European and Mediterranean Plant Protection Organization
Organisation Européenne et Méditerranéenne pour la Protection des Plantes

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EPPO Workshop EPPO Workshop on Zonal Efficacy Assessments
Berlin (DE), 2011-04-05/06

CONCLUSIONS and RECOMMENDATIONS

PRINCIPLES OF A ZONAL SUBMISSION

Number and location of trials

- The basis for the number and location of trials should be scientifically based and consider:
    - the region, regardless of zonal boundaries (and beyond if appropriate);
    - target pest biology, regional cropping intensity and the level of efficacy needed/acceptable damage;
    - pest mobility and the influence of temperature, humidity and soil type;
    - areas of high target incidence ('hot spots') and low pest incidence;
    - regional agronomic factors, including sowing date and cultivars;
    - climatic conditions.

- The determination of trial number should additionally consider:
    - variability and consistency of control;
    - whether addressing new or existing active substances;
    - whether crop safety information is especially relevant (e.g. sensitivity of varieties)

- Identified guidance requirements:
    - Information on target pest biology, distribution and agricultural importance. Industry should present papers for targets, which are put forward for EPPO Panel review.
    - A new guideline on principles of zonal data production and evaluation.
    - Revise EPPO Standard PP 1/226 *Number of efficacy trials*

Minimum effective dose

- Applicants need to demonstrate that the proposed doses are justified.
- More than one lower dose rate is useful to demonstrate this, and provides some dose flexibility.

Formulation changes

- Regarding formulation changes, it should be possible to present bridging trials. However, to assist with this, some guidance is needed to clarify what constitutes major and minor formulation changes and the associated principles of generating bridging data.

Resistance

- Sensitivity baseline information regarding resistance should be considered in terms of the region, rather than nationally.
- Resistance management however should be applied at national level.

Product and active substance characterization

- It is important to understand the strengths and weaknesses of the product/active substance, particularly for the justification of the label rates. This may require further supporting product information with respect to:
    - soil type (for soil applications);
    - air and soil temperature (for soil application);
    - agronomic practice e.g. sowing date.

DOCUMENTATION NEEDED TO MAKE ZONAL SUBMISSION AND EVALUATION

Documentation for submissions and evaluation

- Both the BAD (Biological Assessment Dossier) and the dRR (draft Registration Report) are needed to make application submissions. Both are drafted by the applicant.
- There are no substantive proposed changes to the BAD. This will continue to provide details of the supporting trials and studies. However, there should be some harmonization between the dRR and BAD formats, particularly the numbering.
- The dRR (draft Registration Report) should provide a high level summary. This is then modified by the zRMS Rapporteur (zonal Rapporteur Member State) to create the RR (Registration Report).
- Concerned Member States (cMS) should be able to base their decision on the RR.
- The current proposals for the dRR format and guidance (French and ECPA proposals) should be developed to make a definitive guidance for the applicant. This should include EC guidance on core/national data, and development of the dRR, renumbered and with instructional notes on what should be addressed under each point. Members States should have the opportunity to comment on the proposals.

New EPPO guidance

- There is now a clear need for a new EPPO Standard: *Principles of zonal data production and evaluation*. This should cover the following areas:
    - The spirit of the zonal evaluation approach;
    - Checklists of important considerations for zonal submissions;
    - Minimum effective dose;
    - Numbers of trials and location (though not prescriptive);
    - Requirements for new vs. established active substances;
    - Requirements for major / minor changes of formulation;
    - Principles of bridging;
    - National addenda, e.g. Resistance management at local level, convenience tank mixes, special crop/targets;
    - Principles of a ‘master label’ (should incorporate country specific good agricultural practices (e.g. different doses and uses), if applicable).

- Requirement for agronomic documents on a range of crops and targets. Update or develop further, the EPPO Standards on Good Plant Protection Practice (PP2) if possible. CABI Compendium may also provide some information.
- Possibility for EPPO guidance on IPM compatibility. Requirements for on-label recommendations for IPM compatibility.
- Modification of EPPO Standards on:
    - *Dose expression for plant protection products* (PP 1/239);
    - *Phytotoxicity assessment* (PP 1/135);
    - *Number of efficacy trials* (PP 1/226);

- *Conduct and reporting of efficacy evaluation trials, including good experimental practice* (PP 1/181);
- *Minimum effective dose* (PP 1/225).

- Continuation of work on extrapolation tables to support minor uses. It may be helpful to also develop an inventory of existing national tables.

Clarification of important terms and procedural issues

- Clarification of the definitions for:
  - major/minor crops;
  - major/minor uses;
  - primary/secondary targets.

