

**From:** [PINTO ANTUNES Jorge \(CAB-WOJCIECHOWSKI\)](#)  
**To:** [REDACTED]  
**Subject:** FW: Thank you note from ECPA  
**Date:** 05 May 2020 16:23:57  
**Attachments:** [image003.jpg](#)  
[32450 ECPA letter to DG SANTE on regulatory impact of the covid-19 situation.pdf](#)  
[20200312 Letter to SecGen on MRI&IT.pdf](#)  
[32257 - ECPA's position on the upcoming Farm to Fork initiative.pdf](#)  
**Importance:** High

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**Out of scope**

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Tuesday, March 31, 2020 12:36 PM  
**To:** GESLAIN-LANEELLE Catherine (CAB-WOJCIECHOWSKI) [REDACTED]  
**Cc:** PINTO ANTUNES Jorge (CAB-WOJCIECHOWSKI) [REDACTED]  
**Subject:** Thank you note from ECPA  
**Importance:** High

Dear Ms. Geslain-Lanéelle,

I'd like to thank you once again for the exchange we had yesterday. Considering the Covid-19 crisis and the current priorities for the Commission, this was very much appreciated.

Please find enclosed our position paper on the upcoming Farm to Fork initiative. We acknowledge civil society concerns about plant protection products and we understand the political pressure on the EC to respond to it. We are open to discuss a reduction target of use and risk, providing it is realistic. However, innovation should be rapidly facilitated as farmers need tools to protect their crops. We can't let them without solutions.

I am also enclosing the letter which has been circulated to DG SANTE and EFSA last Friday, reflecting how the covid-19 situation is already, or will, affect several regulatory processes for the authorisation of plant protection products. Our member companies will continue to inform the Commission services and try to limit as much as possible the negative impacts and now expected delays in bringing innovation on the market.

We also wanted to inform you about a two regulatory topics not covered during the call:

- Future of the pesticide legislation: we understand from DG SANTE the expected REFIT report regarding the regulation 1107/2009 is delayed and will be published end of April. We would like to reiterate our views that the framework is protective and delivering on its objectives of protecting human health and the environment. However, we think it is failing to deliver innovation quickly enough.

We call for a better implementation of several measures so as to enhance the availability of solutions for European farmers (e.g. mutual recognition for products between Member States).

- EU policy regarding maximum residues level and import tolerances: we are concerned about the impact on trade of the current EU policy to automatically delete MRLs following non-renewal of a substance. We believe MRLs setting should be based on risk assessment in all circumstances, in compliance with the WTO SPS agreement and aligned with international standards. This aspect is crucial for livestock producers who are highly dependent on high protein feed import. Please find enclosed a letter recently sent to the Secretariat General of the Commission raising this issue together with our suggestions.

Should you have any questions please do not hesitate to contact me.

All the best,



Director General



**ECPA - the European Crop Protection Association, aisbl**

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EU Transparency Register ID No.0711626572-26

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