



The European Seed Bag Labelling Initiative

European Seed Association supported by
the Seed Treatment Industry

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Presentation topics

- Why the need for an EU seed bag labelling standard
- The ESA Generic Safe Use Label
 - *Context*
 - *Content*
 - *Implementation options*
- Compliance requirements
- Overall benefits of harmonized approach
- Request to MS
- Open discussion

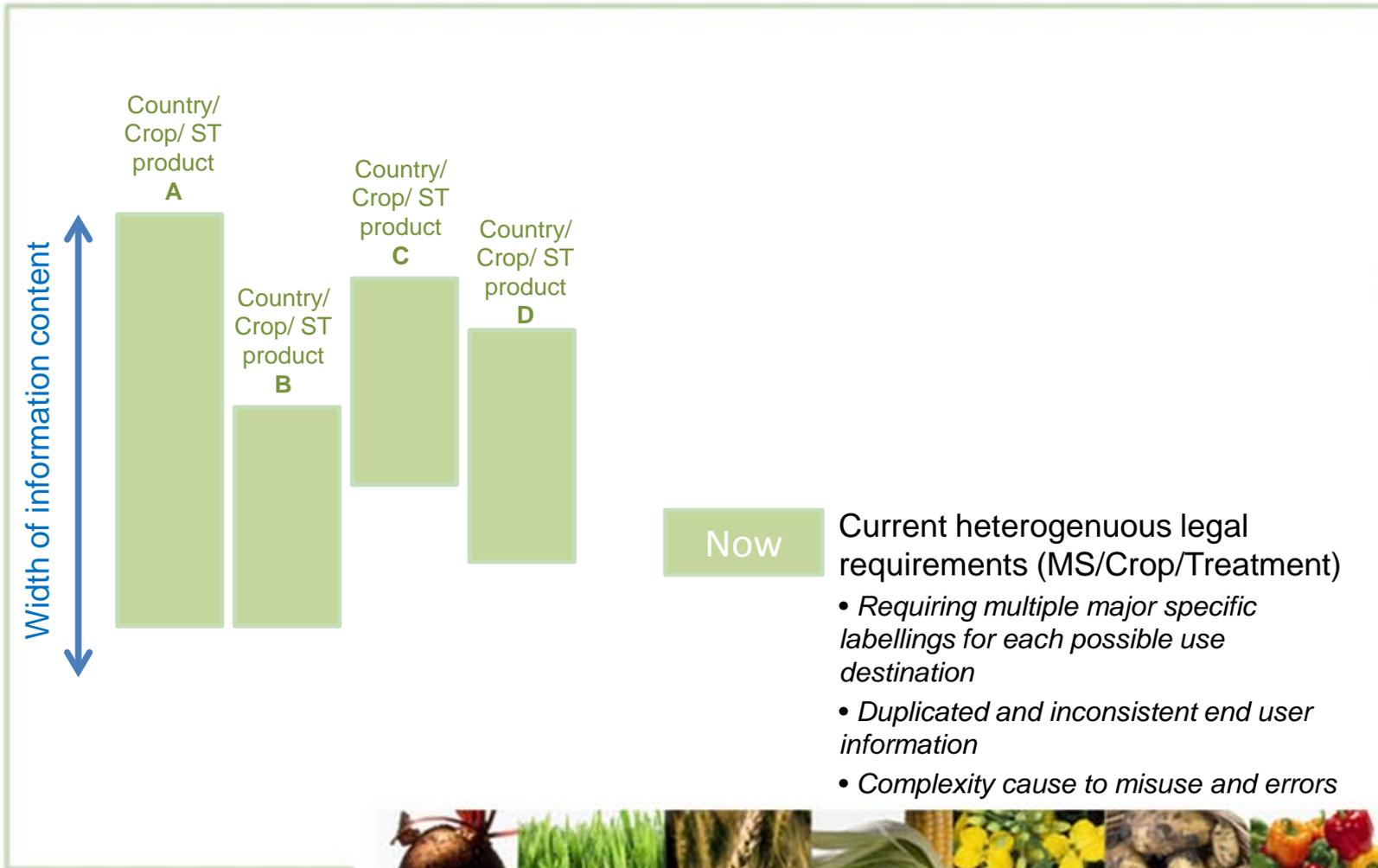


Why the need for a pan EU initiative?

