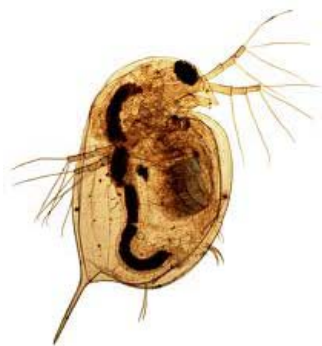


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Statistics of the Public Consultations

Draft Guidance document on tiered risk assessment for plant protection products for aquatic organisms in edge-of-field surface waters"



Tom Meyvis – Application Desk Officer



EFSA infosession on Applications – Pesticides Area

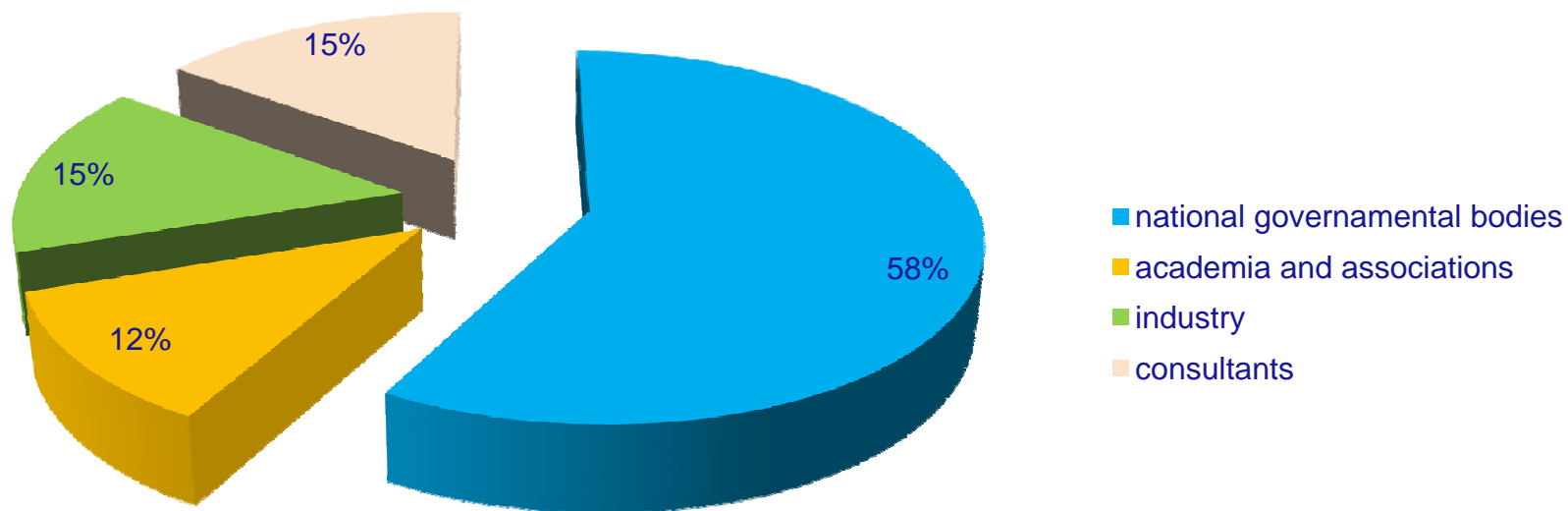
Parma, 6-7th November 2013

- Public Consultation open from 14/12/2012 till 11/02/2013
 - Nr of comments: **533**
 - Nr of commentators: **22**
 - EU (**505**), Switzerland (**28**)



