



National Institute for Public Health
and the Environment
Ministry of Health, Welfare and Sport

Upstream applications for authorization

Commentary

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General points about upstream AfA

- Learning process: enough to take stock but....
- Upstream needed, effect of Annex XIV prioritization
- Key role for level of uncertainty
- Further speed up process: decision making
- Communication: need clarity on treatment of special cases (if any)
- Balance in decision making for upstream authorization: clear and targeted law versus flexibility for Downstream Users