

The UK Expert Committee on Pesticides (ECP)

Advice to Ministers

Applications for an emergency authorisation for the use of 'Gazelle SG' as an insecticide on sugar beet

Issue

1. The Government has received an application for an emergency authorisation for the use of 'Gazelle SG' (contains acetamiprid) for use as an insecticide on sugar beet to control virus yellows complex transmitted by the virus vector, peach-potato aphid (*Myzus persicae*).

Action required

2. The Committee was requested to provide advice on the risk assessment for two applications of an acetamiprid 20% (w/w) formulation.

Discussion

3. The Committee noted:
 - That the sugar beet industry has relied on neonicotinoid seed treatments (containing thiamethoxam and clothianidin) to control virus yellows complex transmitted by the virus vector, peach-potato aphid for 25 years. Authorisations for the outdoor use of these products were withdrawn in 2018. The industry has not had sufficient time to generate data to support standard on-label authorisations for alternative products, though work is currently ongoing.
 - The urgency of the application, with pest pressure developing sooner than expected. Without a suitable method of control, growers were potentially facing yield and financial losses.
 - This was a new application for the use of Gazelle SG on sugarbeet, however, the product is authorised for use on potatoes.
 - The applicant proposed that any emergency authorisation would only be used in England in the Eastern counties.
 - HSE had concluded that:
 - The applicant had demonstrated a suitable 'case for need', noting, in particular, the anticipated shortfall in availability of products 'Biscaya' and 'Insyst' which had previously been given emergency authorisations.

- Non-dietary exposure risks were acceptable and no protective equipment would be required. Members noted the removal of weeds by hand is not considered in the exposure assessment, and it would be appropriate to understand whether this activity is likely to occur in beet cultivation. If it is, a recommendation for the use of gloves and covering of arms and legs would be prudent.
- Consumer exposure assessments included an element of uncertainty, due to the number of supporting field trial data, but that the available evidence provided an assurance that Maximum Residue Levels would not be exceeded and that the use would not harm human health.
- The environmental fate and behaviour assessment did not identify any risk of harm to groundwater quality, but it was necessary to limit the amount of acetamiprid applied to a treated area in any three-year period.
- Ecotoxicological risks were acceptable for virtually all compartments, provided appropriate risk mitigation was imposed. Risks to aquatic life are to be mitigated by the imposition of a 12m buffer zone and use of three-star drift reducing technology (DRT). Risk to non-target arthropods are to be mitigated by the imposition of a 10m buffer zone and use of three-star DRT, but it is uncertain whether this will afford the usual degree of assurance. The risk has not been shown to be acceptable for birds (acute risk) and soil macro-invertebrates

Committee advice and views

4. The Committee advised that:

- based on the evidence presented and the product being used in the way proposed by HSE, it was possible to manage most but not all risks to human health and the environment.
- Government should take account of, and look to minimise the risk of, an excessive number of consecutive sprays of products containing neonicotinoid pesticides that have been approved for emergency use (in order to address resistance and environmental risks).

5. ECP also took the view that:

- A case for need had been demonstrated (potentially significant agronomic impacts arising from a failure to manage the pests and a lack of a suitable range of control options).
- It would be appropriate for HSE to review guidance on aphid monitoring to resolve inconsistencies and for growers to undertake monitoring in all fields and report this at field level to improve understanding of pest pressures;

- It would be useful to provide a drainflow assessment using the end points provided in the EFSA peer review for acetamiprid to show there would be no risk to surface water.
 - The groundwater exposure assessment is acceptable as long as rotation is restricted to at most one year in three.
 - Data presented to demonstrate that use would be limited and controlled were unconvincing
 - The sequential process of applications to control *Myzus persicae* on sugar beet, coupled with a lack of knowledge on the availability of previously approved insecticides under Article 53 of EU Regulation No. 1107/2009 (Biscaya and Insyst) to growers, meant that it was not possible to evaluate the extent of proposed use of this product.
6. The Committee considered that the basis of a suitable case had been presented and that the Government could consider granting an emergency authorisation.

**UK Expert Committee on Pesticides
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