

PLANT PROTECTION ISSUES IN TOBACCO CULTIVATION - MINOR USES COORDINATION FACILITY (MUCF)

Speciality Crops



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WHAT ARE MINOR USES/ CROPS?

Definition

Regulation (EC) No 1107/2009 – Article 3(26):

Use of a plant protection product in a particular Member State on plants or plant products which are:

National dimension

(a) not widely grown in that Member State,
or

Minor crop

(b) widely grown to meet an exceptional
plant protection need

Minor use on a major crop

Is this a workable definition?

- Leaves it up to MS to define what constitutes as "minor crop/use"
- Interferes with the zonal procedure and mutual recognition
- A fixed acreage (per zone) would be favoured by growers association



MINOR USES COORDINATION FACILITY TASKS & MISSION

Mission



- The mission of the Facility is 'to enable European farmers to produce high quality crops by filling minor uses gaps through collaboration, to improve availability of chemical and non-chemical tools within an integrated pest management (IPM) framework'.

Tasks

- coordination of minor use work between Member Countries and stakeholders
- sharing of information & experience gained at national level
- stimulation of harmonisation (e.g. crop grouping, drafting of minor uses guidance document)
- Hosting **EUMUDA** database on MU needs



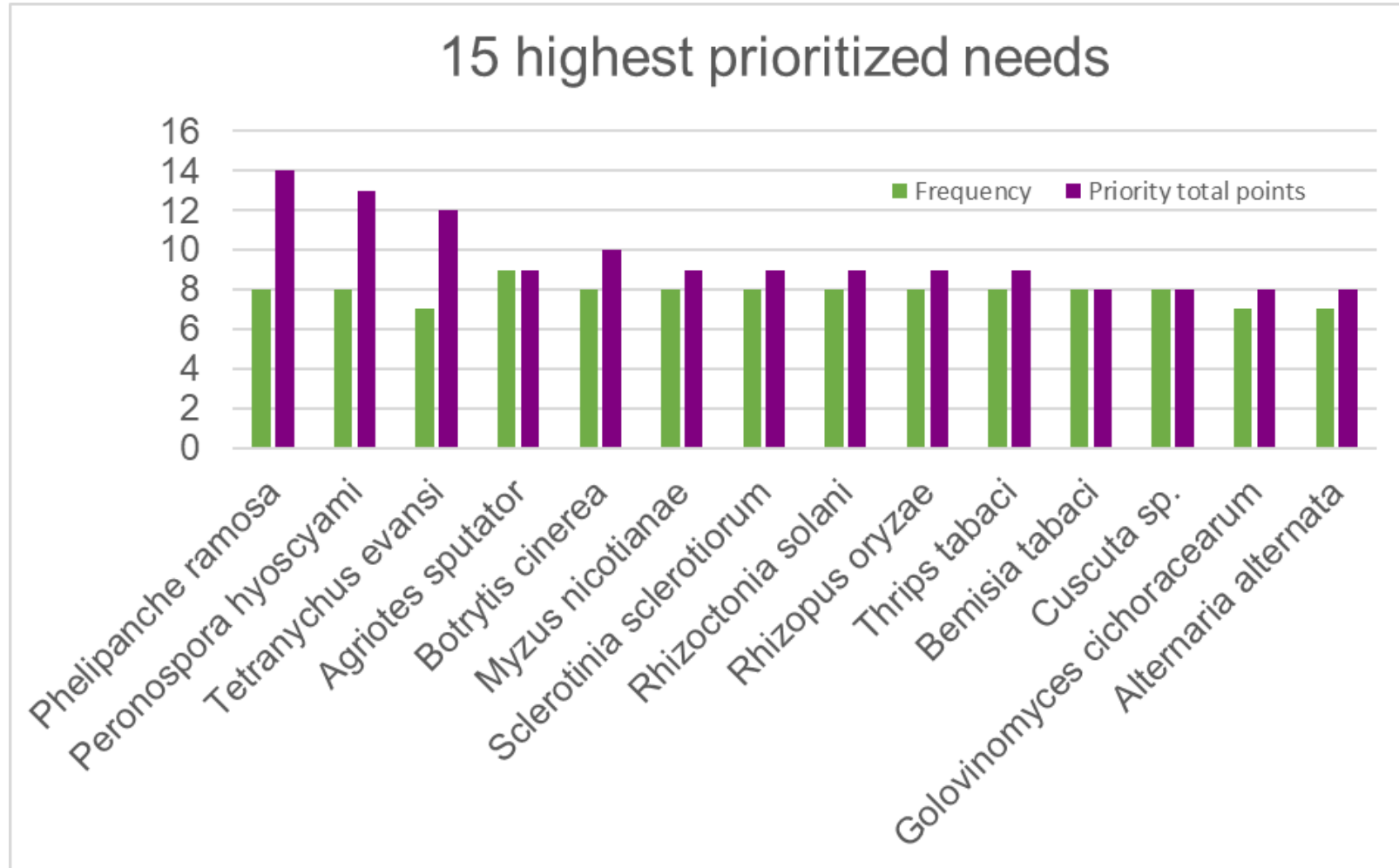
EUMUDA TABLE OF NEEDS

Crop EPPO Code <input type="text" value="Search"/>	Crop common name <input type="text" value="Search"/>	Pest EPPO Code <input type="text" value="Search"/>	Pest scientific name <input type="text" value="Search"/>	Pest common name <input type="text" value="Search"/>	Frequency <input type="text" value="Search"/>	Priority total points <input type="text" value="Search"/>	Member States <input type="text" value="Search"/>	Area of use <input type="text" value="Search"/>	Function <input type="text" value="Search"/>
RUBID	raspberry	DROSSU	Drosophila suzukii	spotted wing drosophila	18	60	Northern: DK,EE,FI,NO,SE Central: AT,BE,CH,DE,HU,IE,NL,SI,SK,UK Southern: FR,IT,PT	f,fg 	insecticide
DAUCS	carrot	PSILRO	Chamaepsila rosae	carrot fly	15	55	Northern: DK,EE,FI,LV,NO,SE Central: BE,CH,NL,SI,SK Southern: CY,ES,PT	f	insecticide
FRAAN	strawberry	DROSSU	Drosophila suzukii	spotted wing drosophila	13	45	Northern: EE,SE Central: BE,DE,HU,IE,NL,SI,SK,UK Southern: ES,FR,PT	f,fg 	insecticide

The current table includes minor uses needs of 28 Member countries (25 EU Member States, plus Norway, Switzerland and Macedonia). Source: https://www.eumuda.eu/database/table_minor_uses