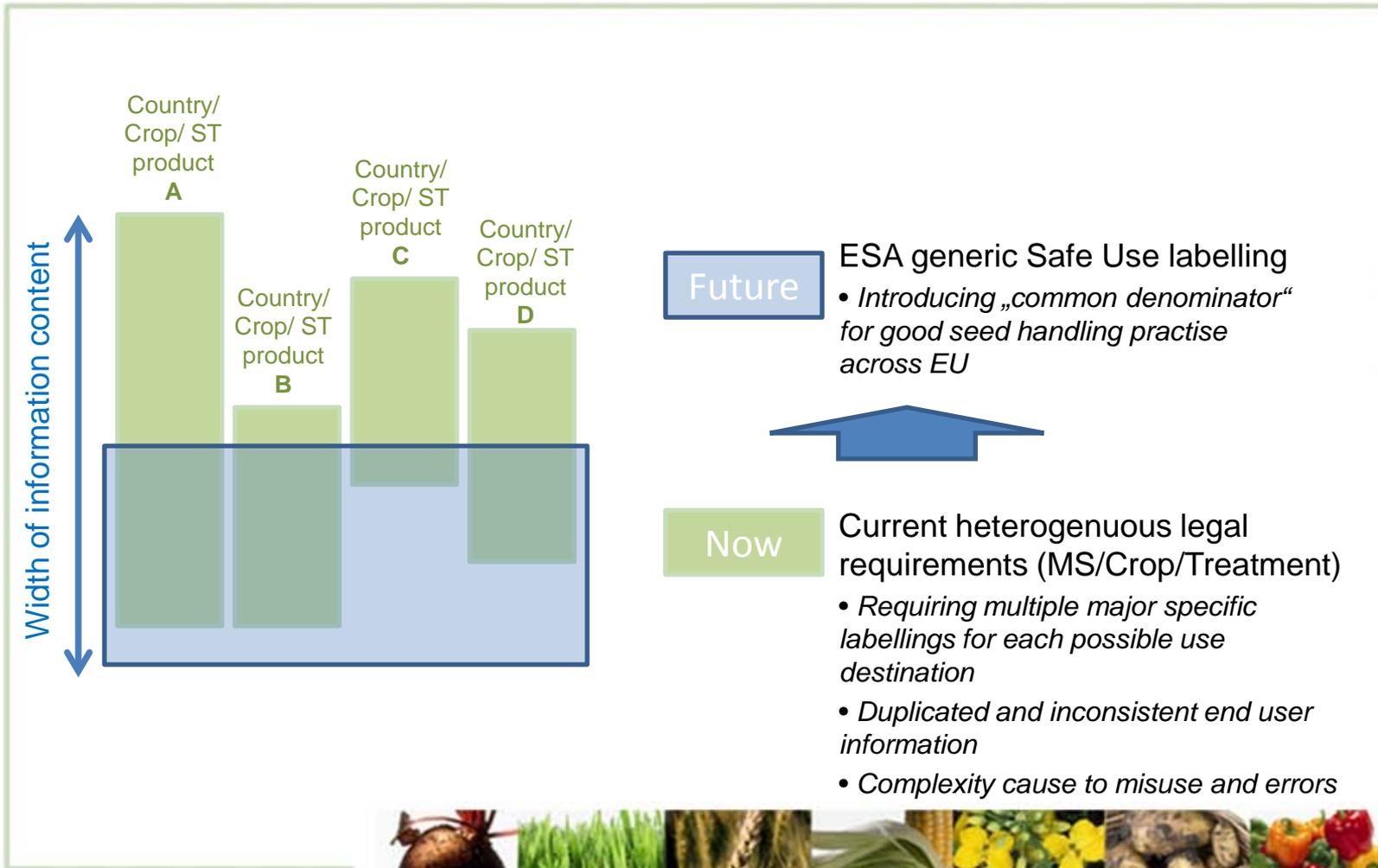
- Need to increase penetration of Good Treated Seed Handling Practice understanding amongst End Users – *major improvement potential to current farmer communication on treated seed bags*
- Need for an EU standard – *current patchwork of local MS requirements on treated seed bag labelling increasingly creating trade barriers for intra EU movements of treated seed*
- 1107 and related new legislation unclear and difficult to interpret – *imperative need for rapid, clear guidance and direction setting for one common interpretation across EU*
- Safe use seed handling practise not only limited to insecticides and certain crops – *introduction of generic, consistent, voluntary seed bag labelling across crops will fortify end user awareness and understanding*



