BRYANT CHRISTIE INC.

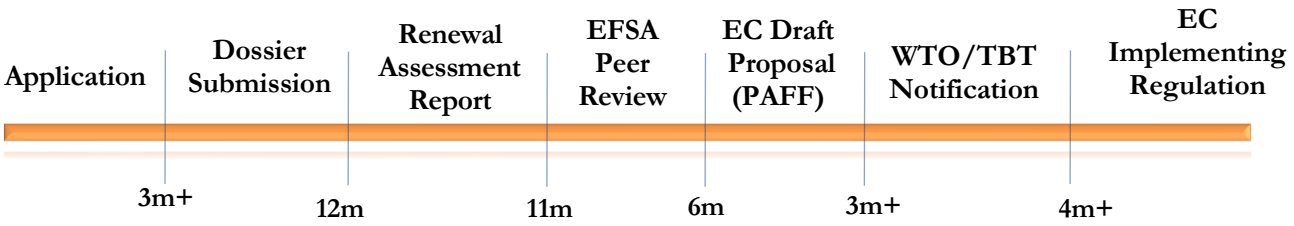
USDA

EU EARLY ALERT - PESTICIDE REVIEW

June 4, 2020

The information presented in this document provides interested stakeholders with advance notice of active ingredients under review for renewal of approval in the EU and highlights which substances that have **expired**, are expected to **expire**, may have **restricted renewal** or **non-renewal of approval**. The green arrows reflect where a substance is in the EU review process as of **May 31, 2020**.

In the European Union active ingredients must be reviewed every 10-15 years. The review process takes three or more years to complete. Registrants must submit an application for renewal no later than thirty-six months prior to the expiration date. The figure below highlights the general timeline between the main steps of the process. During these reviews, substances are checked against EU cut off criteria. Triggering the cut off criteria is likely to result in the removal of the pesticide from use in the EU. It can also result in the elimination of the associated MRLs. These reviews are separate and different from the ongoing MRL-specific reviews that are occurring simultaneously (Article 12 Reviews). MRL-specific reviews are notified on a rolling basis.



APPLICATION FOR RENEWAL – EXPECTED TO EXPIRE

Chemical companies must support the review of their substance. If they do not, the active ingredient will automatically expire in the EU on a set date. For the substances below, registrants **have not submitted the application** for renewal of approval or **have withdrawn the application** and **approval will expire.** Corresponding MRLs may be affected. The substance's expiration date is outlined in parentheses ( ).

- **Triflumizole** (June 30, 2020)
- **Spirodiclofen** (July 31, 2020)
- **Fenbuconazole** (April 30, 2021)
- **Carboxin** (May 31, 2021)
- **Etridiazole** (May 31, 2021)
- **Myclobutanil** (May 31, 2021)
- **Oryzalin** (May 31, 2021)

APPLICATION FOR RENEWAL - EXPIRED (June 2019 – May 2020)

Substances in this section **have already expired** due to **non-submission of application for renewal** or **withdrawal of application for renewal**. This list includes substances that have expired in the last year. Corresponding MRLs may be affected. Expiration date is outlined in parentheses ( ).

- **Ammonium acetate** (August 31, 2019)
- **Methomyl** (August 31, 2019)
- **Sodium hypochlorite** (August 31, 2019)
- **Triadimenol** (August 31, 2019)
- **Quizalofop-P** (November 30, 2019)
- **Chlorsulfuron** (December 31, 2019)
- **Cyromazine** (December 31, 2019)

UP NEXT FOR REVIEW (Up to March 2021)

Under the EU pesticide review program, the substances listed in this section are scheduled to go through the periodic review process. They have **upcoming deadlines for the submission of the application for renewal.**

- **Ametoctradin** (July 20, 2020)
- **Mandipropamid** (July 20, 2020)
- **Bixafen** (September 30, 2020)
- **Halosulfuron-methyl** (September 30, 2020)
- **Spiromesifen** (September 30, 2020)
- **Fluopyram** (January 31, 2021)
- **Penflufen** (January 31, 2021)
- **Pyriofenone** (January 31, 2021)
- **Sedaxane** (January 31, 2021)

STANDING COMMITTEE ON PLANTS, ANIMALS, FOOD AND FEED (PAFF)

Based on the European Food Safety Authority (EFSA) conclusions, the European Commission has proposed the substances in this section for **non-renewal** or **restricted renewal.** They are now **under consideration** by the Standing Committee on Plants, Animals, Food and Feed (PAFF). Some draft proposals are notified to the World Trade Organization (WTO) prior to the Committee's final vote. In these cases, substances are listed below and in the next section.

