

Response to the EFSA 2015 statement on comments made by an international panel of scientists regarding EFSA's 2014 risk assessment for *Phyllosticta citricarpa*

CBS Expert Panel

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Background

The European Union Food Safety Authority (EFSA) released a draft Risk Assessment for *Phyllosticta citricarpa*, the fungus that causes Citrus Black Spot (CBS), in 2013 (EFSA, 2013) and invited public comment. An international panel of scientists with CBS expertise (CBS Expert Panel) provided EFSA with a detailed (55 page) commentary document (CBS Expert Panel, 2013). EFSA published its risk assessment in 2014 (EFSA, 2014a), together with EFSA's responses (EFSA, 2014b) to inputs made on its 2013 draft. The CBS Expert Panel commented (CBS Expert Panel, 2014) on these two documents. EFSA (2015) both referred to subsequent correspondence with the CBS Expert Panel and commented on the inputs previously provided by the CBS Expert Panel. The CBS Expert Panel herein responds to EFSA (2015).

Response to EFSA (2015) comments

1. Table 1 in EFSA (2015) provided a summary of letters exchanged between 03 September 2014 and 07 November 2014. From this summary, it is evident that the engagement sought by EFSA was constrained by (1) "the EFSA PLH Panel stood by the EFSA PLH Scientific Opinion (2014)" and (2) that EFSA would limit its discussion to what it referred to as "uncertainties". From CBS Expert Panel (2013 & 2014) it is clear that the divergence of scientific opinion between the CBS Expert Panel and EFSA related to fundamentals of *P. citricarpa* as a citrus pathogen and the way that EFSA dealt with

this in the EFSA risk assessment (EFSA 2013, 2014a & 2014b) and that the divergence in views went far beyond the scope of “uncertainties”. Nonetheless, EFSA rejected the CBS Expert Panel’s suggestion that EFSA should address this by revising the EFSA risk assessment (EFSA, 2015 – Table 1).

2. In response to EFSA rejecting the proposal from the CBS Expert Panel (that EFSA should revise its risk assessment), it was suggested that EFSA should at least reconsider its response to the inputs provided by the CBS Expert Panel in 2013. Since these inputs had highlighted areas of major concern with EFSA’s risk assessment, a thorough reconsideration of these earlier inputs could have been expected to assist in highlighting the need to revise the risk assessment. EFSA subsequently produced Tables 2 and 3 in EFSA (2015).
3. EFSA (2015) does not constitute a material improvement on the responses previously provided by EFSA (2014b). The CBS Expert Panel (2014) previously indicated that it viewed the EFSA (2014b) responses to the CBS Expert Panel inputs (CBS Expert Panel, 2013) as deficient. The CBS Expert Panel accordingly maintains that its inputs have not been adequately addressed by EFSA (2014b) or EFSA (2015).

Conclusion

The CBS Expert Panel (2013 & 2014) previously concluded that EFSA’s assessment of the risk posed by *P. citricarpa* was erroneous and that EFSA had not appropriately considered relevant available scientific evidence and expert opinion. EFSA (2015), not being materially different from EFSA’s previous handling of expert inputs, provides no basis for changing the CBS Expert Panel’s conclusion. As indicated from the outset of correspondence with EFSA in 2014, the CBS Expert Panel would welcome a revision of the EFSA risk assessment and would be willing to provide further comment on such a revision.

REFERENCES

CBS Expert Panel, 2013. Response to EFSA Panel on Plant Health, 2013 - Draft Scientific Opinion on the risk of *Phyllosticta citricarpa* (*Guignardia citricarpa*) for the EU territory with identification and evaluation of risk reduction options. <http://www.citrusres.com/market-access>

CBS Expert Panel, 2014. Comments on the European Union Food Safety Authority’s Pest Risk Assessment for *Phyllosticta citricarpa*. <http://www.citrusres.com/market-access>

EFSA 2013. Draft Scientific Opinion on the risk of *Phyllosticta citricarpa* (*Guignardia citricarpa*) for the EU territory with identification and evaluation of risk reduction options. Version for public consultation. www.efsa.europa.eu/en/consultationsclosed/call/130731a.htm

EFSA 2014a. Scientific opinion on the risk of *Phyllosticta citricarpa* (*Guignardia citricarpa*) for the EU territory with identification and evaluation of risk reduction options. EFSA Journal 2014; 12(2):3557, 195 pp. www.efsa.europa.eu/efsajournal

EFSA 2014b. Outcome of the public consultation on the draft scientific opinion of *Phyllosticta citricarpa* (*Guignardia citricarpa*) for the EU territory. EFSA supporting publication 2014: EN-555, 195pp. www.efsa.europa.eu/publications

EFSA 2015. Statement on the comments by Hattingh et al. (2014) on the EFSA PLH Panel (2014) Scientific Opinion on Citrus Black Spot. www.efsa.europa.eu/efsajournal