



PHASING OUT OF AGRI REMEDIES

**IMPLICATIONS, MITIGATION STRATEGIES
AND THE WAY FORWARD FOR
THE SOUTH AFRICAN TABLE GRAPE
INDUSTRY**

Why are agricultural remedies being phased-out?

- Reasons for phase-out
 - Pressure on our industry / political decisions
 - New evidence on safety of products
 - New decisions & legislation
- Implications for industry & farmers
- Mitigation strategy
- Summary

Background

- A few basics
 - Agricultural remedies are hazardous by nature – due to attributes related to physical, health & environmental hazards – as they have been designed to control other organisms detrimental to food production and storage
 - Any chemical can have many hazardous health effects, e.g., acute toxicity (oral, dermal, inhalation), skin & eye irritation, skin & respiratory sensitization, carcinogenicity, mutagenicity, reproductive toxicity, etc.
 - Because chemicals are hazardous, it is critical to provide information on their hazardous properties to enhance the protection of human health & the environment during the handling, transport and use of chemicals.

Regulatory process

- All CropLife SA members & industry affiliates know that having a 'product authorisation' for the marketing & sales of an agricultural remedy in South African is the all important 'RIGHT TO OPERATE' for our members
 - this product authorisation / registration is granted by DALRRD according to the various legal constraints of Act No. 36 of 1947 & its many supportive regulations that have been created in recent years
- Regulation is important
 - Protection for the environment, farm workers, consumers & wider society
 - Gives farmers 'piece of mind' that what they are buying will do the job it promises to do
 - Have a minimum level of quality
 - Protects the introduction of foreign organisms, etc.

1. Product loss: Pressure on the industry

- From outside our country
 - EU Green Deal & Farm to Fork strategy
 - Political / ‘secondary regulator’ trade barriers
 - Active ingredient, MRL, quarantine pests, etc.
- From inside our country
 - Activism
 - Activists have many targets in local agriculture from land tenure, to working conditions, to livestock wellbeing, to pesticide use
 - Increasing focus on the reduction of pesticide use without knowing details & facts
 - Local legislation from multiple ministries
 - Sometimes in response to activism
 - New legislation
 - updated information on product safety (eg: Chlorpyrifos)
 - Product phase-outs based on new laws (eg: GHS classification)

Chlorpyrifos

- There have been a number of cases of human intoxication with chlorpyrifos over the years
- Internationally, the active ingredient is under regulatory pressure & use in many countries has been discontinued
- Combined with new risk assessments that indicated unacceptable risks for users & greater society, the DoH revoked the MRLs for this active ingredient
- As a result, the DALRRD indicated its intention to revoke registrations for agricultural remedies containing the active ingredient chlorpyrifos

- The Global Harmonised System for the classification & labelling of chemicals was adopted by South Africa via legislation introduced by the DoEL
- As the name suggests, it is a globally accepted standardized system for classifying & subsequently labelling, any chemical agent
- The GHS provides standardized methods for the classification of hazardous chemicals according to their inherent properties that could pose a risk for humans or the environment
 - The GHS is more comprehensive with regards to hazard communication.
 - The whole formulation is considered in the classification, not just the active ingredient(s)
 - For acute toxicity, all routes of exposure are included (oral, dermal and inhalation).
 - Chronic health hazards, physical and environmental hazards are also communicated.

Impact of GHS classification

- In SA, amongst other regulatory changes contained in the latest regulation in support of Act No. 36 of 1947 (August 2023), DALRRD indicated that any agricultural remedy with an active ingredient &/or co-formulant having CMR attributes (ie: having carcinogenic, mutagenic or reproductive toxicity characteristics) would be phased out of the South African agricultural market
- GHS groupings of CMRs
 - 1A: Known human carcinogen, mutagen or reproductive toxicant, largely based on human evidence
 - 1B: Presumed human carcinogen, mutagen or reproductive toxicant, largely based on animal studies

Implications for SA farmers

- Loss of plant protection solutions
- Loss of export markets
- Difficulties controlling quarantine pests
- Negative impact on resistance management options

- Thankfully, it is not all doom & gloom!
- EU Green Deal delays
 - Industry in Europe has pushed-back on stringent targets
 - Industry & DTIC efforts to push-back on blanket decisions for African countries
- Regulations gives some lifelines, in addition to taking older solutions away
 - Derogations for temporary product authorisations
 - Crop-pest specific
 - temporary
 - Fast-track dossier assessment system for low risk agricultural remedies
 - Fast-track dossier assessment system for biological agricultural remedies

- Yes, we are facing the loss of multiple agricultural remedies from the South African market.
- However,
 - International trading partners are becoming more pragmatic
 - There is the possibility of temporary uses for specific crop-pest combinations remaining for farmers until new solutions are authorized
 - At the same time, there are new technologies entering the market & there are Regulatory pathways for the faster authorisation of low risk & biological agricultural remedies already in place

Therefore, by staying informed as to the latest developments on the regulatory front (in terms of registered agricultural remedies, MRLs for different countries, etc.) SA farmers can mitigate the impacts on their operations from the phase-out of older agricultural remedies.

CropLife SA commits to the continuous sharing of relevant information with SATI & other growers associations in South Africa.

Thank you again for allowing us the opportunity to share this information with you.

Links to CropLife SA website

- Global Harmonised System for the classification & labelling of chemicals (GHS)
<https://croplife.co.za/CropProtection/GHS>
- CropLife SA empty container management programme
<https://www.croplife.co.za/Home/ContainerManagement>
- Agri-Intel database for label, safety data sheet & MRL information
<https://www.agri-intel.com/>