



# ESA

## European Seed Association

Recommendations from the evaluation of the  
Community Plant Health Regime.

ESA comments and priorities

ESA\_10.1018





# Invasive Alien Species



## **Recommendation:**

Plant Health regime to include requirements on Invasive Alien Species plant pests with potential impact on environment and/or economy



## **Alignment with ESA priorities:**

Not a 1<sup>st</sup> priority, but not conflicting.

Mainly relevant for ornamentals and exotic species, but also covers invertebrates and weeds

## **Potential impact for seeds:**

May lead to testing requirements for absence of contamination of seeds of IAS in seed lots (weed analysis/purity testing); important to define practical sample sizes etc.



# Natural spread



## **Recommendation:**

Plant Health regime to include requirements to prevent and to address natural spread of harmful organisms; when feasible and technically justified, case by case



## **Alignment with ESA priorities:**

In line with ESA's position on proactive prevention.  
OK with inclusion in solidarity regime  
Contradictory to desired costs savings and concentration of officials

## **Potential impact for seeds:**

Could allow more proactive dealing with outbreaks such as *Diabrotica virgifera*, with financial stimulant from the solidarity regime



## Regulated non quarantine pests



### **Recommendation:**

Plant Health regime to include requirements for RNQP's, with a 0-tolerance level

### **Alignment with ESA priorities:**

Only partly in line with ESA's position. 0-tolerance requirement is not in line with IPPC definition of RNQP!



### **Potential impact for seeds:**

Might lead to more requirements for testing by NPPO's of seed producing countries in order to meet EU requirements.

Absolute 0-tolerance for RNQP's is not feasible and not justified. Clarification needed on classification(s) and consequences!



## Prevention at import



### **Recommendation:**

Plant Health regime to include complementary measures at import for emerging risks, such as commodity pathway PRA, import ban or official post entry inspections



### **Alignment with ESA priorities:**

ESA accepts the principle but considers clarifications needed:

- demonstrable preventive management by industry?
- reduced checks for seeds?
- Responsibility for defining emerging risks
- Stakeholder involvement / governance

### **Potential impact for seeds:**

Imports of new products or seed sourced from new origins may be impeded, irrespective of certificates.



# Intra-EU surveillance



## **Recommendation:**

Plant Health regime to include measures on general epidemic surveillance for priority HO's, with Community co-financing

## **Alignment with ESA priorities:**

In line with ESA's position. Surveillance provides facts to decide to maintain existing measures for specific HO's and/or to take additional measures on new/emerging HO's.

Notification of new findings to stakeholders is essential

## **Potential impact for seeds:**

Stakeholder involvement may lead to extra efforts & costs.

Regular review and updating of list of HO's may lead to more frequent changes in EU import requirements.





# Emergency action



## **Recommendation:**

Plant Health regime to include measures on horizon scanning, compulsory harmonized contingency plans, speedy emergency and control or eradication measures

Setting up of an EU emergency team, fast track PRA's

Availability of harmonized contingency plans for rapid response

EFSA (science) based

## **Alignment with ESA priorities:**

In line with ESA's position arguing for more prevention and more efficiency in emergency handling.

Stakeholder Advisory Group would boost efficiency

## **Potential impact for seeds:**

Directives for detailed control measures take long to agree upon (Com, MS, EP) → arrange in technical annexes?





# Plant Passports



## **Recommendation:**

Plant Health regime to include measures to restore trust in the system and to harmonize Plant Passport documents.  
Scope of application of PP's to be revised

## **Alignment with ESA priorities:**

In line with principal ESA goal, but differentiation by category needed (seed, young plants, by species) which should be done by Advisory Group; proposed harmonized logo not mentioned.

PP traceability database is still a possible option

## **Potential impact for seeds:**

Revision of the scope may lead to more species requiring a PP  
Risk that PP needs to be a separate document, not integrated with label anymore







# Protected zones



## **Recommendation:**

Plant Health regime to include measures to tighten the PZ system (surveillance and reporting).

Longer term: investigate introduction of Pest Free Areas (PFA)

## **Alignment with ESA priorities:**

Not fully in line with ESA position which proposes to replace PZ's by PFA's, using the IPPC concepts and definitions;

Not a priority for the seed industry

## **Potential impact for seeds:**

Tightening the system of PZ's will be a slow process not quickly leading to removal/updating of PZ's that miss technical justification





# Incentives



## **Recommendation:**

Plant Health regime to include incentives by extension of the solidarity regime: cover loss of destroyed material for producers/growers; co-finance preventive measures by MS

## **Alignment with ESA priorities:**

Objective in line with ESA views but many details and consequences still unclear (involvement of full chain? Increase of claims?)