SURVEY ON MU NEEDS & PRIORITIES- TOBACCO



1. Hemp broomrape
2. Downy mildew
3. Red spider mite
4. Wire worm
5. Grey mould



MINOR USES & SPECIALITY CROPS IN EUROPE ACTUAL STATE PART 1

- **lack of active substances** at MS level due to the relatively high registration process costs.
Sales versus data generation costs (MRL, efficacy data application fees, etc.)
- Off-Label Extension of Authorisation for Minor Uses (EAMU), or Emergency Use Authorisations are used as a solution.

The use of any product in accordance with an off-label EAMU approval is entirely at the **risk of the user!**

Regulation (EU) No. 1107/2009 determines under article 53 that a MS can authorise a PPP on the market in **special circumstances** for limited (max. 120d) and controlled use.



MINOR USES & SPECIALITY CROPS IN EUROPE ACTUAL STATE PART 2

MUCF contacted a survey on Emergency Use Authorisations granted in Europe in Minor Uses Needs

80% of the 50 first prioritized needs are addressed in Europe with Emergency authorization.

The whole survey table is available:

www.eumuda.eu/database/table_minor_uses_and_art_53

- duplication of work (regulatory) and costs (data generation) in different MS
- distortion of competition at European level
- distortion of competition with imports from third countries



MU TABLE OF NEEDS AND EMERGENCY AUTHORISATIONS SURVEY 2017-2019 TOBACCO

Pest scientific name	Pest common name	Member States and active substance	Function	Number of Emerg. auth. on the period 2017-19
<i>Peronospora hyoscyami</i>	downy mildew	IT (1): Dimethomorph	Fungicide	1
<i>Thrips tabaci</i>	onion thrips	GR (1): Flupyradifurone	Insecticide	1
<i>Helicoverpa armigera</i>	bollworm	IT (1): Etofenprox	Insecticide	1
<i>Lema bilineata</i>	tobacco slug beetle	IT (1): lambda-Cyhalothrin	Insecticide	1
<i>Rhizopus oryzae</i>	Wildfire of tobacco	ES (2): 1,3-Dichloropropene	Fungicide	2
<i>Agriotes sp.</i>	wireworms	ES (2): 1,3-Dichloropropene	Insecticide	2
<i>Thielaviopsis basicola</i>	black rot	ES (2): 1,3-Dichloropropene	Fungicide	2
<i>Meloidogyne arenaria</i>	root-knot nematode	ES (2): 1,3-Dichloropropene	Insecticide	2
<i>Botrytis sp.</i>	Botrytis rot	FR (2): Cyprodinil, Fludioxonil	Fungicide	2
<i>Pythium sp.</i>	cavity spot	ES (2): 1,3-Dichloropropene HR (2): Captan	Fungicide	4
<i>Agrotis sp.</i>	cutworms	ES (2): 1,3-Dichloropropene FR (3): Spinosad, Spirotetramat	Insecticide	5

In 2020, the MUCF made a comparison between the EUMUDA table of needs and Emergency authorisations granted over the period 2017-19.



