

From: "5.1.2.e"
Sent: Fri, 10 May 2024 18:13:40 +0200
To: "CTGB Servicedesk" <servicedesk@ctgb.nl>
Cc: 5.1.2.e "5.1.2.e" <5.1.2.e@ctgb.nl>
Subject: RE: [EXTERNAL] RE: 17569 - Synthosgroup - K-PAK: placement on the market

Hoi 5.1.2.e

Ik zou het volgende antwoorden:

Ctgb cannot grant grace periods for these products because they were never authorised by Ctgb. This is a matter for the ministry of agriculture or the enforcement agencies.

Groet,

5.1.2.e

Van: CTGB Servicedesk <servicedesk@ctgb.nl>
Verzonden: dinsdag 16 april 2024 13:43
Aan: 5.1.2.e <5.1.2.e@ctgb.nl>
CC: CTGB Servicedesk <servicedesk@ctgb.nl>
Onderwerp: FW: [EXTERNAL] RE: 17569 - Synthosgroup - K-PAK: placement on the market

Hallo 5.1.2.e

Wat kan ik hier op antwoorden?

Groet 5.1.2.e

Van: 5.1.2.e <5.1.2.e@synthosgroup.com>
Verzonden: dinsdag 16 april 2024 12:26
Aan: CTGB Servicedesk <servicedesk@ctgb.nl>
CC: PLS_rejestracja <rejestracja@synthosgroup.com>
Onderwerp: RE: [EXTERNAL] RE: 17569 - Synthosgroup - K-PAK: placement on the market

Dear 5.1.2.e

Thank you for your reply.

Would it be possible to receive some grace period for sale and the distribution of the product already placed on the market and an additional time for the disposal, storage, and use of existing stocks?

Thank you in advance.

Pozdrawiam/Kind Regards,

5.1.2.e

5.1.2.e

Regulatory Department

T: 5.1.2.e

5.1.2.e <5.1.2.e@synthosgroup.com>

www.synthosagro.com



From: CTGB Servicedesk <servicedesk@ctgb.nl>
Sent: Monday, March 18, 2024 10:33 AM
To: 5.1.2.e <5.1.2.e@synthosgroup.com>
Cc: PLS_rejestracja <rejestracja@synthosgroup.com>; CTGB Servicedesk <servicedesk@ctgb.nl>
Subject: [EXTERNAL] RE: 17569 - Synthosgroup - K-PAK: placement on the market

Sommige personen die dit bericht hebben ontvangen, ontvangen niet vaak e-mail van servicedesk@ctgb.nl. [Meer informatie over waarom dit belangrijk is](#)

Dear Ms. 5.1.2.e

Our policy department has the following reaction to your question:

We are aware of the recent changes in the [scope document](#) with regard to Siltac and also the inclusion of K-PAK as PPP. It is our policy to follow the guidance offered in this document, which would mean that products like Siltac and K-PAK cannot be placed on the market without an authorisation as PPP.

I hope I have informed you sufficiently. If you have any questions in response to this email please do not hesitate to ask. Depending on expertise and time required to answer your question we may require compensation for our services*.

Please use our [contact form](#) to submit new questions to the servicedesk.

Best regards,

5.1.2.e

Servicedesk Ctgb

Workingdays Mon – Tue - Thu

T (31) 0317 471810 (9 – 12 am)

I www.ctgb.nl

The information in this message has been carefully compiled based on the data provided by you and on our knowledge and experience. It represents the opinion of the Ctgb. The information and recommendations presented herein are intended to assist you, but are not legally binding.

* *Conditions 2024*

For questions asked by or on behalf of (future) applicants: if your question needs to be answered by scientific, procedural, legal or policy experts, all costs will be invoiced at the hourly rate of €173,-. If the answering of your question requires more than 5 hours you will receive an specified offer. Questions which require no more than 5 hours will be taken care of without prior offer. By submitting your question you agree to be charged with the costs associated with the answering of your question.

Van: 5.1.2.e <5.1.2.e@synthosgroup.com>

Verzonden: woensdag 6 maart 2024 12:27

Aan: CTGB Servicedesk <servicedesk@ctgb.nl>

CC: PLS_rejestracja <rejestracja@synthosgroup.com>

Onderwerp: 17569 - Synthosgroup - K-PAK: placement on the market

Dear Sir/Madam,

In July 2023, Siltac and a few other products, including K-PAK have been discussed at union level by the respective Standing Committee (https://food.ec.europa.eu/document/download/7098deed-80e4-4b6e-a40d-49945ec52d5a_en?filename=sc_phyto_20230711_ppl_sum.pdf). Following this discussion, Siltac has been re-examined and is now considered to be a plant protection product according to **REGULATION (EC) No 1107/2009 – SCOPE AND BORDERLINE ISSUES SANCO Doc 6621-99 rev 75 January 2024**. Given the similarity of our product K-PAK to Siltac, K-PAK also falls into the plant protection products category.

As **SANCO Doc 6621-99 rev 75**, is not legally binding document and each Members State is allowed to take its own measures, Synthos Agro would like to confirm whether K-PAK can be legally placed on the market in the Netherlands or if it should be withdrawn from sale.

Pozdrawiam/Kind Regards,

5.1.2.e

5.1.2.e

Regulatory Department

T: 5.1.2.e

5.1.2.e [@synthosgroup.com](mailto:5.1.2.e@synthosgroup.com)

www.synthosagro.com



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