



European Commission  
DG Sanco  
Attn. Mr. R. Baayen

Aalsmeer, October 31, 2010

Dear Mr. Baayen,

The International Association of Horticultural Producers (AIPH) is pleased to be able to participate in the evaluation of the community plant health regime and to give some comments regarding the recommendations, mentioned in the evaluation report and the working document for the conference of 28 September 2010.

In general AIPH is in favour of a risk based approach. It gives the opportunity to focus more on the risk of the product in the chain. Measures can be focused on the most risk full organisms and most risk full link in the chain. The risk analysis should be included with a cost-benefit analysis of the pest and the measures. The system of reduced checks fits well in this approach and has to enlarge to a broader ranch of products.

A second point we like to stress is the responsibility of the industry. We are convinced that more delegation of tasks is possible under the authority and supervision of the responsible official bodies. Extra efforts of companies to achieve the phytosanitary requirements must be rewarded; incentives are necessary. More involvement of the industry can play an important role to keep costs under control.

Harmonization of inspections, monitoring programs and emergency plans are in the opinion of AIPH main aspects in the plant health regime. A level playing field also is part of it. However, the diversity in member states and sectors still needs the possibility of tailor made solutions in certain circumstances. Fast reactions and good co-operation with the industry have to be the base of this approach.

#### **Comments on the main recommendations from the evaluation report**

##### **Recommendation 1: IAS**

AIPH supports the inclusion of new Invasive Alien Plant species in the CPHR as far as they are an economic threat, and the decision to include an IAP is based on a risk and economic assessment.

##### **Recommendation 2: Natural spread**

AIPH supports the need of covering natural spread in the current plant health regime; covering by the solidarity regime can have such financial impact that this can only on a case by case basis.

**Recommendation 3: RNQPs**

A better adjustment of the CPHR with the S&PM regime is necessarily as well as a review of the lists of quarantine organisms; PRA's must be the basis of the lists.

**Recommendation 4: Prevention strategies at import**

AIPH support the recommendation that complementary measures have to be taken for emerging risks, particularly new trade in plants for planting/ propagating material (PM), included commodity pathway analysis and post entry inspections for latent HO's. Import bans can be introduced based on PRA's and when other (import) measures will fail; preferably on company level. A better risk based approach means focus on real threats. Extension of reduced checks to plant material with low risk has to be considered.

**Recommendation 5: Intra-EU surveillance**

AIPH supports general epidemio-surveillance for priority HOs and the introduction of co-financing for surveillance, realising that this will have significant consequences for MS.

**Recommendation 6: Emergency action**

AIPH agrees on the recommendation to develop contingency plans according to a harmonized framework (**option iii**); and, speeding up the process for adoption and adaptation of both emergency and control/eradication measures (**option v**). However, such plans have to be dynamic and adaptation to local circumstances has to be possible.

**Recommendation 7: Plant Passport (PP) system**

Revising the scope of application (**option ii**) and harmonising the PP document (**option iii**) are supported by AIPH, but may not lead to an increase of administrative or financial burden for growers. AIPH is in favour of a more equal system of costs payable by private operators for inspections and the plant passports system (level playing field).

**Recommendation 9: Incentives**

AIPH fully supports the recommendations to extend the current scope of solidarity to: cover the loss of destroyed material for producers/growers (**option i(a)**); and, co-finance certain measures which contribute to better prevention e.g. surveillance, contingency planning (**option i(c)**).

**Recommendation 10: Research and development and scientific advice****Recommendation 11: Diagnostics****Recommendation 12: Training****Recommendation 13: EU/MS emergency team**

Recommendations 10, 11, 12 and 13 are very important for maintaining a high standard of knowledge, better prevention and rapid reaction in case of introduction of new HO's in the EU.

**Recommendation 14: Communication and transparency**

AIPH is in favour of developing campaigns to increased public and political awareness. Each target group (consumers, professionals, owners of private gardens etc.) needs a specific approach and information. Special attention is needed for communication to third countries. Third countries are not always adequately informed about modified requirements or do not understand why specific requirements are necessary.

AIPH support the suggestion, made during the conference of 29 September, to come to a better structured cooperation between DG Sanco and stakeholders, e.g. an Advisory Group.

**Recommendation 15: Financial Framework**

The improvement of the shortcomings mentioned in the evaluation report and many of the recommendations have significant financial impact for MS and EU. Therefore a good prioritisation is inevitable and impact analyses are obviously part of it. Therefore it also is important to consider as far as possibilities of delegation of tasks to private stakeholders and cooperation between CA's, public and private stakeholders.

The recommendation that the merits of developing a specific financial instrument in this sector, possibly in the form of a Plant Health Fund need to be examined further, is supported by AIPH.

Sincerely yours,

George Franke  
Secretary AIPH Committee for Environment & Plant Health