

## **Position**

on

## **Seed Treatment**

**in connection with the  
Revision of Directive 91/414/EC**

**ESA\_02.0158**

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The treatment of seed with Plant Protection Products (PPP) is a safe, efficient and environmentally friendly way of crop protection and fits well in Integrated Pest Management.

Seed treatment is carried out in very sophisticated industrial closed systems, where no spill of substances into the environment takes place. Workers safety is at the highest possible level and respective European as well as national legislation is well observed. Farmers are no longer directly exposed to seed treatment substances as they do no longer have to prepare the PPP solution and to fill the spraying equipment themselves. In the case of pelleted seeds, the treated seeds are covered with a non-toxic layer, so that no direct physical contact with the PPP is possible.

With the PPP applied exactly where it is to protect the seed (e.g. against soil born diseases), or where it is taken up by and spread through the plant (systemic PPP), often one or more field applications -and with that much larger doses of the same or other PPP- may be saved as pests and diseases are eliminated in the earliest possible phase of their development, which requires only a minimum of PPP.

As only limited amounts of PPP are used on exact those places where they have to act, the negative effects on the environment are minimised.

Seed production and treatment/packaging not always take place in the area where the seeds are sown. For this export and import of treated seeds, so far no harmonised European legislation is

available for both the seed treatment itself as well as the free movement within the Internal Market and the final use of the treated seeds.

This fact leads to the situation that in a wide number of cases, national branches of international companies in a country of sowing do not have any interest in registering a specific PPP, because no sales of that PPP in the respective country will occur as the seeds are treated in another Member State and then imported.

In most of the cases seed treatment is a minor use. Especially for small crops registration is not economically viable.

Seed treatment is a special way of applying PPP's, leading to environmental benefits along the chain. In order to realise such benefits, in the registration process the biological effectiveness throughout the total cultivation (from seed to yield) must be taken into account (so called system approach).

**ESA is firmly convinced that in its proposal for the revision of Directive 91/414, the Commission must take the following points into account:**

- A revised Directive 91/414/EEC must not lead to obstacles to the free trade of treated seeds within the European Union's Internal Market.
- The application, trade and use of treated seeds must be harmonised within the European Union. If a Member State has registered a PPP for seed treatment, the PPP should automatically be registered throughout the EU and the PPP itself as well as seeds treated with that PPP may be exported, imported, used and sown in all other Member States.
- The registration of PPP's for seed treatment\* has to be based on the so-called system approach.
- If specific risks are foreseen (e.g. bird toxicity) respective labelling provisions for the seed packaging or special other requirements may be prescribed.
- Seed treatment supports an Integrated Pest Management policy as desired by society. Seed treatment must therefore be stimulated, not hindered, by appropriate procedures to register PPP's for this specific use.

\* The PPP referred to are those containing active substances submitted for approval or already listed in Annex 1 of the Directive.