The UK Expert Committee on Pesticides (ECP)

Full Minutes of the meeting of the UK Expert Committee on Pesticides (ECP) held 26 November 2024

Those present:

Chair:

Mr J Clarke

Members:

Prof J Coulson; Prof M Eddleston; Dr J Garratt; Mr M Glynn; Dr C Harris; Dr C Hazlerigg; Dr I Katsiadaki; Dr R Mann; Dr M Rose; Dr A Rowbotham; Dr C Scudamore; Mr P Stephenson; Prof D Spurgeon; Prof M Whelan and Prof M Wright

Assessors:

Ms K Chukwubike (UKHSA); Ms A Faulkner (HSE); Ms L Haddock (representing the Northen Irish Government); Mr B MacDonald (Welsh Government); Mr A Murchie (representing the Northen Irish Government); Ms G Reay (Scottish Government) and Mr D Williams (Defra)

Advisors:

Mr A Dixon (HSE) Dr N Graham (HSE); Mr J Hingston (HSE); Mr B Neill (HSE); Mr B Maycock (FSA); Dr J Newman (Environment Agency); Ms A Porter (Defra); Ms M Reed (HSE); Mr G Shaw (Natural England); Mr G Stark and Ms M Wade (HSE);

Others:

Ms H Bennet (HSE); Mr J Chambers (HSE); Ms P Croft (HSE); Ms A Curtin (HSE); Ms I den Hoed (HSE); Ms C Dorrian (HSE); Mr J Farquhar (HSE); Mr M Fryer (HSE); Ms S Godson (HSE); Ms R Gunn (HSE); Ms S Jahan (HSE); Ms C Kerins (HSE); Mr G Kenney (HSE); Mr M Robertson (HSE); Mr T Riley (HSE); Ms H Wilson (HSE) and Mr J Wyatt (HSE)

Apologies:

Dr C Snaith (HSE) and Dr S Qassim (Natural England)

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

Agenda Item 2: Full Minutes of the previous meeting [ECP 1 (68/2024)]

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

Agenda Item 3: Matters Arising and Forward Business Plan [ECP 2 (68/2024)]

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 from the May 2025 meeting onwards they were expecting at least one active substance item on the agenda at each meeting.

Agenda Item 4: Independent Scientific Advice: Dimpropyridaz [ECP 4 (68/2024)]

4.1 HSE introduced the item stating that they had previously sought advice from the ECP on specific questions relating to the toxicology risk assessment in November 2023 and June 2024. The Chair further noted that the residue risk assessment section was incomplete and would be brought to the committee at a later point. The Business Management Group had agreed this approach with HSE to avoid unnecessary delays.

4.2 HSE had identified several potential areas that would require advice, and committee members could explore any aspects of the risk assessment and underlying guidance they considered to be of interest. The committee held preliminary discussions on the issues identified by HSE and began to formulate their advice.

Action: Members

Agenda Item 5: Control of *Hylobius abietis* in coniferous forestry and the unresolved risk to soil organisms [ECP 4 – 4-1 (68/2024)]

5.1 HSE presented the item noting that they are reviewing multiple applications concerning the chemical control of Hylobius abietis in forestry situations. To support this the ECP was asked to advise on the realism of the risk assessment scenario considered for soil macro-organisms specifically:

- what is known about the behaviour/life cycle of the pest, the large pine weevil, or the non-target collembola, which could inform potential refinements to the risk assessment, as an acceptable risk to collembolans has not been demonstrated and there is currently no available data for determining population level effects or for including spatially variable exposure?

- Whilst the scale of use could be extensive, the total soil area that will be exposed to product treatment could be < 2% and based on specific information on application approaches the treated area could be at 0.2% of that whole planted area. How could the risk assessment performed consider this information? Do members consider that there could be a level of spatial exposure that could be deemed insignificant when considering impacts on soil macro-organisms? (noting that both lethal and sub-lethal effects are predicted in the exposed areas).

- The cycle of treatment involves a number of sequential years (estimated 5) then nothing further post bark establishment, until tree harvesting at 40+ years. Can this provide any further refinement to the risk assessment?

5.2 The committee advised that:

- Soil organisms including collembola will be present throughout the year and are unlikely to have significant levels of mobility.

- They consider it possible that the whole population impact may be restricted to areas of treatment. In those areas there is evidence there will be significant impacts within each patch of exposed soil.

- From the documentation it appears that the areas affected will be around 2% of the total planted area. This would effectively equate to a 2% population impacts across a larger area (e.g. a plantation stand). This level of effect will not, however, be consistent. There will be small patch of greater effects and larger areas of less/no effect.

- Physical blockers intended to limit the amount of product reaching the soil are unlikely to be viable.

- The conditions on use noted by HSE are likely to reduce the expected impact but will not fundamentally change the outcome of any risk assessment.

- There are concerns about broad decreases in arthropod population level across Europe, which may indicate that any population recovery in the 35+ years after spraying will be less than expected.

5.3 The committee noted that due to the significant uncertainties present they were unable to reach any firm conclusion on the expected population level impact. They felt that HSE would likely have to consider the risk/benefit analysis on wider factors outside the remit of the ECP.

Agenda Item 6: Determination of the appropriate higher tier exposure profiles / criteria to apply to the assessment of a pendimethalin-containing plant protection product [ECP 5 – 5-1 (68/2024)]

6.1 HSE presented the item and asked the committee to advise on:

- What are the strengths and weaknesses of adopting an approach of using both the magnitude of the peak exposure and the area under the curve exposure to assess risk? (The area under the curve exposure is defined from when the first peak in a series of toxicologically dependent peaks exceeds the relevant threshold to when the last peak falls below it).

