

#### ČESKÁ REPUBLIKA STÁTNÍ ROSTLINOLÉKAŘSKÁ SPRÁVA STATE PHYTOSANITARY ADMINISTRATION



# Regulation 1107/2009 State of progress

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## Zonal system - expectations

- Higher level of safety
- Harmonisation, reduction of national requirements
- Saving capacity of experts and other staff and costs
- Speeding up procedures
- Similar PPP availability for farmers



#### **Role of CMS**

- Confirm the reciept of the application
- Communication with the applicant possible
- Time to familiarize with the dossier
- Comment the dRR
- Grant or refuse the authorisation on the basis of ZRMS conclusions
- Timely identification of data gaps important



## 120-days procedure

- Evaluate national data if submitted
- Check the relevance of the risk assessment conclusions
- Check the relevance of risk mitigation measures established by zRMS
- Grant the authorisation certificate



## Mutual Recognition procedure

- Deadline 120 days
- Registration report quality
- Data availability (no cross references to non-authorised products)
- Divergence between mutual recognition and standard authorisation not desirable
- Mutual recognition in case of public interest
- Reduction of emergency authorisations



## **Biological Efficacy**

- Dossier to cover the conditions prevailing in the zone
- Minimum effective dose
- Levels of efficacy
- Not all EPPO zones sufficiently covered
- Different application rates
- Some uses not sufficiently supported
- Data gaps affect the label



## Saving capacity

- MS's low personal capacity
- Some MS's refuse to act as zRMS
- Obligatory deadlines often not met
- Limited involvement in commenting



#### **Present CZ situation**

- Estimate 35 applications as ZRMS per year
- 1 3 active ingredients as RMS
- Totally about 1300 applications / year, incl, 200 administrative + 400 parallel imports.



#### Recommendations

- Risk management harmonisation
- Description in dRR the range of conditions for which risk-assessment was performed
- Acceptability of data gaps (risk mitigation measures)



#### Recommendations

- Authorities to focus on effectiveness and priorities
- Compare effectiveness of experts and capacity in MSs
- Commenting limited to crucial issues
- Consistency of experts in each MS and industry
- More trust necessary role of managers



## Thank you for your attention!

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