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Documents considered:

- Draft Commission Implementing Regulation SANTE/10026/2016 Rev. 0 incl.

### **Austrian Comments on the active substance Glyphosate (AIR3)**

- ANNEX Rev. 0  
- Draft Review Report SANTE/10027/2016 Rev. 1

In ANNEX II PART A of the Draft Implementing Regulation the following is stated:

“Member States shall ensure equivalence between the specifications of the technical material, as commercially manufactured, and those of the test material used in the toxicological studies.”

According to our understanding, the equivalence between the specification(s) of the TGAI and those of the test material used in the toxicological studies may not be dealt with at MS/zonal level. This issue clearly relates to an EU wide agreement. Therefore we consider this issue rather to be addressed as confirmatory information.

Draft Review Report Point 6 and

ANNEX II PART A of the Draft Implementing Regulation

Austria fully supports the comments and argumentations made by Germany that “the risk to the diversity and abundance of terrestrial vertebrates and invertebrates via alterations of food web interactions” should be included as a point for attention at member state level.

APPENDIX II of the Draft Review Report - List of uses supported by available data

On the basis of the proposed and supported uses, some issues have been identified as requiring particular attention for non-target organisms. Therefore, restrictions at EU-level for the following applications should be discussed:

- Third use in the list: Cereals – pre-harvest – wheat, rye, triticale
- Fourth use in the list: Cereals pre-harvest - barley and oats

Especially if an acceptable risk to non-target organisms cannot be demonstrated by confirmatory data, appropriate restrictions should be set for all Member States.

In accordance with the precautionary principle we also support restrictions on the use/sale of Glyphosate products for the non-professional use (homes and gardens) as well as the non-food sector.

Special attention must also be given to applications which result in an increased leaching risk for water bodies.

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