- What are the strengths and weaknesses of considering overall duration of exposure (within an ecologically relevant time period) in the risk assessment?

- Further, if duration of exposure is a relevant consideration, what are the strengths and weaknesses of applying the threshold of acceptability (in terms of number of individual exceedance years and the weighted level exceedance in terms of scenario years) being the same as for the peak and area under the curve exposures?

- In the absence of a clear exposure value to use as the minimum concentration when defining these profiles, it has been proposed that the LOQ from the mesocosm study be applied. What are the strengths and weaknesses of this approach?

6.2 The committee advised that:

- There is an established body of literature around time variant exposure and they would generally support a time weighted average approach or the use of the area under the curve where reciprocity has been justified.

- One limitation of the duration of effect assessment highlighted in the meeting was that the same duration could cover two very different exposure profiles and therefore two very different risks associated with each. For example, a single peak on day 0 and another on day 21 with no intermediary exposure would have the same duration of effect (21 days) as an exposure profile that had multiple peaks throughout the 21 days, but the actual exposure to the organism would be higher in the latter. This makes the criterion conservative, members

noted the need to balance any further refinements against the need for conservativism in the face of uncertainty in the data.

- They agree with HSE that additional studies could be used to determine the dependence of exposure peaks such as ADME studies / TKTD studies. Members note that these likely to lead to additional testing, which where fish are involved should be a last resort and therefore necessitates ensuring unnecessary additional testing is not triggered by this new criterion.

- The original threshold for UKHT drainflow assessments indicating an adverse effect was exceedance on more than 18 out of 30 years. Following concerns regarding the suitability of this threshold for aquatic macroinvertebrates and fish, the threshold was reduced to exceedance on more than 3 out of 30 years some years ago. This revised threshold was in part, the result of an analysis of past registrations / experience. The inclusion of the duration of exposure criterion, potentially changes this level of protection again.

- HSE should investigate if the use of a flowing microcosm study would provide more beneficial data compared to the use of a static study.

- It was noted that the default time-window for considering a duration of effect was 21 days. Given mesocosm studies are regularly performed with peak exposures and natural decline within the system that may not last 21 days, implementation of this new assessment criterion may have a considerable impact in future UK HT drainflow assessments where more peaks are often present due to the frequency of rainfall events. HSE should consider exploring these implications.

Agenda Item 7: Review of Ways of Working Document [ECP 6 (68/2024)]

7.1 The secretariat introduced the ways of working document, noting that this is the first review since it was agreed in January 2024. The committee was asked to finalise the arrangements around the provision of limited independent scientific advice, which had been adopted on a provisional basis in January.

7.2 Members noted that they felt there had not been relevant changes in the working practices of the committee and that the document remained an accurate description. Members agreed no immediate need to review the document unless the situation changed. They further suggested the secretariat review how best to incorporate the document in the recruitment and onboarding of new members.

Action: Secretariat

7.3 The committee agreed the process for the provision of limited independent scientific advice was currently appropriate and highlighted the possibility of expanding the biopesticide cloud model to cover other areas of expertise as the need arose.

Agenda Item 8: Human Health Monitoring Data: Review [ECP 7 – 7-1, ECP 8 – 8-3 (68/2024)]

8.1 HSE presented the 2023 to 2024 National Poisons Information Service (NPIS) pesticide exposure monitoring report and the 2023 Human Health Enquiry Incident Survey (HHEIS). HSE stated that they consider the results to be inline with previous years and their expectations.

8.2 Members discussed that:

- As NPIS records incidents referred to them by healthcare providers it would not cover chemical exposure that led to death before the individual could receive healthcare. HSE agreed to refer the suggestion to monitor death certificates for such cases onto Defra and the other lead departments.

Action: HSE

- The overall number of incidents recorded by HHEIS continues to decline from a peak in 2009. HSE noted there has not been a substantive decline in authorisation holders contacted and HSE continue to receive nil returns rather than no response which suggests either a genuine decrease in the number of incidents or that those involved in exposures are increasingly not contacting authorisation holders. This finding contrasts strongly with the NPIS surveillance project which reports many-fold higher numbers of cases and no reduction in number over the last 15 years.

- The NPIS recorded a number of incidents relating to either biocides or veterinary medicines, which would be referred to the relevant regulatory teams within HSE or the Veterinary Medicines Directorate for their consideration and appropriate follow-up.

8.3 Members further noted that the NPIS data is reported to HSE on a quarterly basis, while HHEIS is received on annual basis.

Agenda Item 9: Date of next meeting

9.1 28 January 2025 – To be held in a virtual manner.

Agenda Item 10: Any other business

10.1 Committees update: Work of the Pesticide Residues in Food (PRiF) Committee and Monitoring programme

10.1.1 Members noted that the PRiF 2023 annual report had been published and this would be followed at later point by the 2023 UK competent authority for the pesticide

residues in food annual report. HSE noted those full 2023 data was available in quarterly formats currently.

10.2 Chair's report

10.2.1 The Chair noted that he had met with Defra officials as part of a regular check-in on the work of the committee, he further noted that he would be speaking at the British Crop Production Council's annual congress on the role of the committee.

Ethan Clabby
ECP Secretariat
January 2024