

Turf Solutions

Is Legislation Restricting Our Control Options?

Introduction

Over the last 10 years many 'control' products regularly used on golf courses and other amenity areas have been lost or removed for use by amenity managers. The losses have been seen across the whole amenity area although pesticides and fungicides have been particularly affected, e.g. Chlordane, Gamma HCH and Carbaryl. More recently actives such as Thiabendazol and Diquat for aquatic use have also gone. One thing is for certain, that more control products will be lost over the next few years.

These losses are occurring at a time when the turf manager is under more pressure from pests than ever before. Over the last few years the turf industry has experienced some of the worst Fusarium Patch disease attacks seen in recent times. Another concerning issue is that we also seem to be seeing an increase in more unusual diseases and pests such as Brown Patch, Red Leaf Spot and Root Knot nematodes.

Why Are We Missing More Unusual Diseases, Pests etc?

It is difficult to say exactly why we are seeing increases in disease and pest activity as research is 'patchy' at the moment, and there seems to be no clear reasons. However, there are a number of possible reasons why we are seeing the changes. These include: changing weather conditions - climate change, disease and pest resistance increasing and the fact that fewer control products are available to control the problems.

Why Are Products Disappearing?

There are a number of reasons why there are fewer control products available; the main reasons are listed below:

1. Ai (Active ingredient) not being supported through EU review by manufacturer.
2. PSD/HSE revoke product for safety, (human, flora or fauna).
3. Non support of Data Submission Deadline (efficacy or storage).
4. PSD/HSE revoke label. (addition or deletion of statements).
5. Manufacturer update/change Ai.
6. Marketing decide to request label/name change.



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The EU Review

The EU review of control products is probably the single most influential factor affecting the access to control product for turf and amenity managers. The review is actually officially known as - EC Directive 91/414/EEC.

The review has been initiated to:

- Harmonise national arrangements for authorisation of PPP within EU.
- Ensure that all countries operate to high standard.
- Implemented in UK by Plant Protection Product Regulations (PPPR) 1995.
- Use of European data for national registrations.

The EU Review



Aim

To ensure that all pesticides on the market before 1991 meet present day safety standards

834 substances to be reviewed by December 2008

	List 1	List 2	List 3	List 4	Total
Original No	90	149	402	193	834
Withdrawn/unsupported	16	89	235	27	367
Supported/under review	74	60	167	166	467
Included in Annex I	15	0	0	0	15

25 July 2003

Revocation of approval for sale of products containing unsupported ai's

31 Dec 2003

No more use of unsupported products

And later key dates until proposed completion in 2008

What Does This Legislation Mean For The Turf or Amenity Manager?

Of 834 actives subject to the review Dec 2008, 50% are not being supported although it is fair to say that most of these will affect agriculture and not necessarily amenity horticulture. However, there will be a significant proportion affecting amenity horticulture (or lost) and this will have an impact on how you manage your turf or amenity areas in the future.



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New Product Development

It is not all dome and gloom! There still will be and are new control products coming onto the market. In recent months Scotts have brought out a new fungicide and two new herbicides and there are more products due for launch in the near future. These new products have to meet stringent new guidelines laid down by the EU. So it is fair to say that any new products brought onto the market will be the most efficient and safest products ever seen in the turf and amenity industry.

However, further down the line it may be more difficult to provide new control products that conform with the new legislation as the cost can be inhibiting, for example to produce a specific control product just for the turf and amenity industry could cost as much as £200m. In this situation it would just not be economically viable to invest in this development. Maybe in the future it will be possible to work more closely with all areas of the controls industry (throughout the World) to provide cost effective control products for part of the business.



Research and investment into new control products for the turf and amenity market is still at the forefront of our research programs, however, we are also looking at alternative methods such as IPM and biological programs to provide turf and amenity managers with a means to control pests in the future.

Illegal Chemical Use

With the reduction of turf and amenity control products, one of the areas of concern within the industry at the moment is the use of illegal chemicals from other parts of the controls sector (e.g. Agriculture).

