

UK experiences of conducting pesticide environmental risk assessments for the terrestrial compartment

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- briefly review the achievements in the environmental risk assessment area for pesticides in response to the regulatory scientific requirements.
- attention will be dedicated to the experience-sharing on matters related to the application of the existing scientific guidance documents and assessment methodologies in the field of pesticides ERA.

Outline



Past

- History
- Processes
- What was delivered

Present

- Processes
- What is delivered

Past vs Present

- How far have we come? How far do we have to go? Has it been successful to date?

UK experiences of conducting pesticide environmental risk assessments for the terrestrial compartment

History

UK legislation – Control of Pesticides Regulation (1986), which was under the Food and Environmental Protection Act (1985)

Working documents – covered lab and field

No set risk assessment

Used available EPPO decision-making criteria

History

Directive 91/414/EEC

“Pathfinder” and the first “90”

- Data requirements and Uniform Principles
- No specified approach to risk assessment

What was the result?

First experience of working with OMS

History



Workshops involved MS, Industry, academics
.... SETAC style

Commission instigated work on Guidance
Documents

Process



Unclear

No clear process to determine what was to be considered next

No consideration of protection goals

Implementation issues – timeline... relevant to products vs active substances?

What was delivered

Guidance Documents for the terrestrial environment

*SANCO/10329/2002 rev 2 final 17 October 2002
DRAFT - Working Document Guidance Document
on Terrestrial Ecotoxicology Under Council Directive 91/414/EEC*

*SANCO/4145/2000 – final 25 September 2002 Working Document
Guidance Document on Risk Assessment for Birds and Mammals Under
Council Directive 91/414/EEC*

List of proceedings from workshops etc

ESCORT 1 and 2

What was delivered

Assessments sufficient for MS and COM to decide whether an a.s. should be put on Annex I?

List of endpoints sufficient for MS to carry out assessments at MS level?

Were any “wrong” decisions made?

Lambda cyhalothrin

MS issues in 2001 were:

For the protection of bees Member States should prescribe appropriate risk mitigation measures (e.g. buffer zones) if products containing lambda-cyhalothrin are applied at high doses.

Depending on crop and application rate, Member States should prescribe appropriate risk mitigation measures to avoid unacceptable effects on non-target arthropods when authorisations are granted for plant protection products containing this active substance.

Present day

EFSA process

- Mandate from Commission
- EFSA Panel on Plant Protection Products and their Residues (PPR)
- Opinion – followed by Guidance Document
- Noted by MS – used for a.s. and products?
- Implementation issues

Present day

Use “best science” available?

Scientifically more robust?

More transparent?

More detailed...more complex?

Consideration of protection goals?

Interaction of RA ↔ RM?

Present day

Ecotox growing/developing area?

Knowledge increasing?

Appreciation of uncertainty increasing (?)
...desire to address/highlight uncertainty
but...

So have things “improved”.....?

Lambda cyhalothrin

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Lambda cyhalothrin

MS issues in 2016 were:

risk to mammals and non-target arthropods

Mammals identified in 2016 not in 2001...but what was the issue – lack of data rather than a “real” concern?

Azoxystrobin

MS issues in 1998 (see 7581/VI/97-Rev.5
22 April 1998):

particular attention should be given to the impact on aquatic organisms. Risk mitigation measures should be applied where appropriate.

Azoxystrobin

MS issues in 2011 (see
SANCO/11027/2011 Rev 2) were:

– *the protection of aquatic organisms*

Fenhexamid

MS issues in 2000 (see 6497/VI/99-rev. 2
October 2000):

–impact on aquatic organisms

Fenhexamid

MS issues in 2011 (see EU 2015/1201 of July 2015) were:

- *the risk to aquatic organisms,*
- *the long-term risk to mammals for field uses.*

Final thoughts...

We know more?

We do more?

Do we make best use of this knowledge/
data?

Leads to better assessments?

Do we make better decisions?

Final, final thoughts...

Increase in guidance + work...but what is next?

More guidance? More work?

Can we use what we have learnt to guide us in the future?

- For example, what is really needed to make an appropriate decision?

Thank you for listening!