

Crop Protection - European Regulatory Conference

15th-16th March 2017

Conference Conclusions

Following two days of discussion on current issues at the Conference, it is clear that there are many issues are currently approaching the crunch point and decisions on these issues are planned in 2017.

For example, on **endocrine disruptors**, there now appears to be broad political support for the criteria that have been proposed by the Commission. While industry does not like the criteria, we understand the push for a final decision – but this needs to be clearly linked to the amendment of the derogation which is vital to protect EU agriculture.

In the **AIR process** of active substance re-evaluation, clear problems have been identified during the peer review, and it is a major concern that too many issues are raised very late in the process – where these concerns are not supported by the rapporteur Member State. The lack of predictability is hurting the process and improvements are needed – with possible learnings from the biocides evaluations which does not seem to face the same problems despite a very similar procedural structure.

2016, the year of post-truth, has seen an increase in the **political pressure** on the system. While this is to be expected for our sector, the experienced procedural dysfunctions is leading to unnecessary additional political pressure. Improving the functioning and predictability of the regulatory process is therefore essential - to ensure that politicians see a clear and joined up process between risk assessment and risk management.

The additional challenges to the process are also impacting on the **availability of evaluation resources**, especially in the rapporteur Member States. We understand that the Commission are warning MSs to comply with the timelines, but it is really essential that the Commission resources be focussed on improving the process, to help the Member States to deliver more efficiently. As one speaker mentioned, *stress doesn't improve the process* – but better managed and joined up procedures would improve the process.

Improving the process can in particular be achieved through better guidance documents, less repetition of evaluations and timely feedback during the evaluations; these areas should be a focus for improvements. The unhealthy level of frustration and even hostility between industry and authorities was mentioned – this is indeed problematic and there is a need for place to have a constructive dialogue between stakeholders and policy makers in EFSA, Member States and the Commission.

Looking at the zonal process, the **lack of trust** in the evaluation of neighbouring countries was highlighted as a key blocker to the process. While we do see some progress in the North and South zones, there is still a long way to go. It is frustrating to see that the level of trust is inversely proportional to the resources available in Member States. There is a clear need to improve the management processes in place to ensure focus on important issues and to avoid unnecessary repeat evaluations.

The coming year will also see an increase in workload with many more **Article 43 re-registration** dossiers to be evaluated. This is clearly a time wasting and resource consuming process – the challenge will be to ensure a level of clarity and consistency in its application across Member States.

While the Conference provided an excellent dialogue opportunity, the hope for more discussions was expressed, to help us make progress in the coming year – building a more consistent dialogue, promoting greater trust in the process and looking for longer-term improvement solutions.

The **review of Regulations 1107/2009 & 396/2005** will be an opportunity to look at improvement options in the legislation. While this is a long term process, there are many ideas for short-term improvements that have been put forward but also policy options such as a data call-in process which need to be looked at carefully as they offer potential ways forward to provide greater efficiency in the process.

We hope that the review will contribute to improvements. But our focus needs to be on short term improvements and we hope that we will be able to report improvements when we come back for our 5th Conference in March 2018!

Save the date!!

5th ECCA-ECPA Regulatory Conference 2018

Brussels 7th & 8th March 2018

More details and registration to follow @

<https://ecpa.events.idloom.com/regulatoryconference2018>