

From: "CTGB Servicedesk"
Sent: Thu, 9 Jan 2025 08:49:51 +0100
To: "Ask Juristen" <5.1.2.i @ctgb.nl>
Cc: "CTGB Servicedesk" <servicedesk@ctgb.nl>; "5.1.2.e" <5.1.2.e @ctgb.nl>; "5.1.2.e" <5.1.2.e @ctgb.nl>
Subject: FW: 24001945 - RAAT Agrochemical Trading - K-PAK scope 1107/2009
Importance: High

Beste juristen

Zouden jullie aub vandaag een reactie kunnen sturen?

Groeten,

5.1.2.e

From: 5.1.2.e <5.1.2.e @ctgb.nl>
Sent: woensdag 8 januari 2025 18:06
To: CTGB Servicedesk <servicedesk@ctgb.nl>
Cc: Ask Juristen <5.1.2.i @ctgb.nl>; 5.1.2.e <5.1.2.e @ctgb.nl>
Subject: RE: 24001945 - RAAT Agrochemical Trading - K-PAK scope 1107/2009

Hoi 5.1.2.e

5.1.2.e heeft de taken rondom handhaving overgenomen, maar wat betreft dit scope issue is het volgens mij zo dat ook handhaving afwacht (EU geharmoniseerd heeft over het algemeen voorkeur boven nationale aanpak). Ik zou het antwoord van 5.1.2.e dat je me vandaag stuurde (als de juristen akkoord zijn) versturen.

Groet,

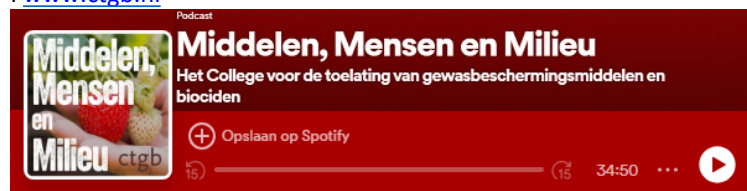
5.1.2.e

5.1.2.e

5.1.2.e - Ctgb

T 5.1.2.e

I www.ctgb.nl



From: CTGB Servicedesk <servicedesk@ctgb.nl>
Sent: woensdag 8 januari 2025 16:03
To: 5.1.2.e <5.1.2.e @ctgb.nl>
Cc: CTGB Servicedesk <servicedesk@ctgb.nl>; Ask Juristen 5.1.2.i <5.1.2.i @ctgb.nl>
Subject: 24001945 - RAAT Agrochemical Trading - K-PAK scope 1107/2009

Beste 5.1.2.e

Zie bijgevoegde antwoord. Dat dateert van 2022. Zijn we het eens met België?

Belgie stelt: In order to sell this product in other European countries besides BE and PL, you will need to address these other countries.

Dat doen zij nu en wij weigeren "toestemming". Vandaar hun aanpak.

Mogelijk kunnen we duidelijk maken dat er geen toestemming vooraf nodig is. Zij kunnen (op eigen risico) de markt op. Het is aan handhaving. We moeten dan dus verifiëren bij handhaving of afspreken met handhaving hoe zij om gaan met deze producten tot de EU discussie weer is afgekaart.

Groeten,

5.1.2.e

From: 5.1.2.e (FOD VVVL - SPF SPSCAE) <5.1.2.e@health.fgov.be>

Sent: woensdag 12 januari 2022 16:05

To: 5.1.2.e @raatgroesbeek.onmicrosoft.com

Cc: 5.1.2.e (FOD VVVL - SPF SPSCAE) <5.1.2.e@health.fgov.be>

Subject: RE: Secover

Dear 5.1.2.e

Based upon the documentation you have provided us, I can confirm that this product Secover can indeed be considered as a product with a physical mode of action, which does not require an authorization as a PPP in order to be placed on the market.

This product will not be put on the European list containing SILTAC however. That list is expanded when countries cannot conclude by themselves, and request a "verdict" from the European Commission. In this case, we base our judgement upon other entries already present in that list, and do not consider it necessary to consult the Commission, PL was obviously of the same opinion.

In order to sell this product in other European countries besides BE and PL, you will need to address these other countries.

With kind regards

5.1.2.e

Attaché Erkenning Gewasbeschermingsmiddelen/Attaché Agréation des Produits Phytopharmaceutique | Dier, Plant en Voeding/Animaux, Végétaux et Alimentation | Gewasbeschermingsmiddelen & Meststoffen/ Produits Phytopharmaceutique et Engrais
Avenue Galilée 5/2 | 1210 Brussel | België

† 5.1.2.e

<http://www.health.belgium.be/eportal/disclaimer/index.htm>



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Mijn emailadres werd gewijzigd in 5.1.2.e @health.fgov.be

Mon adresse e-mail a été modifiée en 5.1.2.e @health.fgov.be

My email address has been changed into 5.1.2.e @health.fgov.be

5.1.2.e

De : 5.1.2.e 5.1.2.e @raatgroesbeek.onmicrosoft.com>

Envoyé : lundi, 20 décembre 2021 10:33

À : 5.1.2.e (SPF Santé Publique - FOD Volksgezondheid) <5.1.2.e@health.fgov.be>

Objet : FW: Secover

Importance : Haute

Dear 5.1.2.e

I'm writing you since I represent the Polish company Synthos.

Synthos is the producer of the Silicon product called Secover. In Poland, this product is sold since 2017 under the name K-Pak. We are now looking to sell Secover/K-Pak in other European countries.

K-Pak, not containing an active and working with a physical mode of action, is sold in Poland without a registration. UK authorities gave us the approval to do the same in the UK.

In the EC there is the working document for Regulation (EC) NO 1107/2009- Scope and Borderline Issues. (Sanco Doc. 6621-99 rev 62 May 2021).

The document consists of a list of products which are evaluated to check if they might or not fall within the scope of Regulation (EC) NO 1107/2009.

In other words, is a product a PPP or not.

Under 1. In the document it is recommended to the reader to first have a look at the table, to search with key-words any entry which come close to his/her specific product.

Under 2. Procedural aspects, the first line says: For any new entries in the scope table, the requester shall first check if his/her case is not already addresses by an existing entry in the table.

In the document on page 47 under No. 162 the product Siltac is mentioned.

Siltac is a product which like Secover/K-Pak is a silicone-based product in the form of a concentrate for the preparation of an aqueous emulsion, with a physical mode of action, intended to combat some pests, including spider mites and aphids in the cultivation of fruit, vegetable, and ornamental plants.

Siltac is already on the list as Non-PPP. Like suggested under 1. You could say Secover/K-Pak is already evaluated.

Since I believe it were the Belgian authorities that send the request to evaluate Siltac to the Commission Services I address myself to you.

My question to you is:

How can I get Secover/K-Pak mentioned on the same list, or is a statement from the Belgium authorities, saying these 2 products are similar enough?

If you need any further information, please tell? The regulatory people of Synthos are eager to help.

I would appreciate a quick answer.

Kind regards,

5.1.2.e

RAAT Agrochemical Trading

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