



LE/11/EJ/20878
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Dear Michael

With the current work on minor uses, we would like to provide you with more information about a new project being developed in collaboration by a number of associations, which we believe can support further work to support the authorization of minor uses. We fully support the current evaluation being carried out by the consortia. However, it has been highlighted by a number of parties that there is a need to find short term solutions for existing pest problems, where few or no products are available.

In order to progress these issues, we are looking to identify up to 10 uses per country where there is an urgent need to find solutions. While many more 'use gaps' currently exist, we believe it is logical to initially focus on some priority areas.

Once those uses have been identified, we will cooperate to see if a suitable solution can be found. In some cases, we believe that solutions can be found by making sensible use of provisions in the new Regulation 1107/2009 – in particular Article 40 (Mutual recognition) and Article 51 (Extensions of authorisations for minor uses). The pragmatic use of data extrapolation would also be helpful in numerous cases. In order to take this issue forward, it would be useful to work closely with the Commission and the relevant national authorities and we would welcome your close cooperation in taking these issues forward.

While we hope to be able to find real solutions in many cases, we also expect to encounter certain blockers and we will report back to you to highlight what we have identified as the major blockers, and to promote possible solutions to remove such blockers.

From our current understanding of the process, we do believe that further guidance and common standards are needed in a number of areas – in order to be able to make progress at the European level and not only on a country-by-country basis. At the present time, we believe that guidance would in particular be helpful in the following areas:

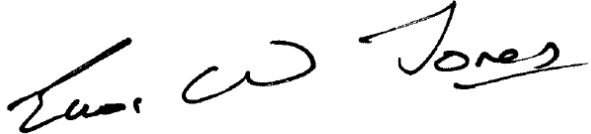
- Common interpretation and implementation of the provisions set out in Articles 40 and 51 of the Regulation
- Common standards for the extrapolation of data
- A common catalogue of uses across Member States.

We are aware that some of the areas suggested for inclusion in an European guidance are being considered at the national level. We would however stress the importance of ensuring that this work is done at the European level in order to support data sharing between Member States.

We fully appreciate that resources will be needed to carry such work. But we believe that such ground work is vital in order to support the long-term process of ensuring greater cooperation and solution finding.

We do hope that you will support this initiative by the associations mentioned. We will also be discussing the initiative with other associations who we expect to also support this initiative in due course. We would of course be happy to discuss it with you in more detail.

Yours 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 more compact style and "Jones" written in a larger, more legible script.

Euros Jones
Regulatory Affairs Director, ECPA
On behalf of ECPA, Freshfel, PROFEL, AREFLH and COPA COGECA

Cc: Ton Rotteveel, DG SANCO
Rosalyn Roy, DG SANCO