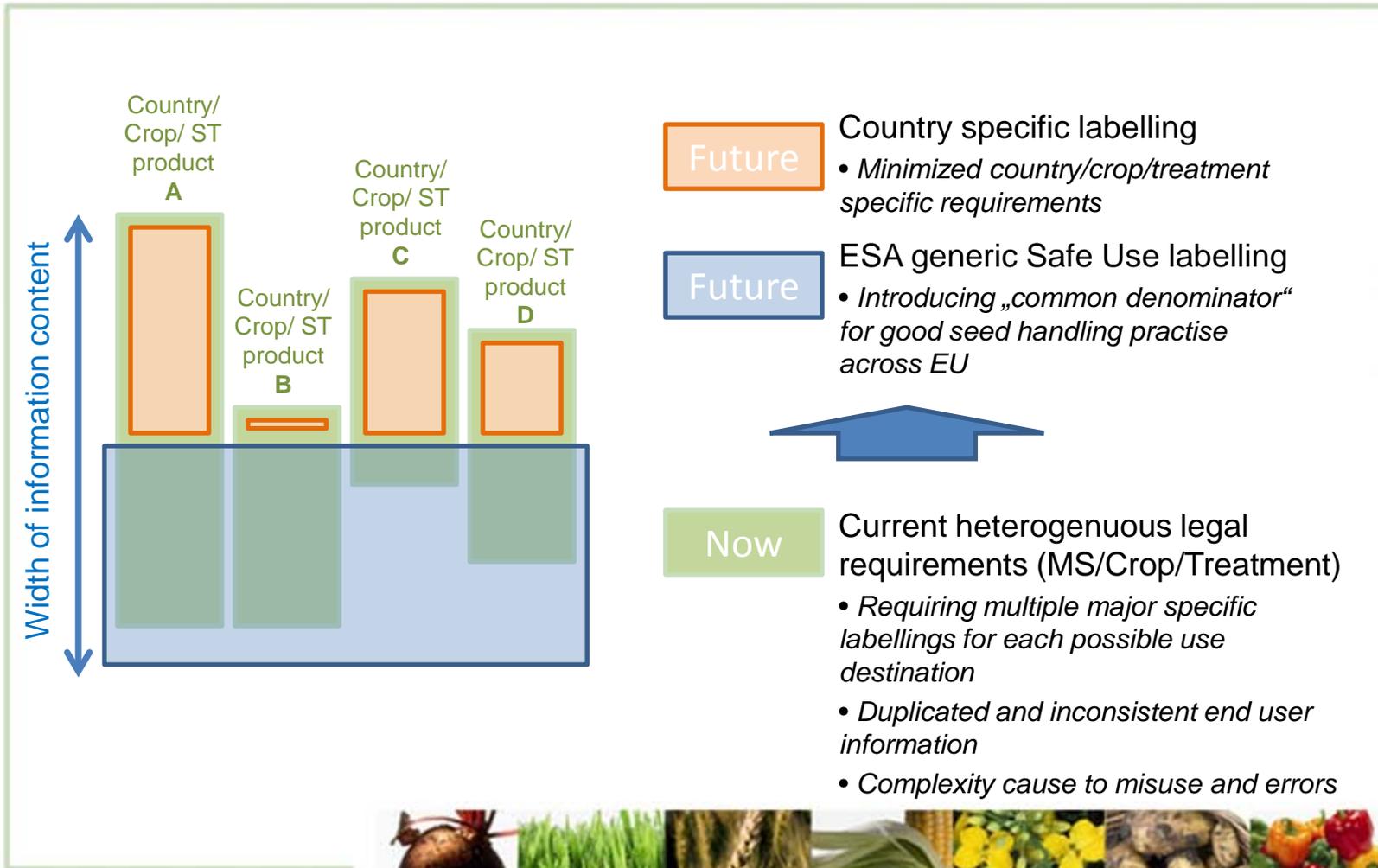
ESA generic Safe Use labelling providing EU common standard for treated seed good handling advice



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ESA Generic Safe Use label: Introduction of Good Practice pictograms to facilitate End User awareness creation

Do not use for human or animal consumption



Keep out of reach of children, livestock and wildlife



Wear suitable protective equipment



Wash hands



Do not contaminate surface water or ditches



Minimize dust generated at drilling



ESA Generic Safe Use label: extensive End User good practise recommendations – in the language of End User

The protection of these seeds is performed according to an agreed industry quality standard. For your own safety and to protect the environment, the following precautions must be observed:

In general

Do not use treated seed for human or animal consumption or for processing.

Keep out of reach of children, livestock and wildlife. Handle seed packages carefully.

Avoid contact with skin and respiratory tract and wear suitable protective equipment during seed handling and equipment cleaning.

Wash hands and exposed skin before meals and after work.

Remove any seed spillages. Keep treated seeds away from surface water.

Before sowing

When opening seed bags and during filling or emptying of the sowing machine, avoid dust exposure.

Avoid transfer of dust from the seed bag into the sowing machine.

Do not treat the previously treated seeds with additional products.

At sowing outdoors

When using a pneumatic sowing machine, dust from treated seeds should be directed to the soil surface or into the soil through deflectors.

Sow at the recommended seeding rate. To protect birds and mammals, treated seeds must be covered by soil, also at row ends.

