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

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Subject: Options for the future plant health regime

Dear Mr. Baayen,

In your mail to the stakeholders from 13 May 2011 you asked for our opinion concerning the overall options for the future plant health regime. Four such overall options (scenarios) were described in an attached document. You also asked which option our organisation would prefer.

We appreciate the possibility to share our view on these four overall options, which we will do in this letter,

Following the discussions in the past three years we do favor option 4 of the described options: *Improve the substance of the regime with increased EU resources (including IAS plants)*

This option is the most comprehensive of the described options and includes all necessary improvements of the Plant Health Regime as recommended in the FCEC evaluation of the Community Plant Health Regime (CPHR) to which LTO Nederland mostly agreed.

We think that including the IAS plants as part of the CPHR will be effective and can prevent double monitoring or double inspections at farm level. Of course the monitoring programs for IAS plants, should than be regulated *only* at the CPHR level and not by any other regulations or regimes.

Concerning the mandatory surveillance for EU priority pests, we think it should be necessary to also make clear what will be the next steps and consequences when a quarantine organism will be found at such a surveillance.

One of our reactions at the FCEC evaluation of the CPHR was to shorten the list of harmful organisms.

We now see that in the future there will possibly be only one list of harmful organisms. Those will be regulated either by the Regulation for Seed and Propagation material or by the CPHR. A regular update of the list and the regime applicable to the harmful organisms, based on clear criteria (via a PRA), remains necessary.

By shortening the list of 'EU priority pests' we do suggest to include no more than 10 to 20 harmful organisms on this list, to update this list once every two years and to make this list in conjunction with stakeholders.

There will be a lot more to discuss about the future health regime. LTO Nederland highly appreciates staying involved in new developments concerning the CPHR.

When the European Commission wants to have more data or information about dealing with phytosanitary matters in The Netherlands at farmers level, we are very willingly to help you getting this information. In this case it is best to contact our policy advisor on phytosanitary questions, Mrs. Anneke van Dijk, email avdijk@ltonoord.nl.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'J.J.J. Langeslag', written over a faint rectangular outline.

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