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 DIRECTORATE-GENERAL FOR AGRICULTURE AND RURAL DEVELOPMENT
 Directorate C. Single CMO, economics and analysis of agricultural markets
 C.4. Arable crops

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FILE NOTE

Subject : Meeting report – Tricyclazole (TCA) with DOW Chemicals and FERM - 24/10/2016

Participants

Industry: [REDACTED] (FERM- Rice Millers)

DOW: [REDACTED]

AGRI: Mr [REDACTED], Mr [REDACTED] (C4)

We presented the situation regarding Tricyclazole (TCA). After the 15 October publication of the non-approval decision (Commission Implementing Regulation 2016/1826) for TCA, DG SANTE is now going ahead with lowering the EU Maximum Residue Limit (MRL) to the limit of detection/quantitation (LOQ), *i.e.* to 0.01mg/kg (while it is currently at 1mg/kg).

In the USA, India and Japan it is 3mg/kg (import tolerance while TCA is not used by US rice producers). Regarding that, DG SANTE states that "the EU has an extremely robust regulatory system for pesticides and food safety, based on comprehensive scientific evidence which is assessed in an independent, objective and transparent manner." No flexibility should be expected. On this point, FERM said a tolerance of 0.1mg/kg can be workable but see no reason why DG SANTE would be open to compromise.

The DG SANTE timeline for this is adoption in June 2017 and deferred application date 6 months after entry into force, which means around January 2018.

[REDACTED] This will take 3-5 years. In the meantime, hopefully something can be done on the import tolerance (12 months) which DOW could do by June 2017. FERM said India is also requesting this.

TCA is also produced elsewhere, mostly as generic chemicals in India, which is used in India and Pakistan. India is reportedly trying to organise a group of countries to raise the issue at the SPS committee in the WTO. FERM and DOW are asking us to support their position to have EFSA evaluate additional safety data. We did not commit to anything, but said we would look at ways to arrive at a less rigid solution.

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e-signed

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Cc

J. Schaps,

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