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Deutsche Sozialversicherung
Europavertretung | DSV

Feedback from German Social Insurance dated 20 March 2024

European Commission proposal for a Regulation amending Regulations (EC) No. 178/2002, (EC) No. 401/2009, (EU) 2017/745 and (EU) 2019/1021 of the European Parliament and of the Council as regards the re-attribution of scientific and technical tasks and improving cooperation among Union agencies in the area of chemicals

I. Preliminary remarks

The German Social Insurance (DSV) welcomes the Commission's initiative for a Regulation on the reallocation of existing tasks and the allocation of new tasks to the EU agencies. This will ensure good cooperation between the EU agencies, avoid duplication of work and achieve efficiency in the evaluation of chemicals.

II. Opinion

However, with regard to **Article 1** of the proposed Regulation, we take a critical view of the amendments to **Article 30** of Regulation (EC) No. 178/2002 (Regulation on general food law) provided for in **No. 2**. The European Food Safety Authority (EFSA) is to be herein given the task of monitoring and identifying potential divergences between its scientific reports and the scientific reports of other bodies, and eliminating them in a next step if applicable. To this end, it should first contact the other body concerned and work with it to resolve the divergence. This means that only these two stakeholders deal with any contentious scientific and technical issues. From the DSV's point of view, it must therefore be ensured, as part of this process, that all relevant and technical details of the relevant reports are made available to the two bodies concerned and that these are comprehensively exchanged. A necessary scientific discourse must not be restricted by a merely bilateral exchange.

About us

The German Federal Pension Insurance (DRV Bund), the German Social Accident Insurance (DGUV), the National Association of Statutory Health Insurance Funds (GKV-Spitzenverband), the national associations for statutory health and long-term care insurance funds at the federal level and the Social Insurance for Agriculture, Forestry and Horticulture (SVLFG) have joined forces to form the "German Social Insurance - Working Group Europe" (Deutsche Sozialversicherung Arbeitsgemeinschaft Europa e. V.) with a view to their common European policy interests. The association represents the interests of its members vis-à-vis the bodies of the European Union (EU) as well as other European institutions and advises the relevant stakeholders in the context of current legislative projects and initiatives. As part of the statutory insurance system in Germany, health and long-term care insurance with 74 million insured persons, pension insurance with 57 million insured persons and accident insurance with more than 70 million insured persons in 5.2 million member companies offer effective protection against the consequences of major risks of life.