Clarification on the CA comments received 21 September 2018

Dear *Please note that it has been necessary to delete this text in order to respect the provisions of Article 339 of the Lisbon Treaty as regards confidentiality*

I. In case of Page 1 point 1. your amendment is correct, please use the National Public Health Institute (NPHI) instead of the Hungarian Institute of Occupational Health in the whole report.

II. It is not clear to me who is entitled to purchase and/or use Category I PPPs. I thought that purchase was only authorised to professional users showing a prescription from an Expert. I understood that the Expert must be registered as member of the Chamber, but not the user. I propose the following text: "Purchase and use of a Category I PPPs must be prescribed and supervised by an expert registered as member of the Chamber with a higher degree of qualification in the area of plant protection. Higher degrees of qualification in the area of plant protection are:"

10. Purchase and use of a Category I PPPs must be prescribed and supervised by an expert with a higher degree of qualification in the area of plant protection, meeting one of the following three criteria:
   a) a university degree in plant health, agricultural engineering, environmental management or garden engineering, where the education comprises at least 600 hours related to PPPs;
   b) a university degree as agricultural engineer, nursery engineer, biologist, forest engineer, including university graduates in other areas of natural science, and where they had completed a minimum of 24 consultations with a qualified plant health expert, or the qualification includes a diploma as a certified plant protection professional engineer, meeting the requirements listed under point a) above;
   c) a qualification recognised by the Minister responsible for food chain supervision as equivalent to the qualifications referred to in points a) and b) above,

and

• d) to be registered as member of the Chamber.

I would need you to clarify how does the system work.

• Can a trained grower purchase Category I PPPs with the prescription of the Plant Health Doctor?

It depends on what you mean by a trained grower.

If the trained grower has a corresponding university degree, she/he is member of the Chamber and has a Category I licence (a.k.a. the white book) she/he doesn’t need to have a contract with a Plant Doctor to purchase Category I PPPs. (But since 2016 she/he needs his own prescription for the PPP.)
If she/he does not fulfill the above mentioned conditions (e.g. only has a Category II licence – a.k.a the green book or does not have any kind of licence) she/he has to have a prescription from the Plant Doctor (whom she/he has a contract with for the whole vegetation period).

- Can a trained grower spray Category I PPPs while supervised by a Plant Health Doctor?
  
  Yes.

- Is a trained grower required to be registered as member of the Chamber of Plant Health Doctors?

  Not necessary. Only if a trained grower (who has a corresponding university degree) wants to issue a prescription.

III. In page 18 point 4.6 paragraph 53, we propose the following amendment:

There were 99 samples taken of groundwater for pesticides in 2016, with 7 detections. In 2015 464 samples were analysed for 450 different subparameters with 114 pesticide detections.

We hope all clarifications are acceptable for you.

Best regards,

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