

# Unfavourable Regulations on Organic Plant Protection Products

**Pacific Organic Policy Toolkit**  
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## Unfavorable Regulations on Organic Plant Protection Products

Recognizing the danger of chemical pesticides on human health and the environment, and therefore the need to regulate their approval before they are placed on the market, many governments have developed cumbersome registration procedures for pesticides. This is highly desirable, of course, and large agrochemical companies have no problems meeting those registration requirements. However, when the same cumbersome requirements are applied to organic plant protection products, it can become a major hindrance to adoption of organic agriculture because the small companies that produce those innovative products (in small quantities) cannot afford the registration cost and bureaucracy.

An example of an unfavorable legislative framework in this regard is the EU system, which has no differentiated legal provisions for synthetic plant protection products: they currently fall under the same regulation as their synthetic counterparts. The data requirements are partly inappropriate or difficult to interpret for bio-pesticide active substances such as microorganisms. In general, the EU, compared to the USA, has higher costs and a slower approval system for organic plant production products to enter the market. However, Registration fees are not yet harmonized at the EU level. In most EU Member States these fees are still much lower than the fees requested for the evaluation of conventional pesticides, which somewhat limits the problem. Below are a few examples:

- In **Denmark** the fees for the microbial products accepted for bio-control are half those required for the evaluation of chemical active substances ( € 220.000 versus € 110.000 ).
- In the **UK** the fee for microbial products is £22,500 , whereas the fee for synthetic chemical products is £ 110,000 . This follows a project launched in 2003 that aimed at encouraging the registration of alternatives pest control products such as pheromones, plant extracts and biological organisms, with registration fee reduction being an essential component of the project. The success of this project led to the creation of a permanent Bio-pesticide Scheme in 2006.
- In **Belgium**, a special procedure was launched in 2007 in the framework of the program for reduction of pesticides, in order to improve the availability of bio-pesticides on the market. The projects aims to give special consultancy for the applicant, a separate fast-track procedure for bio-pesticides, lower fees and improved communication. Fees for new active substances have been reduced from 100.000 Euros to 10.000 Euros for bio-pesticides and 300 Euros for national product authorization.

The **United States** has a bio-pesticide registration program similar to the approach of Belgium. The US Environmental Protection Agency (EPA) has a fast-track,

streamlined bio-pesticide registration program which is supported by IR-4 program based at Rutgers University. IR-4 was started in 1982 and considerably expanded in 1994. IR-4 facilitates registration of sustainable pest management technology for specialty crops and minor uses. Working closely with and advising the EPA, IR-4 completed 43 registration projects since 1994 at a cost of \$US 2.85 millions, and also gives regulatory advice to manufacturers.

Governments undertaking a strategic plan for organic agriculture and markets should always undertake a review of current pesticide regulations and rectify any provisions that deter use of organic inputs. This includes any provision that would deter the on-farm preparation and use of organic inputs. In some developed countries with complex registration requirements, it is technically illegal for farmers to use any unregistered pesticide or fertilizer, even if it is biologically based and prepared on farm.

