

Glyphosate renewal regulation (NL)

Interpretation of 'compliance of pre-harvest uses with good agricultural practices'.

The EU renewal regulation for glyphosate state a particular attention point for Member States, that to our knowledge has not been used before for other active substances ((EU) 2017/2324 d.d. 12 December 2017):

In this overall assessment Member States shall pay particular attention to: [...]

— *compliance of pre-harvest uses with good agricultural practices.*

Ctgb is internally discussing whether and how this provision should be reflected in ongoing assessments and upcoming decisions on applications for glyphosate based products. A harmonized approach throughout the Central zone and preferably all zones would be preferred.

In order to reach this, Ctgb has composed a questionnaire handling with the MS's view with regard to 'relevant pre-harvest uses' in connection to this particular attention point. Some MS have already given their view after bilateral contact. We would kindly ask the MS to return this to Ctgb before **20 December 2018**.

What are the relevant uses?

Not all authorizations contain uses at the end of the crop cycle. However, quite a few do contain uses as:

1. herbicide against weeds in crops close to harvest.
2. Herbicide/desiccant for the crop in late crop stages.
3. Herbicide/desiccant for grassland, cover crops or green manure crops.
4. Synchronizing the maturation and ripening of seeds.

For discussion

Ctgb has the following questions, with below the reactions received from the zRMSs approached in a preliminary inventory. All reactions received so far have a preliminary status as all MS seem still to be in the process of deciding how to approach this provision in the approval of the active substance glyphosate:

Use 1 herbicide in late crop stages – full-field – not considered as good agricultural practice

NL	<i>Use 1 does not seem to fall within Good Agricultural Practice as weeds should not be a problem in a properly managed mature crop. In special cases like crop failure on flooded areas in the field or local layering of cereals, development of weeds may become a problem, but can be managed with a spot treatment. No full-field application should be required. Spot treatment is often covered by another GAP line.</i> If a problem, weeds could be managed after harvest, thereby preventing (extra) residues from a late application in the harvestable plant parts.
5.12.a	5.1.2.a Woo
5.12.a	5.12.a
5.12.a	5.1.2.a Woo

	5.1.2.a Woo
5.1.2	5.1.2.a Woo
5.1.2.a	5.1.2.a Woo

Use 2 herbicide/desiccant for the crop in late crop stages– not considered as good agricultural practice

NL	<i>Use 2 does not seem to fall within Good Agricultural Practice as glyphosate is systemic in the plant and may also affect the harvestable plant parts, like e.g. in potato. Desiccation or herbicide is sometimes mentioned while use 4 is intended.</i>
5.1.2.a	5.1.2.a Woo
5.1.2.a	5.1.2.a
5.1.2.a	5.1.2.a Woo

	5.1.2.a Woo
5.1.2	5.1.2.a Woo
5.1.2.a	5.1.2.a Woo

Use 3 – herbicide/desiccant for grassland, cover crops or green manure crops – may be good agricultural practice

NL	<i>Use 3 may fall within Good Agricultural Practice in case the crop infested with perennial weeds and in cases where the cover crop or green manure crop has a stronger competitive behavior compared to the next crop to be planted.</i>
5.1.2.a	5.1.2.a V
5.1.2	5.1.2.a V
5.1.2.a	5.1.2.a Woo
5.1.2	5.1.2.a Woo
5.1.2.a	5.1.2.a Woo

Use 4: Can you agree that use 4 is a use as growth regulator rather than herbicide use and is therefore not/no longer permitted under (EU) 2017/2324?

NL	<p><i>Ctgb considers use 4 a non-herbicide use and a use as growth regulator instead. As the use of glyphosate in EU 2017/2324 is explicitly limited to herbicide, use as growth regulator cannot be authorized.</i></p> <p>In case use 1 or 2 is mentioned in the GAP/national label in that late crop stage for certain crops like cereals, pulses, oil seed crops, etc., the effect on desiccation/synchronizing the maturation of seeds is more likely the main reason for the use. In any case the effect as herbicide and growth regulator cannot be separated and should therefore not be authorized in crops where efficacy as a growth regulator may be expected.</p>
5.1.2.a	5.1.2.a V
5.1.2.a	5.1.2.a V
5.1.2.a	5.1.2.a Woo
5.1.2.a	5.1.2.a Woo
5.1.2.a	5.1.2.a Woo
5.1.2.a	5.1.2.a Woo
5.1.2.a	5.1.2.a Woo

- Do you identify any other uses that may be discussed whether they fall within Good Agricultural Practice or not?

NL	Not yet
5.1.2.a	5.1.2.a Woo
5.1.2.a	5.1.2.a Woo
5.1.2.a	5.1.2.a Woo
5.1.2.a	5.1.2.a Woo

Point posted by DE: Non-agricultural use of glyphosate

5.1.2.a	5.1.2.a Woo
NL	<p>Professional uses apart from agriculture are largely prohibited by law in NL. Non-professional uses are still permitted but does good agricultural practice apply for these uses? Pre-harvest treatment does certainly not apply to these uses. So probably these uses are out of the scope of the provision in the renewal of glyphosate.</p>
5.1.2.a	5.1.2.a Woo
5.1.2.a	5.1.2.a Woo

Are you planning as a zRMS to include a conclusion on the Good Agricultural Practice of the uses applied-for in the Core assessment?

NL	<p>Ctgb is discussing how to include this point in the assessment and whether there is enough legal ground to include it in our decisions.</p>
5.1.2.a	5.1.2.a Woo
5.1.2.a	5.1.2.a Woo

5.1.2.a	5.1.2.a Woo
5.1.2.a	5.1.2.a Woo
5.1.2.a	5.1.2.a Woo

Are you planning as CMS, so on a national level, to include a conclusion on the Good Agricultural Practice of the uses applied-for in the national addendum?

NL	
5.1.2.a	5.1.2.a Woo.
5.1.2.a	5.1.2.a Woo
5.1.2.a	5.1.2.a Woo
5.1.2.a	5.1.2.a Woo
5.1.2.a	5.1.2.a Woo

If we do agree that the Good Agricultural Practice should be part of the assessment for glyphosate-based products, should we not do this for each authorization applied-for, irrespective of the active substance involved?

NL	Not yet decided on, but part of the discussion. For glyphosate it is expressly stated in the AS renewal approval. Normally it is not.
5.1.2.a	5.1.2.a Woo
5.1.2.a	5.1.2.a Woo
5.1.2.a	5.1.2.a Woo
5.1.2.a	5.1.2.a Woo
5.1.2.a	5.1.2.a Woo

Please share your views and any other related ideas.