

Pesticides Review and Implications for the REACH registration process - June 2009

The Pesticide Review, which ran for 16 years has been completed, with some very interesting statistics:

961 pesticide substances on the EU market in 1991 (approximately)
644 (67%) dossiers not submitted/ incomplete/ withdrawn
317 (33%) dossiers were evaluated

Of the dossiers which were evaluated:

247 (26% of original total) were passed (database available at http://ec.europa.eu/sanco_pesticides/public/index.cfm)

70 (7% of original total) were withdrawn because evaluation showed unacceptable risks to human health and the environment

So there has been a 74% reduction in the number of pesticides available on the EU market since 1991.

It will be very interesting to see if this reduction in the tools available to farmers and growers compromises the food supply in years to come.

For those pesticide manufacturers who have managed to survive the first round of the Pesticide Review, there will be a new directive covering pesticides currently on the market, which will impose even tighter limits on environmental and human health criteria, ban certain toxic chemicals and harmonise pesticide authorization across the three EU geographical zones, see the working draft at

<http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//TEXT+TA+P6-TA-2009-0011+0+DOC+XML+V0//EN&language=EN#BKMD-17>.

What the Pesticide Review statistics may mean for REACH participants:

- incomplete dossiers are an easy excuse to ban substances - don't let this happen to your company or consortium
- the EU almost seem to be relying on the paperwork being too much hassle as a way of weeding out substances (no pun intended) - it's really important not to allow this to happen
- reviewing very hazardous substances may take longer than the EU / ECHA realise (the pesticide review rate was 16 years for 371 substances = 23 per year), and this may prolong the length of time it takes bans to be implemented
- the good news for pesticide manufacturers was that 78% of the dossiers evaluated were considered safe enough to be allowed onto the EU market. Although there have been some difficulties over early REACH registrations, if you can get your dossier evaluated, then logic would suggest that there should be a better success rate for general chemicals, as most of these are less hazardous than pesticides.

Of course, once the first round of reviews have been completed, the cycle will start all over again, but the current hurdle for REACH is to get through registration safely in the first place.