



European Commission  
Health and consumers directorate- generale  
Safety of food chain

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Informatie :

Dear Mr Baayen,

With great interest LTO Nederland learned about the evaluation of the Common Plant Health Regime (CPHR) and its recommendations for the future . We like to share our views with you regarding the recommendations and options proposed by the Food Chain Evaluation Consortium (FCEC).

At first we like to express our deep appreciation for the enormous work that has been done by the FCEC. The evaluation report is very complete and thorough and serves as a good starting point for renewing the Common Plant Health Regime (CPHR).

For LTO Nederland the major points of interest for renewing the CPHR are:

- EU- wide harmonisation of both inspection- and monitoring programs and emergency programs.
- Strengthening the plant passport system.
- Where possible share responsibilities between government and growers/companies, e.g. regarding quality systems / certification, monitoring, surveillance and inspections. This will be helpful to establish a new CPHR, without increasing costs.
- Prioritisation of harmful organisms (HO's) based on Pest Risk Analyses, including an economic impact assessment for growers.
- Developing a procedure to update the list of HO's at regular intervals. We suggest to consider regulating all IIAll organisms within the S& PM regime.
- Following a source- based regime: This must lead to better prevention, earlier detection and action. We therefore agree with the recommendations on horizon-scanning and measures that strengthen prevention at import.
- Installing an EU Plant Health Fund: this will stimulate early detection and quick reaction
- Maintaining sufficient support for Research, Development and training. Exchange programmes may be used to share knowledge among Member States, stimulating harmonisation and cost reduction.

Related to the recommendations of the FCEC our major points of interests are:

**A. Recommendations regarding the scope of CPHR:**

- Recommendation 1: Invasive alien species  
This should be considered together with the guidelines of the IPPC and CBD
- Recommendation 3: Regulated non-quarantine pests (RNQPs)  
Concerning the RNQPs it is necessary to consider the reasoning behind regulating and subsequently defining what regime: CPHR or Seed & Propagation Material (S& PM) regime is most suitable.  
Better adjustment with the S&PM regime may be useful, but this should not necessarily be done by positioning all HO's for which zero tolerance is required, within in the CPHR.

**B. Recommendations substantially modifying existing elements of the regime or expanding obligations:**

- Recommendation 5: Intra-EU surveillance  
We want to emphasise options ii en iv:
- (ii) development of common principles and guidelines for harmonised surveillance and reporting and  
(iv) Introduction of co-financing for surveillance, however only when this leads to shared responsibilities of surveillance between government and growers/ companies.
- delegation of tasks with official authorities supervision should be made possible.
- Recommendation 7: Plant Passport system  
Strengthening the plant passport system and harmonisation of procedures behind the PP document is very important.

In addition to these recommendations we suggest to create a possibility for growers to demand a second opinion when an HO is diagnosed by the authorities.

**C. Recommendations with substantial financial impact:**

- Recommendation 9: Incentives  
Besides the option (i) to extend the current scope of solidarity, we suggest to seriously explore the possibility to install a Plant Health Fund.
- Recommendation 15:  
A Plant Health Fund can be helpful to prevent spread of HO's, because it stimulates early detection and quick response.

**D. Recommendations largely focusing on improved practices:**

- Recommendation 4: Prevention strategies at import  
Awareness of emerging risks is important, and therefore options iii (pathway analysis for emerging risks) and iv a/c ( official post entry inspections, after notification and on the basis of a commodity pathway analysis, introduce import bans when necessary) seems to be very well complementary to the current strategy.
- Recommendation 6: Emergency action  
This is part of a source-based regime. Horizon scanning and early detection can prevent the spread of HO's. Contingency plans should be made according to a harmonised framework.

However, there must be a possibility for each Member State to take its own proportionate measures (to be approved by the European commission or PFC).

**E. Widely supported recommendations on horizontal issues without multiple policy options:**

Recommendation 10, 11, 12:

It is important to maintain sufficient support for Research, Development and training. With exchange- programmes it will be possible to share knowledge among Member States, stimulate harmonisation and reduce costs.

Recommendation 13: EU/MS emergency team

This can be helpful for a MS that needs experience or assistance from another country for proportionate measures when emergency action is needed (see also recommendation 6).

We agree with the statement of the FCEC, that changing the CPHR should be realised by evolution rather than by revolution.

For the impact assessment, that will be carried out in 2011, LTO Nederland kindly offers help and is very willing to provide information and discuss ideas and proposals.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'J.J.J. Langeslag', written over a faint, illegible stamp or background.

Ir. J.J.J. Langeslag  
Chairman Fytosanitary commission LTO Nederland