CARITY CROPS



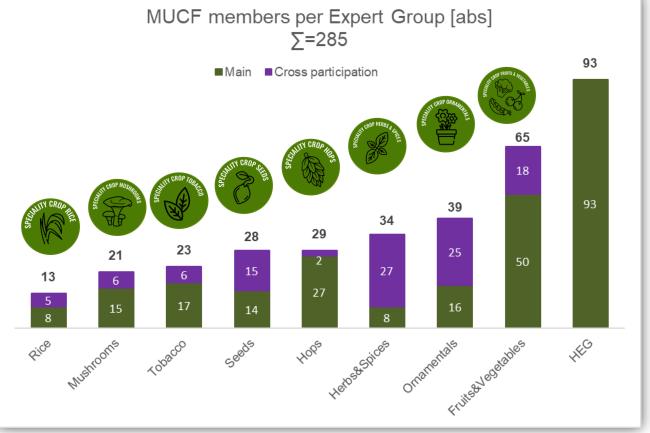
# UPDATE ON MUCF AREAS OF ACTIVITY BETWEEN REGULATORY FRAMEWORK AND REALITY

BARBARA EDLER – COORDINATOR & THE MUCF TEAM

## WHO ARE WE?



- Established 2015
- 302 members from 27 Member States + GB, CH and NO
- ~5 % are from PPP industry



#### **EUROPEAN MINOR USES COORDINATION FACILITY IN A NUTSHELL**



The **MISSION** of the MUCF is to support the work of European stakeholders and EU Member States, the UK, Norway and Switzerland through information exchange and efficient cooperation to close pesticide gaps in minor uses.



Our **VISION** is to work innovatively to ensure that the work is targeted to the most important minor uses topics. This is to enable farmers in the European region to produce high-quality crops through improved availability of crop protection tools, thus contributing to sustainable European agriculture.

#### MUCF MAIN FIELDS OF ACTIVITY & CORE COMPETENCIES

#### **Meetings**



- + Host & facilitate MUCF Commodity and Horizontal Expert meetings.
- + Organise meetings between stakeholders to discuss possible solutions and approaches for identified minor uses needs.

# Database **EUMUDA**



- + Host & further develop the European Minor Uses Database (EUMUDA).
- + Implement & collect minor use needs and priorities, minor uses, minor crops, and crop acreage data information.

# Information Exchange



- + Coordinate & support minor uses work among all Member Countries and stakeholders.
- + Address regulatory hurdles.
- + MUCF newsletter

Further details: Details about the MUCF can be found on www.minoruses.eu

# WHY ARE MINOR USES & SPECIALITY CROPS SO IMPORTANT?

#### **Economical impact**

- Minor uses represent 3% of cultivated area, but 20% of value of EU crop production. This corresponds to a value of more than 60 billion Euros per year in Europe.
- Speciality crops mostly produced on highly specialised farms, economic impact on farm level is high.

#### **Environmental impact**

- Enhance biodiversity in the region, counteract monoculture cultivation.
- Locally grown crops, CO<sub>2</sub> footprint reduction

#### Socio-economic impact

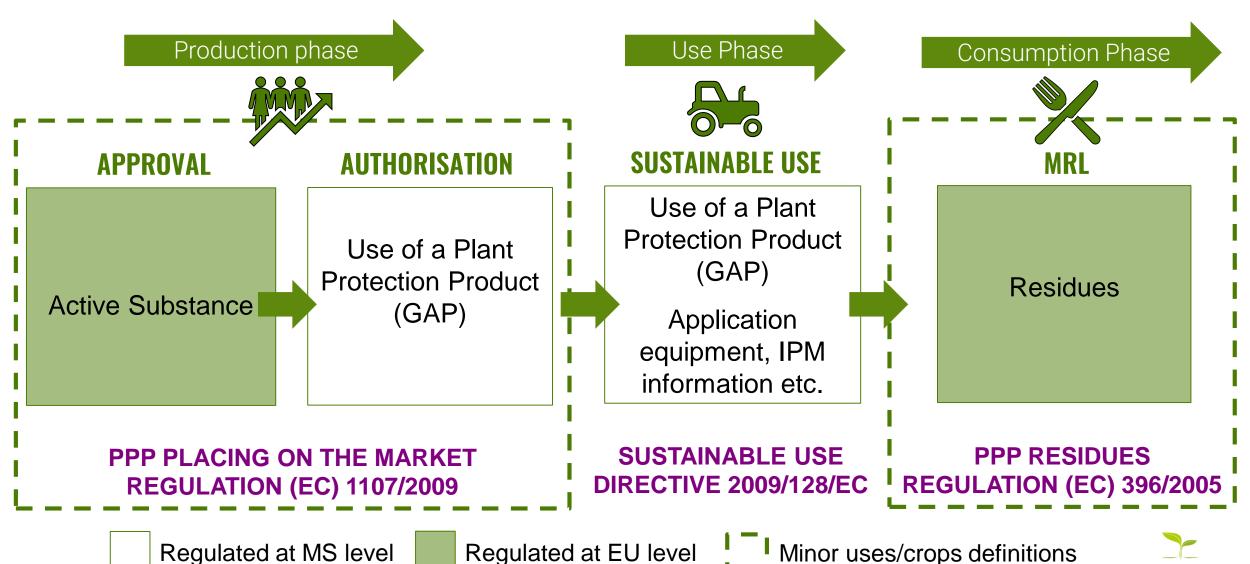
 Small-scale agriculture creates jobs, less abandonment of the countryside

