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CropLife Europe input for SCOPAFF meeting 1-2 December 2021

- **Microorganism Active Substances**
- **MS updated survey on timing of regulatory procedures**
- **Microplastics / REACH**

Dear SCOPAFF members,

Ahead of the SCOPAFF phytopharmaceuticals-legislation meeting on 1-2 December 2021, CropLife Europe would like to provide input on several issues:

Microorganism Active Substances (A13)

CropLife Europe welcomes the proposals by the European Commission amending the data requirements for microorganisms pesticides. Overall, we believe this is a clear improvement which will allow proper differentiation from conventional pesticides data requirements. It is also very positive to see the adaptation of the requirements, while keeping some flexibility for discussions, as well as the presumption in the area of low risk active substances that microorganisms are safe.

However, we would like to point the high risk of diverging opinions and interpretations of these new requirements by different stakeholders. **We believe that appropriate and tailored guidance documents will be needed** to ensure consistent assessments, clarify the circumstances under which studies shall be done or how a weight of evidence could be applied when requirements cannot be addressed by a first evidence based approach (literature, mode of action/biology of the microorganism, read across from the other dossier sections). In addition, a deep understanding of microorganisms and their unique characteristics is now needed, and **we call for sufficient resources at EU and national levels to further build up the expertise and necessary technical capacity**.

Finally we fully support the Commission proposals as they will help applicants into delivering innovative pesticides based on microorganisms to the EU market, and **we would also call for further consideration of other types of technologies which for the time being cannot be properly addressed by the EU regulatory framework** (e.g., peptides, antibodies, fermentation products, etc.).

MS updated survey on timing of regulatory procedures (A.17)

CropLife Europe welcomes this exercise of gathering more information on the practical implementation of the authorisation system in Europe.

We believe discussions with all actors in the regulatory system are needed to find solutions that can improve timelines, resources and efficiencies to obtain a better implementation of the framework - as correctly identified during the REFIT exercise on Regulation 1107/2009. **CropLife Europe calls for the Commission to organise a dedicated workshop with all stakeholders, similar to what was done in Dublin in 2015 and which yielded positive results.** Such event would be the opportunity to take stock of more than 10 years of implementation of the regulation and identify practical solutions to enhance the authorisation system for pesticides and biopesticides.

Microplastics / REACH (A17)

CropLife Europe would like to highlight the need for an adequate implementation of the proposed REACH restriction on microplastics considering the impact it will have on the availability of pesticides.

We believe any legislative proposal by the European Commission should **follow the ECHA proposal when it comes to size limit (a minimum of 0.1 µm).** There would be serious concerns about measurement for any lower size limit, making the compliance and enforceability of the restriction impossible. Similarly, **we strongly suggest to follow ECHA proposal to include biodegradability as a criterion** considering our industry is working to replace microplastic polymers with suitable biodegradable materials where possible. We also advocate for a **transition period of 11 years** for crop protection products, seed treatments and coatings. This is to allow sufficient time for the supply chain to formulate new material and have them approved under the EU regulatory system.

Yours sincerely

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cc. Karin Nienstedt
Manuela Tiramani

This letter will be published on the CropLife Europe website and will be available at:
https://croplifeeurope.eu/resources-library/