

15th May 2005

Dear Sirs,

On behalf of Becker Underwood, I would like to formally object to the current proposals to classify nematodes as a micro biological organism. Currently nematodes are classified along side beneficial insects as macro biologicais, which is logical when you consider the way in which these organisms are used.

As with most macro biologicais, nematodes are specific in use, making them a safe but effective option to target pests. Much independent work has been done to assess the environmental impact of these organisms; all with the conclusion that they are environmentally benign. This important attribute of specificity is also limiting for the development of nematode produets in that each individual product can only be applied to a relatively small market sector. If the regulation authorities place nematodes in the micro biological classification category (along with broader acting agents like fungi and bacteria), then the registration requirement will be too costly to be supported by the small market segments of each nematode product.

Ultimately this will severely limit the use of these effective and safe biological produets throughout horticulture and agriculture. Existing produets, relied upon by many growers, may have to be withdrawn, and the future will be in doubt for the development of new produets to combat problems in other niche sectors where chemicals are no longer effective or desirable.

As a professional organisation Becker Underwood recognises and supports the need for some form of regulation for all erop protection produets to ensure quality and safety. However, we do not believe that regulations as currently outlined for micro biological produets present a workable situation for nematodes and, therefore, must not be approved. In conclusion I would ask that a forum is made available to address the issues outlined here to safeguard the continued effective and safe use of nematode based biological produets.

Yours faithfully,

Graeme Gowling
General Manager
Becker Underwood Ltd