Products for crop health

Evaluation criteria for the Dutch Input List

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1. Introduction

This document describes the criteria that need to be fulfilled in order for products for crop health[1] to be included in the Dutch Input List. This document will be updated whenever necessary. The most recent version which is available on the website https://netherlands.inputs.eu/ is the only valid version.

The Dutch Input List

The Dutch Input List is a public list of 'inputs' that may be legally used by certified organic farmers in the Netherlands. For the time being, the scope of 'inputs' is limited to fertilisers and soil improvers, plant protection products and related products and feeding products expansions of the scope might be possible in the future. The first issue of the Dutch Input List was published in 2016.

Dutch organic farmers may use products from the Dutch Input List. If they use a product not listed there, they have to prove during inspection that the use of the product is allowed, otherwise it will be treated by Skal as a non-conformity. For proving the compliance of non-listed inputs, farmers can use this document as a guideline.

About the project partners, contact information

The Dutch Input List is produced in collaboration by Skal and FiBL. Skal is an accredited control authority of organic operators in the Netherlands, while FiBL is a private research institute based in Switzerland.

For further details and contact information, see the document «Application guidance ».

2. General provisions

Administrative and formal pre-conditions

The administrative and formal aspects of registration are described in the document the document «Application guidance». Please pay special attention to the following points:

- Only products which comply with the relevant EU and Dutch legislation will be included. For details, see the product application forms. The Dutch Input List reserves the right to reject products, if it suspects that they do not comply with legislation. For example, this applies to products which are not registered as plant protection products, but which are sold with claims of a plant protection effect.
- Only products which are on the market in The Netherlands can be included.

[1] In this document, the term 'further products for crop health' refers to plant protection products, basic substances, beneficials and adjuvants

- Companies must register for the Dutch Input List prior to submitting products for evaluation.
- Requests must be complete. All questions in the application form must be addressed, and all required supporting documents (e.g. registration documents, product labels) must also be submitted. The application forms provide guidance regarding the documents required.

Disclosure of composition

Disclosure of the full composition and manufacturing process of the product is a pre-requisite for the evaluation in all cases. The following minimum requirements apply:

- The production process has to be described.
- All components which are used during the production process have to be declared.
- All components have to be described with English names. If possible, use standard chemical nomenclature. Where available, give also CAS numbers.
- For each component, the quantity must be given (in %, g/kg or other suitable units).
- Where known, indicate the technical function of each component.

Scope of products for crop health

Annex I of Reg. (EU) 2021/1165 covers products for plant protection including basic substances. Additionally, the Dutch Input List covers a broader scope of products and includes also products such as adjuvants and other products used in the context of crop health.

Please refer to the Annex for the detailed products for crop health that are included in the scope of the Dutch Input List.

Compliance with general legislation

The Dutch Input List includes only products that comply with the relevant EU and Dutch legislation. Compliance with general legislation is primarily in the responsibility of the applicant companies. However, if FiBL suspects that a product does not comply with the relevant legislation, it may postpone inclusion into the list until the applicant has demonstrated legal compliance.

Compliance with the objectives and principles of organic farming

FiBL and Skal reserve the right to reject products/uses which they consider to be non-compliant with the objectives and principles of organic farming, as set out in Reg. (EU) 2018/848.

3. Prohibition of GMOs

The EU organic legislation prohibits the use of GMO food, feed, processing aids, plant protection products, fertilisers, soil conditioners, seeds, vegetative propagating material, micro-organisms or animals in organic production. Any unavoidable presence of GMOs must not exceed 0.9 %.

Implementation in the Dutch Input List

- For all materials, which are known to exist as GMOs, the applicant must provide a declaration of the absence of GMOs, using the dedicated non-GMO declaration template on the website of the Dutch Input List.
- Upon necessity, FiBL may request companies to effect analyses and/or provide existing analysis reports to verify this point and/or provide samples for analysis.

A non-GMO declaration is required for all materials, including processing aids, which are considered as 'risk materials', such as:

- Antioxidants, e.g. ascorbic acid, citric acid, calcium citrate
- Corn and and products derived from it (e.g. oils, hydrolysates, flours, meal, press cake/expeller, maltodextrin)
- Cotton and products derived from it (e.g. seed oils, fibers, cellulose products)
- Enzymes
- Fermentation products in general
- Microorganisms and products thereof
- Potatoes and products derived from it (e.g. starch, potato juice concentrate)
- Rapeseed and products derived from it (e.g. oils, hydrolysates, flours, meals, press cake/expeller)
- Rice and products derived from it (e.g. oils, hydrolysates, flours, maltodextrin)
- Sugar beet and products derived from it (e.g. molasses, vinasses, sugar beet pulp)
- Sugar cane and products derived from it (e.g. molasses, vinasses, fibers)
- Soja and products derived from it (e.g. oils, hydrolysates, flours, meals, press cake/expeller, maltodextrin)
- Vitamins
- Wheat and products derived from it (e.g. oils, hydrolysates, flours, meals, press cake/expeller)

4. Products for crop health: Compositional requirements

4.1 Requirements for plant protection products and biocides

Background

Pesticidal active substances are explicitly mentioned and regulated in Annex I of Reg. (EU) 2021/1165. Plant protection products may only be marketed in The Netherlands, if they have been registered for that purpose by Ctgb[2], or if it has granted a derogation for an emergency situation.

