



# UK (GB&NI) PPP regime:

An industry view of two years on from  
the end of the BREXIT TP

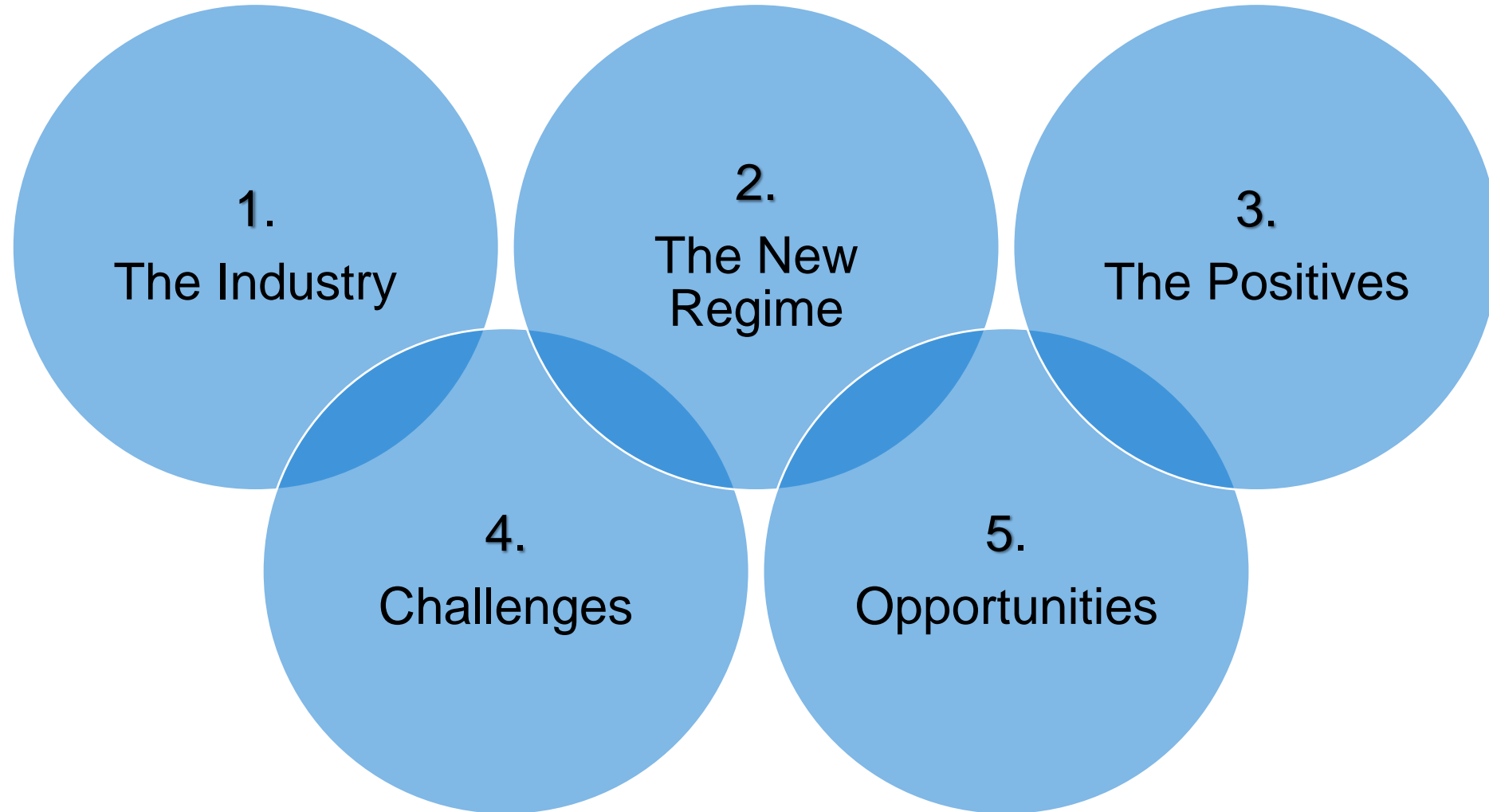
**Sheridawn Schoeman**  
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# What Will Make The Ship Sail Faster ?



# UK (GB&NI) PPP Regime:

*'An industry view of two years on from the end of the BREXIT TP'*



# The Industry

*23 member companies representing 96% of the UK market for Plant Protection Products (PPPs).*



Crop Protection



Biotechnology



Biopesticides



Digital and Precision  
Agriculture

# What Do We Want?

- ✓ Predictable
- ✓ Efficient
- ✓ Proportionate
- ✓ Transparent

# New Great Britain (GB/NI) Pesticides Regime



**31st January 2020:  
BREXIT**

*Start of the Transition Period*

The UK is no longer involved in EU wide active substance, product and MRLs evaluations but new decisions taken under the EU regime apply in UK.

