53 – Emergency authorisations in plant protection

Germany

- Fipronil: as granule in potatoes
- Thiamethoxam: as root application (liquid poured on soil around stem)
Impact of the ban to the seed sector

- Impact of the ban to OSR on the ongoing season
- Assess the damage in the EU
- Review of the ban
Impact of the restriction to the seed sector
Impact of the ban to the seed sector

Sources:
- National Seed Associations
- Farmers Associations
- Major OSR ESA members

PLEASE GIVE US INPUT