Please note: If a derogation for an emergency situation has been applied for a product, the applicant should state this in the application. For such products, the evaluation team will search for individual solutions to ensure timely listing. Products will only be listed when the derogation has been granted. Thus, companies have to notify FiBL as soon as they receive the emergency derogation.

Requirements

- Active substances in plant protection products are restricted to those listed in Annex I of Reg. (EU) 2021/1165.
- Regarding co-formulants, see separate section below.
- The product is neither a genetically modified organism (GMO[3]) itself, nor does it contain any such organism, nor was it produced "from", or "by" a GMO. For materials with an increased GMO risk, the respective template confirming their GMO-free status must be provided.
- Materials of marine origin (Chitosan hydrochloride, Laminarin) are restricted to sustainable sources[4]. The Dutch Input List provides a specific form[5] to declare conformity of such materials with the applicable requirements.

4.2 Requirements for basic substances

Background

[2] See http://www.ctgb.nl/toelatingen

[3] GMO, as defined in Article 3 and 11 of the Regulation (EU) No 2018/848

[4] Marine chitosan hydrochloride shall derive from organic aquaculture or from sustainable fisheries, as defined in Article 2 of Regulation (EU) No 1380/2013 of the European Parliament and of the Council; Laminarin shall be obtained from Kelp grown in organic aquaculture or collected in a sustainable way in accordance with point 2.4 of Part III of Annex II to Regulation (EU) 2018/848.

[5] See "Declaration on sustainability for materials sourced from aquatic environment" on netherlands.inputs.eu

Basic substances for use in organic production are regulated in Annex I of Reg. (EU) 2021/1165. The authorised uses can be found in the respective review reports (available for download from the EU Pesticides Database[6]).

Note: Basic substances are authorized generically and may thereafter be marketed by any distributor. Therefore, FiBL will include for each basic substance a 'default entry' which does not specify the distributor.

Requirements

- Basic substances are allowed for the authorized uses, if they are explicitly mentioned in Annex I of Reg. (EU) 2021/1165.

4.3 Requirements for adjuvants

Background

In this document, the term 'adjuvant' refers to products which may be used in combination with other authorised products, for example spreaders/stickers.

As per article 9(3)(b) of Reg. (EU) 2018/848, adjuvants are generally allowed, if used in combination with plant protection products. Adjuvants for use in combination with plant protection products may only be marketed in The Netherlands, if they have been registered for that purpose by Ctgb[7].

Requirements

- They should be registered by Ctgb.
- Safety for humans and the environment has to be demonstrated.
- The main ingredient(s) should preferably be of natural origin, identical to a natural substance or derived from a natural substance. Other materials are evaluated case by case.
- For co-formulants, see separate section below.

4.4 Requirements for trapping and mating disruption systems

Background

Trapping systems usually consist of a combination of an *attractant* and a *killing agent*. The attractant may be a pheromone, another volatile substance (often related to the smell of food) or a board with certain colour. The killing agent may be an insecticide, a liquid

[6] See https://ec.europa.eu/food/plants/pesticides/eu-pesticides-database_en

[7] See https://english.ctgb.nl/plant-protection/applicationtypes-plant-protection-products/adjuvants

where the insect drowns or a sticky surface. Mating disruption systems usually consist of one or several pheromones and a dispensing device. Under pesticide legislation, certain pheromones or other attractants and certain killing agents are considered as active substances, while others are not. Annex I of Reg. (EU) 2021/1165 allows all pheromones. Components of trapping systems such as coloured panels, sticky traps, glues etc. are not regulated by Reg. (EU) 2021/1165.

In the Netherlands requirement for authorisation depends on the purpose of the product, no authorisation is required for products containing attractants as long as they do not contain any other chemical active substance.

Requirements

- Pheromones are acceptable, as listed in Annex I of Reg. (EU) 2021/1165 are allowed.
- If applicable, the trade product must be authorized by Ctgb[8].
- Other components of trapping or mating disruption systems such as coloured panels, sticky traps, glues and aerosol sprayers are generally allowed.

