BRYANT CHRISTIE INC.

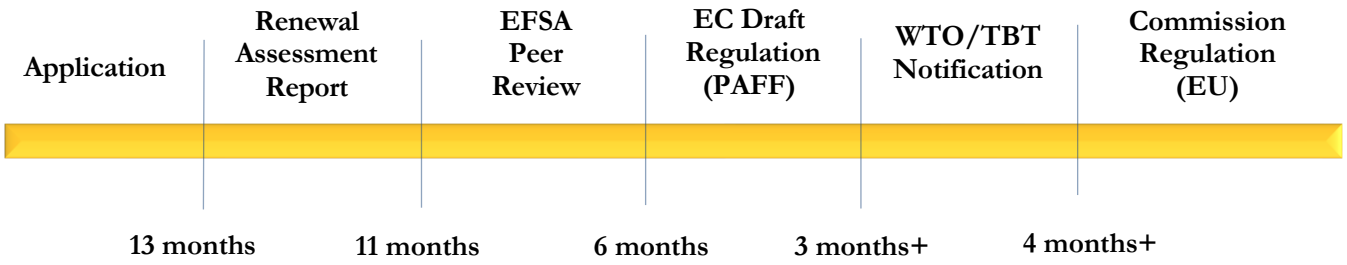
USDA

EU EARLY ALERT - PESTICIDE REVIEW

December 3, 2021

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 **November 30, 2021**.

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 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 November 2022)

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 For the substances below, registrants **have not submitted the application** for renewal of approval or **have withdrawn the application** and **approval will expire.** Corresponding MRLs may be affected.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

- **Fluquinconazole** (December 31, 2021)

APPLICATION FOR RENEWAL - EXPIRED (December 2020 – November 2021)

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 ( ).

- **Imidacloprid** (December 1, 2020)
- **Zeta cypermethrin** (December 1, 2020)
- **Fenbuconazole** (April 30, 2021)
- **Carboxin** (May 31, 2021)
- **Cyproconazole** (May 31, 2021)
- **Etridiazole** (May 31, 2021)
- **Flutriafol** (May 31, 2021)
- **Myclobutanil** (May 31, 2021)
- **Oryzalin** (May 31, 2021)

UP NEXT FOR REVIEW (Up to May 2022)

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.**

- **Aminopyralid** (December 31, 2021)
- **Azoxystrobin** (December 31, 2021)
- **Chlorantraniliprole** (December 31, 2021)
- **Fluroxypyr** (December 31, 2021)
- **Oxyfluorfen** (December 31, 2021)
- **Imazalil** (December 31, 2021)
- **Kresoxim-methyl** (December 31, 2021)
- **Metaflumizone** (December 31, 2021)
- **Tefluthrin** (December 31, 2021)
- **Pyriofenone** (January 31, 2022)
- **Benalaxyl-M** (April 30, 2022)
- **Pyroxsulam** (April 30, 2022)
- **Bixafen** (May, 30, 2022)
- **Fluxapyroxad** (May, 30, 2022)
- **Penflufen** (May, 30, 2022)
- **Penthiopyrad** (May, 30, 2022)
- **Sedaxane** (May, 30, 2022)

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) as available in the July 5-6, 2021 meeting summary and the October 21-22 and December 1-2, 2021 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:

- **Sulfoxaflor**
- **Isopyrazam**
- **Bifenazate**

Draft presented for a vote:

- **Phosmet**

WTO NOTIFICATION (December 2020 – November 2021)

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.

Abamectin: proposed restricted renewal to permanent greenhouse use only. (March 15, 2021)

Phosmet: proposed non-renewal based on environmental concerns and multiple data gaps. (March 25, 2021)

WTO NOTIFICATION *(Continued)*

Sulfoxaflor: proposed restricted renewal to permanent greenhouse use only. (November 17, 2021)

COMMISSION IMPLEMENTING REGULATION (December 2020 – November 2021)

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.

Mancozeb: non-renewal based on classification as toxic for reproduction category 1B. (December 15, 2020)

Etoxazole: renewal as a candidate for substitution and restricted to use on ornamental plants in permanent greenhouses. (December 16, 2020)

Fenpyrazamine: renewal restricts products with concentration of hydrazine higher than 0.0001%. (March 16, 2021)

Alpha-cypermethrin: withdrawal of approval as applicant did not submit required confirmatory data. (May 17, 2021)

Cyazofamid: renewal subject to confirmatory data submitted within two years. (May 26, 2021)

Famoxadone: non-renewal due to high potential for workers exposure, high long-term risk for mammals and high risk for aquatic organisms. (August 20, 2021)

Cypermethrin: renewal of approval as a candidate for substitution. (November 25, 2021)

Indoxacarb: non-renewal due to risks posed to mammals and bees, as well as insufficient data to complete consumer, groundwater, and ecotoxicology risk assessments. (November 29, 2021)

MRL CHANGES (December 2020 – November 2021)

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:

(None)

Implementing Regulation:

- **Chlorothalonil:** Commission Regulation 2021/155 on February 10, 2021. *Effective date: September 2, 2021*
- **Chlorpropham:** Commission Regulation 2021/155 on February 10, 2021. *Effective date: September 2, 2021*
- **Dimethoate:** Commission Regulation 2021/155 on February 10, 2021. *Effective date: September 2, 2021*
- **Ethoprop:** Commission Regulation 2021/155 on February 10, 2021. *Effective date: September 2, 2021*
- **Fenamidone:** Commission Regulation 2021/155 on February 10, 2021. *Effective date: September 2, 2021*
- **Propiconazole:** Commission Regulation 2021/155 on February 10, 2021. *Effective date: September 2, 2021*
- **Pymetrozine:** Commission Regulation 2021/155 on February 10, 2021. *Effective date: September 2, 2021*

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 2021-22, according to information available as of **November 30, 2021**. The Office of Plant Division at the Foreign Agriculture Service notifies stakeholders at the beginning of a MRL review, providing stakeholders with an opportunity to liaise with registrants in support of the EU MRL review.

Active Substance	Start of MRL Review	Reasoned Opinion
Alpha-cypermethrin	04/16/2021	09/30/2022
Cypermethrin	04/15/2021	09/30/2022
Zeta-cypermethrin	05/12/2021	09/30/2022
Pyriproxyfen	08/16/2021	08/08/2022
Difenoconazole	09/17/2021	09/09/2022
Phosmet	01/15/2022	01/15/2023
Zoxamide	09/15/2022	09/15/2023