NEW ACTIVE SUBSTANCES AUTHORIZED IN TOBACCO IN 2020

Country	Category	Active substance	Pest
France	Fungicide	Fluopyram + Trifloxystrobin	<i>S. sclerotiorum</i>
		Orange oil	Blue mold, Powdery mildew
		<i>Bacillus subtilis</i> strain QST 713	<i>S. sclerotiorum</i> , <i>B. cinerea</i>
		<i>Bacillus pumilus</i> QST 2808	White mold, <i>Erysiphe chioracerum</i>
		<i>Bacillus amyloliquefaciens</i> MBI 600	<i>S. sclerotiorum</i> , <i>B. cinerea</i>
	Herbicide	Metobromuron	before planting
		Pelargonic Acid	Sucker control
	Insecticide	Azadirachtin A	Caterpillar, Aphids
	Nematicide	<i>Paecilomyces lilacinus</i> strain 251	Nematodes
Germany	Herbicide	Metobromuron	before planting
	Insecticide	Flonicamid	Aphids (seedbed use)
Greece	Fungicide	<i>Bacillus subtilis</i> strain QST 713	<i>S. sclerotiorum</i> , <i>B. cinerea</i>
		<i>Bacillus pumilus</i> QST 2808	Blue Mold
	Insectide	Flupyradifurone	Aphids, Thrips
		Orange oil	White flies & Thrips
	Nematicide	Fluopyram	Nematods
Italy	Fungicide	Cyprodinil + Fludioxonil	Botrytis, Sclerotinia & Rhizoctonia in seedbed
	Insecticide	Flupyradifurone	Aphids, Thrips
	Herbicide	Metobromuron	before planting
Spain	Fungicide	Copper oxide	Blue Mold
		<i>Pythium oligandrum</i> M1	<i>Botrytis cinerea</i> , <i>Rhizoctonia solani</i>
		<i>Trichoderma asperellum</i> cepa T34	Pythium-Phytophthora - Rhizoctonia
		Cyprodinil + Fludioxonil	Botrytis, Sclerotinia & Rhizoctonia in seedbed
		<i>Bacillus subtilis</i> strain QST 713	<i>S. sclerotiorum</i> , <i>B. cinerea</i>
	Insecticide	Flupyradifurone	Aphids
		Orange oil	Thrips
	Herbicide	Metobromuron	before planting
		Oxyfluorfen	Weeds
		Fluazifop-P	Weeds
	Nematicide	<i>Bacillus firmus</i>	Nematodes
		Fluopyram	Nematodes

WITHDRAWN ACTIVE SUBSTANCES SINCE 2018-TOBACCO

Year	Active substance	Category	Member State affected by the withdrawal
2018	Iprodione	Fungicide	All in the EU
2018	Thiamethoxam	Insecticide	FR
2018	Acetamiprid	Insecticide	FR
2018	Picoxystobin	Fungicide	All in the EU
2018	Maneb	Fungicide	All in the EU
2018	Imidacloprid, thiamthoxam, acetamiprid	Insecticide	All in the EU
2019	Pymetrozin	Insecticide	DE
2020	1-Decanol	Herbicide	FR
2020	Diquat	Herbicide	ES
2020	Methomyl	Insecticide	ES
2020	<i>Metharizium anisopliae</i>	Insecticide	ES
2020	Chloryrifos	Insecticide	ES
2020	Metam-Sodium	Nematicide	ES
2020	Chlorothalonil	Fungicide	ES
2020	Dimetomorph	Fungicide	ES
2020	Metalaxyl	Fungicide	ES
2020	Micronized sulphur	Fungicide	ES
2021	Pyridate	Herbicide	FR
2021	Mancozeb	Fungicide	All in the EU

19 A.I. have been withdrawn in the last 4 years. Mainly insecticides and fungicides. PPP solutions for tobacco growers are decreasing every year. Good agricultural practice is increasingly difficult to implement, e.g., resistance management.



SUMMARY/ CONCLUSION

- The availability of PPPs for MU is negatively affected by **a lack of clarity** regarding the rules for authorisation and of harmonisation between MS
- The **definition of minor uses** is not sufficiently clear and procedures are often not clearly established
- Lack of solutions for minor uses needs
- Create level playing field for EU tobacco growers. Pest problems are the same as in major crops.
- CEG tobacco: 18 experts from GR, FR, ES, HU, DE, PL & IT
- 4 ongoing tobacco projects against the pests *Peronospora hyoscyami* and *Botrytis cinerea*.
- **Virtual MUCF tobacco meeting: 19.04.**



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THANK YOU FOR YOUR ATTENTION

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