4.5 Invertebrate biocontrol agents ('beneficial organisms')

Background

In this document, the term 'beneficials' refers to animals such as predatory insects and mites, entomopathogenic nematodes etc, which are also known as 'macrobial biocontrol agents' or 'natural enemies'.

Invertebrate biocontrol agents are pooled in one chapter of the Dutch Input List. At the moment they are included as a default entry.

Requirements

- Invertebrate biocontrol agents must comply with the Dutch legislation on nature protection. In particular, the species must be listed on Bijlage 8 of the Regeling Natuurbescherming[9].
- Insects sold in combination with banker plants must be listed on Bijlage 9 of the Regeling Natuurbescherming[10].

4.6 Requirements for related products

Technical materials in the category of plant protection and related products encompass products such as wound sealings, trunc paints, UV-protectants, sprouting inhibitors,

[8] See https://english.ctgb.nl/plant-protection/active-substance-approval/semiochemicals

[9] See http://wetten.overheid.nl/BWBR0038668/2017-03-17

[10] See http://wetten.overheid.nl/BWBR0038668/2017-03-17

spreaders and stickers. While products containing active substances for plant protection are subject to authorization by Ctgb, products containing other materials are not.

Requirements

- For products subject to plant protection authorization, the respective active substance(s) need to be listed in Annex I of Reg. (EU) 1165/2021.
- For products exempted from authorization the main materials should be natural or of natural origin. If synthetic materials are being used, the products are subjected to a case-to-case evaluation.
- For co-formulants see separate section below.

4.7 Requirements for seed treatments

Seed treatments with a plant protection claim or containing plant protection products or biocides are classified as plant protection products and are subject to the requirements of section 4.1. Seed treatments that do not contain plant protection or biocidal products are not subjected to the criteria of products for crop health and are evaluated according to the following criteria of fertilizers and technical materials.

Compulsory treatments required by EU phytosanitary legislation are allowed. A claimed obligation will be checked with the Dutch Ministry.

Co-formulants for seed treatments

- The need for co-formulants is recognised.
- Preferably, they should be listed in Annex I or Annex II of Reg. (EU) 2021/1165.
- Other natural materials are also acceptable.
- Synthetic components may be accepted under the following conditions:
  (i) the applicant can demonstrate that they are necessary to achieve the desired function, and that they are used in the lowest possible amounts.
  (ii) They comply with the principles given in section 4.8.

Auxiliaries used in seed operations / processing, but later removed from the seeds

- The need for auxiliaries is recognised.
- Preferably, they should be listed in Annex I or Annex II of Reg. (EU) 2021/1165.
- Other natural materials are also acceptable.
- Synthetic components may be accepted under the following conditions:
  (i) the applicant can demonstrate that they are necessary to achieve the desired function, and that they are used in the lowest possible amounts.
  (ii) They comply with the principles given in section 4.8.
  (iii) the use of synthetic solvents such as hexane and chloroform for seed grading is not allowed.
- They are removed from the seeds after the operation and leave no residues.

Auxiliaries used in seed priming

- Soluble nitrogen used as signalling compounds during the priming process are allowed.
- Synthetic substances acting as plant hormones are not allowed, with the exception of ethylene.

4.8 Requirements for co-formulants

Background

In this document, materials other than active substances are referred to as 'co-formulants'. As per Art. 9(3)(b) of Reg. (EU) 2021/1165, co-formulants are generally allowed, if used in combination with plant protection products. The Dutch Input List does not restrict the use of co-formulants to certain substances, as this would limit the potential for innovations in this field. However, to ensure consistency with the objectives and principles of organic production, the following requirements apply:

Requirements

- All co-formulants must explicitly be declared during the application process.
- Natural substances should be used in preference.
- Co-formulants must not be harmful to humans or the environment. FiBL reserves the right to request additional information, particularly on environmental fate and on residues in soil and/or crops.
- The EPA's old list 4, and the 'Safer Choice' database may be consulted for orientation purposes.
- Substances mentioned in Reg. (EU) 2021/383 may not be present in any products.

- Co-formulants which are in contradiction to the principles of organic production (e.g. easily soluble nitrogen compounds such as ammonia, urea) are evaluated case by case.
- Certain co-formulants, such as phosphonic acid (H_3PO_3), are known for their problematic residue behaviour. In order to prevent residues in organic goods, the evaluation team reserves the right to request further information.

5. Annex: Scope of products for crop health in the Dutch Input List

The current scope of products for crop health in the Dutch Input List is shown below. Please note that the scope may be widened in the future.

Products for crop health and related products	**Status**
Plant protection products such as: • Fungicides • Insecticides • Micro-organisms • Pheromones and pheromone traps	included
Basic substances	included
Adjuvants	included
Products for protection of stored products	included
Pruning agents; wound protectants	included
Invertebrate biocontrol agents ('beneficials')	included as a default entry
Mechanical traps	not included