



18 April 2011

Dear Mr. Baayen,

CONSULTATION ON THE REFORM OF THE PLANT HEALTH REGIME

In the framework of the reform of Common Plant Health Regime (CPHR), Europatat, the European Potato Trade Association, has been closely following the discussions during the various steps of the consultation process. Following the most recent Working Group on Plant Health on 18 February 2011, we would like to reiterate our key points which mostly relate to the impact of certain measures on exports to third countries. EU-27 exports of seed potatoes represent a value of 250 million EURO corresponding to volume of 500.000 MT.

With regard to the discussions on the establishment of an EU plant health fund, we consider the co-financing of certain losses appropriate in order to incite farmers to report outbreaks of harmful organisms. Due diligence seems however a pre-condition to benefit from any future EU scheme in this regard, farmers should be encouraged to take all reasonable preventive measures.

Plans for a rearrangement of the EU plant health and plant reproductive material regimes regarding harmful organisms should provide more flexibility in listing and delisting harmful organisms. An integrated decision-making process in which de-listing from the EU plant health regime would be linked to the listing in the plant reproductive material is therefore recommendable. In this regard harmful organisms which are already widespread in the EU, could be considered for de-listing, although trade implications should always be kept in mind. Nevertheless integrated decision-making process should at all times respect the distinct character and purpose of each regime. Since the positioning of harmful organisms will eventually be considered on a case-by-case basis, Europatat intends to prepare a detailed overview with regard to organisms relevant for the potato sector.

The revision of the plant passport system did not raise particular concerns among the membership. Whereas the plant passport should carry traceability information and further harmonisation should be encouraged, members wish to keep the possibility to use their national mark with a view to export to third countries. The inclusion of commercial information (company name, logo) on the plant passport should also be considered.

Finally, Europatat acknowledges the need to revise the protected zones system but does not support the transition to the logic of the pest free area concept to overcome the weaknesses of the current system. Indeed the concept of pest free areas carries great risks with a view to exports to third countries, as one notification of a harmful organism would entail the loss of the 'pest free' status for the entire area.

We hope that our comments will prove useful in the framework of the evaluation and thank you in advance for taking our views into consideration in the next steps that will lead to the review of the EU Plant Health Regime. Please note that we might in the future further contribute with additional and more detailed comments on this matter, particular with regard to the repositioning of harmful organisms.

Sincerely,

A handwritten signature in black ink, appearing to be "Frédéric Rosseneu". The signature is stylized and somewhat abstract, with long horizontal strokes.

Frédéric Rosseneu
Secretary-General