UK Implementation of Comparative risk assessment

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The principles and approach

• Based on the principle of using the ‘safest alternative’ when controlling a ‘pest’

• Applied if there are significantly safer (for human health or environment) alternatives (chemical or non chemical)

• No significant economic or practical disadvantage to the user

• Resistance risk in the target organism is minimised

• Consequences for minor use are considered
EU guidance

- EU draft guidance document
  SANCO/11507/2013 REV 12 (10 October 2014)
- Decisions on this aspect are made at Member State level
- Clarifies when a comparative assessment is and is not needed
  - For applications for amendments only that use is subject to comparative assessment
  - ALL uses on major crops are considered at renewal
  - Provides some options when the derogation may be relevant to acquire practical experience
CRD approach

- Clear stepwise approach
- Definitions:
  - Significant difference; very obvious difference
  - Information on risk mitigation measures may be useful as a first step e.g. types of PPE
  - Slight differences are insufficient to conclude a significantly safer option exists
  - Similar effect: efficacy data determine the UK claim level
  - Minor use: a working definition of what is considered to be a minor use is provided within the CRD guidance
  - Significant economic or practical disadvantage; this should be obvious
CRD approach

- We use the principles in EPPO PP1/271(1)
- We use a stepwise approach but the steps are not in the same order as in the EPPO standard
- Our approach enables us to effectively filter those which are acceptable and those which need more detailed examination and work
- This is important as a lot of products need to be examined
- We are not currently doing the ‘optional’ assessments for products not containing candidate for substitution as detailed under Article 50(2)
Sources of information we have used:
Public domain data

- List of Candidates for Substitution
- Authorisation databases (including for minor uses)
- Agronomy databases/publications; usage data
- Research (UK research on non-chemical alternatives)
- Resistance advisory groups
- Standardised efficacy requirements for specific claims
- Product labels
CRD experience

- We believe the UK guidance has been working well.
- The guidance has enabled effective filtering, so we can focus the more detailed assessment on a ‘lower’ number of products which require more detailed scrutiny.
- The vast majority so far they have only gone up to step 8 of the UK guidance.
- We have identified some products where it was concluded that the product could be substituted and UK authorisation was refused.
Candidates for substitution: useful links that the UK uses

• EU list of actives which are candidates for substitution:

• UK comparative assessment guidance:

• UK question and answer briefing on CA:
  http://www.hse.gov.uk/pesticides/topics/pesticide-approvals/pesticides-registration/applicant-guide/candidates-for-substitution.htm
What have been the challenges?

- A large number of products need to be considered
- The EU list of candidates for substitution needs to be kept up to date
- The detailed efficacy assessment can be time consuming and we need to use multiple sources of information
- It is time consuming to validate the product lists of available modes of action for a specific pest
- Also these are a function of the date of the CRA assessment
What is on our UK ‘wish list’?

• The EU list to be kept completely up to date
• To find some more streamline ways of doing the detailed efficacy assessment on the available products, MOA, levels of control etc. to see if we can justify substitution of the product
• To understand more about what other Member States do to see if we pick up some tips to help us further improve our approach
Now for something different: cutest dog?