Because the turf and amenity market is so small compared to other control sectors such as commercial horticulture or agriculture, it is very expensive to develop and launch products into our market place (see above).

Sometimes turf and amenity products can seem expensive compared to agricultural products, however, turf and amenity products are specifically developed for their particular area of use and market place and have to go through the same research, development and registration costs as the other market areas. As the turf and amenity market is so small compared to the other markets this means that economics dictate that the products have to be more expensive. If control companies cannot recoup their investments in the control products they will simply not develop products for the turf and amenity market.



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Only chemicals with a recommendation on the label for use on **managed amenity sports turf** can be legally, advertised, supplied, stored and applied to managed amenity sports turf situations. In addition to the fact that the illegal product will probably not work there are also a number of other important reasons why not to use illegal products:

- They are Illegal!
- Heavy Fines can be handed down.
- All Insurance will be void.
- Waste money.
- May damage turf, environment etc.
- Operator exposure advice could be different.
- Not work.
- Reduce new product development.

Future Options

As we have already said it is not all bad and there are new products coming through, although probably not as fast as we have been losing them. Therefore the industry does have to look at alternative methods for controlling pests and diseases.

IPM (Integrated Plant/Pest Management)

IPM has been around for a long time, especially in the horticultural industry. The definition is: 'Attempt to control pests using various different proactive management strategies, considering everything that may affect pest development'. After considering and adopting all cultural and preventative treatments it may still be necessary to use a '**control**' treatment, with most appropriate control product. Control products are still very much part of IPM! Scotts are committed to helping turf and amenity managers to manage their turf and amenity areas in a proactive and environmentally friendly way. This means providing advice and information to help prevent attacks in the first place.

If attacks do occur try to find out why they are occurring and work on a plan to prevent it happening again. The idea is to have a specific plan for all areas that are managed.

The basic plan components include:

- **Site assessment** - Understanding conditions that favour the pest - unique to your turf area (map of area needed).
- **Monitoring** - accurate identification needed more unusual diseases/include training in the plan.
- **Setting thresholds** - how little/much is acceptable.
- **Identifying management options** - e.g. cultural etc.
- **Building pest profiles** - for each disease - now and future.
- **Proactive turf management** - what is actually being done to manage disease.
- **Evaluation** - is the plan working.



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Biologicals

Another exciting and potential growth area is the use of biologicals for managing pest problems in turf and amenity areas. Biologicals have been around for a long time especially in the horticultural industry. They are used successfully at the moment in some areas of the turf and amenity industry but the scope for their use is potentially much bigger.

The term biologicals covers a wide range of different types of product and approach. They range from bacterial and fungal products to soil fauna enhancement products.

There is no doubt that the turf industry is starting to look more closely at these types of products however there is still a lot of research and development needed. It is also worth noting that this type of product can only claim efficacy against a disease etc. if it has been through the same registration process (Pesticide Safety Directorate) as a control product, it is illegal to claim efficacy without registration.

Further Options Available?

R&D and communication are vital if the turf and amenity industry are to be able to effectively manage pests in the future. What is needed now?

- More specialised R&D.
- Manufacturers working more closely with the legislators, enforcers and end users!
- Better planning/communication.
- A more integrated way of managing amenity areas.
- Lobbying from relevant parties such as IOG, BIGGA, IOH, CPA etc.

Conclusion

Is legislation restricting our control options? Well the answer is definitely – yes! There is more pressure than ever before on turf and amenity control products which means that there will be increasing pressure on turf and amenity managers when trying to control pests and diseases.

The EU review process and other legislation will have a big impact on availability of control products for use on turf and other amenity areas. However, there are still high quality products available now and new products coming onto the market, it's just that new introductions will be reduced in the future. The impact of new legislation on the turf and amenity sector can be minimised if an integrated approach is used. We are also relying on R&D to provide new products for the future and certainly The Scotts Company are leading the way in this area.



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