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Stakeholder participation in ScoPAFF

Dear Dr Flüh

ECPA would like to take this opportunity to request greater Stakeholder transparency and participation in the work of the ScoPAFF sections on '*Phytopharmaceuticals*' and '*Pesticide Residues*'. While all discussions in these groups have to date been held without stakeholder participation, we request that this policy be reviewed, in particular to ensure greater consistency with other similar Standing Committees such as the Biocides Committee and the CARACAL committee for chemicals.

There are two areas where we would request greater transparency:

➤ Documentation

Documents prepared for the Biocides Committee and CARACAL are currently made available on dedicated public access sections within CIRCABC. We would ask that a section be created within CIRCABC, with stakeholder access for the documents that are to be discussed in the relevant SCoPAFF section.

➤ Participation

We would request that relevant discussions in the SCoPAFF section meetings should be opened up to stakeholders to allow dialogue between decision makers and stakeholders. For ECPA members, such a dialogue would in particular be helpful in order to receive direct and timely feedback on the implementation of relevant pieces of the legislation.

In making such a request for stakeholder participation in the work of the ScoPAFF sections, we recognise the need of the committees to have confidential discussions, where Member States can freely express their opinions and where stakeholders should therefore be excluded. We would therefore support a process where stakeholder participation would not be possible during formal decision making nor during discussions on specific commercial dossiers. Stakeholder participation should however be possible on all other discussions which are related to the process of application of the legislation and particularly the points listed under Section A of the SCoPAFF agenda.

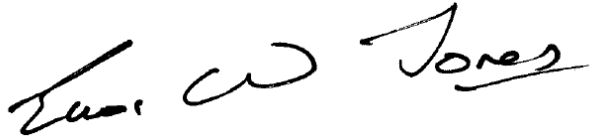
Our experience from other sectors is that the organised participation of stakeholders has been helpful to the discussions and have provided a higher level of transparency for decision makers and stakeholders alike. We look forward to greater transparency in these areas, to provide alignment with the transparency principle¹ and the REFIT objectives², while ensuring greater consistency with the committee procedures in similar policy areas.

¹ http://ec.europa.eu/transparency/index_en.htm

² <http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52014DC0368&from=en>

I am copying this letter to colleagues in ECCA and IBMA, who I am sure will share a similar interest in this issue. We would of course welcome the opportunity to discuss this issue with you in the near future.

Your sincerely

A handwritten signature in black ink, appearing to read "Euros Jones". The signature is fluid and cursive, with the first name "Euros" written in a stylized, somewhat abbreviated manner, and the last name "Jones" written more fully.

Euros Jones

Cc:	Almut Bitterhof	DG SANTE
	Wolfgang Reinert	DG SANTE
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