

INDUSTRIAL COMMITTEES



CROP PROTECTION COMMITTEE

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NEW REQUIREMENTS FOR IMPORTATION OF PESTICIDES AND POTENTIAL RISKS OF UNTIMELY AND INCOMPLETE SUPPLY OF CROP PROTECTION PRODUCTS TO RUSSIAN FARMERS

On June 29, 2021 new requirements for import of crop protection products (CPP) entered into force. The new requirements had been established in the following regulatory instruments:

- › Federal Law No. 109-FZ, dated July 19, 1997, 'On Safe Handling of Pesticides and Agrochemicals', as amended by Federal Laws No. 522-FZ dated December 30, 2020, and No. 221-FZ dated June 28, 2021;
- › Order of the Government of the Russian Federation No. 1030, dated June 28, 2021, 'On State Control (Supervision) of Safe Handling of Pesticides and Agrochemicals at Crossing Points of the State Border of the Russian Federation'; and
- › Decree of the Government of the Russian Federation No. 1667-r dated June 19, 2021, approving the List of Specialized Crossing Points of the State Border of the Russian Federation for the Import of Pesticides and Agrochemicals.

According to the new requirements, pesticides and agrochemicals may be imported solely through specialized border crossing points at which federal state control (supervision) is carried out, including both the examination of relevant documents and the collection of samples for laboratory analysis. The purpose of such analysis is to verify the compliance of an imported product batch with the requirements of the relevant state registration certificate for the pesticide or agrochemical imported.

Ensuring compliance with the new requirements presents the following problems.

Until recently, almost 90% of pesticide imports have been imported to Russia through the Republic of Belarus. Companies will have to alter supply chains they have built over years. So far, the approved border crossing points do not have analysis laboratory facilities. The bulk of laboratory analysis will be performed at the Federal State-Funded Institution Federal Center of Quality and Safety Assurance for Grain and Grain Products (Ramenskoe, Moscow Region), to which samples will be submitted. Consequently, both the employees of the Center and the inspectors of the Federal Service for Veterinary and Phytosanitary Surveillance (Rosselkhozadzor) at



the border crossing points will face workloads way above their capabilities. Importation of pesticides through a limited number of crossing points that do not have analysis laboratory facilities will inevitably result in kilometers-long queues of trucks at the border during the peak period of pesticide and agrochemical supply for spring field works and, consequently, in delays in CPP delivery to Russian agricultural producers.

At meetings with Rosselkhoznadzor, it was explained that the sample collection requirement is a tool for detecting counterfeit pesticides and agrochemicals. Nevertheless, fraudsters import counterfeit pesticides under the guise of detergents and other goods that are not subject to Rosselkhoznadzor's inspections – the counterfeit products are later dispensed and packaged within the Russian Federation. International companies being members of the AEB CPC are the among world's leading innovative chemical producers. They have or are building plants in Russia with the goal of ensuring the sustainable and progressive long-term development of their business in the country. Their constant priority is the quality of their products, which has upheld their strong reputation for years.

RECOMMENDATIONS

- › Focus within the regulatory activities at border crossing points shall be shifted from bona fide suppliers towards actual violators.
- › For the period of large-scale CPP import for spring field works (January–March), regulatory activities shall be arranged at additional customs inspection points within Russia, primarily in the North-Western, Central, and Southern Federal Districts through which (e.g. Krasnodar, Voronezh, Ryazan) the bulk of pesticides are imported – this will allow the workload among the Federal Customs Service's and Rosselkhoznadzor's officers to be evenly allocated.

INFLUENCE OF EUROPEAN TRENDS IN, AND GLOBAL APPROACHES TO, CPP ON AGRICULTURE IN RUSSIA

The European Union's politicized approach to pesticide circulation has resulted in scientifically unsubstantiated restrictions on the use of a number of active substances (AS) in Europe. Such pseudo-environmental fluctuations in the authorities' sentiment affect agriculture. Following the adoption in May 2009 of stricter rules – Regulation (EC) 1107 – and due to growing political and social pressure, over 50 AS have been withdrawn from the market. It is becoming increasingly difficult to register AS in the EU on the basis of objective scientific research. The range of CPP available to European farmers is constantly decreasing.

Published on May 20, 2020 the EU's Farm to Fork strategy is a component of the increasingly popular European Green Deal. The strategy is aimed at reducing the use of pesticides

by 50% by 2030. Moreover, currently, Russian experts are participating in the coordination of the Post-2020 Global Biodiversity Framework (GBF). In Target 7 of the first GBF project, prepared by the Working Group of Experts on Biological Diversity of the UN Security Council, it is proposed that, by 2030, pesticide use be reduced by at least two thirds based on the volume of pesticide use per agricultural land area unit.

Committee members are seriously concerned about the negative impact on agriculture that may result from following said trends and approaches that threaten food security, both globally and regionally. Currently, agricultural crops are affected by 30,000 weeds, 3,000 worms, and 10,000 insect pests – the toll of which amounts to 26–40 percent of possible yield. Without pesticides, the damage can double in no time. Only the use of pesticides can prolong crop life and prevent post-harvest losses. Since 1960, CPP have become more efficient – the volume of AS in a pesticide is nowadays approximately 95% lower than back in the 1950s.

Presently, Russian agriculture is pursuing ambitious goals in terms of yield and aims at doubling agricultural product exports to USD 45 billion by 2024. Grain remains the number-one export commodity. It accounts for a third of the total export volume in monetary terms. Throughout recent years, grain exports have grown due to an increase in yields and stable domestic consumption.

The current Russian laws and regulations governing CPP circulation are based on the principles of CPP safety for human health and the environment. Sometimes, requirements for CPP toxicological, hygienic, and environmental assessment and classification are even stricter than in the EU.

Assessing pesticides from the perspective of their possible hazardousness, causing the European agriculture to lose more and more CPP, hardly corresponds to the goals of Russia's agricultural policy – it will hinder Russia's achievement of its declared yield goals and to the development of the country's export capacity.

RECOMMENDATIONS

- › It is recommended to shift focus towards optimal use of pesticides, namely towards making the most of their advantages such as increasing yield per hectare and minimizing their impact on the environment and human health, e.g. through switching to precision agriculture, as well more responsible and deliberate compliance with regulations on pesticide use.
- › The goals set in Target 7 of the Post-2020 Global Biodiversity Framework shall not be considered through the lens of per-hectare use of pesticides when the use of pesticides on existing agricultural lands is already permissible contamination, even if it is regulated, but from the lens of permissible residues of pesticides in the

environment and food products, as specified in countries' monitoring programs (in accordance with the requirements of Article 5.10.1 of the International Code of Conduct on Pesticide Management).

- › Based on the joint stance with the Russian Union of CPP Manufacturers, a constructive dialogue must be maintained with the relevant public authorities and research institutions in order to clarify the possible negative consequences that may result from following

the aforesaid trends and approaches, with due regard to the requirements for CPP circulation within the Russian Federation and the goals pursued by Russian agriculture.



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