

The UK Expert Committee on Pesticides (ECP)

Full Minutes of the meeting of the UK Expert Committee on Pesticides (ECP) held 10 September 2024

Those present:

Chair:

Mr J Clarke

Members:

Prof T Butt (Biopesticide cloud); Dr I Cano Cejas (Biopesticide cloud); Dr D Chandler (Biopesticide cloud); Prof J Coulson; Prof M Eddleston; Dr J Garratt; Mr M Glynn; Dr C Harris; Dr R Mann; Dr M Rose; Dr A Rowbotham; Dr C Scudamore; Mr P Stephenson; Prof D Spurgeon; Dr M Wakefield (Biopesticide cloud); Prof M Whelan and Prof M Wright

Assessors:

Ms K Chukwubike (UKHSA); Mr B MacDonald (Welsh Government); Mr A Murchie (representing the Northern Irish Government) and Ms G Reay (Scottish Government)

Advisors:

Mr A Dixon (HSE); Mr N Graham; Mr J Hingston (HSE); Ms S Hugo (Defra); Mr B Maycock (FSA); Dr J Newman (Environment Agency); Mr M Penrose (HSE); Ms A Porter (Defra); Dr S Qassim (Natural England); Mr G Shaw (Natural England); Dr S Snaith (HSE); and Ms M Wade (HSE)

Others:

Ms J Bains (HSE); Ms F Beacon (HSE); Mr M Fryer (HSE); Ms S Jahan (HSE); Ms E Kells (HSE); Ms S Mattock (HSE); Ms A Robinson (HSE); Mr B Shek (HSE) and Mr A Wilder (HSE)

Apologies:

Dr R Gwynn (Biopesticide cloud); Dr C Hazlerigg and Dr I Katsiadaki;

Agenda Item 1: Introduction

1.1 The Chair reminded the meeting of the confidentiality of the papers and their discussions. If Members believed that they had a commercial or financial interest in any of the items being discussed, they were required to declare their interest to the Chair and Secretariat prior to the meeting. They may then either be invited to absent themselves from the discussions, not participate and/or not be involved in any discussions and decision-making, unless invited to do so.

1.2 One member identified a potential conflict of interest, this was deemed to be non-personal, non-specific conflicts and it was decided they could remain and participate in discussion on the relevant agenda items.

1.3 The Chair welcomed Dr C Scudamore who has joined the committee as an expert in toxicology and noted that Dr C Hazlerigg has been appointed to the committee as an expert in ecotoxicology and will be joining committee at the November meeting.

Agenda Item 2: Full Minutes of the previous meeting [ECP 1 (67/2024)]

2.1 Members agreed the full minutes of the July 2024 meeting.

Agenda Item 3: Matters Arising and Forward Business Plan [ECP 2 (67/2024)]

3.1 The Secretariat provided an update on matters arising from previous meetings and invited Members to suggest any additions/amendments to the forward business plan which would be incorporated before the next meeting.

3.2 Members noted that following on from the July meeting it had been agreed to refer the discussion on post-approval monitoring, and the possible joint work with the Expert Committee on Pesticide Residues in Food, to the November business management group.

Agenda Item 4: Independent Scientific Advice: Sweet Lupin [ECP 3 (67/2024)]

4.1 The advice note for sweet lupin were amended and agreed following the September meeting and have been submitted to HSE

4.2 The Secretariat introduced a working draft of the Independent Scientific Advice for Sweet Lupin, noting that members had raised comments on specific areas of the text that would need to be reviewed. Members reviewed these comments and agreed to liaise with the Secretariat to ensure consistent use of terminology and to address a number of

specific technical queries raised by Members. The advice note will be agreed following these amendments and submitted to HSE.

Action: Members and Secretariat

Agenda Item 5: Emergency Authorisation: ‘Cruiser SB’ [ECP 4 – 4-4 (67/2024)]

5.1 The Government has received an application for emergency authorisation under Article 53 of Regulation 1107/2009 for the use of ‘Cruiser SB’ (contains thiamethoxam) on sugar beet seeds to protect against Beet Virus Yellow, through the control of aphid populations.