- **Benfluralin**
- **Beta-cyfluthrin**
- **Bifenazate**
- **Bromoxynil**
- **Etoxazole**
- **Famoxadone**
- **Fenpyrazamine**
- **Indoxacarb**
- **Mancozeb**
- **Phenmedipham**
- **Pydiflumetofen**
- **Thiophanate-methyl**

WTO NOTIFICATION (June 2019 – May 2020)

The substances in this section have been notified to the **WTO as proposed for non-renewal** or **restricted renewal**. After the comment period, the Commission will analyze the comments received and publish the Implementing Regulation. Notification date is outlined in parentheses ( ). Please refer to the draft Commission Regulation for the full explanation of the justification for the restricted or non-renewal of approval.

Beta-cyfluthrin: proposed non-renewal based on unacceptable risk to workers, high risk to residents, non-target arthropods, and to aquatic organisms. (February 20, 2020)

Bromoxynil: proposed non-renewal based on suggested classification as toxic for reproduction category 1B. (April 17, 2020)

Mancozeb: proposed non-renewal based on classification as toxic for reproduction category 1B. (April 17, 2020)

Benfluralin: proposed non-renewal based on long-term risk to birds and mammals including the risk from secondary poisoning of earthworm eating birds and mammals, as well as the genotoxic potential of an impurity could not be excluded. (May 6, 2020)

COMMISSION IMPLEMENTING REGULATION (June 2019 – May 2020)

The Commission has published the final decision on non-renewal or restricted renewal in the EU for the substances in this section. EU MRLs may be subject to change as a result. Implementing regulation publication date is outlined in parentheses ( ). Please refer to the published Commission Regulation for the full explanation of the justification for the restricted or non-renewal of approval.

Chlorpropham: non-renewal based on concerns of endocrine disrupting properties and risk to non-target arthropods. (June 18, 2019)

Dimethoate: non-renewal based on concerns of genotoxic, reproductive, persistent bioaccumulative toxicity, high risk to mammals and non-target arthropods, and risk to honeybees. (June 27, 2019)

Desmedipham: non-renewal based on potential endocrine disrupting, carcinogenic, and mutagenic properties. (June 28, 2019)

Methiocarb: non-renewal based on unacceptable risk to workers and genotoxic potential of metabolite. (September 30, 2019)

Alpha-cypermethrin: restricted renewal as a candidate for substitution until October 31, 2026. (October 9, 2019)

Chlorpyrifos: non-renewal based on genotoxic potential, developmental neurotoxicity, and classification of the substance as toxic for reproduction, category 1B. (January 13, 2020)

Chlorpyrifos-methyl: non-renewal based on genotoxic potential, developmental neurotoxicity, and classification of the substance as toxic for reproduction, category 1B. (January 13, 2020)

Thiacloprid: non-renewal based on a critical concern in relation to the contamination of groundwater by metabolites containing carcinogenic properties. There is also an undetermined risk to aquatic organisms, bees, and non-target plants, as well as concerns on the impact on reproductive toxicity. (January 14, 2020)

Metalaxyl-M: restricted renewal limits the use of treated seeds to greenhouses. (May 5, 2020)

MRL CHANGES (June 2019 – May 2020)

As a **result of non-renewal** or **expiration of approval**, restrictive MRLs have either been proposed (WTO notification) or implemented (Commission Regulation) for the substances below.

WTO Notification:

- **Flufenoxuron**: WTO notification G/SPS/N/EU/371. February 28, 2020
- **Chlorpyrifos**: WTO notification G/SPS/N/EU/360. December 12, 2019
- **Chlorpyrifos-methyl**: WTO notification G/SPS/N/EU/360. December 12, 2019

Implementing Regulation:

- **Triasulfuron**: Commission Regulation 2019/1792 on October 17, 2019. *Effective date: May 18, 2020*
- **Fipronil**: Commission Regulation 2019/1792 on October 17, 2019. *Effective date: May 18, 2020*
- **Imazosulfuron**: Commission Regulation 2019/1792 on October 17, 2019. *Effective date: May 18, 2020*
- **Orthosulfamuron**: Commission Regulation 2019/1792 on October 17, 2019. *Effective date: May 18, 2020*