#### **Health impacts**

Diversification of diet



# **EU PESTICIDE LEGISLATION** THE REGULATORY CYCLE OF A PLANT PROTECTION PRODUCT



Regulated at MS level



# WHAT ARE MINOR USES/CROPS?

**DEFINITIONS** 

### Regulation (EC) No 1107/2009 – Article 3(26):

Use of a plant protection product in a particular Member State on plants or plant products which are:

**National dimension** 

(a) not widely grown in that Member State, or

**Minor crop** 

(b) widely grown to meet an exceptional plant protection need

Minor use on a major crop

Minor crop refers to cultivation area

**EPPO Standard** PP 1/224(2) Principles of efficacy evaluation for Minor Uses.

Minor crop refers to economic value of the crop





# WHAT ARE MINOR USES/CROPS?

# **DEFINITIONS**

**TECHNICAL GUIDELINES:** On data requirements for setting MRLs, comparability of residue trials and extrapolation for residue data on products from plant and animal origin (SANTE/2019/12752).

The following criteria were used for classifying a crop or a product as 'major' in the EU:

- (a) Daily intake contribution > 0.125 g/kg bw/day and relevant cultivation area (> 20 000 ha) and/or production (> 400 000 tonnes per year) in the zone or
- (b) Cultivation area > 20 000 ha and production > 400 000 tonnes per year

All crops not defined as 'major crops' according to the criteria outlined above are minor crops.

Minor/major refers to daily intake in combination with cultivation area or production amount



# REGULATORY VERSUS EPPO AND RESIDUE ZONES

#### **Regulatory zones:**

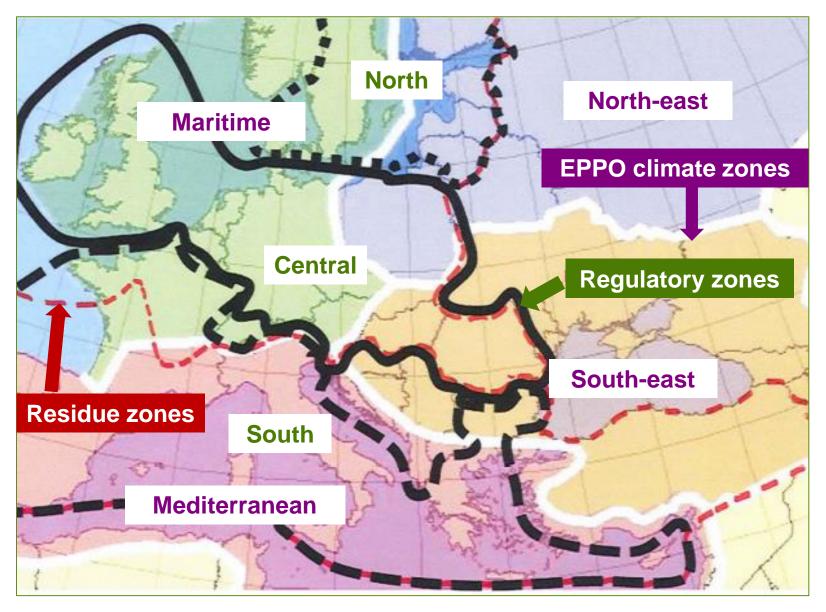
North, Central, South (black borders)

