From: Julia Stark
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To: SG INPUT ROADMAPS FEEDBACK
Subject: Roadmap: Feedback received for REFIT Evaluation of the EU legislation on plant protection products and pesticides residues (Regulation (EC) No 1107/2009 and Regulation (EC) No 396/2005) - DG:SANTE - Register ID :19320296049-30

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Your Voice In Europe: ROADMAP feedback for REFIT Evaluation of the EU legislation on plant protection products and pesticides residues (Regulation (EC) No 1107/2009 and Regulation (EC) No 396/2005)

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Related document: REFIT Evaluation of the EU legislation on plant protection products and pesticides residues (Regulation (EC) No 1107/2009 and Regulation (EC) No 396/2005)

Feedback:

The system has to be refitted urgently. The final report of an audit carried out in Germany by DG SANTE (DG(SANTE) 2016-8780 – MR) states clearly the necessity of the renewal for the regulation system. Harmonization is far away.

The delays in granting authorisations of plant protection products exceed the legal deadlines set out in European Union (EU) legislation for both new products and re-authorisation of those already on the market. This is primarily caused by a lack of EU harmonisation in the standards which Member States use for evaluations, particularly in the environmental area. Further evaluation delays result as a consequence of the policy of routinely accepting additional studies and clarifications from applicants in cases where the initial evaluation has a negative outcome.

On the EU level we recognize a lack of harmonization in rules for assessing (active) substances and in methodologies for assessment.

The possibilities for national deviations from the EU system are extensive even vast and consequently result in huge differences between Member States – especially with regard to minor uses and for speciality crops. Separate and deviating national paths (the German "Sonderweg") need to be further restricted and eliminated.

The procedure of mutual recognition urgently needs to be reinforced and strengthened. There is an urgent need to clarify that approvals according to the Directive EC 91/4141 should and can be used in general in all Member States for mutual recognition.

It is necessary to define and determine at EU level that the state of science at the moment of submission of applications is sufficient. This is in order to avoid subsequent duties to submit newer findings which prolong the process for approval for an indeterminate period of time and to avoid national deviations which consequently result in distortions of competition in the EU internal market.

There is a strong need for a clearly defined European level for decisions on approvals in case of disputes between Member States. This decision body has to base its decisions solely on scientific evidence and evaluations and not on politically opportune opinions (example: glyphosate).

It is highly important and indispensable that the work of the Coordination Facility for Minor Uses continues and a long-lasting and sustained financing for this body is guaranteed.

Feedback file: