

**BAAYEN Robert (SANCO)**

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**From:** Corina Binnendijk [c.binnendijk@plantum.nl]  
**Sent:** lundi 4 avril 2011 12:30  
**To:** BAAYEN Robert (SANCO)  
**Cc:** Sandra Poot  
**Subject:** Plantum - Response Plantum to the working document of the meeting of 18 February 2011  
**Attachments:** Response Plantum to the working document of the meeting of 18 February 2011.doc

To Mr R. Baayen

Gouda, 4 April 2011

**Subject: Response Plantum to the working document of the meeting of 18 February 2011**

Dear Mr Baayen,

Please find enclosed our input and suggestions to the questions raised to the meeting of the Working Group on Plant Health of the Advisory Group on 18 February 2011.

We trust this information will be of some assistance to you.

Yours sincerely,

Ms Sandra Poot  
Plantum NL



## **Modalities for EU co-financing of losses**

### **1) What sectors should be included in the scope of the coverage of EU co-financing?**

We believe if EU co-financing would be possible, it should be open to any sector which deals with economic losses of destroyed plant material because of the necessity to eradicate regulated organisms.

A fund however should not be a goal itself but an incentive to growers etc. to take preventive measures and early report findings of harmful organisms to prevent HOs to settle and distribute within the EU. In the end the fund should reduce financial impact of harmful organisms.

Therefore there need to be clear conditions which operators (either private or public) will have to meet in order to benefit from compensation of losses such as:

- Use of healthy starting material / resistant varieties.
- Applied hygienic measures at company level; growing conditions, soil and growing media, storage, water and fertigation system, pest management, rotation when appropriate, post-harvest conditions etc.
- Scouting and testing during production, when appropriate.
- Tracking and tracing.

In other words the co-financing should only be effective in case operators have demonstrated to have carried out all usual preventive and hygiene measures in relation to the HO and the crop concerned.

### **2) What balance should be struck concerning the emphasis of future EU co-financing in relation to public and private interest?**

Part of possible economic losses because of eradication measures are seen as a business risk, but some risks are not foreseen such as new or uncontrollable pathways (for instance natural spread or spread by traffic). This could influence the percentage of co-financing from the EU. For instance;

- Known pathways, manageable risks (limited compensation of EU funds)
- Unknown or unmanageable pathways (higher compensation of EU funds)
- Spread / introduction of HOs limited to commercial production chains (limited compensation of EU funds)
- Spread / introduction of HOs risk for forestry's, public parks etc. (higher compensation of EU funds)

### **3) What legal form is preferred for the coverage of economic losses?**

We would not be in favour of insurance, because this would not support the goal of prevention.

We also believe it will be impossible to pre-fill a fund with a financial contribution of individual companies or sectors, especially if companies or sectors will need to pay for other sectors or companies in other MS. Therefore compensation of economic losses would be best assessed at MS level and based on predetermined conditions.

The part of the fund to be filled by private operators would have to be linked to the sector. For example tomato producers should not be charged for an outbreak of a quarantine disease in ornamental plants.

**4) What form of cost-responsibility sharing is preferred? What should be the role of stakeholders?**

We would suggest co-financing individual private operators to a certain percentage and a maximum amount (not “sectors”). It will be hard to get the commitment of private operators to contribute to a solidarity fund, because the phytosanitary risks are not comparable between the many different plant products chains, growing conditions, economic losses etc. The suggestion is to keep it simple and easy to explain to the tax payers and stakeholders.

**Rearrangement of the EU plant health and plant reproductive material regimes in relation to harmful organisms**

**5) What criteria should receive priority when deciding on adjustments between the CPHR and the S&PM regime?**

- Goals of the CPHR and S&PM and associated responsibilities.
- Pest status in the EU; present (currently regulated organism Annex IAI and IAI and non-regulated organisms) or absent.
- Preventing the introduction of new pests in the EU (import of seed and plant propagation material); quarantine pests.
- Requirements for the production and trade of seed and plant propagation material in the EU integrated and primarily based on company authorization under official supervision. Knowing that quarantine organisms (IAI and IAI) are not present and to be prevented or eradicated it seems logical to design the regime including inspection and monitoring based on these principles.
- Practical possibilities of operators to prevent and/or manage the respective HO. If practical options such as seed treatment/disinfection, discarding of seeds on basis of laboratory tests, variety resistances, etc. are possible, it is most practical to integrate these HO's into the inspections systems that are linked to the S&PM regime.
- Differences between closed production chains (S & PM) and forests / public greens etc.

In our opinion a review of HO of the Annexes of the CPHR should have priority.

**6) Revision of the plant passport system**

We have been approached by the FCEC consortium on the revision of the plant passport system and answered the questions in detail.

**Revision of the Protected Zones system**

**7) To what extent would you support a transition of the PZ system to the logic of the PFA concept?**

We do support the transition of the PZ system to the PFA concept. On the one hand to bring it in line with the international standards and on the other hand because the stricter

requirements to a PZ will give a better guarantee of its continuous high pest free area level.

We also assume that the number of Protected Zones will be reduced when using the PFA concept. This will support the single market approach and will reduce the need for PZ-based Plant Passports.

### **Revision of the import regime in relation to high-risk trade**

#### **8) To what extent would you support the introduction of such provisions in the new EU plant health law?**

We are not in favour of a PEQ for latent harmful organisms in general. Latent HOs which impose no risk for public greens or forests and only affect certain production chains could be monitored by a post entry inspection combined with a tracking and tracing system which is already in place according to the Marketing Directives.

We could imagine that for specific latent HOs which may impose risks to public areas and forests AND are difficult to manage AND are originating from certain production places a PEQ could be an option. The criteria “latent” is too general in our point of view.

Our opinion on introduction of a reversed strategy for import will be depending on the definition of “high-risk commodities”. We do believe it is necessary to analyse the main outbreaks of new HO’s of the last ten years before introducing a system only for high-risk plants for planting. The introduction pathways of these new HO’s need to be compared to the success of eradication in certain sectors.

For instance the introduction of *Tuta absoluta* via fresh fruits, insects introduced by packing material and traffic, bugs in woody plants, and their subsequent natural spread.

We suggest to first setting the criteria to determine a “high-risk commodity”.

When introducing a case-by-case authorisation for import it will have huge impact on the trade of plants for planting and producers in the EU. Depending on the type of crop, the import of planting material as starting material for professional growers can be up to 90%.

For example: The import of unrooted chrysanthemum cuttings is about 1,8 billion cuttings a year (value approx. 36 million euro); being approx. 95% of all cuttings which are sold in the EU. The rooting period in the EU is about two weeks; at max three weeks after import the cutting are delivered to the growers.

There is a big concern that the process of scientific studies concerning high-risk commodities will be very slow and complex and will not meet the pace of trade.

#### **9) How could the proposed approach for high-risk trade be improved from your perspective?**

The most important issue is to ensure that the imported product is free from HO’s. This is the responsibility of the exporter and the exporting country. The EU, in cooperation with IPPC, should support developing countries to meet the import requirements of the EU.

For instance how to set up a monitoring system, how to perform phytosanitary field inspections and product inspections, lab tests etc.

The EU also needs to improve its communication to third countries on its phytosanitary legislation and create awareness among public and private operators.

Another important issue which needs to be improved is to harmonise the import inspections at the borders of the EU. As long as the import inspections are not harmonised there will be a risk at import.