#### **EPPO climate zones:**

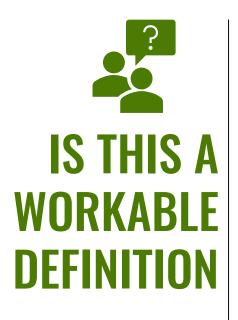
Maritime, Mediterranean, North-east, South-east (white borders)

### Residue zones (outdoor):

North and South (red borders)







#### Issues

- Leaves it up to Member Country (MC) to define what constitutes "minor crop/use" "-> A minor crop/use in one country, can be a major crop/use in an other and vice versa!
- Interferes with the zonal procedure and mutual recognition
- A fixed acreage (per zone) would be favoured by growers association
- An EU wide harmonized definition of 'minor crop/use' would be needed to facilitate minor use authorisations.

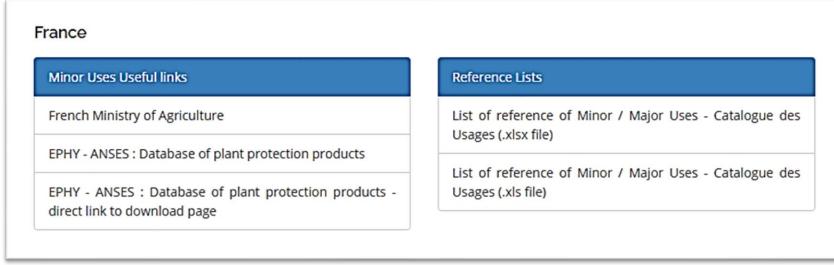


### **EUMUDA-DATABASE**

 EUMUDA is an important tool to collect the minor use needs from Member Countries, to follow-up on these needs and to manage projects

#### What information can be found in EUMUDA?

- A compiled list of minor uses needs from Member Countries.
- An overview of ongoing projects and their status.
- Reference lists of what are considered "minor uses" in different Member Countries (example from France below) and minor uses-useful links.





## **EUMUDA TABLE OF NEEDS**

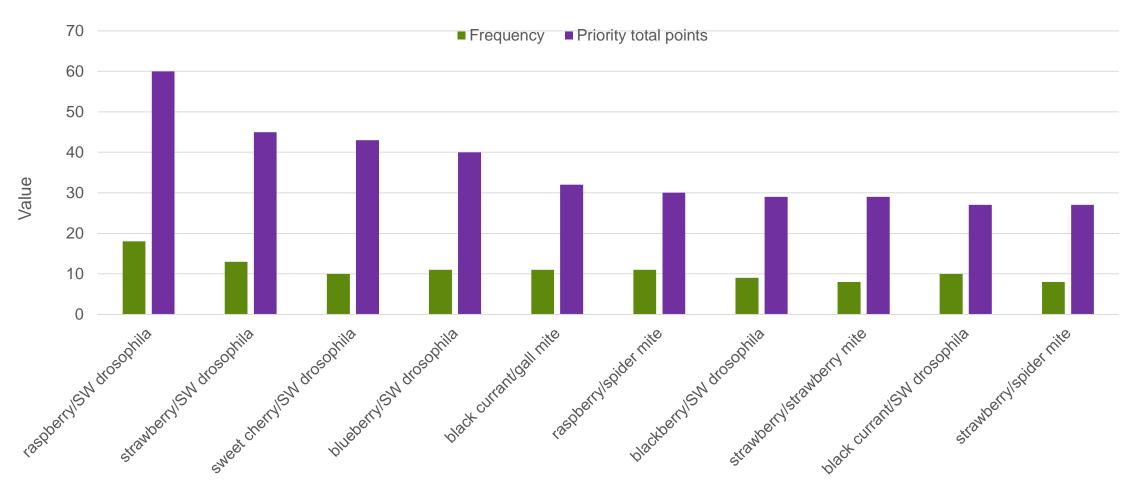
Crop EPPO Code	Crop common name \$\square\$	Pest EPPO Code \$	Pest scientific name \$ Search	Pest common name	Frequency Search	Priority total points	Member States Search	Area of use \$	Function Search
RUBID	raspberry	DROSSU	Drosophila suzukii	spotted wing drosophila	18	60	Northern: DK,EE,FI,NO,SE Central: AT,BE,CH,DE,HU,IE,NL,SI,SK,UK Southern: FR,IT,PT	f,fg 🚯	insecticide
DAUCS	carrot	PSILRO	Chamaepsila rosae	carrot fly	15	55	Northern: DK,EE,FI,LV,NO,SE Central: BE,CH,NL,SI,SK Southern: CY,ES,PT	f	insecticide
FRAAN	strawberry	DROSSU	Drosophila suzukii	spotted wing drosophila	13	45	Northern: EE,SE Central: BE,DE,HU,IE,NL,SI,SK,UK Southern: ES,FR,PT	f,fg 🐧	insecticide

