

Agrochemical Compliance Outlook in India and EU 2023– Q&A

NO.	Question	Answer
1	Are these regulations applicable to repellent products? Also wanted to check whether antimicrobial pesticide registration also fall in the scope of these regulations?	<p>This regulation is applicable for chemical pesticides (public use pesticide and household pesticides). The repellent product to be applied on skin are not covered under pesticide regulation in India.</p> <p>However, for both the product category (repellent and antimicrobial pesticide) based upon the content (active substance) the applicability of the regulation shall be decided</p>
2	How do we register plant nutrition products in India and EU?	The plant nutrition products are mainly covered under the ‘Bio stimulant/Fertilizer’ category in both India and EU.
3	Are there any registration requirements for adjuvants?	Currently in India the registration of adjuvants is not required.
4	<p>Is CIBRC going to consider in silico modelling with this new update?</p> <p>From when the new fee’s structure applicable</p>	<p>CIBRC is getting open about accepting the new approaches of fulfilling data requirements. In the latest updates it is mentioned that the scientific justifications and data waiver will be supported & accepted.</p> <p>There is no update yet, once the RC confirm the new fee’s structure it will be published through Public Notice.</p>
5	Is biostimulant part of this regulation?	<p>Bio stimulant is not the part of this regulation.</p> <p>Bio stimulant registration is handled by the Integrated Nutrient Management Department of Department of Agriculture. The separate guidelines are published for bio stimulant registration in India.</p>
6	What is the major impact of new EU regulation on microbial pesticide	<p>Less data requirements</p> <p>Less animal testing.</p> <p>Less evaluation time.</p> <p>Fit to purpose data requirements.</p> <p>Acceptance of literature search, justifications</p> <p>More straight forward risk assessment, and shorter timelines is expected to get access to the EU market.</p>

7	Is there data and fees relaxation for microbial pesticide registration in EU?	<p>The regulatory requirements for micro-organisms are made more "fit-for-purpose" and flexible. The product specific data requirements are applicable to be fulfilled. The data requirements can be fulfilled by scientific justification, data waiver and fewer experiments on animals will be required.</p> <p>The fees' structure depends upon the scope of evaluation of dossier and MS reviewing the evaluation</p>
8	If product is registered under import category in India, can we export the same imported material?	Yes, the same material can be exported from India. However, the registration under export category is required.
9	I have confirmed PO for some products from Middle east company and we have apply the to get Export registration u/s 9(3) Export on urgent basis. Will it be required the certificate of origin of this product from the importing country	<p>If the product is already registered in India, then the certificate of origin is not required but if the compound is not registered in India, in this case the certificate of origin is required for Schedule inclusion.</p> <p>This is a case specific scenario and will require evaluation of active and product. In case of detailed analyzing please reach out to info@auxilife.com</p>
10	Is there any restriction for registration of microbial pesticides imported from Asia or other regions?	In India the import of microbial pesticides is not favored.