

**From:** 5.1.2.e Woo  
**Sent:** maandag 4 juli 2016 15:54  
**To:** CTGB Dist Neonics coördinatieteam  
**Subject:** FW: ECPA letter regarding Bee GD implementation and amendment of Uniform Principles  
**Attachments:** Annex 1 - EFSA conclusions in 2016 on bees RA - Up to 30 06 2016.xlsx; 26359\_ECPA\_letter\_to\_SCoPAFF\_on\_Bee\_GD - July 2016.pdf; Annex 2 - Bee GD - List of new information since 2013.pdf  
**Categories:** Coördinatieteam neonicotinoiden

Ter info aan het neonicsteam.

Gr 5.1.2.e Woo

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**Van:** 5.1.2.e Woo 5.1.2.e Woo @ecpa.eu] **Namens** 5.1.2.e Woo  
**Verzonden:** maandag 4 juli 2016 10:33  
**Aan:** 5.1.2.e Woo @ec.europa.eu  
**CC:** 5.1.2.e Woo @ec.europa.eu; 5.1.2.e Woo ec.europa.eu  
**Onderwerp:** ECPA letter regarding Bee GD implementation and amendment of Uniform Principles

**To:** 5.1.2.e Woo  
**Cc:** 5.1.2.e Woo  
**Bcc:** SCoPAFF (phytopharmaceuticals)

Dear Dr 5.1.2.e Woo,

Please find enclosed an ECPA letter (with annexes) regarding the EFSA Bee Guidance Document and the discussion that will take place during the July Standing Committee meeting and where the Commission will look to enact the use of the EFSA document and propose an amendment of the uniform principles despite the opposition of a majority of Member States.

ECPA is supportive of a revision of the existing pollinator risk assessment. However, we still fail to see how this now outdated document from 2013 will ensure risks to pollinators are realistically evaluated.

We continue to be of the opinion that the document as currently drafted is unworkable in a regulatory context and if implemented, even partially, would lead almost all insecticides to fail the first tier laboratory risk assessment along with many herbicides and fungicides. We believe a proper calibration needs to be conducted as the tiered approach is meant to provide meaningful differentiation between compounds with high or low risk potential to bees.

**In respect of the principle of proportionality and the commitment for “Better Regulation” we would ask the Commission, EFSA and Member States to consider the following requests before adopting the guidance or making any legislative change:**

- *Review the progress in science and knowledge gained over the last 3 years, before the implementation of the measures currently under discussion, which lead to unfeasible additional data requests.*
- *Use the most recent scientific knowledge to revise the questionable trigger values.*
- *Carry out a transparent “ex-ante” assessment of the impact of the proposed measures.*

As industry, we would promote a technical discussion so that solutions to some practical issues could be jointly explored.

Should you have any questions please do not hesitate to contact me.

Sincerely

5.1.2.e Woo

**Director, Regulatory Affairs**

**ECPA - the European Crop Protection Association, aisbl** (EU Transparency Register ID N° 0711626572-26)

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