EUMUDA includes 3186 needs from 28 countries. The table of needs will be updated in autumn 2021.

https://www.eumuda.eu/database/table\_minor\_uses

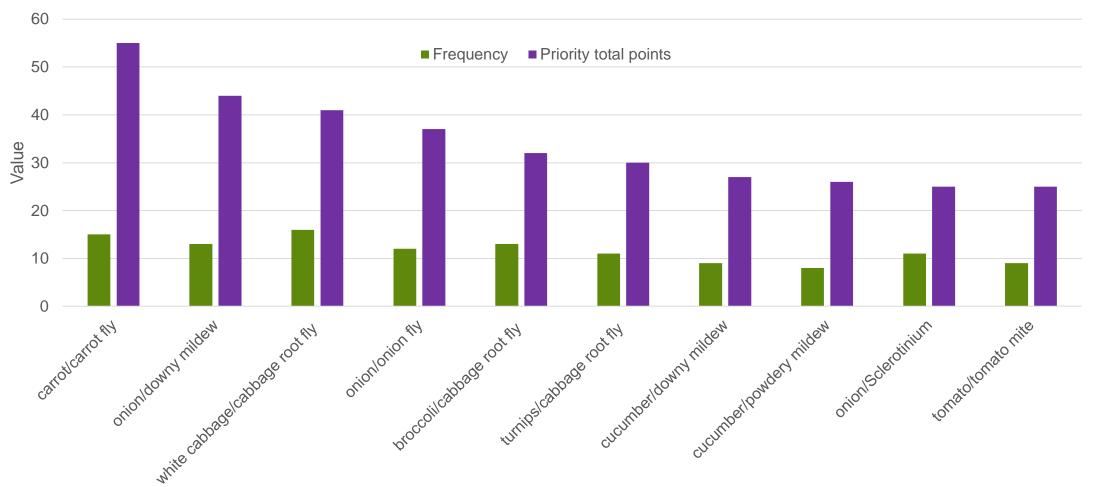


### TOP 10 PRIORITIES OF GROUPED MINOR USES NEEDS - FRUITS -



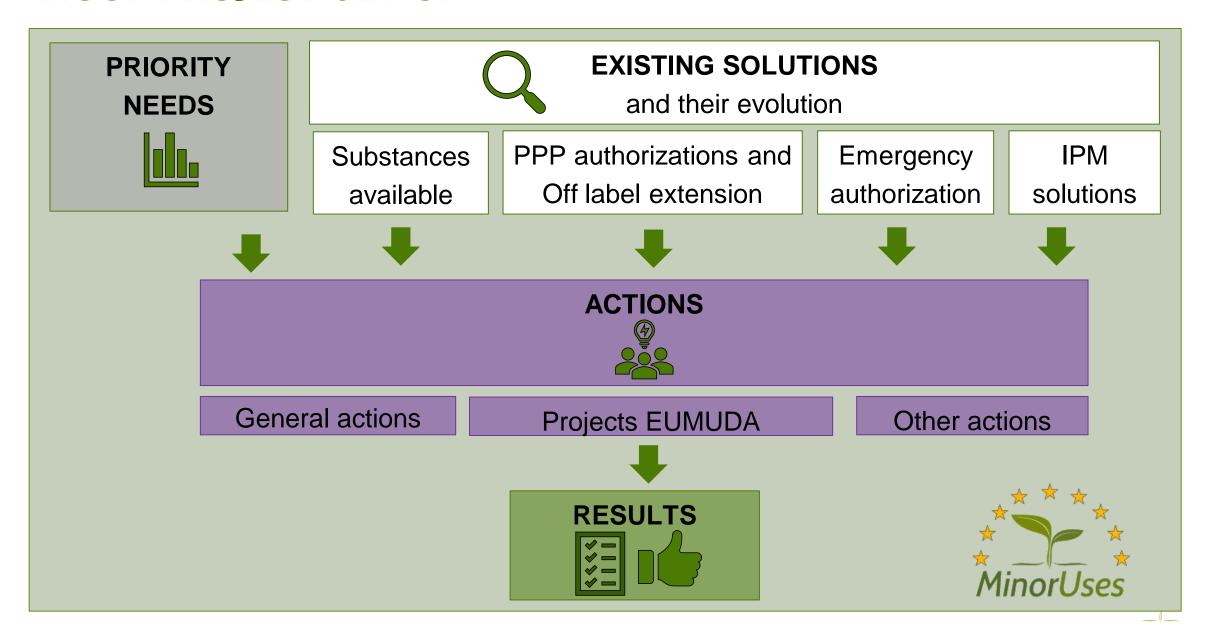


## TOP 10 PRIORITIES OF GROUPED MINOR USES NEEDS- VEGETABLES -





## **MUCF PROJECT SET-UP**





- A searchable database on crop efficacy to retrieve extrapolation possibilities for minor uses. To be hosted by EPPO.
- A searchable database on crop residue data to retrieve the extrapolation possibilities for minor uses, after SANCO residue extrapolation tables. To be hosted by MUCF.

For residues, for example, extrapolation possibilities only relate to crops, whereas for efficacy they are related to a combination of pests and crops.

For efficacy and residues there are different crop grouping systems.

 Update of the survey on minor uses needs and minor/major crop, minor uses per Member Country.

# MINOR USES & SPECIALITY CROPS IN EUROPE

# CURRENT SITUATION PART 1

- Lack and decrease of active substances due to EU requirements for evaluation and the relatively high registration process costs. Sales versus data generation costs (MRL, efficacy data, application fees, etc.)
- Approved active substances in Oct. 2021: 454; 57 out of these are candidates for substitution; 23 are basic substances; 33 are low risk substances.
- Non-renewed substances (93 since beginning of the program AIR), renewed substances (62), new substances approved (61).
- Interim solutions: Emergency Authorisations.
  - Article 53 states that a Member State can authorise a PPP in special circumstances for limited period of max.120 days
- Other solution: Off-Label Extension of Authorisation for Minor Uses (EAMU)
  - The use of any product with an off-label EAMU approval is entirely at the risk of the user.

