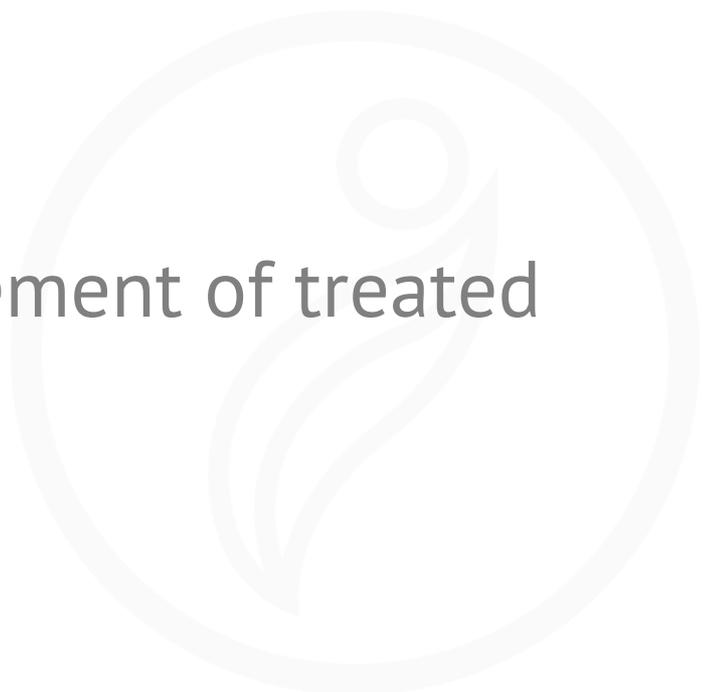


International movement of treated seed

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CONTEXT

The free, international movement of treated seed is important to ensure that the best quality seed is accessible to all farmers. Seed treated with Seed Treatment Products (STP) is a key tool for both decreasing environmental impact of agriculture and enabling the full expression of the seeds' potential.

The seed industry is a global business, and the international movement of all types of seeds is critical to meet customer expectations. The organization, processes and seed import/export activities of seed companies are often unknown to many stakeholders, including regulators. This lack of knowledge negatively impacts the free, international movement of treated seed.

Breeding, seed production and the global movement of seed

It is common practice for the seed industry to produce and trial seed in different countries all over the world. This enables breeders to make selections based on specific climate conditions, as well as seed producers to diversify risk of production loss and take advantage of climate conditions, timing of harvest, and localized expertise at specialized production locations.

After harvesting the seeds from these selected seed producing countries distributed across the globe, the seeds are not yet ready to be provided to the farmers. At this early stage, the seeds are only a raw material that needs further processing prior to being planted.

The seeds (that are not yet treated with STP) from production areas located across the globe are then frequently exported to seed processing facilities where seed quality is evaluated and improved. Seed processing facilities are typically located in a few strategic countries in the world where expert knowledge, best practices, and specialized equipment are present to perform the quality control analyses on physical, physiological, genetic, and sanitary parameters, as well as to perform the seed processing (cleaning, sorting, sizing, priming, bagging/conditioning, etc.) and seed treatment. STP applied in these seed processing facilities are handled under controlled and safe conditions.

When the seed processing is complete, seeds are often re-exported to different global markets for sowing. It is common practice to re-export from the same seed lot over several years and to various countries.

Global issues impacting the free movement of treated seed

STP are often applied to protect the seed from the challenges of the planting environment (pests, diseases and environmental stresses) and to allow the full expression of the genetic potential of the seed (during and after sowing), as well as to protect the young plant and ensure a crucial step that can directly influence the final yield.

Confusion surrounding current regulations on the movement of STP, the application of the STP to the seed in seed processing facilities, the treated seeds, and the release of STP in the environment by sowing treated seed are negatively impacting the ability of seed companies to provide farmers with a reliable supply of seed treated with STP.

Confusion between terms and scope surrounding treated seeds activities may lead to regulations that have unintended consequences. For example, if regulations in a country do not permit seed treated with a particular STP from being sown in its territory, it may prevent companies in that country from treating seed with the same STP for export purposes. This would limit the number of countries for seed processing facilities and the volume of seeds treated with STP.

Additionally, the distinction between the STP and the treated seed is often confused, even though they are not the same and have clearly different functions. Furthermore, the management of an STP and treated seed are completely different. Any confusion or extrapolation between STPs and treated seeds leads to increased burden and complexity, and in the end, lack of clarity for all stakeholders.

The variation in the condition of use (e.g. dosing rate, planting rate, field rotation, etc.), formulations, product names, and labelling of STPs is causing further confusion and issues for the free movement of treated seed. With each country having such unique requirements, the seed processing facilities must perform seed treatment applications and packaging specific to each country, which results in delays of seed exports.

POSITION

It is the view of ISF that any regulations, controls or conditions of use surrounding seed treatment must make the distinction between the movement of the STP, the application of the STP to seed in seed processing facilities, the movement of treated seeds, and the release of the STP in the environment by sowing treated seed, as any confusion between terms and scope leads to lack of clarity for all stakeholders and negatively impacts the free movement of treated seed. In addition, harmonization of the conditions of use, the formulations, and the naming and labeling of products across countries will further facilitate the free movement of treated seed.

PREREQUISITES FOR A WORKING SYSTEM

- The movement of the STP

Registration regulations should distinguish between the controlled application of the STP to seed in processing facilities and the release of the STP in the environment by sowing treated seed.

Any regulation on the movement of STP should be considered under the scope of the international UN standards dealing with the transportation of goods.

- The application of the STP to seed in seed processing facilities

As seed processing facilities are located in a limited number of countries in the world, even if an STP is not allowed for release in the environment in the country where the facility is located, it is essential that the STP remain accessible to the facility for treatment of seeds intended for export.

As the treatment of seeds with STP is not an interference with the environment, only relevant points should be assessed, such as operator safety and the handling of STP and treated seeds.

- The movement of treated seeds

Treated seed is not an STP. Labeling of treated seed should carry only relevant information for allowing safe and good storage, use, and sowing of seeds by end users. Harmonized labeling facilitates the movement of treated seeds between the various countries. When requirements or languages are different, a multilingual label could provide a solution without decreasing the level of information.

- The release of the STP in the environment by sowing treated seed

Most STPs are regulated for their release in the environment. For example, plant protection products usually require an official approval on a case by case basis. An assessment should be performed using science based criteria and on international recognized standards. When approval is granted in one country, mutual recognition by other countries may contribute to the international movement of seed.

Regulations should distinguish between the controlled application of the STP to seed in processing facilities and the release of the STP in the environment during the sowing of treated seed.

Terms and definitions

- **Seed Treatment Product (STP):** Product applied on seeds to protect them against pests and diseases present on the seeds and in the environment during sowing, or to enable the seeds to express their genetic potential across various agronomical conditions when sowing. STP can be a chemical, biological, biostimulating, phytosanitary or fertilizing product having a positive effect when the seed is released in the natural environment.
- **Seed treatment:** Application of a seed treatment product on seed. Application of seed treatment products is usually done in professional, seed processing facilities.
- **Treated seeds:** Seed treated with a seed treatment product. This is a treated article, and therefore a seed.