



# Better Regulation for Plant Protection Products

The European Seed Association's view on  
the revision of Directive 91/414/EC

ESA European Seed Association is the voice of the European seed industry. It represents the interests of those active in research, breeding, production and marketing of seeds of agricultural, horticultural and ornamental plant species.



## Better Regulation for Plant Protection Products

Treatment of seed with plant protection products assures seed and plant health by restricting pests and pathogens. This helps to secure crop quality, safety and yield. And it can all be achieved with only very limited amounts of chemicals! Seed Treatments therefore offer great benefits: environmentally, in public health, and economically!

By revising the current plant protection Directive 91/414, the European Union now has the opportunity to create a system that supports this effective, environmentally-friendly technology in Europe, and simultaneously to promote the competitiveness of Europe's vital seed sector. If the right choices are made, European consumers and farmers will benefit, and Europe's technological leadership in this area will be strengthened.



For further information, please contact

**ESA European Seed Association**

23, Rue du Luxembourg

1000 Brussels

T. +32-(0)2-7432860

E. [secretariat@euroseeds.org](mailto:secretariat@euroseeds.org)

W. [www.euroseeds.org](http://www.euroseeds.org)

## Protecting the seed

Seed is the starting point for all plant production. Throughout history, mankind has developed plant varieties that are ever more sophisticated, with higher potential for yield, resistance to pests and pathogens, and suitability for specific uses or areas of cultivation. Protecting the seed has always been crucial for plant breeders, seed producers, farmers and those involved in crop protection. Protecting the seed is the base for a healthier, better crop.



### When just a little makes a big difference

Today, increased understanding of chemistry and biology permit effective crop protection with the help of only very small amounts of active ingredients. The direct treatment of the seed itself has become the cutting-edge technology to improve plant growth, prevent or limit pests and diseases and to attain consequently higher yields with lowest inputs of chemicals.

## Seed Treatment

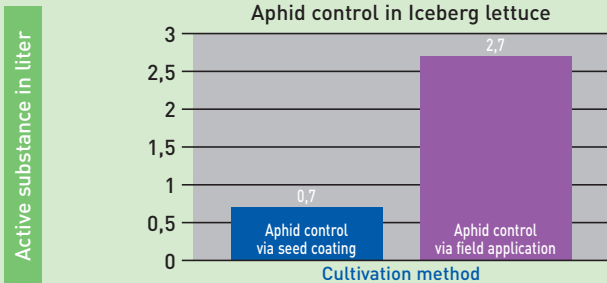


## Seed treatments...

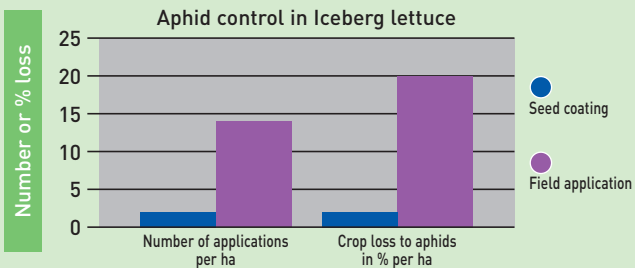
### ... Less chemicals - better for the environment !

Seed treatment means applying only minute quantities of plant protection products directly to the seed itself, prior to the sowing. Seed treatments protect the seed during germination, and protect the plant itself during growth. With much lower chemical intensity per hectare, it is more environmentally friendly than spraying crops in the field.

### Lower input, less applications and a better result



Compared to conventional systems the input of active substance via coating technology is 75% reduced.



### ... Fewer applications – better for the soil and saving energy !

The technology also makes it possible to combine different applications into only one sowing procedure, helping to reduce the use of fuel, the risks of soil erosion and compression, and thus assisting low-intensity farming practices and an integrated pest management policy.

### ... Precision - safe for workers and farmers !

Seed Treatment applications are also a very safe and practical technology. The treatment of seed cannot be compared to the spraying and drenching systems regularly used in the field by growers and farmers - it is a very precise procedure!

The actual treatment process is highly industrialized, conducted by specialist professionals, with safety and environmental issues carefully managed throughout. Facilities are designed to ensure safe operating conditions and special equipment protects workers from accidental exposure to the chemicals.



By using treated seed, farmers no longer have to handle or mix the actual chemical substances. This practically eliminates any risks of unwanted exposure.

### ... a European high-tech success!

Seed treatments provide excellent value for money to farmers and growers. In 2005, the worldwide seed treatment market was worth some € 1.1 billion with the EU still as the global leader : the farm gate value of seed treatments in the EU is estimated at € 400 million. Global growth of 5% per annum is predicted, particularly due to the increased use of seed treatments instead of soil-applied granules or early crop sprayings. It is a rapidly-developing high-tech area where companies in Europe still excel - but where continued investment and research are essential to remain competitive in the world-wide market place.