# MINOR USES & SPECIALITY CROPS IN EUROPE

# CURRENT SITUATION PART 2

MUCF conducted an analysis on **Emergency Authorisations** granted between 2017-19 in Europe & compared it with minor uses needs

- A total of 311 substances were covered by 1753 authorisations.
- 80% of the 50 first prioritized needs are addressed in Europe with emergency authorization.
- Insecticides were authorized 906 times, fungicides 442 times, herbicides 264 times, and others 141 times.
- Most emergency authorisations granted for the active substance cyantraniliprole (5%), and for the pest *Drosophila suzukii* (6%).

The complete table of survey results is available at: www.eumuda.eu/database/table\_minor\_uses\_and\_art\_53

# 10 MOST REPRESENTED NEEDS IN EMERGENCY AUTHORIZATIONS

Need	Nr. of Emerg . Auth. 2017-19	
sweet cherry	Drosophila suzukii	63
raspberry	Drosophila suzukii	45
Europ. plum	Drosophila suzukii	42
sour cherry	Drosophila suzukii	40
bilberry	Drosophila suzukii	38
blackberry	Drosophila suzukii	24
black currant	Drosophila suzukii	23
blueberry	Drosophila suzukii	22
peach	Drosophila suzukii	22
apple	Venturia inaequalis	21

Need	Nr. of Emerg . Auth. 2017-19	
potato	Agriotes sp.	21
asparagus	Botrytis cinerea	18
tomato	Tuta absoluta	15
chicory	dicotyledonous weeds	15
potato	sprout depression	13
tomato	Globodera (cyst nematode)	12
cucumber	Nematodes	12
tomato	Nematodes	12
sweet pepper	Nematodes	11
aubergine	Nematodes	11



# MINOR USES & SPECIALITY CROPS IN EUROPE

# CURRENT STATE PART 3

- Duplication of work (regulatory) and costs (data generation) in different member countries
- Distortion of competition at European level for the crop producer
- Distortion of competition with imports from third countries



# INCREASING TREND FOR BIOLOGICAL CONTROL

#### **Decline of chemical active substances**

- PPP industry invest less and less in new active substance development.
- Farm to Fork strategy with two main targets:

Target 1: to reduce by 50% the use and risk of chemical pesticides by 2030.