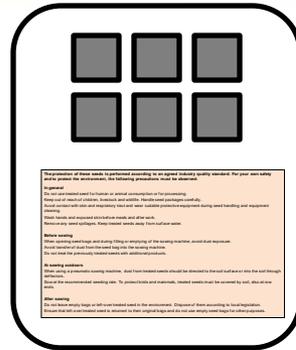
After sowing

Do not leave empty bags or left-over treated seed in the environment. Dispose of them according to local legislation.

Ensure that left over treated seed is returned to their original bags and do not use empty seed bags for other purposes.

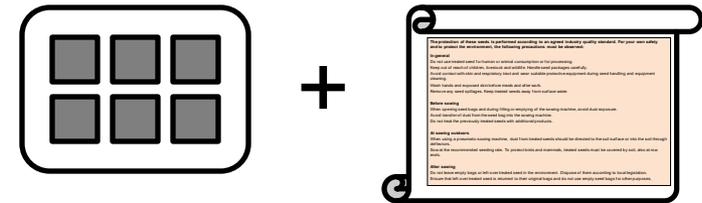


ESA Generic Safe Use label: Two implementation options



Full template

- For use on Seed bags with enough space for full printing
- Pictograms depicting key messages
- Reference to centralised web resource
- Safe Use Text printed in one or several languages on the seed bag, or as attached booklet with many languages



Short template plus separate leaflet

- For use on small packages without enough space for full printing
- Pictograms depicting key messages
- Reference to centralised web resource, and to information leaflet with full Safe Use Text delivered with the treated seed
- Safe Use Text in one or several languages found in information leaflet to be delivered together with the seed package, to the end user of the treated seed



ESA Generic Safe Use label: Key issue for implementation / compliance with 1107 – Vegetable seed packaging



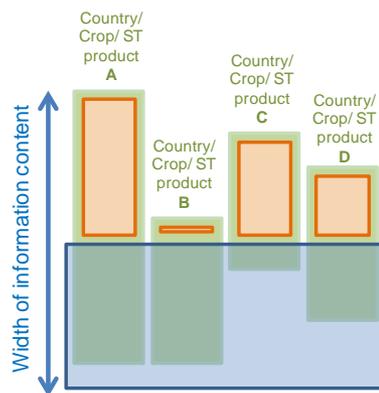
- *Many vegetable seed packs physically not big enough to allow additional labelling*
- *End User messaging required no different than for other seed*

ESA vegetable working group to present implementation recommendation by early July



Compliance with Treated Seed Bag labelling legislation

ESA and the Seed Treatment Industry consider treated seed bags compliant with the intent of the EU legislator, in light of 1107 and other relevant legislation, if the end user of the treated seed are provided with:



- *ESA Generic Safe Use label, implemented as outlined in this presentation*
- *Name of registered Seed Treatment Brand used, and its' active ingredient*
- *If needed, any additional country specific labelling requirements*



Benefits of implementation / cross EU acceptance of the ESA Seed Bag labelling recommendation

- Better platform for increased awareness impact at End User level
 - Only one good practice message extending to all crops and treatments
 - Visuals of key messages plus wording structured for target audience are more effective
 - Elimination of current seed bag labelling patchwork will reduce confusion, complexity and ambiguity at farmer level
- Reverting current trend of increasing intra EU trade barriers
 - Harmonized requirements allowing for mutual recognition of import/export seed
 - Minimized country specific labelling simplifying logistics of treated seed packaging
- Clear direction set to EU seed industry for compliant and harmonized interpretation of 1107 and related legislations
- Reflects harmonization of Seed Treatment regulatory evaluation criteria



Steps forward

- ESA, supported by the Seed Treatment Industry, has recommended implementation to its members with phase-over as practically possible during the upcoming treatment year (from Corn season 2011 – until OSR 2012)
- ESA, and Seed Treatment Industry, recommending MS country regulators to:
 - Collectively endorse ESA seed labelling initiative through harmonizing local country regulation EU wide



Open discussion

- Questions/reflections to what presented?



Back Up material



Requirements on ESA Seed Bag labelling recommendation

- Generic across all seed treatment chemicals and crops, excluding AI specific requirements.
- Meet requirements of legislation pertinent to safe use and risk mitigation
- Technical feasibility – ease of application/compatibility with equipment
- Compatibility with varying pack sizes
- Label should not detach during label application, transport and handling
- Low costs
- Need to convince national authorities to waive country specific labelling requirements (or combine all requirements in the safe use advice label)
- Need to provide information in the language of the end user
 - Easy to read (pictograms), Easy to see (need to grab attention)
- Minimize SKUs
- Harmonization across EU (free trade of seed)
- Complementing communication means are required, seed labels information not necessarily best way to reach the end user. Avoid „false security“.
- Potential pictograms not to be mixed up with dangerous substance pictograms

