
From: Alix Darmaille

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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)

User's data:

- Domain: Company/Business organisation
- Name: Alix Darmaille
- Email: alix.darmaille@agpm.com
- Country: France
- Organisation: Confédération Européenne de la Production de Maïs (CEPM)
- Headquarter: France
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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:

CEPM (the European Confederation of Maize Production) welcomes the opportunity to comment on the evaluation and fitness check road map on regulations n°1107/2009 and n°396/2005. Indeed, to ensure sustainable maize production, farmers need to have access to innovation and to keep a diversity of solutions when it comes to crop protection products (CPP) to fight against pests and diseases.

CEPM would like to already highlight the following points:

- *The current regulation, based on hazard approach, has a very bad impact on farmers. On the one hand, active substances are being constantly removed from the market, and, on the other hand, new substances are not being made available. Mutual recognition, which is supposed to speed up the evaluation process, encounters a lot of*

difficulties, partly due to a lack of trust between Member States. Additional requirements are often asked by some Member States inside a same zone to evaluate CPP. All these factors are slowing down the authorisation process.

o That is why CEPM wants the delay of the evaluation for approving active substances to be considered in detail in the future (new active substance – page 4) and also to base the regulation on a risk approach.

o Mutual recognition needs to be clearly assessed and improved in order to ensure real harmonisation between Member States.

o Moreover, mitigation measures must be considered because it is resulting in different applications of EFSA guidelines by the Member States. These measures are distorting competition between maize producer inside and outside the EU.

• CEPM welcomes the fact that the scope of the REFIT evaluation is considering the application of cut-off criteria which can have important consequences (page 5 – scope of the evaluation). For CEPM, it is really important to strike the right balance between benefits and risks in the evaluation process of CPP. This point must be considered regarding this cut-off criteria application.

• As mentioned in the document, CEPM welcomes the close interaction with the evaluations and fitness checks on chemical legislation, in particular CLP and the General Food Law Regulation (page 7 – Previous evaluations and other reports). Nevertheless, it seems necessary to clearly define the responsibilities of EFSA and ECHA in the area of active substance.

In conclusion, CEPM believes it is very of the utmost importance to improve the actual regulation on Crop Protection Products registration procedures through the REFIT process and will be contributing actively to future consultations on the dossier.

Feedback file:

[ContributionCEPMREFIT15122016.pdf](#)