

**From:** [REDACTED] (TRADE)  
**Sent:** lundi 2 octobre 2017 14:40  
**To:** [REDACTED] (TRADE)  
**Subject:** FW: Meeting with ECPA: Follow-up  
**Attachments:** 28446\_ECPA\_input\_for\_SCoPAFF\_meeting\_October\_2017\_FINAL.pdf; Annex to ECPA letter 28446 - SCoPAFF 5&6 Oct 2017.zip

---

**From:** [REDACTED] [mailto:[REDACTED]@ecpa.eu]  
**Sent:** Friday, September 29, 2017 5:24 PM  
**To:** [REDACTED] (TRADE); [REDACTED] (TRADE)  
**Cc:** [REDACTED]  
**Subject:** Meeting with ECPA: Follow-up

Dear [REDACTED]

I would like to take this opportunity to thank you and [REDACTED] for meeting with us this week to discuss various issues.

Regarding the issue of import tolerances, I would like to share with you a letter provided today to SCoPAFF-phytopharmaceuticals (and DG SANTE); where we highlight a number of issues including import tolerances.

Our key suggestions in the import tolerances discussion are copied below for ease of reference:

- Hazard based restrictions on setting import tolerances would also be contrary to principles set out in the WTO SPS agreement, with a substantial impact on international trade. The WTO SPS requires that decisions are based on the assessment of risk and it is imperative that the EU continues to comply with these principles. A violation of the agreement by the EU could encourage other WTO members to use their own criteria and presents a significant threat to the future use of the SPS agreement itself. **We therefore believe the Commission should notify and consult with WTO members before taking any decision.**
- We request the Commission to ensure that MRLs and Its continue to be decided on the basis of an assessment of risk, in line with Regulation 396/2005, ensuring that the EU meets its obligations under the SPS agreement. **Given the significant impacts of implementing the policy option currently being put forward, the Commission should carry out an impact assessment, in line with the EU's Interinstitutional Agreement on Better Law making.**

We appreciated the opportunity to dialogue on these issues and we would be happy to provide any additional information you may require.

Best regards

[REDACTED]  
**European Crop Protection Association**  
Tel: [REDACTED] (direct); [REDACTED] (GSM - Mobile)

---

**From:** [REDACTED]  
**Sent:** 29 September 2017 14:31  
**To:** [REDACTED]  
**Subject:** ECPA input ahead of SCoPAFF phytopharmaceuticals meeting; 5 & 6 October

**To:** SCoPAFF members (all in bcc)

Dear colleagues

Ahead of the upcoming SCOPAFF-Phytopharmaceuticals meeting on 5 & 6 October, please find enclosed an ECPA letter, expressing our views on a number of issues that will be discussed at that meeting.

The letter in particular provides input on:

- Residue definition guidance document
- Endocrine disruptors
- Bee guidance document
- REFIT evaluation of Regulations 1107/2009 & 396/2005
- Import tolerances
- Glyphosate

To ensure full transparency, this letter is being published on the ECPA website and will be available at: <http://www.ecpa.eu/transparency-policy>.

If you require any further information on the issues raised by ECPA please do not hesitate to contact us.



**ECPA - the European Crop Protection Association, aisbl** (EU Transparency Register ID N° 0711626572-26)

6 Avenue E. Van Nieuwenhuysse, 1160 Brussels - Belgium

Tel: [redacted] (direct); [redacted] (mobile) +32 2 663 15 50 (reception)

[www.ecpa.eu](http://www.ecpa.eu)

