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Dear Mr. Baayen,

During the meeting of the working group on Plant Health on 18 February 2011 some issues about the review of the EU Plant Health Regime were outlined and discussed with the stakeholders.

LTO Nederland, the Dutch Organisation of Agriculture and Horticulture, is following the discussions with great interest. At this point we like to share our comments on the Working document, which was also part of the agenda on 18 February.

1. EU co-financing of losses from eradication and containment measures.

Considering the first questions concerning EU co-financing of losses from eradication and containment measures, LTO Nederland supports the recommendation of developing a specific financial instrument for the plant health sector in order to compensate growers for losses due to an outbreak of quarantine organisms.

We can imagine there are some general criteria to co-finance private losses. Our suggestions for these criteria are:

- There must be an order of the NPPO, to destroy plant material. All following losses can be taken in account;
- All common known precautions should have been made (as showed by certificates, documents);
- Sufficient expertise has been used at the import of plant material (as showed by inspection documents);
- Tracking & tracing is well organized.

We also suggest to make (national and private) initiatives possible, which aim for compensation of losses due to an outbreak of Hazard Organisms, by co-financing these initiatives. These initiatives should also have incentives to stimulate prevention.

Both mutual funds and insurances need consideration. To support these initiatives it should be possible to

- Save fund money over years; this is necessary because an outbreak of a Hazard Organisms will not occur each year. Through building up money in a fund, the costs per year, will be acceptable;
- Co-finance funds which are regulated at a national level with participation of the private sector.

We suggest to separate covering losses by private companies, from covering losses by Member States authorities. We suggest that losses in the rural and urban environment, and compensation of these losses, is reserved to governments of Member States.

We see a role for stakeholders in :

- Providing information as part of horizon scanning;
- Preparing and committing emergency-procedures;
- Implementing new measures, based on information about new, upcoming hazard organisms, to reduce risks of an outbreak of these organisms.

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

Concerning the criteria which should receive priority when deciding on adjustments between the CPHR and the S&PM regime, LTO Nederland suggests, to consider to regulate all II/III organisms within the S&PM regime. Therefore we support the third option "All HOs pertinent to seeds and propagating material to be moved from the CPHR to the SPM regime".

The Non Regulated Quarantine Pests (NRQP's) should be regulated at the S&PM regime.

3. Revision of the plant passport system:

According to LTO Nederland a plant passport is giving a guarantee, that plant material meets all phytosanitary standards. It is important that the meaning of the guarantee of the plant passport is the same all over the EU. The control system should be sufficiently equipped for this.

Efficiency can be reached by phytosanitary and quality controls at the same time and by means of a good ICT structure.

It is important that plant passport documentation remains attached (or is integrated) to other documentation belonging to the plants.

A plant passport will give the opportunity to trace the supplier. Furthermore, a good tracking&tracing system should be the responsibility of trade and industry/companies involved.

4. Protected zones

We prefer to keep the PZ system as it is at this moment. Within this concept we do agree with an obligation to eradicate hazard organisms within a certain period after an outbreak.

5. Revision of the import regime in relation to high-risk trade:

We do support the introduction of these provisions. However, it should be used in a very restricted way. The conditions and reasons to keep products on a post-entry-quarantine place, should be well described. We suggest also to explore possibilities to get more guarantees before plant material will be imported in the EU, by making additional guidelines, instructions and inspections. High-risk trade will be a combination of product/hazard organism/place of origin. The list of high-risk trade should be made according to transparent procedures.

At last we suggest to install a permanent commission with representatives of stakeholders, to discuss adjustments and issues of the Plant Health regime.

Yours sincerely,



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