ALIANȚA PENTRU AGRICULTURĂ ȘI COOPERARE

Bucharest, 15th of September 2026

To: EUROPEAN COMMISSION – Directorate-General for Health and Food Safety (DG SANTE)

For the attention of: Mr Eric LIÉGEOIS, Head of Sector – Pesticides

E-mail: eric.liegois@ec.europa.eu

Cc: Ministry of Agriculture and Rural Development – to kidn att. of Ms. Aniela Radu;
National Phytosanitary Authority – to kind att. of Ms. Ramona Nechifor;
Permanent Representation of Romania to the European Union – to kind att. of. Ms. Maura Herinean

Support for the renewal of the approval of ZIRAM and the continued use of KORIT® FS 420 for maize seed treatment

Dear Mr Liégeois,

The Alliance for Agriculture and Cooperation (AAC), representing Romanian farmers and agricultural cooperatives, is closely following the EU procedure for the renewal of the approval of the active substance ZIRAM. We wish to draw the European Commission's attention to the specific importance of KORIT® FS 420 for Romanian agriculture, where it is used as a maize seed treatment with a repellent effect against bird damage.

EFSA's conclusion on the peer review of the pesticide risk assessment of ziram, published on 24 February 2026, states that the assessment was based on the representative uses proposed at EU level as a fungicide applied by foliar spraying to plum, pear and peach trees. We therefore understand that the use of ziram as a bird repellent in maize seed treatment was not included as a representative use in that assessment.

We also acknowledge the issues that could not be finalised and the concerns identified by EFSA, as well as EFSA's observation that certain additional data submitted under ongoing ECHA processes were not available for the peer review. Without questioning the need for a high level of protection of human and animal health and the environment, we consider it essential that the final decision be based on all relevant scientific data that may lawfully be taken into account and reflect the specific characteristics of the bird-repellent use.

In many agricultural areas of Romania, crows and other birds cause significant damage to maize seeds and young plants, sometimes making it necessary to re-sow affected fields. Re-sowing creates additional costs, delays crop development and increases the risk of yield loss, particularly under increasingly narrow sowing windows and recurrent drought conditions.

Romanian farmers currently have no practical, effective and economically viable alternative providing a comparable level of protection. The loss of this solution would further reduce the technical tools available for maize production at a time when farmers are already facing a continued contraction of crop-protection options, rising production costs and the effects of climate change.

Maize is of strategic importance for Romania, both for food and feed production and for maintaining balanced and diversified crop rotations. Keeping maize in rotation contributes to the sustainability of farming systems, while effective protection during the earliest stages of crop establishment is decisive for production stability.

Against this background, **AAC respectfully requests the European Commission** to ensure, before a decision is taken on the renewal of the approval of ZIRAM, that:

- the specific use of ZIRAM as a bird repellent in maize seed treatment is appropriately considered;
- all additional scientific data that are relevant and admissible within the procedure are taken into account;
- the agronomic and socio-economic consequences of losing ZIRAM - KORIT® FS 420 are assessed in Member States where no effective alternatives are available;
- proportionate solutions are identified to avoid removing this use before farmers have access to practical, effective and affordable alternatives.

AAC supports the renewal of the approval of ZIRAM and the continued availability of KORIT® FS 420 (*in case of Romania*) for maize seed treatment under conditions of use that safeguard health and the environment. We believe that a balanced decision should protect both the EU's safety objectives and farmers' capacity to manage a genuine agronomic risk for which no equivalent solution is currently available.

Thank you for your consideration. We would appreciate any information on the next steps in the procedure and on how this specific use may be taken into account in the decision-making process.

Yours sincerely,
ALLIANCE FOR AGRICULTURE AND COOPERATION

ORGANIZATION	PRESIDENT	SIGNATURE
PRO AGRO	Ionel ARION	
LAPAR	Matei TITIANU	

UNCSV	Mircea BĂLUȚĂ	
AFF	Vlad MACOVEI	