

LET/19/SR/30805  
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Almut Bitterhof  
European Commission  
Rue Froissart 101  
1040 Brussels  
almut.bitterhof@ec.europa.eu

Stuart Rutherford  
Director Water and Food Policy  
(+ 32) 2 663 15 65  
stuart.rutherford@ecpa.eu

## EU MRL and IT setting policy

Dear Mrs Bitterhof,

We would like to follow up with you and your services on the topic of a future EU policy for setting Import Tolerances under Reg (EC) No 396/2005 for substances not (re)approved under Reg (EC) 1107/2009, and in particular for substances which are not approved on the basis of the hazard based cut-off criteria.

Following the draft revised Technical Guidance Document (TGD) on the MRL setting process on which ECPA was consulted and commented in July 2018, and the discussions which took place on the TGD and the related issue of transition periods in SCoPAFF residues meetings in June, September and November of 2018, it is our understanding that the Commission's approach on its policy to set import tolerances (ITs) remains open for the time being.

Given the important implications of this policy area for approvals of crop protection products, and more broadly in terms of potential uncertainty and impact on global food and feed commodity trade, ECPA would like to request a meeting with your services to share our thoughts and scenarios aimed at contributing to a smooth implementation of the relevant EU regulation while avoiding unnecessary impacts on trade.

We understand that the next SCoPAFF residues meeting is scheduled for 21-22 February 2019, and that there may be further discussion of a proposed EU approach either at this meeting and/or subsequent SCoPAFF meetings.

We would very much welcome the opportunity to discuss with you, either by inviting you to the new ECPA premises or by coming to your offices, possibly at the end of January or first week of February.

We very much look forward to engaging with the Commission's services on this matter and to hearing from you on the most suitable date(s) and format.

Yours sincerely

A handwritten signature in black ink on a light grey background. The signature is cursive and appears to read 'S. N. Rutherford'.

Stuart Rutherford  
Director Water and Food Policy

Cc K. Berend