BRYANT CHRISTIE INC.

USDA

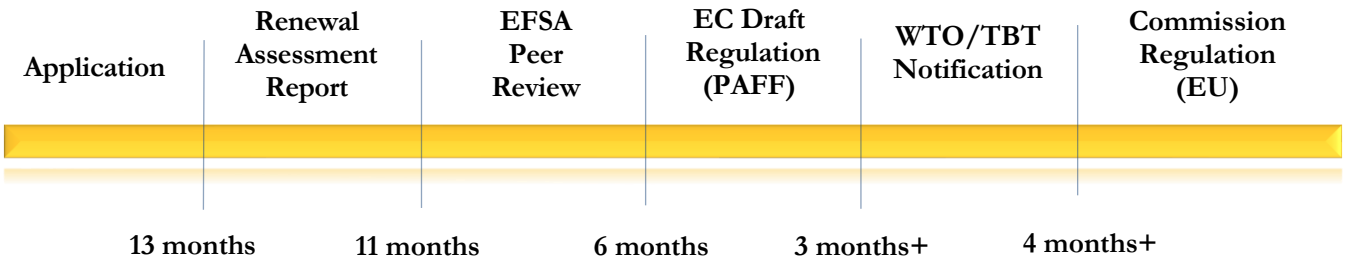
EU EARLY ALERT - PESTICIDE REVIEW

June 2, 2023

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, 2023**.

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.

The pesticide review process monitored here is different from the MRL review process (Article 12 Reviews). MRL-specific reviews are notified on a rolling basis according to the schedule shared at the end of this report.



APPLICATION FOR RENEWAL – EXPECTED TO EXPIRE (Up to May 2024)

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 For the substances below, registrants **have not submitted the application** for renewal of approval or **have withdrawn the application** and **approval will expire.** Corresponding MRLs may be affected.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.

- **Bacillus firmus I-1582*** (September 30, 2023)
- **Spiromesifen** (September 30, 2023)
- **Trichoderma atroviride** (formerly T. harzianum) **strain IMI 206040*** (September 30, 2023)
- **Quizalofop-P** (November 30, 2023)

APPLICATION FOR RENEWAL - EXPIRED (June 2022 – May 2023)

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.

- **Bispyribac** (July 31, 2022)
- **Plant oils /Citronella oil*** (August 31, 2022)

**Substance is exempted from a tolerance in the United States*

UP NEXT FOR REVIEW (Up to May 2024)

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.**

- **Pinoxaden** (June 30, 2023)
- **Cyantraniliprole** (September 14, 2023)
- **Isofetamid** (September 15, 2023)
- **Bacillus amyloliquefaciens MBI 600*** (September 16, 2023)
- **Oxathiapiprolin** (March 3, 2024)

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

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 (SCoPAFF) as available in the **March 22-23 and May 24-25, 2023**, meeting agendas. Drafts are first presented for discussion and subsequently for a vote by the Committee. Draft proposals may be 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.

Drafts presented for discussion

- **Captan**
- **Triflusulfuron-methyl**
- **S-metolachlor**

WTO NOTIFICATION (June 2022 – May 2023)

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.

Proposed non-renewal

S-metolachlor: proposed non-renewal based on multiple concerns, including contamination of groundwater risk for earthworm-eating mammals. (May 31, 2023)

Proposed restricted renewal

Captan: proposed restricted renewal of approval to permanent greenhouse use only. (September 28, 2022)

COMMISSION IMPLEMENTING REGULATION (June 2022 – May 2023)

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.