5.2 The Committee was asked to advise on:

- The approach taken to deviate from guidance and present a drinking water exposure assessment in this emergency authorisation situation, and the risk to consumers resulting from this.
- Whether/how the evidence resulting from monitoring activity could support the regulatory assessment/decision.
- The continuation of soil monitoring and whether/how the evidence could be used to supplement the existing dataset of persistence information on thiamethoxam and clothianidin.
- Whether there is sufficient evidence within the data to indicate lateral movement of residues from the cropped area into field margins or whether monitoring of field margins should be continued.
- Whether there are further additional approaches to appropriately limit the use of ‘Cruiser SB’ to identified higher risk situations, where existing combined control measures may not provide sufficient level of control.

5.3 Members discussed the application, and their full advice can be found in Annex 1 of these minutes.

Agenda Item 6: Update from Other Government Departments

6.1 Environment Agency

6.1.1 The Environment Agency noted they continue to monitor water quality across a range of catchment areas, this testing includes screening for neonicotinoids. This data is published on a monthly basis on data.gov.uk.

6.2 Natural England

6.2.1 Natural England noted that the publication of Integrated Pest Management for Biodiversity Enchantment ([NERC575 Edition 1](#)) may be of interest to the committee.

6.3 UK Health Security Agency

6.3.1 UKHSA are monitoring formaldehyde due to concerns around indoor air exposure through consumer products. Formaldehyde is currently under review in a Risk Management Option Analysis. UKHSA noted that the substance could also be of relevance to the committee given the recent publication of the [US EPA's draft risk assessment](#) for the use of formaldehyde as a pesticide under FIFRA.

6.4 Welsh Government

6.4.1 The Welsh Government noted they have no substantive updates at this point but continue to work closely with the other UK governments on progressing cross-cutting policy issues.

6.5 Scottish Government

6.5.1 The Scottish Government noted that since February 2024 Jim Fairlie, Minister for Agriculture and Connectivity has responsibility for the plant health portfolio including pesticides. He chaired the latest quarterly Pesticide Stakeholder Group meeting on the 5th of September. Going forward the PSG minutes will be published.

6.5.2 The Scottish Plant Health Centre recently published a project report on Understanding crop producers' perceptions around crop health decision making and the impact of that on key metrics such as pesticide usage. This project aimed to understand how attitudes and responses to pest risk are influenced by perceived pest threat, economics and information sources (e.g. agronomist type) to identify Integrated Pest Management (IPM) solutions and routes to encourage the adoption of best practice. The full report is available to download from the [Plant Health Centre website](#).

6.5.3 The Scottish Plant Health Centre has also published a report on the potential of microbial biocontrol for the sustainable management of plant diseases in Scotland. The project aimed to understand the current use of microbial biocontrol agents (MBCA) and also to determine the potential for using them in Scotland. The project identified risks associated with their use and determined whether the current regulations for MBCA are fit for purpose. The full report is available to download from the [Plant Health Centre website](#)

6.6 Department for Environment, Food and Rural Affairs

6.6.1 Defra noted that they continue to work through pesticides policy issues such as active substance renewals. Publishing the NAP is a key priority for the new administration therefore Defra, along with the devolved governments, are updating it to align with the government's vision.

Agenda Item 7: Date of next meeting

7.1 26 November 2024 – To be held in a hybrid manner.

Agenda Item 8: Any other business

8.1 Guidance Document Update [ECP 5 – 5-1 (67/2024)]

8.1.1 HSE presented an annual update on the technical guidance and other related documents that have been discussed or adopted by the EU since March 2023. HSE noted they monitor the development of EU guidance documents as they have continuing relevance for authorisations in Northern Ireland and for their potential relevance for Great Britain.

8.2 Chair's Report

8.2.1 The Chair presented a brief update on his quarterly meetings with Defra senior officials.

8.2.2 The Chair noted he would be speaking at the British Crop Production Council annual congress in November. He invited members to suggest any relevant topics for his presentation.

