

Dear Sir, Madam,

Ctgb has, in anticipation of decision-making on applications for assessment and reassessment of glyphosate-containing products, taken two principle decisions that serve as the basis for the assessment of all renewal applications and new applications for glyphosate-containing products.

In this letter we inform you about these decisions because you are an applicant with a pending application for a glyphosate-based product. Depending on the requested GAP, these principle decisions will affect your application to a greater or lesser degree. As usual, you will be informed of the progress of your own application via the relevant project manager. If you still have questions after reading this letter, you can of course always contact them.

The Board's decisions concern the procedure that will be followed during the assessment/reassessment with regard to (1) exceeding the limit for glyphosate in surface water that is intended for the preparation of drinking water and (2) pre-harvest uses of glyphosate.

Glyphosate in surface water intended for the preparation of drinking water

Part of our current assessment/reassessment is the assessment of the intended uses against the drinking water limit¹. Monitoring data, collected in series over several years, has shown that the quality of the surface water in the catchment areas of the Rhine and Drentsche Aa meets the drinking water limit. However, at monitoring locations near surface water intake points for drinking water abstraction in the catchment area of the Meuse, glyphosate concentrations exceeding the drinking water limit have been measured. The limit is already exceeded where the Meuse enters the Netherlands, but use in the Netherlands also contributes to the exceedances measured further downstream. So this is a shared Dutch/Belgian problem. The degree of exceedance decreases downstream and shows a lightly decreasing trend in recent years. However, at present the test concentration remains above the drinking water limit. This requires measures in The Netherlands and consultation with the Belgian authorities on planned and implemented measures in Belgium.

The Ctgb analyses the continuous exceedances of the drinking water limit measured near several drinking water intake points based on data submitted by applicants, as well as publicly available information and other monitoring data. The analysis has shown that in the Netherlands the use on closed and semi-open pavements makes the largest contribution to the observed exceedances.

The Ctgb cannot authorize a use *“if the concentration of the active substance or of relevant metabolites, breakdown or reaction products to be expected after use of the plant protection product under the proposed conditions of use in surface water exceeds, where the surface water in or from the area of envisaged use is intended for the abstraction of drinking water, concentrations above which compliance with drinking water quality established in accordance with Directive 2000/60/EC of the European Parliament and of the Council (10) is compromised”*. This is stated in article 2.5.1.3. of part I, section C of Commission Regulation (EU) No 546/2011, concerning the Uniform Principles for

¹ In accordance with Section 2.3.2. of the Evaluation Manual, Chapter 6 Fate and behaviour; version 2.4., March 2019

the evaluation and authorization of plant protection products for execution of Regulation (EU) 1107/2009.

The Ctgb therefore will set a region-specific restrictive measure for the catchment area of the Meuse. By denial of the authorization for the applied-for uses on closed and semi-open pavements in the catchment area of the Meuse, it is expected that the Dutch contribution to the exceedance of the drinking water limit is reduced, leading to a further decrease of those exceedances. For emission to surface water, no difference can be made between professional and non-professional use nor between agricultural and non-agricultural use. Therefore none of the uses on closed and semi-open pavements within the catchment area of the Meuse can be authorized, neither for professional nor for non-professional use, neither for agricultural nor for non-agricultural use.

Apart from this, the Ctgb will contact the Belgian authorities in order to align measures to decrease the exceedances of drinking water limit in the Meuse on both sides of the border. Additionally, the Ctgb suggested the Dutch Secretary of State of Infrastructure and Water Management (*Staatssecretaris van IenW*) to consider contacting the Belgian government in order to aim for a joint action for reduction of emissions of glyphosate-containing plant protection products to the surface water in the Meuse River.

Pre-harvest uses of glyphosate

Pursuant to EU Implementing Regulation 2017/2324, extending the approval of the active substance glyphosate, only herbicide uses of glyphosate may be authorized.

Following advice from the Netherlands Food and Consumer Product Safety Authority, the Ctgb has concluded that a number of full-field applications are used just before harvest as to promote a uniform ripening of the crop, and therefore not as a herbicide use. With good crop management there is no need to control weeds with a full-field application shortly before harvest. For the evaluations that the Ctgb is currently working on, these are full-field uses just before harvest in the following crops:

- Cereals (wheat, barley, rye, oats, triticale and spelt, winter wheat, winter barley, summer wheat, summer barley);
- Peas (dry) and beans;
- Pulses;
- Linseed, oilseed rape and mustard.

Such uses are contrary to the EU Implementing Regulation, and the Board therefore deems this type of use cannot be authorized. From crop management perspective, local application (maximum 10% of the plot) shortly before harvest can be justified for local weed control (use as herbicide), and from that point of view there are no objections to an authorisation, provided that the assessment or reassessment shows that such use is safe for humans, animals and the environment.

When assessing your application, the Ctgb will determine whether such full-field pre-harvest uses in the above mentioned crops have been applied for. The Netherlands Food and Consumer Product Safety Authority will be consulted if the intended full-field uses regard other crops than the above-mentioned ones. In case the conclusion is that requested uses intend a promotion of a uniform ripening of the crop, the Board will apply the decision above and deny that particular use.

Please do not hesitate to contact us should you have any further questions.

Kind regards,

Dr. Ingrid Becks-Vermeer
Secretary/Director