Target 2: to reduce by 50% the use of more hazardous pesticides by 2030.

**Upward trend** in the number of approved non-chemical, low-risk and basic substances (EC report 2020-05-20)

**Manage resistance ("**resistance breaker")

**Zero residue policy** by supermarkets due to consumer trends

- Desire to have maximum information about the food. Full traceability + more information from "the field"
- Move toward organic consumptions (+ now 0 residues initiatives)
- Put pressure on retailers for better transparency and more responsibility, safety, quality standards, etc..
- Supermarkets in Europe specify a range of pesticide residues criteria for the supply of fresh produce (e.g. Lidl: Total sum of active substances found must not exceed five. Consequences: nonconformances- "full investigation", reanalysis costs, jeopardize Global GAP certification, grower ban!)

IPM tool (consideration of all PPP measures).

#### General principles of IPM, adapted from Annex III of Directive 2009/128/EC

- Crop rotation
- Use of adequate cultivation techniques (i.e. stale seedbed technique, sowing dates and densities, under-sowing, conservation tillage, pruning and direct sowing).
- Use, where appropriate, of resistant/ tolerant and standard/ certified seed and planting material.
- Usage of balanced fertilisation, liming and irrigation/ drainage practices.
- Preventing the spreading of harmful organisms by hygiene measures (i.e. by regular cleansing of machinery and equipment).
- Protection and enhancement of important beneficials, by adequate plant protection and the utilisation of ecological infrastructures inside and outside production sites.
- Prevention and/or Suppression

Learning

and

**Optimization** 

- Harmful organisms must be monitored by adequate methods and tools, where available.
  - Tools should include observations in the field as well as scientifically sound warning, forecasting and early diagnosis systems, where feasible as well as the use of advice from professionally qualified advisors.
    - Based on the results of the monitoring the professional user has to decide whether and when to apply plant protection measures. Robust and scientifically sound threshold values are essential components for decision making. For harmful organisms threshold level defined for the region, specific areas, crops and particular climatic conditions must be taken and account before treatments where feasible.

#### IPM PRINCIPLES

To be achieved & supported by

- Based on the records on the use of pesticides and on the monitoring of harmful organisms the professional should check the success of the applied plant protection measures.
- Where the risk of resistance against a plant protection measure is known and the level of harmful organisms requires repeated application of pesticides to the crops.
- Available anti-resistance strategies should be applied to maintain the effectiveness of the products.
- This may include the use of multiple pesticides with different modes of action.

Solution

**Monitoring** 

and

Decision

- Sustainable biological, physical and other non-chemical methods shall be preferred to chemical methods if satisfactory pest control is provided.
- Pesticides applied shall be specific as possible for the target and shall have the least side effects on human health, non-target organisms and the ecosystem.
- The professional user keep the use of pesticides accordingly to the label recommendations 'the label is the law' and other forms of intervention to levels that are necessary, e.g. partial applications, considering that the level of risk in vegetation is acceptable and they do not increase the risk for development of resistance in populations of harmful organisms.

# CONCLUSION & SOME DISCUSSION POINTS

#### Biocontrol products and their potential

- Many products are low-risk and target specific
- Many do not need residue work
- Perfectly fit in IPM matrix as a solution tool piece

#### **Discussion**

- Mutual recognition is not applied as needed
- More harmonisation in regulations and definitions is needed, e.g. an EU wide harmonized definition of 'minor crop/use' would facilitate minor use authorisations.
- Authorization of low-risk active substances and products (e.g. improved timelines and fees) should be favoured. Many low-risk products are based on biocontrol substances. Often there are disproportionate costs and fees for small markets.

### Invitation to participate in the MUCF

An exchange of MUCF data with the PPP industry is envisaged in the near future.



CIMITY CROPS

# THANK YOU FOR YOUR ATTENTION.





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