

**From:** 5.1.2.e Woo  
**Sent:** vrijdag 18 januari 2019 17:18  
**To:** 5.1.2.e Woo @ec.europa.eu'  
**Cc:** 5.1.2.e Woo ; 5.1.2.e Woo, dr. 5.1.2.e Woo  
**Subject:** NL Comments Action Point A.08.01 EFSA Bee GD implementation

Dear 5.1.2.e Woo,

Please find below our comments on Action Point A.08.01 on the EFSA Bee GD implementation:

In the December SCoPAFF the Commission presented a proposal for the implementation of the EFSA Bee Guidance, including a step-wise implementation plan and a foreseen update of the guidance to bring it in line with the latest scientific insights. The protection of bees is a very important topic for the NL and we therefore wish to take the necessary steps to adopt new risk assessment guidance as soon as possible, provided that the guidance guarantees a sufficient level of protection and is workable for applicants and risk assessors. The NL does not have a formal position on the Commission's proposal yet. However, from a technical perspective the Ctgb is positive about the current proposal, provided that two comments are taken into account:

\* the implementation date of Part B should be amended to read "To be used for applications submitted 6 months after adoption by SCoPAFF of the revised EFSA Guidance Document on the risk assessment for bees." This amendment is necessary considering the accustomed responsibility of the SCoPAFF to adopt new revisions of guidance documents before their implementation. It also provides a suitable transition period for applicants to adapt their dossier to the updated guidance when adopted.

\* we note that the implementation date of Part A (1 July 2019) is now fast approaching. To allow applicants sufficient time to amend their dossiers after decision making in SCoPAFF we propose to allow for a period of 6 months between SCoPAFF-adoption and the implementation date.

Also, as indicated before, we would also like to review the Commission's mandate to EFSA on the update of the GD before finalising our position.

Many thanks for taking our comments into consideration.

Have a nice weekend!

Best regards,

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Ctgb