

From: [REDACTED] (SG)
Sent: Friday 24 April 2015 10:51
To: [REDACTED] (SG)
Subject: Meeting with EPPA on pesticides legislation, 23.4.15, conclusions
Attachments: [REDACTED]_2015.04.23_13.52.56_5C4N11360_1.pdf

[REDACTED] – can you send this through ARES to [REDACTED] and me? Thanks! [REDACTED]

Participants:

Mr. [REDACTED], Mr. [REDACTED] (EPPA consultancy)
Mr. [REDACTED], Mr. [REDACTED] (SG E/1)

Conclusions:

The meeting had been requested by EPPA to present their views on the EU pesticides legislation. EPPA represents *inter alia* Bayer, Arkema, and Sumitomo Chemical.

EPPA considers the hazard-based regulatory framework for pesticides in the EU as too "precautionary". EPPA argued it was not in line with the legislation on biocides and REACH in this respect. In EPPA's view, the legislation should be reviewed and revised in order to bring the regulatory approach closer to that of biocides and REACH.

In EPPA's view, when implementing the legislation one could build some flexibility into the system, for example through Article 4(7) of the pesticides legislation ("serious danger to plant health"), or the notion of "negligible exposure", or the definition of endocrine disruptors. Regarding the latter, EPPA criticised the delay in the process, which leads to a prolonged application of the interim criteria. EPPA argued that this creates a competitive disadvantage for products that are regulated on the basis of interim criteria. SG explained its role as policy-coordinator and queried about ongoing technical implementation work as regards the pesticides legislation.

EPPA handed over the attached position paper.

[REDACTED]
Unit E1 - "Citizens and Security "
Directorate "Policy Co-ordination II"
Secretariat-General
Ext. [REDACTED]