

Overview of Brazilian Minor Use activities

— extracted from the Global Minor Use Summit 2 program booklet.

Luis Rangel¹ and Juliano dos Santos Maly²

1. Ministry of Agriculture, General Coordinator of Pesticides

2. ANVISA, Specialist in Regulation and Sanitary Monitoring

Introduction

Brazil has a population nearly 200 million people, distributed in regions with different characteristics that provide particular challenges for food production. This is especially true for the supply of fresh food like fruits and vegetables that are environmentally safe and healthy, while providing economic security for growers. Part of the challenge is also competing in a globalized and demanding market.

The challenge of safe food production is closely related to the management of these crops, including the use of pesticides. However, Brazil has the same problems faced by other countries in terms of pesticides for crops of minor economic importance, and the solutions designed and implemented by the Brazilian government are not very different from solutions elsewhere.

Although the methodology of pesticides registration in Brazil is clear, it involves the participation of the Federal Agencies of Agriculture, of Health and of Environment. It is therefore a complex procedure, with high costs for agrochemical companies. Since the governmental requirements are complex and the demand for registration of products comes solely from the pesticides companies, companies prefer not to spend time and money on Minor Crops.

Therefore, since the early 1990s, this issue has been discussed in Brazil in order to find a solution to the problem. One result has been the strategy of grouping plant cultures, as recently included in the Brazilian legislation for pesticides, published in 2010, respecting the peculiarities of the Brazilian market. In developing this legislation, consultations were held with the staff of the IR-4 Program of the United States; the U.S. government through USDA; and the Canadian government, specifically Agriculture and Agri-Food Canada (AAFC) and Health Canada's Pest Management Regulatory Agency (PMRA).

The legislation

The Brazilian Law for Minor Uses is based on the grouping of crops for the purpose of extrapolating data from "major" crops to "minor" crops. These groups are often defined according to the form of consumption (edible peel or peeled) and broad botanical characteristics (consumed as tubers, leaves, fruit, nuts, etc.). There are two main cultures representing these groups, those not considered "Minor" because there are a large number of active ingredients registered for use and "minor Uses. For which the data from the crops with existing data will be used to provide MRLs and registrations on these minor uses. Some data extrapolation is also allowed among the crops considered "Minor" where data can be generated on representative crops to cover other crops of the sub-groups. The crops selected for data generation are those of greater economic interest, and were chosen to be the culture in which the residue studies are conducted.

Challenges

Some technical difficulties were observed after the Law came into force. Although some crops are similar botanically and have the same pests, good agricultural practices for a defined culture may not match to another exactly, requiring the testing of efficacy and phytotoxicity for each culture, which requires time and expense for the agrochemical companies.

Moreover, some companies were concerned about including specific cultures on product labels without a full investigation of potential phytotoxicity, efficacy and residues.

Currently the Brazilian government does not have a framework for funding nor conducting Pesticide Residue Study under Good Laboratory Practices (supervised studies). This precludes such studies by the government. However, the Brazilian government is investing in the implementation of such a structure through the Brazilian Agricultural Research Corporation (Embrapa), and it is expected to be completed in 2012.

Another point of intense discussion is in relation to data protection. The Brazilian government decided that the duration for protection of data from Pesticide Residue Studies is one year, which, in principle, can be considered short.

Expectations

After the publication of Law, the Brazilian government intends to:

- Increase the supply of pesticides for minor crops. Offer products of low toxicity, such as modern chemicals, and to take into account the effect of the pesticides on the applicator and on beneficial natural enemies, with the aim of producing safe, economic crops. For this, some chemicals have been eliminated in the review process for use in Minor Crops, for reasons such as high toxicity (most organophosphates, chlorinated hydrocarbons, etc.). Molecules that have restricted use as backpack sprays, practice widely used in Brazil, especially for crops grown in small areas, were also removed.
- Increase knowledge on the subject of all involved, as producers, agrochemical companies and the government. For it is planned to run an annual workshop with the participation of all those sectors. The first workshop was scheduled for 26 October 2011.

After increasing our knowledge and production data for Pesticide Residue Study, we hope to participate in projects and studies with other countries in the world, sharing not only data but also MRLs for Minor Crops.

Expectations for the Second Global Summit on Minor Uses

- Show the current status of Minor Crops in Brazil: difficulties, challenges and future strategy.
- Encourage the implementation of laws for Minor Crops in Latin America.
- Gain from other's experience with Minor Crops worldwide.
- Receiving criticism and suggestions on our performance and our legislation on Minor Crops.

Strategic actions for projects in Brazil

We currently have multiple demands from growers and industry. Considering that cost for all pesticide residue studies in the next two years will be borne solely by the pesticide industry, the Brazilian government's intention is to create priorities for the implementation of these studies as follows:

- Priority I: Projects that simultaneously meet the demands of growers and industry.

- Priority II: Projects that exclusively meet the demands of the pesticide industry.
- Priority III: Projects that exclusively meet demand from farmers.

All projects will be analysed for the toxicological potential of each active ingredient. Projects with products that are not of interest to the government will be discouraged.