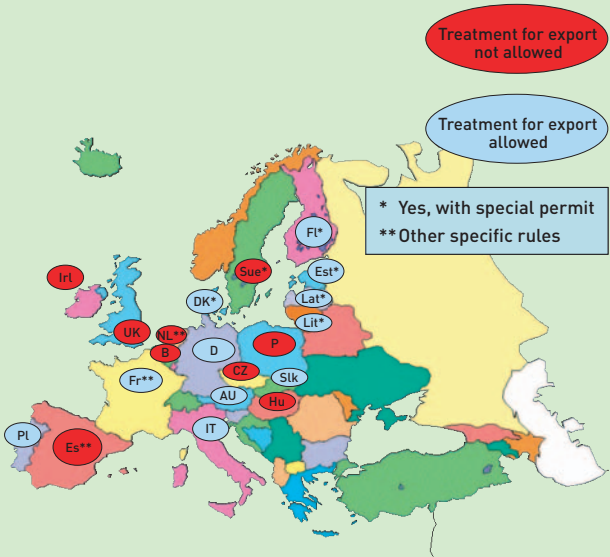


# The current EU legislation disadvantages the European seed treatment sector

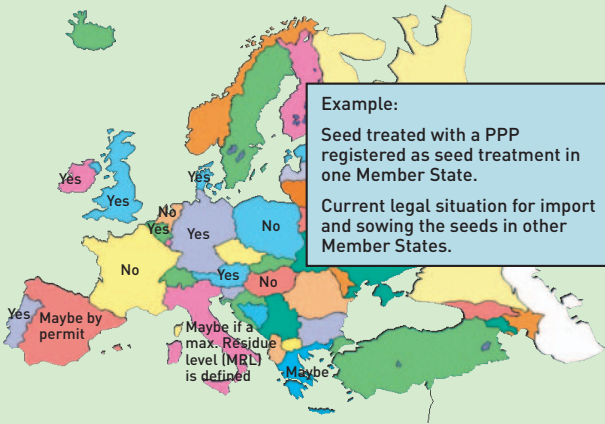
Today's seed treatment sector suffers from an incoherent EU regulatory framework which delays product authorisation, imposes uncertainty on producers, makes EU-wide product launch difficult, and therefore discourages research and investment. These difficulties are intensified by the relatively low volumes involved - making already-high administrative and financial burden even more disproportionate, and discouraging applications.

## Today's EU Common Market for Treated Seed : a legal patchwork

### Disharmonisation in export of treated seeds



## Disharmonisation in import of treated seeds



Seed Treatment is trapped at the intersection of EU seed marketing and crop protection rules. Because today's system depends largely on Member State authorisations with no effective mutual recognition procedure, it is very unpredictable: inconsistencies in Member States' application of the legislation amount to a de facto fragmentation of the EU's internal market for seed. This seriously damages the EU seed industry - which has to operate in a highly internationalised and intensely competitive world market, but is confronted by multiple regulatory barriers even on what should be its home turf – the European Common Market!

Proper adaptation of Directive 91/414/EC can offer new regulatory predictability for the sector, speed up authorisation processes at national and European level, and lead to more sustainable and more productive agriculture in Europe. It would also enhance the prospects for one of Europe's high-tech sectors to contribute even more to the EU's Lisbon strategy of sustainability, jobs and growth.



## **A better regulation for seed treatments bringing radical improvements for Europe**

Seed treatments are a key tool for achieving the policy goals of the European Thematic Strategy for the sustainable use of pesticides. European decision-makers now have the opportunity to liberate that potential. The overall goal should be to ensure that farmers and growers have access to seed treatments that are safe for the environment and consumers, effective, and affordable - to combat all existing and potential crop-pest problems.

The revision of Directive 91/414/EC should therefore make specific provisions for seed treatments to achieve the following goals:

### **■ Encouraging research and development**

The new legislation should facilitate and encourage research and development for plant protection products as seed treatments by providing specific R&D regulations.

### **■ EU wide harmonisation of authorisations**

Registering plant protection products for use as a seed treatment should be made easier, and registrations should be valid across the entire European Union. An EU-wide authorisation system for seed treatments would encourage companies to file these specific small-scale applications.

### **■ One common standard for Europe-mutual recognition**

A centralised authorisation procedure or, alternatively, an automatic mutual recognition of authorisations between all Member States, would help to reduce application costs for small-scale products and specific, minor uses. One common safety standard and one authorisation regime should apply to the whole of the European Union.

### **■ Maintaining authorised products**

Products that have been duly authorised should be allowed to remain on the market. Compulsory substitution discourages investment by bringing additional uncertainties into recovery of development costs, in particular for small volume products or minor crops. Seed treatment should therefore still be allowed where authorisations for conventional applications are ending.

