Letters

Address your letters to the editor, Greenkeeper International, 13 Firle Close, Seaford, East Sussex BN25 2HL

■ May I respond to the letter that appeared in November from Sandy Brown, Crieff GC., seeking clarification on the pricing of pesticides labelled for golf course use as opposed to horticultural or agricultural uses?

To begin, may I make it quite clear that the chemical industry, like any other, has to run on a sound commercial base. That means covering all the costs of development, registration, production, promotion and staff - and then returning a positive contribution to its directors or shareholders. We are not profiteers as was implied, but companies that seek to survive in an increasingly difficult climate.

The legislation associated with pesticide registration is now so complex and rigid that extensive development trials and efficacy work has to be done for every individual label recommendation, let alone the initial toxicological, ecological, residue and storage tests that have to be undertaken for any pesticide registration. This is a very expensive process.

To explain this in simple terms let us take for example the easiest and cheapest route to introduce a chemical, ie. an established agricultural product such as a fungicide that has potential in turf.

Costs involved £

i) Development programme Minimum 3 years of replicated trials which will hopefully give adequate efficacy on a range of turf diseases. Cost of 4 trials = £20K/ year

.....approx £60,000

- ii) Trials clearance (MAFF) permit1,550
- iii) Registration submission Preparation of trials protocol, the written submission, letters of access to ingredients, final formulation, writing of label, etcapprox £15,000
- iv) MAFF Submission (fixed charge) New label usage£2,250

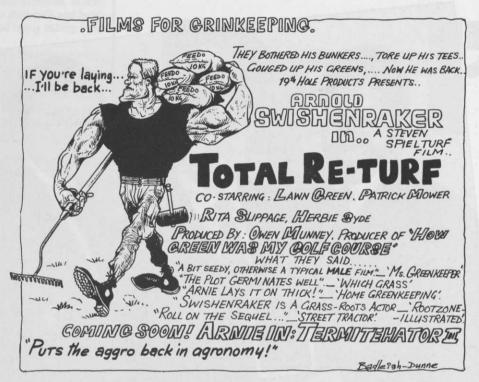
This can take up to three years from submission to receiving approval. The possibility of introducing a new molecule into the amenity sector that is not already registered in the UK for other uses is dictated by the considerable costs involved. A new molecule would require extra support data to the previous example plus an increased registration fee:

- i) Toxicological studies Human and environmental safety
-approx £30,000–50,000 ii) Residue data.....approx £10,000-20,000
- iii) The registration fee to the

Ministry in this case is a fixed

figure of:....£53,000 TOTAL£93,000-£103,000

The registration of a new molecule can take up to six years from submission to approval. The costs involved in developing a new prod-



uct are therefore considerable, but it does not end there. All the older established products have, by law, been subject to reviews and their data packages updated so registrations could be maintained. The amount of work required will vary but can cost up to £50,000 per product.

Unfortunately the golf/leisure and amenity markets are relatively small and therefore any costs have to be spread over a much lower sales opportunity than experienced in agriculture or horticulture. Customers operating in these sectors must be prepared to pay a premium if they want manufacturers to retain current registration and invest in the registration of new products.

To compound the manufacturers problems of cost, the timescales are also prohibitive. Money has to be invested over a 4-10 year period and at any stage of development the programme may have to stop for a multitude of reasons. Even when a product is launched the threat of competitors is ever present and the opportunity to recoup these costs can be limited.

The information provided here are facts and are the justification for the price differentials that occur. To use chemicals that do not have a specific label recommendation is illegal. If the industry wants the opportunity to use chemicals as a management aid they must accept there is a price to pay in order to provide the necessary data for registration of label recommendation. Failure to accept this position could ultimately mean manufacturers will not invest, and products needed to maintain our courses and public areas will disappear

Despite these costs and resources involved,

ICI Professional Products will continue to be committed to providing high quality products to the UK golf market.

ROGER M MOSSOP

Marketing Manager, ICI Professional Products. Haslemere, Surrey

■ I read with great interest (Faces & Places, November) that Robert Brewer had attained his Private Pilot's Licence - well done Robert. Is he Britain's first airborne greenkeeper, you

Discounting the many apprentices that have become airborne off the end of some crabbit auld greenkeeper's boot, we at Tulliallan Golf Club must deny Robert this title. Some four years ago whilst first assistant at Tulliallan, Kenneth Turnbull (then aged 26) gained his Pilot's Licence. Friend and fellow assistant Kenny Thomson can attest to his skill in that he has twice flown with Kenneth and returned to tell the tale. This is more than can be said for a certain trade sales manager, who has managed to side-step all Kenneth's invitations to 'come fly with me'.

Unfortunately Kenneth decided the glamour of greenkeeping was not enough and is now a member of London's finest - the Metropolitan Police. So look out Robert, don't go speeding in the skies or you may get picked up by Kenneth Turnbull, one of Tulliallan's claims to fame in having been Britain's first airborne greenkeeper.

Incidentally, both Robert and Kenneth worked at Stirling Golf Club, albeit at different

ELLIOTT R SMALL

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