



EUROPEAN COMMISSION
ENTERPRISE AND INDUSTRY DIRECTORATE-GENERAL

Resources Based, Manufacturing and Consumer Goods Industries
REACH

Brussels, 23/01/2013

Meeting with BASF on the identification of PBTs under the PPP regulation

23/01/2013, 15:00-16:30

Participation

- For BASF: **Harald Schumacher** (Vice President Environmental and Consumer Safety, Crop Protection) and **Michael Schumacher** (EU Government Relations BASF Group, Head of Innovation & Technology Policy)
- For DG ENTR F.2: Klaus Berend, Eric Liegeois
- For DG ENTR F.1: Georg Streck

Background

BASF asked for a meeting with DG ENTR F.2 to discuss the PBT-assessment of plant protection products (PPP) under Regulation (EC) No 1107/2009. I participated in this meeting since I took an active part in the working group of DG SANCO, which discussed guidance for the identification of PBTs under this regulation and since I am member of the PBT-Expert Group, which recently discussed this issue.

Discussion

- During the discussion, misunderstandings and reservations concerning the PBT-assessment under REACH could be clarified, e.g. the misunderstanding that according to the REACH-guidance field data could not be used for the PBT-assessment.
- It was generally agreed that a Weight of Evidence Approach together with high qualitative studies is a good basis for a PBT-assessment of PPPs.
- BASF suggested that guidance documents developed by ECHA or EFSA should be subjected to a kind of impact assessment during their development. They mentioned as example the "impact assessment" conducted by the German Federal Environment Agency (UBA) in the context of the PBT-assessment of PPP. In this study, UBA estimated how many PPPs could be regarded as persistent if e.g. varying temperature corrections for DT50-values as a parameter measuring persistence are applied.
- BASF sees still problems in the assessment of PPPs for setting up the Candidate list for Substitution of PPPs, which will be established by the Commission (DG SANCO) till 14 December 2013 (Annex II of (EC) No 1107/2009). According to BASF, several criteria not related to the PBT-assessment (e.g. presence of non-active isomers in a PPP) should be better defined. BASF was referred to DG SANCO for further discussing this issue.

Georg Streck