

From: [REDACTED] (RTD)
Sent: Wednesday, March 11, 2015 8:57 AM
To: [REDACTED] (RTD)
Subject: RE: ERF Meeting and Innovation Principle

Many thanks, [REDACTED] for this very helpful debrief. Let's discuss our attendance at the meetings you mention when we have further details.

[REDACTED]

From: [REDACTED] (RTD)
Sent: Tuesday, March 10, 2015 2:15 PM
To: [REDACTED] (RTD)
Cc: [REDACTED] (RTD)
Subject: ERF Meeting and Innovation Principle

[REDACTED]

The meeting with [REDACTED], [REDACTED] and the ERF was very informative in terms of the Innovation Principle/Impact assessment and an interesting points for reflection in light of InnovRefit also.

- Innovation Principle is intended to spark debate and consideration of impact of innovation. A recognition that this is a long term project.
- Business has no wish to put consumer/societal well-being at risk – is concerned about increasing risk averse perception of EU legislation and impact on investment.
- Issues around framing the Innovation Principle in terms of the Precautionary Principle due to perception issues – it is seen as challenging the PP rather than balancing it.
- In some cases applications of the Precautionary Principle go beyond the 2000 guidance note on its use.
- Some legislation e.g. REACH, deliberately 'stigmatises' certain product groups. This kind of legislation should trigger the Innovation Principle since it can be a major barrier to innovation.
- Derogations are often harmful to innovation and are not necessarily a suitable mitigating measure for legislation that may impact on R&I– they don't create an environment of certainty for investors, can create monopolies, they channel investment towards keeping old products on the market and in some cases derogations to old products place new products at a disadvantage e.g. novel foods.

Points of relevance to InnovRefit

- Companies/stakeholder groups can be reluctant to discuss regulatory issues within a sector 'publicly' due to the impact on investor confidence in a sector. They may be willing to discuss issues bilaterally with the Commission. This could possibly apply to e.g. ETP members also and might be something to consider in further consultations. It had been suggested in the Task Force that regulatory issues be discussed at the next annual ETP meeting but

perhaps instead of/additionally we could consider other means of communicating with stakeholders.

ERF are holding a Forum in April and will discuss regulation, risk and innovation. They will send invitations to [REDACTED] This might be something you are interested in attending.

They have also offered to come back to discuss the Monograph (attached) in depth in 5 or 6 weeks. I haven't read it thoroughly as yet but it looks like an interesting document that could provide us some useful input/interesting case studies and if possible I think it would be good for us to attend this meeting too.

[REDACTED]

From: [REDACTED] (RTD)
Sent: Monday, March 09, 2015 11:27 AM
To: [REDACTED] (RTD); [REDACTED] (RTD); [REDACTED] (RTD); [REDACTED] (RTD)
Subject: FW: Innovation Principle documents

And here is the attachment....

From: [REDACTED] [[mailto:\[REDACTED\]@riskforum.eu](mailto:[REDACTED]@riskforum.eu)]
Sent: Monday, March 09, 2015 11:22 AM
To: [REDACTED] (RTD)
Subject: Re: Innovation Principle documents

Dear [REDACTED],

In light of our meeting tomorrow, I herewith send you a revised one pager, listing our priorities in innovation and Better Regulation.

You can discard the earlier version I sent on Friday.

With Best Regards

[REDACTED]

From: "[REDACTED]@riskforum.eu">
To: [REDACTED]
[REDACTED]@ec.europa.eu>
Sent: Friday, March 6, 2015 4:48:59 PM
Subject: Innovation Principle documents

Dear [REDACTED],

Further to your conversation with [REDACTED] earlier this week, I hereby send some additional documents on the Innovation Principle and our priorities in the field of Better

Regulation.

With Best Regards

[REDACTED]

[REDACTED]

European Risk Forum

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