

PESTICIDE REGISTRATION

Charles H. Frommer  
Velsicol Chemical Corporation  
Rosemont, IL

Over the years, and especially over the past ten years, the cost of registering a new pesticide, in both dollars and time, has risen dramatically.

As you can see from Table 1, the cost in dollars to bring a new product to market is almost \$17,000,000. And that is for a basic registration where all of the data submitted to EPA is accepted. If any data is either not accepted or is questioned and additional data required, the cost can increase by orders of magnitude.

**Table 2 gives you an idea of the time needed to bring a product to market, approximately 17 years.**

A third item must not be overlooked and that deals with patents. During the second or third year of development, a patent is applied for. Once issued, that patent has a life of 17 years. If a patent is issued in year 4, that means we would only have four years of commercial sales before we faced competition copying our product.

What all of this says is that in order to get a return on this type of investment, the new product must have a use in corn, soybeans, cotton or small grains. Use on any other commodity, without at least one of the above, would not support a volume

that would provide a return necessary to pay for the investment.

If a new product is found to be profitable, then the manufacturers will look for additional markets. If the estimated additional volume will offset the cost of the additional data requirements, then these new uses will be registered.

All of this deals with new products. "Why are we losing our old products?" you ask. Each year EPA requires additional data from registrants. If the request for data on nursery uses, for instance, is more than the market will support, the registrant will most likely voluntarily cancel that use.

The current regulatory demand on registrants just does not favor "minor" uses and, because of the volume of product used, forest nurseries must be considered "minor" uses or users.

It is not a very bright picture I paint but at least it gives you the reasons for a dwindling supply of older products and not much new on the horizon.

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TABLE 1  
TOTAL COST OF NEW PRODUCT DEVELOPMENT

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STAGE	COST
1. Synthesis	\$4,000,000
2. Process Development	3,250,000
3. Formulation	500,000
4. Initial Field Testing	650,000
5. Metabolism	700,000
6. Toxicity	2,800,000
7. Advanced Field Testing	3,000,000
8. Environmental Studies	750,000
9. Analytical Residue Studies	1,000,000
10. Regulatory Activities	200,000
TOTAL	<u>\$16,850,000</u>

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