

CEUREG FORUM XV

6th -7th October 2011

Bratislava

Peter Knap

UKSUP (Central controlling and testing institute in agriculture)

Department of pesticide registration

Applications in May 2011

- Significant increase (>200)
- New products and prolongations

Applications considered as zonal

- 24
- SK acting as zRMS – 0

Practice

- Short time for practical experience
- More questions than answers
- Guidance vs. Regulation 1107/2009 interpretation (registration authorities and applicants)
- Applicants attitude

Practice

Minor uses

- 2 Applications finished after 14th June
- Considered administrative
- Glyphosate product for the spring OSR (identical GAP as approved for winter OSR)

Practice

Mutual recognition

- Applications (after 14th) rejected

Reason:

- 1) Product authorized according to 91/414/EEC
- 2) Zonal approach not possible

Practice

Mutual recognition

- 3) Commenting period
- 4) Registration report language
- 5) 120 days for decision

Slovak republic status:

Only products authorized (and evaluated) according to regulation 1107/2009 are permitted to be authorized through mutual recognition procedure.

Practice

Mutual recognition

UKSUP is expecting harmonized approach and Commissions official interpretation

Practice

„Identical“ authorization

Application according to article 45 rejected

Reason:

- 1) unique authorization number
- 2) (usually) different authorization holder
- 3) products authorized nationally –
consequences to status of registration

What were the reasons for new regulation?

FACILITATE AND HARMONISE AUTHORISATION PROCEDURES.

What is common feeling today?

UNCERTAINTY IN PESTICIDES REGULATION AND MORE QUESTIONS THAN SOLUTIONS.

OPEN POINTS

Changes and amendments of authorization

- Extension of use, composition change...
National authorization level, 91/414/EEC
authorization (dRR, commenting period...?)

Minor uses

- Product is authorized nationally (not re-registered):
 - a) minor use is covered by existing uses (dRR, zonal commenting?)
 - b) minor use needs to be evaluated (dRR, zonal commenting?)

OPEN POINTS

Parallel trade re-packaging

- 1107 does not restrict / allow
- Manipulation with product – how to guarantee product quality?

The spirit of new Regulation is good but the question of practical working should have been solved first.

... every answer bring two more questions.

Thank you for your attention.