

The Agricultural Pesticide Committee (APC)

Ministry of Agriculture & Land Reclamation Arab Republic of Egypt

(We work to serve Egypt with honesty, integrity and quality)

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The Agricultural Pesticide Committee in Egypt (Egypt-APC)

Since Egypt is not a pesticide producer country, most of its needs for agricultural pesticide use are mostly imported. Therefore, when trying to register any pesticides or renew its registration, references have to be considered for the judicial use. In this respect, The Agricultural Pesticide Committee (APC) is the Egyptian governance accountable for the assessment, evaluation and registration of agricultural pesticides, and for their regulation up to and including the point of retail sale. APC – by law - sits within the portfolio of the Minister for Agriculture and Land Reclamation. The current APC was banded according to the Ministerial decree 1293/2011. The committee strictly follows many international reference guides and guidelines in pesticide registration mandates, policies, requirements and procedures. The role of APC is to independently evaluate the efficacy, safety and performance of pesticides

intended for use in the Egyptian agro-ecosystem, ensuring that the health and safety of people, animals and crops, the environment and trade are well-protected. All registered products must be shown to work effectively against target pests and be safe for Egypt's public health and the environment. Registered products must also not unduly jeopardize Egypt's agreements and trade with other nations, especially those of the European Union.

For the sake of likely guaranteed human and environmental safety, only pesticides registered in internationally reputable and accredited agencies, authorities, commission, etc are accepted for consideration to local registration. In particular, the US Environmental Protection Agency (US-EPA) or the European Union (EU) are accepted for consideration to local registration. Similarly, the legislator and authorities in Japan and later China pay close scrutiny to the approval (standard) processes in Europe and the USA. While **APC** highly respects the referential and leading pesticide regulatory systems and initiatives in the US, EU and other countries, Egypt has its own system in place. It seems reasonable at this point to briefly review registration in these two reference authorities and summarize the web sites wherein important information regarding pesticide management schemes in the USA and EU are published.

Pesticide Registration: Reference Organizations and Website Information

Pesticide Registration is the process whereby a responsible national government or a regional authority approves the distribution, sales and uses of pesticide following the evaluation of comprehensive data demonstrating that the candidate pesticide(s) is effective for the intended purposes and does not pose any unacceptable risk to the health of humans, animals, plants, or the environment. The registration of

pesticides and their formulations by government agencies began after World War II and was given further impetus by the publication of Rachel Carson's book "Silent Spring" in 1962. Since that time the regulatory process for pesticides has become more stringent and, in order to compare the properties of different pesticides, the requirements for registration have become more formalized. This has resulted in a large number of documents being published which give detailed instructions on which studies are needed, how to report results, how to balance pesticide efficacy against target pests with risk against public health and the environment to make rational and well-informed registration eligibility decisions, etc.

An excellent source of information on pesticide regulation can be found on the Organization for Economic Co-operation and Development (OECD) web site¹, where a search using the word "pesticides" yields many useful documents. These include links to other regulatory sites², guidance on the preparation of documents for pesticide registration³ and the launch of an initiative for a global regulatory scheme by 2014⁴. Whilst countries in the OECD respect the OECD initiatives on pesticide regulation many have their own systems in place.

The United States - The US Environmental Protection Agency (EPA) web page on registration⁵ explains that "Pesticide registration is the process through which EPA examines the ingredients of a pesticide; the site or crop on which it is to be used; the amount, frequency and timing of its use; and storage and disposal practices. EPA evaluates the pesticide to ensure that it will not have unreasonable adverse effects on humans, the environment and non-target species. A pesticide cannot be legally used in the USA if it has not been registered with EPA's Office of Pesticide

Programs. The EPA has separate review processes for three categories of pesticides: conventional, bio-pesticides and antimicrobials. On the EPA web site details can be found on the federal registration procedure for the United States, with links to other EPA web sites that give a more detailed description of the requirements and procedures for registration⁵.

Europe - In the European Union (EU) a distinction is drawn between plant protection products and biocides and these products are regulated under two different directives. The main legal instrument that governs crop protection products in Europe is Directive 91/414/EEC⁶, which will be superseded by Directive 2009/128/EC⁷, and Directive 98/8/EEC⁸ governs biocides. Whilst there are many similarities there are also differences in the regulatory requirements for the two classes of products. Directive 91/414/EEC regulates the placing of crop protection products on the market and harmonizes national product approval requirements throughout Europe. The approval process consists of two main stages: in the first, the active substance must be approved at the EU level, and in the second, formulations (products) for national markets must be registered by the Member States.