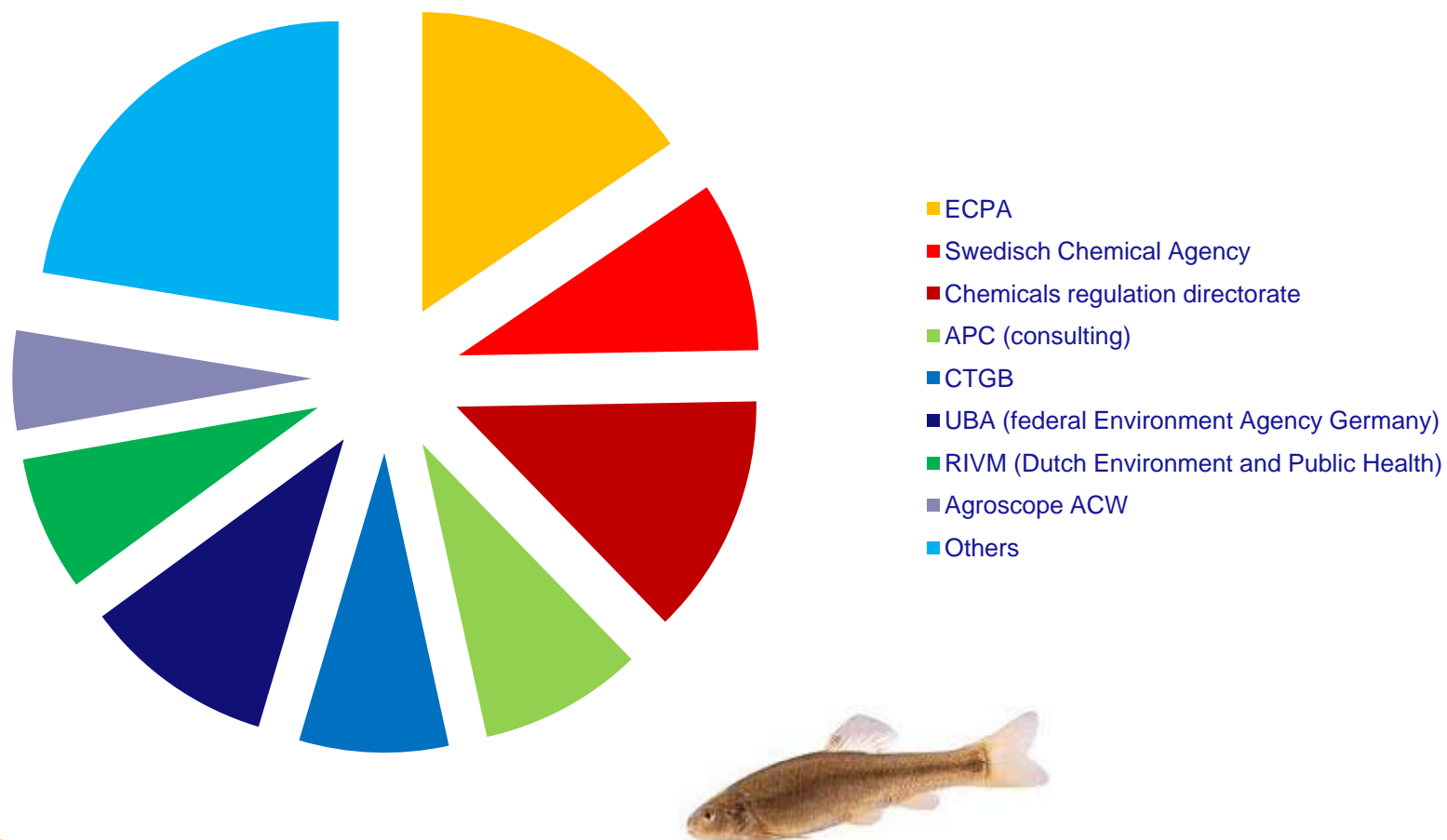
Public Consultation

participants per category



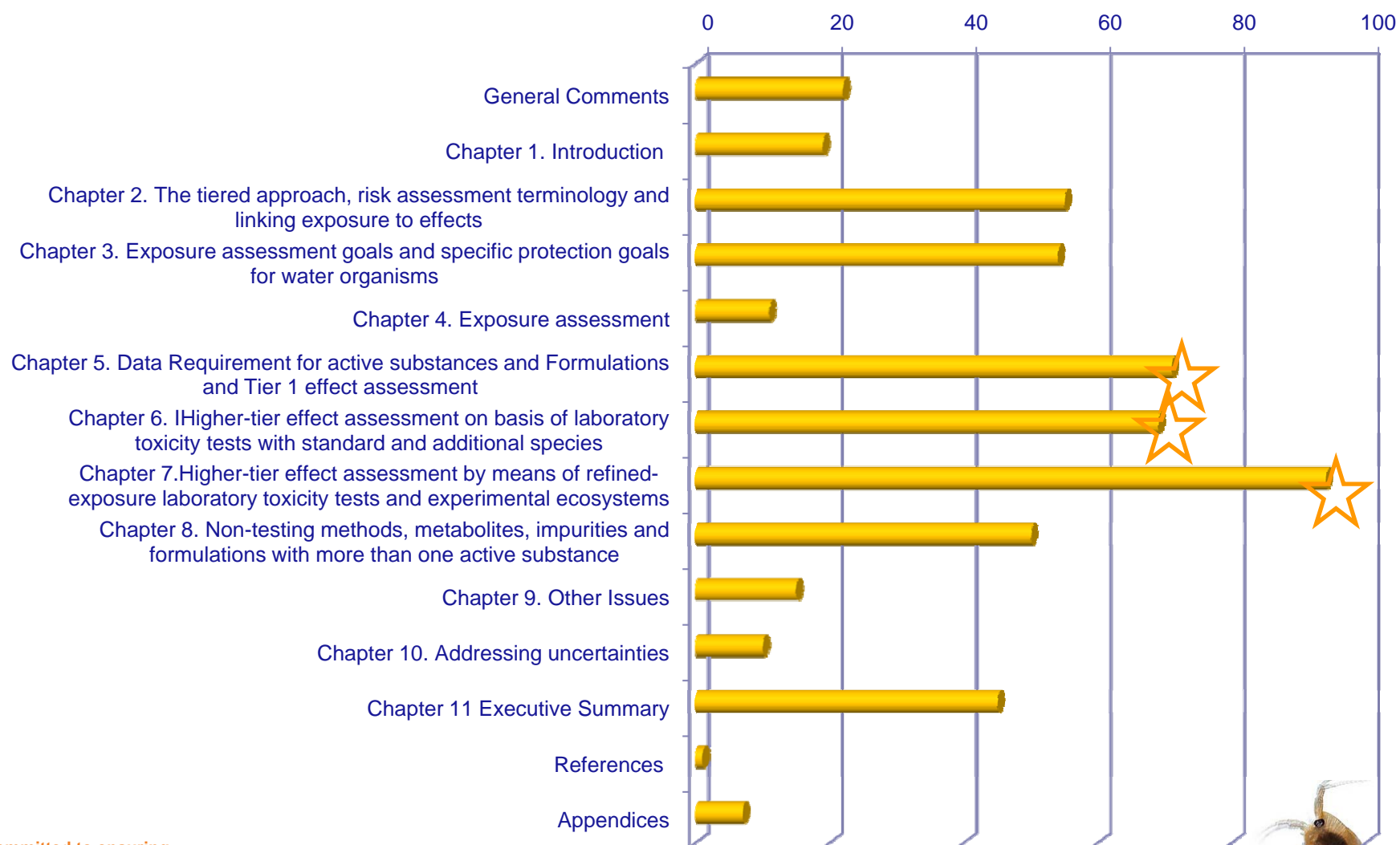
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Public Consultation participants



Public Consultation (draft guidance)

comments per topic



Public Consultation

recurring topics

- **Limitation on exposure assessment:** several stakeholders would have welcomed a revision of the surface water exposure assessment (FOCUS). **was not in the mandate**
- **Use of growth rate based endpoints for primary producers:** some stakeholders concerned that this is less conservative than using yield based endpoints. **WG preferred scientifically more robust endpoint which is also the one required / recommended in the respective OECD guidelines**
- **RA for formulations:** several stakeholders asked for clearer guidance on RA for formulations. **WG revised section 7.5 on formulations and section 10.3 on formulations containing more than 1 a s**





- **Use of geomean-AF approach:** concerns raised this might be less conservative than before. WG thinks it is a transparent and harmonised approach that keeps the level of protection as in tier 1. Some additional instructions on precautionary measures when using the geomean approach were added after the public consultation
- **RAC derivation based on SSDs:** use of lower limit of confidence interval for HC5 (LLHC5) was criticised by many stakeholders. The whole approach was revised and the LLHC5 is now used as **one of several quality criteria** to select the appropriate AF.
- **RAC derivation for mesocosm studies:** many stakeholders disagreeing with an AF of 1 for deriving ETO-RAC based on effect class 1 data. The option of using (AF1) was taken out after public consultation

Public Consultations

Conclusions

- Good overall participation
- Majority of comments from national governmental bodies
- A lot of suggestions for fine tuning and increasing the clarity of the guidance



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GRAZIE