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**To: Members of SCoPAFF-  
phytopharmaceuticals**

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**ECPA input for SCoPAFF meeting on 17-18 May:**

- **Endocrine disruptors**
- **Bee Guidance document**
- **Neonicotinoids**
- **Glyphosate**

Dear SCoPAFF members

Ahead of the SCoPAFF-phytopharmaceuticals meeting of 17-18 May, ECPA would like to take this opportunity to provide our input on a number of issues. Reference is made to the meeting agenda item where relevant:

**Criteria for endocrine disrupting properties (Agenda items B.08)**

As has previously been communicated, **ECPA cannot support the current Commission proposal**. While we agree with the use of the WHO/IPCS definition as a scientific starting point, we have consistently highlighted the need to develop **regulatory** criteria suitable to support decision making under Regulation 1107/2009. Authorities need to be able to clearly separate those substances that have the real potential to cause harm from those that do not, and this proposal does not and cannot do that without incorporating hazard characterisation elements, particularly potency.

**The amendment to the derogation must be re-introduced if the Commission is committed to science-based legislation.** ECPA is highly concerned that this amendment has now been omitted from the current proposal. While our first priority has always been to have the right criteria in place, rather than rely on a process of derogations, the changes put forward offered a positive step towards a more workable proposal. We view the amendment to the derogation as an integral part of the Commission proposal and an important opportunity to ensure greater coherence with the Biocides Regulation (Regulation 528/2012).

**The current proposal clearly ignores the needs of European farmers** and will have a disproportionate impact on agricultural productivity, competitiveness and trade; all with no demonstrable benefits for the protection of human health or the environment. We again call on the Commission to adopt **workable, proportionate and science based criteria**.

**Bee guidance document**

ECPA is supportive of a revision of the pollinator risk assessment. However, we still fail to see how the EFSA document on the risk assessment to honeybees, bumble bees and non-*Apis* bees (2013) provides useful support to decision making.

Since 2013, industry has been active in developing additional research to propose a way forward that is both protective and realistic. In order to consider practical solutions to maintain a high level

of protection and robustness in the bee risk assessment, we would welcome the opportunity to engage in a technical discussion with risk assessors and risk managers in the Commission, Member States and EFSA

ECPA will continue to ask that the Commission, EFSA and Member States:

- **Not to adopt the guidance document as it currently stands**, on the basis that it is not fit for purpose and does not provide useful support to decision making
- **To reject any proposed legislative changes** when the proposed trigger values remain questionable and are not based on the most recent scientific knowledge
- **To review progress in science and knowledge** before implementing the measures currently under discussion, which lead to unfeasible additional data requests.

Recently suggested proposals by the European Commission to further restrict 3 neonicotinoids active substances are based on EFSA's 2016 evaluation of confirmatory data using this unapproved document. **ECPA does not agree with a process where a proposal is based on an assessment using an unapproved guidance document**, in particular given that Member States have consistently refused the use of this guidance for regulatory assessment. The suggested proposals are a further illustration of the consequences of using this document: ECPA continue to believe that most insecticides, and a lot of herbicides and fungicides (including those used in organic agriculture) would not pass the unrealistic criteria set out in this unapproved guidance document. ECPA is convinced that the suggested restrictions are not justified, and would put unnecessary additional pressure on European farmers, especially for those growing non-greenhouse crops such as sugar beet, potatoes, winter cereals or fruit and vegetables.

We therefore urge SCoPAFF to review the guidance document and ensure that decision making is not based on the unrealistic criteria in the current guidance document. We would welcome the opportunity for a dialogue to make progress in this important area.

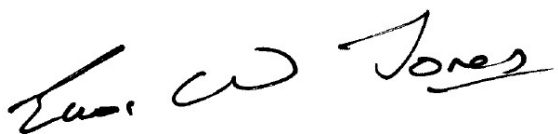
### **Glyphosate (Agenda items A.21)**

A temporary extension of the approval for Glyphosate is in place until the end of 2017, having been granted earlier this year when the SCOPAFF could not come to a decision on re-approval. Since then, ECHA has finalised its assessment and has concluded that glyphosate is not carcinogenic. It is worth recalling that original proposal put forward by the Commission was for a 15-year approval, on the basis of the evidence they had at the time, including a favourable opinion from EFSA. **Given that glyphosate meets all of the technical criteria set by the European system for re-approval, we strongly urge the European Commission to bring forward a new proposal to re-approve glyphosate for a further 15-years**

A decision on the approval of glyphosate is required to ensure that decisions are in conformity with the principles of Regulation 1107/2009 and to maintain a key tool used by European farmers. Further information on the importance of glyphosate as an agronomic tool is available at [http://www.ecpa.eu/sites/default/files/ECPA\\_glyphosate\\_infographic\\_web.pdf](http://www.ecpa.eu/sites/default/files/ECPA_glyphosate_infographic_web.pdf)<sup>1</sup>

We would of course welcome a more detailed discussion on these issues. If you have any questions about the ECPA views, please do not hesitate to contact me.

Yours sincerely



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<sup>1</sup> The loss of glyphosate from the market would for example result in the loss of almost 1 billion euros of farm income in Germany, and 1 million tons of tomatoes in Italy. Of 1.9 million jobs dedicated to crop agriculture in 5 EU countries, 0.5 million are directly linked to production that relies on glyphosate. These jobs would be placed at direct risk. Full report also available at: [http://www.ecpa.eu/sites/default/files/documents/Glyphosate%20Final%20Report\\_EU%20results\\_20Feb2017.pdf](http://www.ecpa.eu/sites/default/files/documents/Glyphosate%20Final%20Report_EU%20results_20Feb2017.pdf)