Directive 91/414/EEC states that “active substances cannot be used in plant protection products unless they are included in a positive EU list”. An EU program of evaluation to create this list is underway. Most of the active substances under evaluation are pesticides but many – such as growth regulators, pheromones etc. – are not. All plant protection uses are covered; not just those in agriculture. Pesticides used in other areas, for example as veterinary drugs or as biocides, are covered by other legislation. Once a substance is included in the positive list, Member States may authorize the use of products containing them.” Individual

European countries also issue registration information for pesticides e.g. Finland⁹ and the UK¹⁰.

Many other countries have information on their regulatory requirements, including Australia¹¹, Canada¹² and Japan¹³.

It is also worth remembering that apart from official government sites there are other sites from, for example, Trade Associations^{14,15} which also contain useful information on regulatory requirements and up-to-date interpretation of current guidelines.

The International Code of Conduct on the Distribution and Use of Pesticides¹⁶ is the globally accepted standard for pesticide management. It was first adopted by FAO and its member countries in 1985 and the revised version adopted in 2002. The Code of Conduct recognizes that: *“In the absence of an effective pesticide registration process and of a governmental infrastructure for controlling the availability of pesticides, some countries importing pesticides must heavily rely on the pesticide industry to promote the safe and proper distribution and use of pesticides. In these circumstances foreign manufacturers, exporters and importers, as well as local formulators, distributors, repackers, advisers and users, must accept a share of the responsibility for safety and efficiency in distribution and use.”*

APC-Egypt pays close scrutiny to the approved processes of pesticide managerial and regulatory systems in the USA, Europe, Canada, Australia, Japan, etc. Other systems may be added to our registration references. As the highest regulatory governmental agency in Egypt, **APC**'s primary mandate is to ensure the protection of human health and environment from crop protection products when used according to label

directions. In so doing, the committee routinely reviews any registered pesticide and ensure that it sustains its efficiency and human safety.

Mission

APC is the highest Government Statutory authority responsible for registering agricultural pesticides based on two major criteria: first to be highly effective against agricultural pests; and second to be highly safe to the public health and the environment. Being an effective gateway to the Egyptian market and an effective steward of pesticides already on the market, the **APC** registration-eligibility decisions and pesticide regulatory policies are always evidence-based, freely-discussed and consensually-reached. The decision-making process in the committee and its peripheral subcommittees always integrates experimental data with social, economic, and environmental interests of the community. The committee is mandated by the Egyptian law, and its members are appointed by a Ministerial decree. Two fundamental beliefs underlie **APC** mission: first, pest management is essential to protect the agricultural economy; second, the people of Egypt deserve to be best served by a continuous effort to minimize risks associated with pest/pesticide management. **APC** is guided by the highest standard of professionalism, excellence, work ethics and unparalleled transparency.

Vision

APC vision is to become a globally well-recognized leader in assessing, evaluating, registering agricultural pesticides; monitoring pesticides trade, distribution, and use in Egypt; and safeguarding the public health and environment from any possible unwanted risk of these pesticides. **APC** has been investing in its workforce, workplace and partnership to support one of the best pesticide regulatory systems in the world.

Purpose

- **APC** enhances the ability of the Ministry of Agriculture and Land Reclamation, other governmental agencies and the public with the information and knowledge they need to adopt Integrated Pest Management (IPM), and reduce unreasonable effects or uses of pesticides.
- **APC** is responsible for tailoring, administering and managing the National Registration Scheme and Decrees for agricultural pesticides, which sets out the regulatory framework for the management of pesticides production, import, export and use in Egypt.
- **APC** administers the legislation scheme in partnership with state and territory governments and with the active involvement of other Egyptian government agencies.
- **APC** serves as a national focal point that cooperates with international pesticide regulatory authorities for effective use and global safety of plant protection products throughout their life cycles.
- **APC** ensures that only those products that meet the **APC's** requirements are actually supplied, and constantly monitors the market for compliance. Besides, other government agencies are equally responsible for regulating and managing the use of pesticides once they are sold.
- **APC** is working closely with other government regulatory agencies around the world, e.g. the US-EPA, the EU, to keep pace by using and contributing to the development of the most up-to-date risk assessment tools and methods.

- **APC** continuously and stringently reviews registered chemical products to ensure that they continue to meet contemporary high standards of efficacy and safety.
- **APC** establishes a synergy mechanism for stakeholder identification and participation, and prioritization of emerging pesticide issues for research, extension and outreach to respond to economic, human health, environmental and safety concerns.
- **APC** responds to plant protection emerging problems promptly and ensures that available registered pesticides do not fall short of dealing with new pests or outbreaks.

APC Guiding Principles

- Demonstrating leadership in pest/pesticide management
- Providing transparent and accountable governance
- Encouraging community and stakeholders involvement
- Building trust and respect in stewardship and partnership
- Promoting innovation and creativity to improve the pesticide regulatory system
- Fostering open and proactive measures communication
- Serve with honesty, integrity and quality

References

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15. European Crop Protection Association (ECPA), Reading Room
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