

From: 5.1.2.e Woo drs. 5.1.2.e Woo
Sent: maandag 8 april 2019 11:26
To: 5.1.2.e Woo
Subject: FW: NL comments on the COM proposals time-frame for use GD Bees and amending UP
Attachments: BEE-GD_NL_comments_time-frame_10June16.docx
Importance: High

Van: 5.1.2.e Woo dr. 5.1.2.e Woo
Verzonden: vrijdag 10 juni 2016 17:46
Aan: 5.1.2.e Woo @ec.europa.eu; 5.1.2.e Woo @ec.europa.eu'
CC: 5.1.2.e Woo @minrol.gov.pl; 5.1.2.e Woo @mccaa.org.mt; 5.1.2.e Woo @mst.dk; 5.1.2.e Woo @vaad.gov.lv; 5.1.2.e Woo @sanita.it; 5.1.2.e Woo @dgav.pt; 5.1.2.e Woo @da.moa.gov.cy; 5.1.2.e Woo @sepel.maec.es; 5.1.2.e Woo @dgav.pt; 5.1.2.e Woo @madr.ro; 5.1.2.e Woo @gov.si; 5.1.2.e Woo @ages.at; 5.1.2.e Woo @asta.etat.lu; 5.1.2.e Woo @vaad.gov.lv; 5.1.2.e Woo @gezondheid.belgie.be; 5.1.2.e Woo @magrama.es; 5.1.2.e Woo @hse.gsi.gov.uk; 5.1.2.e Woo @tukes.fi; 5.1.2.e Woo @agri.ee; 5.1.2.e Woo @mmm.fi; 5.1.2.e Woo @tukes.fi; 5.1.2.e Woo @bvl.bund.de; 5.1.2.e Woo @agri.ee; 5.1.2.e Woo @sanita.it; 5.1.2.e Woo @anses.fr; 5.1.2.e Woo @ukuz.cz; 5.1.2.e Woo @da.moa.gov.cy; 5.1.2.e Woo ; 5.1.2.e Woo @mps.hr; 5.1.2.e Woo @bfsa.bg; 5.1.2.e Woo @ukuz.cz; 5.1.2.e Woo @agriculture.gov.ie; 5.1.2.e Woo @bmel.bund.de; 5.1.2.e Woo @land.gov.sk; 5.1.2.e Woo @minagric.gr; 5.1.2.e Woo @vatzum.lt; 5.1.2.e Woo @agri.ee; 5.1.2.e Woo @vaad.gov.lv; 5.1.2.e Woo @nsrz.government.bg; 5.1.2.e Woo @gov.si; 5.1.2.e Woo @efsa.europa.eu; 5.1.2.e Woo @mattilsynet.no; 5.1.2.e Woo @mattilsynet.no; 5.1.2.e Woo @hse.gsi.gov.uk; 5.1.2.e Woo @magrama.es; 5.1.2.e Woo @ec.europa.eu'; 5.1.2.e Woo @ec.europa.eu; 5.1.2.e Woo @ec.europa.eu'; 5.1.2.e Woo @ec.europa.eu; 5.1.2.e Woo @ec.europa.eu'; 5.1.2.e Woo @agriculture.gouv.fr; 5.1.2.e Woo @bmlfuw.gv.at; 5.1.2.e Woo @fm.gov.hu; 5.1.2.e Woo @mzv.sk; 5.1.2.e Woo @bfsa.bg; 5.1.2.e Woo @ukuz.cz; 5.1.2.e Woo @agri.ee; 5.1.2.e Woo @dgav.pt; 5.1.2.e Woo @sanita.it; Dr. 5.1.2.e Woo ; 5.1.2.e Woo Dr. 5.1.2.e Woo , ir. 5.1.2.e Woo , ing. 5.1.2.e Woo 5.1.2.e Woo ir. 5.1.2.e Woo

Onderwerp: NL comments on the COM proposals time-frame for use GD Bees and amending UP
Urgentie: Hoog

Dear 5.1.2.e Woo, dear 5.1.2.e Woo
Dear colleagues,

Please find attached the comments of the Netherlands on **the time-frame proposal of COM for the EFSA 'Bee Guidance Document' and the EC proposal to amend the UP**, as have been made available by COM for the May meeting of the PAFF PPP committee.

On a number of occasions the Netherlands stressed the importance of this guidance to be finalised and have it made available for use in the evaluation of substances and PPP.

In general, the Netherlands truly welcome the proposal for the time-frame that has been prepared by the Commission to implement the EFSA guidance document on the risk assessment for bees. We thank COM for this.

At the same time we would like to express our deep concern about the feasibility of some aspects of the guidance, especially as concerns the wild bees ("Bumble Bees") and the solitary bees. Requirements should be imposed on authorisation holders /applicants that are scientifically sound, up-to-date and feasible. Industry should be able to meet these requirements. If this fails, a regular risk assessment procedure will not be possible.

We listed a number of issues that illustrate our concern in the attached document, together with an overview of general comments, also concerning the amending of the UP. We also pointed to a way forward.

Next to the technical points that are raised, we would urge Commission to provide EFSA as soon as possible with a mandate to review the trigger values on the basis of the BEEHAVE model. In this way revised trigger values should be available before the implementation date of the bee guidance (01 Feb 2017).

Implementation of the guidance will bring to light many unsolved topics and many points that need clarification and perhaps need expert judgement. We emphasise the importance of solving these issues by a harmonised approach amongst MS experts, avoiding different national approaches. That is why we propose to look into the possibilities of installing an expert group (evaluators) working jointly on an existing zonal dossier. By jointly preparing this dossier (a herbicide, a fungicide and / or an insecticide) valuable experience is gained that will motivate risk assessors to make full use of the guidance and harmonise at the same time.

We thank you for considering our comments.

Best regards and have a nice week-end!

5.1.2.e Woo



Dr. 5.1.2.e Woo
5.1.2.e Woo

Ministerie van Economische Zaken / Ministry of Economic Affairs

Bezuidenhoutseweg 73/2594 AC/s-Gravenhage
Postbus 20401/2500 EK/s Gravenhage

T - 5.1.2.e Woo
M - 5.1.2.e Woo
Email - 5.1.2.e Woo@minez.nl