

Authority fees for the scientific evaluation of the glyphosate renewal dossier

This text summarizes the authority fees applicable for the scientific evaluation of the glyphosate renewal dossier. The glyphosate renewal dossier evaluation is an unprecedented process where for the first time a group of four individual EU Member States are jointly acting as Rapporteur Member State (RMS). The Glyphosate Renewal Group (GRG) as the applicant for this renewal considers an overview of authority fees of interest in the frame of maximum transparency. The below summarized information is based on communication that was kindly provided by the Assessment Group on Glyphosate (AGG) to the GRG in January of 2020.

The applicable Regulation (EC) No 1107/2009 concerning the placing of plant protection products on the market specifies in Article 74:

Fees and charges

1. Member States may recover the costs associated with any work they carry out within the scope of this Regulation, by means of fees or charges.

2. Member States shall ensure that the fees or charges referred to in paragraph 1:

(a) are established in a transparent manner; and

(b) correspond to the actual total cost of the work involved except if it is in public interest to lower the fees or charges.

The fees or charges may include a scale of fixed charges based on average costs for the work referred to in paragraph 1.

For the scientific evaluation of the glyphosate renewal dossier the European Commission mandated a group of four Member States to jointly act as evaluating body: The so-called Assessment Group on Glyphosate (AGG), composed of France, Hungary, Sweden and The Netherlands.

The AGG informed the GRG about the fees to be charged by the AGG-members for the evaluation of the renewal dossier of glyphosate, based on the respective national regulations.

The AGG decided to fully apply each national regulation concerning evaluation fees. Hence the charged fees are significantly higher than any other typical active substance renewal process where there is only one Rapporteur Member State (RMS), supported by a Co-RMS.

Fees are charged for different categories of authority involvement:

- Preparatory discussions during so-called pre-submission meetings
- Management and secretariat of the AGG
- Scientific evaluation of the glyphosate renewal dossier

Two different systems of charging fees are applicable in the involved Member States:

- Charging actual costs based on spent working hours, with a defined hourly cost. While the evaluation work is ongoing, costs are estimated, and final costs will be calculated once the work of AGG has been finalized. This is applicable for Sweden and The Netherlands.
- Charging of a fixed overall amount, independent on actual working hours, that is covering all authority activities. This is applicable for France and Hungary.

Table: Overview of authority fees for the scientific evaluation of the glyphosate renewal dossier

Cost for secretariat of the AGG	80,000 €			
Member State	France	Hungary	Sweden	The Netherlands
Hourly cost	Not applicable	Not applicable	92 €	140 €
1) Fees for pre-submission meetings	Not applicable	~ 10,000 €	Not applicable	76,332 €
2) Fees for Application, assessment and peer review	200,000 €	~ 75,000 €	actual costs based on spent working hours, max. ~ 635,000 €	Application: 12,875 € Actual costs based on spent working hours. Forecast communicated by Ctgb September 2020: 450,000 € Additional forecast communicated by Ctgb February 2021: 75,000 €
3) Fees for hours spent on dossier after submission to EFSA				Actual costs based on spent working hours. Typical deposit requested by Ctgb: 75,000 €
GRG estimate of total Member State fees (sum of positions 1 – 3)	200,000 €	~ 85,000 €	~ 635,000 €	~ 689,000 €

The information summarized in the table is based on the national legislation of the involved countries:

- <https://www.legifrance.gouv.fr/affichTexte.do?cidTexte=JORFTEXT000034513173&dateTexte=20191206>
- https://www.riksdagen.se/sv/dokument-lagar/dokument/svensk-forfattningssamling/forordning-201363-om-bekampningsmedelsavgifter_sfs-2013-63
- http://njt.hu/cgi_bin/njt_doc.cgi?docid=151085.368717
- <https://english.ctgb.nl/about-ctgb/documents/decrees/2019/01/03/tariffs-decree-2019>

Amounts in country currency have been estimated in Euro.

Hourly fees can be subject to change over the years.