

Contribution of Bernard Géry, on behalf of Felcoop and Coop de France

We would like to focus your attention on the need for quick solutions regarding some situations.

Cooperatives, as they are responsible companies, involved in certifications, absolutely do need transparent relationship with their members/growers and all stakeholders.

For 2 years now, the work of the French "Commission Usages Orphelins" is helpful in the frame of the current legislation.

The 1107/2009 regulation predicts solutions towards unprovided uses in EU and consequent competition discrepancies.

These predictions need to be effective as soon as the 14th of June 2011, when regulation is coming into force.

Everybody aims and work for it : by the means of close cooperation and the harmonisation of authorisations conditions in the MS, authorisations will become in fact more and more zonal.

But the new processes for mutual recognition will have consequences only in mid term : "3-4 years and more. Moreover, on the current situation, the extension of uses (including off-label approvals) may work only on a product already approved on an other use in the considered MS.

On the field, the situation is unsustainable : referring to the Brussels conference on the 4th of November 2009 at Copa-Cogeca on speciality crops, concerning high-priority uses, technical shortages lead to an impossibility of growing while being compliant with legal requirements. In the frame of certifications, it leads massively to hypocrisy.

Areflh, Freshfel, the Copa-Cogeca phyto group and all the fruit and vegetables chain work on this matter to make DG Sanco and DG Agri sensitive at legal level and in order to find a sound answer in the GlobalGap frame.

Cooperatives as all companies looking for true and liable certifications, in transparency, want to find sound and sustainable solutions, in close collaboration with authorities, PPP industry and Certification Bodies.

All the stakeholders need this transparency, and so, URGENTLY to find, at least temporary/provisional answers for these high-priority uses.

In order to make the 1107/2009 Regulation being compliant with its promises of ending competition discrepancies and effective protection of crops in respect of consumer and IPM principles, it needs :

- to use immediately the mutual recognition procedure on high priority uses when an authorisation is already available in an other MS, following a quick and proportioned process of risk analysis and management.
- to work on the possibility of extensions of uses, if necessary off-label (upon responsibility of the growers) on the basis of already approved uses in other MS, when there is no other solution.
- to organise for these aims zonal, inter-zonal and EU wide working groups in order to elaborate sound, simple and fast procedures on these matters.

Approving such perspectives, the conference should allow to be functional on the field as soon as the 14th of June 2011.