



European Commission  
DG Sanco  
Attn. Mr. R. Baayen

Aalsmeer, July 1, 2011

Dear Mr. Baayen,

The International Association of Horticultural Producers (AIPH) is pleased to have the possibility to react on the policy options for the future plant health regime. The four options are a simplification of the whole process of evaluation and consultation. As mentioned in the document RB/ D(2011) of 13 May the first option, which means a status quo, was discarded, given the outcome of the evaluation and the consultations. Another outcome was that there is a strong need for extending the solidarity regime to losses of producers, the creation of a plant health fund and co-financing of certain measures which contribute to better prevention e.g. surveillance and contingency planning. For that reason the second option, introduction as much as possible the necessary improvements to the substance of the regime without additional budget, is also rejected by AIPH.

Regarding options 3 and 4 the discussion is focussed on the question if invasive plants (IAP) have to be part of the plant health regime or not. Inclusion of IAP has also consequences for the budget. Given the demands to improve the plant health regime the extra budget is necessary to fulfil the demands regarding the plant health regime.

AIPH is aware of the increasing threats of invasive plants and has fully supported the Code of Conduct on Horticulture and Invasive Alien Plants, developed by the Council of Europe and the European and Mediterranean Plant Protection Organisation. AIPH believes that voluntary instruments, like codes of conduct, contribute positively in controlling the introduction of IAP. However, legal instrument are necessary to prevent serious damage to agriculture and nature. AIPH is not against the inclusion of IAP in the plant health regime, but only for those plants that are a threat for the agricultural sector, have serious economic impacts and based on a pest risk assessment. As DG Environment has developed a strategy to combat invasive alien species, the approach under the plant health regime must be aligned with DG Environment. For the horticultural sector it is important that measures necessary for combating and controlling IAP are unambiguous, without doublings and regulated from one central point.

Sincerely yours,

George Franke  
Secretary AIPH Committee for Environment & Plant Health