Action: Members

**Ethan Clabby
ECP Secretariat
November 2024**

ECP ADVICE TO GOVERNMENT: USE OF 'CRUISER SB' ON SUGAR BEET

Issue

1. The Government has received an application for an emergency authorisation for the use of 'Cruiser SB' (containing thiamethoxam) for use as a seed treatment on sugar beet.

Action required

2. The Committee is requested to advise on:
 - The approach taken to deviate from guidance and present a drinking water exposure assessment in this emergency authorisation situation, and the risk to consumers resulting from this.
 - Whether/how the evidence resulting from monitoring activity could support the regulatory assessment/decision.
 - The continuation of soil monitoring and whether/how the evidence could be used to supplement the existing dataset of persistence information on thiamethoxam and clothianidin. Also, whether there is sufficient evidence within the data to indicate lateral movement of residues from the cropped area into field margins or whether monitoring of field margins should be continued.
 - Whether there are further additional approaches to appropriately limit the use of 'Cruiser SB' to identified higher risk situations, where existing combined control measures may not provide sufficient level of control.

Discussion

3. The Committee noted that:
 - This is the fifth consecutive application for this proposed use.
 - Modelling predicts that one of the metabolites of thiamethoxam will exceed the regulatory-based hazard-based cut off for groundwater. In the absence of any further data on the metabolite, HSE have, in accordance with the guidance, assumed it shares the same reproductive toxicity profile as the active substance and therefore that it is a relevant groundwater metabolite. A commercial authorisation is not possible when a relevant metabolite is predicted to occur in groundwater at or above 0.1µg/L. However, since this is for an emergency use, HSE have conducted a risk assessment which shows the risk to consumers from drinking water to be acceptable. Members questioned whether water treatment plants tested for clothianidin and if they would be able to detect the metabolite at a concentration above the hazard based cut off.
 - Six sites sown with 'Cruiser SB' treated seed in 2022 and 2023 were monitored for thiamethoxam and its major metabolite clothianidin. The monitoring was from field soils, field-margins, field margin vegetation and field margin pollen. The method of analysis used in 2022 did not have a sufficiently low LOQ to allow meaningful use

of the results in the risk assessment. For the monitoring conducted in 2023 a more sensitive method was used. The difference in methodologies makes comparison between 2022 and 2023 difficult.

- It is HSE's view that the use of a threshold trigger restricting use only to when the predicted virus incidence provided by the virus yellows forecasting model is above the level of this threshold is not sufficient to consider the use limited.

4. The Committee agreed with HSE's evaluation that:

- The requirement to ensure that the product will be used in a limited and controlled way has not been met. Members agreed it was unclear why growers responsible for 40% of the area of sugar beet used for sugar production chose not to use 'Cruiser SB' treated seeds in 2023 and 2024.
- The soil, vegetation and pollen monitoring is evidence that, in the field, the persistence of thiamethoxam and clothianidin is greater than expected from the standard regulatory DT₅₀ testing.

5. The Committee advised that:

- They agreed with HSE's approach to conduct a refined risk assessment to show the risk to consumers from drinking water is acceptable. Due to no toxicology data being available for metabolite NAO 459602, HSE's approach to extrapolate from the parent compound is valid.
- The indications of increases in the concentrations of clothianidin in the water monitoring data for one catchment is in line with what was predicted by modelling members conducted previously, that suggested clothianidin was the main metabolite form that could enter waters. Further, concentrations at the catchment outlet imply higher edge of field concentrations for treated areas. It would be helpful to see additional monitoring from the edge of fields or streams/ditches near fields with a high coverage of sugar beet sown with 'Cruiser SB' treated seeds where concentrations of both thiamethoxam and clothianidin are expected to be higher.
- Reliance on the Rothamsted beet virus yellow forecasting model was not enough. Further research needs to be carried out to understand, for sugar beet grown without the use of seed treated with 'Cruiser SB', what products are being used, where they are being used and why. It is also important to understand yield difference between sugar beet grown from treated seed vs that grown without (with and without later spray treatment).

Conclusion

6. Based on the evidence presented to ECP, the Committee agreed it supports the HSE assessment and that it is unable to support an emergency authorisation under Article 53 of Regulation 1107/2009.