



Federal Office of  
Consumer Protection  
and Food Safety



**CONNECT.EFSA – problems in  
context of targeted consultations of  
the CAs of the member states**

The Federal Office of Consumer Protection and Food Safety (BVL) is the national competent authority (CA) concerning applications for marketing authorisation of GMOs either for cultivation or for the use as food and/or feed according to Regulation (EC) No 1829/2003.

After EFSA validated a new GMO application it has to consult the national CAs according to article 6 (4) and article 18 (4) of Regulation (EC) No 1829/2003 in line with Directive 2001/18/EC, which then have a 3-month time period to comment on the application.

The BVL delivers its opinion on these applications to EFSA as part of the EU Community approval procedure as prescribed by law.

In the former EFSA DMS system, an unlimited number of characters for each comment field could be entered.

Concerning the submission of the BVL comments for the first targeted consultation on CONNECT.EFSA in August 2022, we had to face several difficulties.

The competent authorities of the member states submit their comments to the different chapters, which have to be addressed by the applicant...

Document title ▼ | File Type ▼

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Disclaimer

Please note the the max number of characters allowed per section is 5000.

- > 1. Hazard identification and characterisation

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- > Other information (e.g. additional information on single events or sub-combinations in the frame of stacks applications)

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- > 3. Risk characterisation

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- > 4. Post-market monitoring on the genetically modified food or feed

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- > 5. Environmental Risk Assessment

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- > 6. Environmental Monitoring Plan

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- > 7. Additional information related to the safety of the genetically modified food or feed 7.1 Studies published in the Scientific Literature

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...which are further divided into subchapters with a limit of 2000 characters per comment

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#### 1. Hazard identification and characterisation

Comments for 1. Hazard identification and characterisation

2000

characters remaining

#### 1.1 Information relating to the recipient or (where appropriate) parental plants

Comments for 1.1 Information relating to the recipient or (where appropriate) parental plants

2000

characters remaining

#### 1.2 Molecular Characterisation

##### 1.2.1 Information relating to the genetic modification

##### 1.2.2 Information relating to the genetically modified plant

##### 1.2.3 Additional information relating to the genetically modified plant required for the environmental safety aspects

In addition, an upload function is missing, ...

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▼ [1. Hazard identification and characterisation](#)

Comments for 1. Hazard identification and characterisation

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... which is already available for public consultations

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▼ [1. Revised RAR - Volume 1](#)

Comments for 1. Revised RAR - Volume 1

2000 characters remaining

Attach file to Comments for 1. Revised RAR - Volume 1

Upload Files Or drop files

During the first targeted consultation we had a long, laborious email exchange with the EFSA servicedesk due to the restriction of comments to 2000 characters and the missing upload function, which resulted in the prospect of an extension of the number of characters.

However, in the input mask for a current targeted consultation the comments are still limited to 2000 characters.

**The substantiate contribution of Member States should not be limited by formal and/or technical requirements and, therefore, the installation of an upload function, which is already available for public consultations, and an unlimited number of characters for each comment should be provided.**

# Thank you for your attention!

**Contact:**

Internet: [www.bvl.bund.de](http://www.bvl.bund.de)

