

From: PRATS MONNE Xavier (SANTE)
Sent: 12 January 2016 08:19
To: [REDACTED] (SANTE); [REDACTED] (SANTE)
Subject: FW: Discussion topics - Meeting Cefic/ECPA - 21 January at 16:00

From: [REDACTED] [@cefic.be](mailto:[REDACTED]@cefic.be)
Sent: Tuesday, January 12, 2016 8:05 AM
To: PRATS MONNE Xavier (SANTE)
Cc: [REDACTED] (SANTE)
Subject: Discussion topics - Meeting Cefic/ECPA - 21 January at 16:00

Dear Mr Prats Monné

Thank you for agreeing to meet Cefic and ECPA on 21st January. We welcome the opportunity to have an initial discussion with you. There are a number of issues that we would like to discuss with you as follows:

1. **Priorities of the chemicals and crop protection industries**

We would like to stress the key role of these sectors in terms of investment and employment in Europe. The competitiveness of the sectors is vital, in particular to drive and maintain the our focus on innovation. While legislation has impacted on the competitiveness and innovation potential of our sector, we believe that the focus on Better Regulation is essential to drive future competitiveness in the sector.

2. **Endocrine disruption**

While the delays in the setting of criteria for endocrine disruptors are unfortunate, we support the current process with a full assessment of the potential impact of legislative changes. We would welcome your views on the current situation and how we as an industry could provide our support for the development of the final criteria.

3. **Delays in the evaluation of active substances**

While there are delays in the process of active substance evaluation for plant protection products, this is clearly linked to the setting of unrealistic timelines. We are seeing major delays in the AIR-3 process and this will have a knock-on effect on future evaluations. We are currently approaching a situation where the evaluation process will be completely blocked, and we would ask for an urgent review to put in place a workable and achievable evaluation programme.

4. **Specific complaints in the crop protection sector**

The legislative procedures are having a negative impact on bringing new crop protection innovation onto the market. We would in particular underline the delays in the approval of new chemistry and one element in this delay is linked to the Commission's unilateral change of policy and procedure on the setting of MRLs. While ECPA has made a complaint to the ombudsman on this issue; we hope that a solution can be found to implement the legislative provisions and encourage new innovation.

We would also highlight that ECPA has made a recent complaint to the ombudsman about EFSA's role in the evaluation of PPP risks to bees. A recent mandate given to EFSA raises concerns about predictability and transparency of the process. We would request greater clarity to help industry in its investment decisions.

We welcome the opportunity to meet with you and we look forward to a constructive dialogue.

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[Redacted]

Cefic

[Redacted]
[Redacted]

ECPA