Non-renewal

Benfluralin: 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. (January 23, 2023)

Oxamyl: non-renewal of approval due to high risk for all the representative uses assessed to exceed the acceptable operator exposure level, exceedance of the acute reference dose, others. (April 5, 2023)

Ipconazole: withdrawal of approval due to high long-term risk to birds and classification as toxic for reproduction category 1B. (May 10, 2023)

Restricted renewal

Abamectin: restricted renewal to greenhouse use based on high risk identified to aquatic organisms and wild terrestrial non-target organisms, others. (March 8, 2023)

MRL CHANGES (June 2022 – May 2023)

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:

- **Cyromazine**: WTO notification G/SPS/N/EU/582. (July 21, 2022)
- **Topramezone**: WTO notification G/SPS/N/EU/582. (July 21, 2022)
- **Triflumizole**: WTO notification G/SPS/N/EU/582. (July 21, 2022)
- **Calcium phosphide***: WTO notification G/SPS/N/EU/582. (July 21, 2022)
- **Bifenazate**: WTO notification G/SPS/N/EU/609. (January 17, 2023)
- **Carboxin**: WTO notification G/SPS/N/EU/616. (February 23, 2023)
- **Diuron**: WTO notification G/SPS/N/EU/617. (February 24, 2023)
- **Etoxazole**: WTO notification G/SPS/N/EU/617. (February 24, 2023)

Import tolerances and/or some Codex MRLs were maintained for the following substance:

- **Methomyl**: WTO notification G/SPS/N/EU/617. (February 24, 2023)

Implementing Regulation:

- **Thiram**: Commission Regulation 2022/1406 on August 3, 2022. *Effective date: February 28, 2023*

MRL CHANGES (*continued*)

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.

Implementing Regulation:

- **Bromoxynil**: Commission Regulation 2023/128 on January 19, 2023. *Effective date: August 8, 2023*
- **Chlorsulfuron**: Commission Regulation 2023/128 on January 19, 2023. *Effective date: August 8, 2023*
- **Clothianidin**: Commission Regulation 2023/334 on February 15, 2023. *Effective date: March 7, 2026*
- **Thiamethoxam**: Commission Regulation 2023/334 on February 15, 2023. *Effective date: March 7, 2026*
- **Sodium aluminum silicate**: Commission Regulation 2023/377 on February 22, 2023. *Effective date: September 14, 2023*
- **Triadimenol**: Commission Regulation 2023/377 on February 22, 2023. *Effective date: September 14, 2023*
- **Imazaquin**: Commission Regulation 2023/710 on March 30, 2023. *Effective date: October 21, 2023*
- **Phosmet**: Commission Regulation 2023/1029 on May 25, 2023. *Effective date: September 15, 2023*

Import tolerances and/or some Codex MRLs were maintained for the following substance:

- **Cyfluthrin**: Commission Regulation 2023/173 on January 27, 2023. *Effective date: August 16, 2023*
- **Beta Cyfluthrin**: Commission Regulation 2023/173 on January 27, 2023. *Effective date: August 16, 2023*

EU EARLY ALERT – ARTICLE 12 MRL REVIEW

The Article 12 of Regulation (EC) No. 396/2005 provides for the review of all MRLs established in the European Union. EFSA publishes a progress report that lays out the expected timeline for MRL-specific reviews (start of data collection and conclusion of EFSA's Reasoned Opinion). The table below lists active ingredients of interest to U.S. stakeholders that have started or are expected to start the MRL review process in 2023, according to information available as of **May 31, 2023**.

The Office of Plant Division at the Foreign Agriculture Service notifies stakeholders at the beginning of the MRL review process. This early notice provides stakeholders the opportunity to contact registrants and coordinate on actions to support the EU MRL at a critical point of the MRL review process.

Active Substance	Start of MRL Review	Reasoned Opinion
Gamma-cyhalothrin	01/15/2023	01/01/2024
Clopyralid	06/15/2023	30/05/2024

***Important Note**: The BCI Early Alert System Report is intended to be an initial reference source only. Users must verify information obtained from it with knowledgeable parties prior to sale or shipments of any products. Users of the EU Early Alert Report acknowledge that BCI cannot and does not warrant that information will be one hundred percent (100%) accurate and free of omissions. BCI shall not be held liable for any losses or damages arising from errors or omissions from use of the information contained in the EU Early Alert System Report.*