  (It was noted that the EU Technical Group on Minor uses should be consulted regarding some of these terms).

- Partial zonal submissions are important for some industry sectors. Some input/guidance is needed from the Commission on the framework within which partial applications can be addressed.
- Clarification of the procedural aspects of zonal evaluations including:
  - Submission of a zonal application;
  - Evaluation procedures and coordination;
  - Commenting periods and timelines.

Re-evaluation of progress and requirements

- It was proposed that a further Zonal procedures meeting may be valuable in 2012 to discuss progress, experience and further requirements.

Appendix I

11-16843

***Ad hoc* meeting of the Panel on General Standards on Efficacy Evaluation**
Berlin (DE), 2011-04-06/07

Following the EPPO Workshop on Zonal Efficacy Assessments a special meeting of the Panel on General Standards was held in order to address the main action points. These are summarized as follows (tasks 1-3 were viewed to be highest priority):

1. A new EPPO standard will be drafted entitled *'Principles of zonal data production and evaluation'*.

EPPO will coordinate the development of a draft guideline, which will cover the following areas:

- the spirit of the zonal evaluation approach;
- checklists of what to think about when making zonal submissions;
- minimum effective dose;
- Numbers of trials and location (though not prescriptive);
- Requirements for new vs. established AS;
- Requirements for major / minor changes of formulation;
- Principles of bridging;
- National addenda, e.g. Resistance management at local level, convenience tank mixes, special crop/targets;
- Principles of a 'master label' (should incorporate country specific GAPs (e. g. different doses and uses), if applicable).

Examples will be produced for the guideline appendices or as independent papers (which would be preferably), before such a standard is finalized. These will be developed from the Workshop scenarios and will include:

1. *Apera spica-venti* in winter cereals;
2. Colorado beetle;
3. Cereal disease for the central zone;
4. Fungicide (potato, phytophthora/alternaria);
5. Insecticide (*Cydia pomonella* codling moth);
6. Herbicide (Maize, grass and broad leaf herbicide);
7. Aphids on stone fruit.

The new draft EPPO Standard with appendices/papers of examples will be presented to the Working Party on Plant Protection Products in May 2011.

Other relevant discussion points regarding the new draft guideline:

<u>The issue of dose(s)</u>
- how to address dose and dose variation – is it a core or national issue?
- The General Standards Panel agreed that dose should be addressed in the <u>core dossier (as far as is possible).</u> I.e. data should be presented in the core BAD to support the proposed doses in the respective regions in which approvals are being sought.

<u>Seed treatments</u>
Supporting dossiers for seed treatments should also be addressed in a regional approach with respect to trials, if applicable.

2. Development of the dRR template and guidance

- It was felt that the intent of the documents regarding the dRR had perhaps become confusing at the Workshop. The General Standards Panel therefore clarified that:

  - The 'French' document is a proposal to address core and national data requirements.
  - The ECPA document assists with determining the level of information that is needed in the dossier, via a template and guidance on what should be included. It was noted that in the short/medium term, it will be the Member State evaluation and how well it is written, that will be of most use to other countries when considering Mutual Recognition of the zonal assessment. In the longer term, industry may adapt their submissions, and it may become easier to simply provide comments rather than having to do a complete evaluation. (It was noted that at present, it is often easier for evaluators to write their own assessment, than do a detailed critique of company submission).

- Using these materials, it was agreed that a draft EC guidance document specifying core/national addenda would be drafted. The chapters will be harmonized with the BAD, which will include the consideration of merging the chapters on 'adverse effects on beneficials' and 'compatibility with IPM'. The new draft will be submitted to the Commission for circulation and Member State comment.
- It was also agreed that the regulatory Evaluators Groups should also have the opportunity to comment on this document.
- It would be useful to add a note to the dRR template that an update is expected. For the attention of Annex I group.

3. Procedural overview

The General Standards Panel agreed that it was extremely important that the application procedures, including evaluation and timelines are clarified with some urgency. The process was discussed and very briefly summarized:

- The applicant produces a BAD and high level dRR summary.
- The zRMS (Zonal Rapporteur Member State) drafts the Registration Report (RR) = the evaluation.
- The evaluation goes to other MS and to the applicant. Comments can be made and the RR is then finalised by the zonal rapporteur.
- Once finalized, after comments of concerned Member States (cMS), the zRMS authorizes.
- The cMS have 120 days to address national addenda and authorize accordingly.

Tasks:
- It was felt that this overview should be elaborated with signposts to relevant documentation and guidance. See Appendix 2.
- The elaborated procedural overview may be appended to the workshop conclusions or added to the EPPO summary webpage. For the longer term, an EC guidance document is being developed by the Post Inclusion Annex I working group.

