



Ms. Sabine Jülicher
Director, DG SANTE

Ref: ESA_18.0273.3

Object: Letter to support the renewal of the authorisation of the active substance thiram for seed treatment.

Brussels, 24.04.2018

Dear Ms. Jülicher,

ESA, European Seed Association, is the voice of the European seed sector, representing the interests of those active in research, breeding, production and marketing of seeds of agricultural, horticulture and ornamental plant species.

With the current letter ESA would like to express the concern of the European seed sector regarding the extension of the authorisation of the active ingredient thiram for seed treatment.

Thiram is a fungicide with excellent selectivity on any kind of seeds that has been widely used over the last decades for the seed treatment of vegetable, maize, oilseed rape, sugar beet, cereal, cotton, sunflower and a large number of minor crops. Thiram is effective against soil-borne diseases and has a wide spectrum of efficacy, which allows it to be applied to many species. Additionally, it gives a boost to the emerging plant due to its phytotonic properties. Therefore it is registered for a wide crop range in a number of EU member states that have large seed treatment operations.

In most of the cases, there is no alternative active substance that could replace thiram. Alternative substances are either not authorised; they are authorised for a few crops only or they are in the reregistration process and likely to lose their approval as well; they are more susceptible to development of resistance; they are not as broadly effective, neither they perform as consistent and reliable as thiram. Consequently, they are not a practical solution for the professional seed market. Furthermore, thiram is a well-known product in third countries.

A potential non-renewal of the authorisation of thiram will have a huge economic impact for European agriculture. Crop production is expected to be reduced due to damping off of the plants since pathogenic fungi are naturally present in the soil. In the absence of thiram more expensive fungicides may be used. In this case, the cost of the seeds will be higher specially for low value seeds. Additionally, for several third countries, treatment of seeds with thiram is a phytosanitary requirement. Alternative substances are not known and therefore are not accepted by third countries. If thiram is not available, at least for seed treatment for export purposes, the treatment of seed will move to third countries outside the EU reducing the competitiveness of the EU seed industry.

Due to the structure of the seed industry market, any decision to withdraw the authorization for a plant protection product used for seed treatment, during or after the processing campaign of commercial seeds, and to withdraw it from the market leads to serious economic consequences for the seed companies.

For some species, the processing of seeds already starts just a few days after the harvest with cleaning, grading, and treatment to avoid deterioration of the seed quality. Within a few weeks only, the entire seed production must be cleaned, graded, treated, and transported to the traders.

Due to the products' nature and the low frequency of sale and use -just once per year- the seed stocks of a year N consist of the production of the very year as well as the remaining seeds of the previous year N-1, which in most cases are already treated.

It is impossible to reduce the stock of treated seeds by simply selling them to third countries as this requires the previous inscription of the variety in the national variety list of the respective country, and varieties must be adapted to the climate of that country.

As seeds are sold only once a year, and as it is impossible to reduce stocks of treated seeds by selling them on other markets, such seeds which are not sold are bound to be incinerated. The economic damages suffered by the seed companies are substantial, as this comprises the research and development expenses as well as the multiplication and processing cost- in the field and in the processing line- of many years.

Indicatively, the economic value of the seeds treated with thiram as this was calculated by ESA in April 2018 is the following:

Crop	Value of seeds treated with thiram*. The prices are estimated in farmgate level ('mill. Euros)
Cereals	7,311
Cotton	10,5
Maize	702,62
Oilseed rape	184
Proteaginous crops	0,786
Sugar beet	202
Sunflower	252
Vegetables	799
Soybean, lineseed, clover & grasses	1,159
TOTAL	> 2,1 bill Euros**

*the value of thiram treated seeds may vary depending the time of the year

** the data was provided by the ESA membership

Moreover, we would like to stress that seed treatment in EU 28 takes place under highly professional environment following the latest technology. The active substances are applied to the commercial

seeds by means of sophisticated, very precise machines. Seed dressing machines apply a very exact amount of active ingredient to the grain based on the treatment fluid prepared, and this fluid is well distributed over the entire grain surface and has a good adhesiveness. The seed sector can guarantee the safe application of plant protection products to seeds which is confirmed by the success of the European Seed Treatment Assurance (ESTA) scheme.

For the aforementioned reasons, ESA urges the policy makers to take into account new scientific data that defend the use of thiram for seed treatment. Furthermore, in case of non-renewal of the authorisation of the active substance we recommend that the grace period to put the thiram treated seeds in the market should be defined after considering the particularities that are described above, thus allowing a cropping season of **two cropping campaigns** for seeds treated with thiram. Finally, following the already communicated ESA position regarding the treatment of seeds solely intended for export to third countries, the European seed industry is asking for a specific procedure to allow seeds that will be exported to third countries to be treated with thiram.

We thank you in advance for taking our considerations into account. We are at your disposal for additional information.

Yours sincerely,

A handwritten signature in cursive script that reads "Amalia Kafka". The signature is written in a dark ink on a light-colored background.

Amalia Kafka

Manager ESTA

Cc: Klaus Berend, Head of Unit, DG SANTE

Mark Williams, Policy officer, DG SANTE

Klaus Schlünder, Chairman of ESA Board WG STAT

Garlich von Essen, ESA Secretary General