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## CropLife Europe input for SCOPAFF meeting 10-11 March 2026

- **Harmonisation of Annex II of Regulation (EC) No 1107/2009 with the new hazard classes in the CLP Regulation**
- **Omnibus Simplification Package (update on co-legislative workplan)**
- **Guidance document FOCUS surface water scenarios (possible endorsement of the temporal percentile)**
- **General issues for information / Critical Appraisal Tools (CATs) in Ecotoxicology: background and way forward**
- **Co-formulants and assessment of formulations (update) – Non-paper on sharing data among Member States (for possible endorsement)**

Dear SCOPAFF members,

Ahead of the SCOPAFF phytopharmaceuticals-legislation meeting on 10-11 March 2026, CropLife Europe would like to provide input on several issues:

### **A.03(1) - Harmonisation of Annex II of Regulation (EC) No 1107/2009 with the new hazard classes in the CLP Regulation (update)**

CropLife Europe would like to request more information on this point to better understand the terms of the discussion. If there would be a draft of the updated Annex II already available, it would be beneficial and transparent to share this proactively with relevant stakeholders.

### **A.03(3) - Omnibus Simplification Package (update on co-legislative workplan)**

The Food and Feed Safety Omnibus is a timely opportunity to remove long-standing bottlenecks in the EU authorisation system, helping farmers access a full range of safe crop protection solutions while maintaining high levels of protection for consumers and the environment. With competitiveness and sustainability pressures growing, the Omnibus should ensure the regulatory framework is fit for today's needs and future challenges.

Updating the SCoPAFF representatives on the procedure and timeline that will be followed is key, yet it would be important to relay this information also towards relevant stakeholders, like CropLife Europe. We look forward to the workplan and next steps of this legislative procedure.

### **A.07(5) - Guidance document FOCUS surface water scenarios (possible endorsement of the temporal percentile)**

Given the significant potential implications for European agriculture and the aquatic environment, CropLife Europe's urges Member States be given the opportunity to examine, consider and debate the results of the FOCUS Version Control Stage 2 testing report.

Furthermore, Member States should be afforded the opportunity to evaluate the new Software Framework for themselves to better understand constraints and model behaviour (e.g., significant increases in model run times). It is important that Member States have the opportunity to assess this information, as well as to have access to the new models, to discuss and support a decision on the

protection goal. CropLife Europe recommends a decision that considers the overall protection goal provided via the combination of temporal and spatial elements, as well as other elements of conservatism within the risk assessment framework and suggests targeting an overall combined 90th percentile protection goal on a scenario-by-scenario basis, in line with the Ground Water Risk Assessment.

We would like to refer to our “*CropLife Europe Position on Planned Revision of Aquatic Risk Assessment Protection Goal*”, attached to this letter, in which we include a partial impact assessment which indicates a risk of significant product losses across herbicides, fungicides and insecticides if a 90th percentile temporal element of the protection goal is adopted. In addition, a summary of preliminary results with the updated models is included in a Technical Appendix to this position document – See *Annex 1*.

#### **A.12(7) - Critical Appraisal Tools (CATs) in Ecotoxicology: background and way forward.**

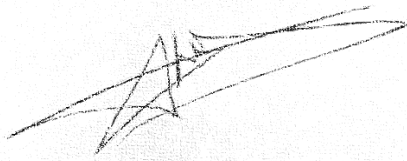
CropLife Europe recognizes that the use of Critical Appraisal Tools (CATs) in Ecotoxicology could establish a methodology for ensuring the harmonised appraisal of a number of studies for which standard agreed guidelines are not in place. However, if discussion or endorsement of certain scoring systems to evaluate relevance and reliability of ecotoxicological studies is taking place, it would be beneficial and transparent if relevant stakeholders can learn more about it in advance and are given a chance to share comments.

#### **A.13 - Co-formulants and assessment of formulations (update) – 1. Non-paper on sharing data among Member States (for possible endorsement)**

In light of the increased attention and regulatory developments on the assessment of formulations and co-formulants, CropLife Europe would like to suggest the possibility for stakeholders to comment on the indicated non-paper before endorsement.

In the October 34th PSN meeting Commission highlighted the intention of establishing a comprehensive overview in collaboration with ECHA and EFSA to prioritize data-poor co-formulants for further review. The SCoPAFF January 2026 minutes refer to the work by ECHA on a first list of co-formulants. We understand that substances with limited dataset will be selected and further scrutinized for their potential hazards to humans in line with a prioritization note, details of which remain unclear. CropLife Europe would like to highlight that this triggers a discussion on relevancy of data availability, and on both opportunities and pitfalls of moving towards and working with a centralized non-living list, and would like to emphasize the need for detailed context and relevance in regulatory decisions.

Yours sincerely



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cc. Eric Liégeois  
Mark Williams  
Manuela Tiramani

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

***Annex 1 - CropLife Europe Position on the planned revision of Aquatic Risk Assessment protection goal*** (separate document - #39397)