4. Other important issues to be addressed by the EPPO Working Party on Plant Protection Products (WPPPP)

Definitive solutions for the following issues were not agreed. These points were highlighted to be discussed by the EPPO Working Party on Plant Protection Products to be held in May 2011, in order to set and prioritize tasks and timeframes. The main discussions are summarized:

<u>a. Requirement for agronomic documents on a range of crops and targets</u>
- The GPPP standards already exist, though the focus may not necessarily be appropriate in the current format.

- ECPA could be asked to take the current standards and develop new drafts. Input may be necessary from industry/ ECPA/ IBMA/ DG agriculture and such associations.
- Should also address IPM component (with a view to meeting the requirements of the Directive on the Sustainable Use of Pesticides)
- Potential for a new EPPO guideline and/or revision of GPPP guidelines.

b. Unintended side-effects
- How should this be addressed? May be considered by national addenda or is further guidance needed?
- IOBC may have some relevant material.
- Potential for EPPO guidance on general principles of IPM integration/compatibility – i.e. what countries should be doing.
- EPPO WPPPP should revisit the German draft and UK documents for discussion. Question – what are other countries doing?

c. Phytotoxicity
EPPO to facilitate an update of *Phytotoxicity assessment* (PP 1/135) including the issues of varietal screening.

d. Number of trials
Regarding *Number of efficacy trials* (PP 1/226), it was felt that the Herbicides/PGR and Fungicides/Insecticides Panels should address issues of crop safety including yield and insecticide/fungicide seed treatments respectively.

e. Convenience tank mixes and tank cleaning
- a definition is needed about the terms used: farmers mixtures, recommended mixtures on the label, mandatory mixtures on the label; the last two according the Directive 91/414 Annex III and VI.
- EPPO to facilitate progress with a guideline on tank cleaning.
- A UK document exists for tank mixes.

f. Formulation changes (major vs minor)
- UK guidance exists that addresses major/minor formulation changes and bridging requirements.
- Working Party discussion is necessary to determine how the issue can be progressed. This could be a potential Workshop topic.

g. Clarification of definitions
- EPPO to pursue a definition guide to the following terms:
    - major/minor crops;
    - major/minor uses;
    - primary/secondary targets.
- Input should be sought from the EU Technical Group on Minor uses regarding these terms.
- It was proposed that this definition could be presented as a discussion point to the forthcoming Minor Use Conference in Wageningen, May 2011. Progress to be reported back to the WPPPP.

Appendix 2.

Procedural overview of the zonal process in the European Union with respect to efficacy evaluation[1]

1. The applicant company writes a BAD and accompanying overview in section 7 of the dRR (as was agreed at the EPPO Workshop).

2. The company writes a full dRR to cover all areas and submits this (with supporting materials including the BAD) to the zonal Rapporteur Member State (zonal RMS). A copy is also submitted to other concerned Member States (cMS) at the same time. Ideally the submission would also include the National addenda, but it is permissible for these to be submitted later.

3. The zonal RMS evaluates BAD and produces the RR. (For each specialist area the Zonal Rapporteur could choose to simply comment on what the applicant company puts into the dRR if the company summary is considered to be accurate; OR alternatively, they could amend sections; OR they could simply re-write their own evaluation. Current experience is that for efficacy, regulators often write their own evaluations, since it is less time consuming than amending the company one. However, over time and when companies see the types of assessment that are written, it may be possible to adopt amendments of company summaries). The cMS can, if they wish, start to look at the National addenda if available at that point, or look at the dRR. During this process the zonal RMS may contact the applicant for further information/clarification and, could have informal contacts with the other Member States, e.g. the efficacy evaluator may want to seek advice from another country more familiar with a particular use.

4. The zonal RMS puts their copy of the draft assessment on CIRCA (the European electronic information sharing platform), for comment both by the other Member States and the applicant company. This version is intended to be sufficiently explicit to enable cMS to accept core areas without additional supporting information. There is subsequently a 6 week deadline for comments.

5. After 10 weeks the dRR becomes the final Zonal RR, having considered all comments, and this is also added to CIRCA.

6. After the receipt of the final Zonal RR and the copy of the authorisation from the zonal RMS the cMS have 120 days to issue their own National authorisations. This is also the stage where individual countries will consider any National addenda.

7. An applicant may then seek further Member State authorizations via intra- or inter-zonal Mutual Recognition, i.e. the respective countries may be within the same EU zone or in EU different zones.

[1] Please note that this appendix represents an efficacy specific overview of the zonal procedure. Please note that detailed SANCO guidance on the general process of *zonal evaluation and mutual recognition under Regulation (EC) No 1107/2009* is under development.