

European Commission  
Health and Consumers Directorate-General  
Safety of the Food Chain Plant Health  
Office B232 3/102  
Att. Mr. R. Baayen  
1049 Brussels  
BELGIUM

50.6893/JG/SvdK

The Hague, 7<sup>th</sup> april 2011

Dear mr. Baayen,

On behalf of the Dutch potato trade, we want to give our reaction on the Working Document of the meeting on 18<sup>th</sup> February 2011 of the 'Working Group on Plant Health of the Advisory Group on the Food Chain, Animal and Plant Health'. We attended that meeting as a member of Europatat. The Nederlandse Aardappel Organisatie (NAO, Dutch association for potato merchants) represents more than 95 percent of the Dutch trade in seed potatoes.

Concerning the EU co-financing of losses for farmers due to plant diseases, we think that it is important that such co-financing should have some restrictions. Farmers should not be stimulated to take risks. That means to get compensation the farmers should be able to show that they have taken measures to avoid plant health problems. For the Dutch trade of seed potatoes is prevention very important to avoid damage to the image of Dutch seed potatoes. Of the yearly Dutch production of seed potatoes of one million tonnes, is about two third exported.

In the report of the meeting on February 18<sup>th</sup> 2011 it is suggested that the EU co-finances scientific research. We support this.

In the Working Document the rearrangement of the EU plant health and plant reproductive material regimes in relation to harmful organisms is mentioned. We believe it is very important to have flexible and clear procedures for the listing and delisting of harmful organisms. It might for that reason help to create an integrated decision-making process in which the delisting from the EU plant health law is linked to the listing in the S&PM law. If for that reason it is helpful to move organism from the S&PM regime to a separate Annex in the CPHR, we are in favor of this measure.

But it should be prevented that social culture of the 'phytosanitary world' overrules the social culture of the 'quality world'. That means that a transfer of the list to the CPHR might not lead to phytosanitary solutions for quality diseases. We think this very important.

As criteria for listing and delisting of harmful organisms we suggest the damage an organism can have on a crop. When the damage is limited, and for third countries the organism is not an item, than the costs for regulation can better be spend to organism which causes more damage on the crop and to the image of Dutch seed potatoes. Also the extend in which an organism is already spread in the EU is an important criteria. Because when an organism is already wide spread, it doesn't make sense to have extremely strict measures. These measures will restrict the trade. But again, when listing or delisting, the reaction of third countries should be taken in consideration.

In the Working Document the revision of the Plant Passport system is described. We think a Plant Passport should carry traceability information. We are quite satisfied with the Plant Passport system as it is nowadays. We don't see at this moment possibilities to improve the effectiveness and efficiency of the Plant Passport system. But a more harmonized Plant Passport would be welcome.

But we are not in favor of the proposal in the Working Document to introduce an EU-logo or mark on the Plant Passport. Some EU-memberstates, especially The Netherlands, export a lot to Third Countries. These countries are familiar with the national logo which is now on the Plant Passport. To keep the Dutch seed potatoes recognizable abroad we prefer to keep the possibility to have our national mark. Besides that, the Dutch seed potato sector wants to have the possibility to have commercial information, like the company name, on the Plant Passport. Also a barcode on the Plant Passport is asked by our members.

In the Working Document you ask our opinion about the Protected Zones (PZ) system. Although we recognize the problem that partial implementation of the PZ requirements may result in distorted competition, we are strongly against the option to introduce the Pest Free Area (PFA) system in de the EU. We fear strongly the possible reaction of third countries. That this is a realistic issue shows the Egypt case last year. As the biggest exporter of seed potatoes in the world, our balance is really against the introduction of PFA's.

As last item in your Working Document you mention the revision of the import regime. We would suggest to handle post entry quarantine and restrictions on imports with care. The Dutch seed potato sector is very dependent on the export to third countries. We don't want to evoke third countries.

We would appreciate if you take our opinion in your consideration.

Best regards,

Dutch Potato Organization (NAO)



H. J.D. Gottschall

Secretary seed potatoes