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Sent: Tue, 13 Jun 2023 11:26:33 +0100
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Subject: Comments NL to the first draft amendment of the Annex IV of Regulation (EC) No 1107/2009
Attachments: NL comments draft proposal annex IV.docx

Dear 5.1.2.e

Attached you can find The Netherlands' written comments on the first draft amendment of Annex IV of Regulation (EC) No 1107/2009.

In addition to our comments we would like to inform you about an ongoing process in NL to update our approach to the practical implementation of CA. We are developing a method for the comparative risk assessment step which is based on the hazard properties of the CfS-based PPP and comparison of risk mitigation measures between the CfS-based PPP and its potential alternatives. In our opinion, this approach is in the spirit of the Regulation, as the focus is on the inherent properties of certain active substances. In our proposed approach, CfS-based PPP may be replaced by non-chemical methods or PPP that (1) do not have the hazard properties of the CfS in question, and (2) which require less risk mitigation (see recital 19). By focusing primarily on the hazard properties of the CfS and potential alternatives, the comparative assessment can be simplified to great extent and will lead to unequivocal outcomes because a complex comparative risk assessment can be avoided in many cases.

As the approach is still under development we have not included it in our formal comments. We hope to be able to inform you more extensively around the beginning of July. If you have any questions about it in the meantime, please do not hesitate to contact us directly by email or phone to discuss ideas about this approach.

Many thanks for your work on simplification of the Comparative Assessment. We look forward to hearing about the next steps!

Kind Regards,

5.1.2.e and 5.1.2.e

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