**1st January 2021:**

An independent pesticides regulatory regime is in operation in GB (England, Scotland and Wales) responsible for →:

Active substance & plant protection product (PPP)

*Reg (EC) N.  
1107/2009*

REACH  
*Reg (EC) N.  
1907/2006*

Maximum Residue Level (MRL)

*Reg (EC) N.  
396/2005*

Classification, Labelling and Packaging  
*Reg (EC) N. 1272/2008*

# New Great Britain (GB/NI) Pesticides Regime



- GB make their own decisions based on GB assessments
- New decisions taken under the EU regulatory regime will not apply in Great Britain
- The Chemical Regulation Directorate (CRD) remain the national regulator for the whole of the UK, on behalf of the UK government and the *devolved administrations*
  - *(i.e Scotland, Wales, and Northern Ireland)*
- Northern Ireland will follow EU process and timelines

**Reputational excellence** of CRD added balance to EU Committee discussions and decision making.

# Positives

**Open communication** applicants

- Pre-submission discussions
- Training offerings (CRD Industry)

**Positioning Global influence** and consideration of evaluations from other jurisdictions

- Drones and Codex

**Regular dialogue** with trade association CropLife UK

- Updates and solutions of the emerging regime





# Positives

- **Guidance Development And Publication e.g's**
  - *Toxicology Skin sensitisation*
  - *Stereoisomers*
  - *Ground Water metabolites*
    - *Agility and proactivity*
  - ***CRD proactive engagement new/updated guidance pre-adoption***
- **Managed divergence with EU not all EU GD evolutions are beneficial**
- **Pragmatism being displayed within CRD departments e.g Environmental Fate and residues**
- **Workshops (field and online) great way to support new staff development**
  - Significant recruitment since Jan 21
  - **Reconsideration of Amateur container recycling restriction**

# Positives

## New Active Substance Approval



- ✓ Approval of a new Active Substance (AS) ahead of the EU process – Cinmethylin

*Approval of the AS, GB MRLs and authorisation of the product Luxinum Plus, were granted almost simultaneously in early June 2022*

CRD have demonstrated that they can be faster than EU

# Challenges & Concerns

- *Policy makers (DEFRA) and Implementers (CRD)*
- *Bigger organisations post EU exit, require time 'build capacity and capability'*
  - *Political discontinuity, ministerial churn*
  - *Lag delivery and consultation outcomes e.g. **National Action Plan***
- *loss of expertise will be problematic as well as attracting senior specialists*
- *Efficient and timely communication for best outcomes on workshops*
  - *E.g **Integrated Pest Management (IPM)***
- *Influence of the devolved administrations ?*



# Challenges and Concerns – Resource



- **Clarity required in major area's for industry budgeting and resource planning**
  - *GB Active substance renewals process  $\neq$  EU active substance process*
  - **Resourcing the needs of GB dossier's** will need a lot of internal planning
    - *Different End points and different timelines will almost certainly mean a new different dossier having to be produced*
- **Fee's**
  - *EU Plus GB*
    - *Will GB/NI market remain attractive ? e.g. Biopesticide charges*
- **Timelines**
  - *Active substance expiry dates likely to be extended.*
  - *Need clarity for growers and supply chain*
- **MRL's**
  - *more Import Tolerance needs and separate/duplicate MRL applications*
- **Duplication** of EU classification, REACH, biocides submissions

# Challenges & Concerns – Divergence

- **'Divergence within UK'.**
  - *Divergence of PPPs between NI and GB will increase as EU and GB take substance decisions at different times.*
  - *Northern Ireland due to the Northern Ireland Protocol*
  - *Precision breeding (Gene editing) Bill is England only in scope.*
  - *MRL's can be different in GB, NI , and EU. Art 12 reviews complicated to track.*
- **Divergence from EU**
  - *Increased resource demand for industry and the food chain stakeholders*
  - *Brexit Freedoms Bill - Sunset in December 2023*

## Opportunities - Regulate 'better'



- ✓ Implement the 1107/2009 regulation as it was intended via an independent standalone regulatory regime
- ✓ Streamline and reduce the bureaucratic and technocratic EU implementation without reducing standards.
- ✓ Be proportionate in reviews
- ✓ GB to mitigate Brexit burdens by adopting a more balanced approach to updating active substance assessments that have already been evaluated to modern standards.
- ✓ Continue to build effective working relationships for the benefit of all (CRD - DEFRA- Industry)
- ✓ CropLife UK offering pragmatic solutions
- ✓ DEFRA timely engagement to support the sector and food security
- ✓ A CRD website like the past