## **Potential impact for seeds:**

Cost-responsibility sharing schemes such as a ***Plant Health Fund*** may lead to higher costs for seed companies (and other stakeholders)





## R&D and scientific advise



### **Recommendation:**

Plant Health regime to include measures to secure resources and funding for plant health related R&D and scientific advice

Today R&D resources are mainly at MS-level, policy setting is at EU-level; need for better coordination by EUPHRESKO.

Mandate of EUPHRESKO ended in June 2010. Need to create more permanent platform

Socio-economic impact studies to be added to EFSA's biological risk assessments (PRA)

### **Alignment with ESA priorities:**

Principally in line with ESA views; should include reference to EU Technology Platform Plants for the Future

### **Potential impact for seeds:**

Industry to find a way for "a voice" in setting the R&D priorities





# Diagnostics



## **Recommendation:**

Plant Health regime to include measures to complete the establishment of National Reference Labs (NRL) and EU Reference Labs (ERL) for a limited number of priority HO's

## **Alignment with ESA priorities:**

Setting up of ERL's is in line with ESA views (competent labs).

Setting up of NRL's is ok, if EU harmonization based on defined quality standards and protocols is assured.

## **Potential impact for seeds:**

NRL's and ERL's to have attention for the specific needs of seed testing. Coordination with EPPO, ISTA and ISHI to be assured.

Laboratory testing can already be delegated to private labs (Directive 2009/143/EC). Further study recommended!





# Training



## **Recommendation:**

Plant Health regime to include measures to strengthen training of inspectors and experts in the diagnostics field.

## **Alignment with ESA priorities:**

In line with ESA views –

But should concentrate on making full use of available resources, i.e. strengthen public-private (training) partnership

## **Potential impact for seeds:**

Lobby for possibility to achieve joint training of NPPO and Industry inspectors and diagnostic experts.





## EU/MS emergency team



### **Recommendation:**

Plant Health regime to include establishment of an EU/MS emergency team

### **Alignment with ESA priorities:**

In line with ESA views, provided proper involvement of stakeholders (v. also Advisory Group) is assured

### **Potential impact for seeds:**

Lobby for possibility to include industry experts in emergency team (ad hoc and when needed)





## Communication and transparency



### **Recommendation:**

Need for public awareness campaigns at EU and MS level to increase awareness for plant health

Clarity of EU import requirements to be improved for 3<sup>rd</sup> countries

### **Alignment with ESA priorities:**

Only partly in line with ESA views!

Stakeholder involvement as a way to improve communication and transparency already considered to be 'at a good level' which is not the case

EU databases as a means to improve info and transparency

### **Potential impact for seeds:**

unclear





# Financial framework



## **Recommendation:**

Repair mismatch between available resources and (new) objectives of the CPHR

Solidarity schemes to compensate growers for destruction.

Penalties for late alerts and late actions (MS and growers)

## **Alignment with ESA priorities:**

In line with ESA views but missing the issue of delegation of tasks under official supervision – **KEY POINT**

## **Potential impact for seeds:**

No solution proposed to harmonize fees between MS

Cost reduction by delegation to industry is mentioned as an option, but does not appear in conclusions/proposals (see above: **KEY POINT!**)







# ESA Priorities for the future EU Plant Health Law



## Advisory Group PH / GOVERNANCE



- Not included in report
- New governance based on public-private partnership needed to achieve improvement of quality (outcome) at stable or lower costs
- Horizontal Advisory Group Plant Health to be set-up with involvement of key stakeholders
- Technical sub-groups to provide expertise and input on specific items, issues or crops etc.
- **KEY POINT**





## Delegation of tasks under official supervision



### **Recommendation:**

Limited need or opportunity for further delegation of tasks  
If delegation is done, only to other competent official bodies

### **Alignment with ESA priorities:**

Not in line with ESA views!

Missed opportunity to enhance collaboration of NPPO's and  
seed industry **KEY POINT**

### **Potential impact for seeds:**

In connection with the recommendation to enforce import  
controls, this may lead to more testing and inspections by  
NPPO's → higher costs and logistic delays





## Export and Re-export



### Recommendation:

No recommendation in report, only listing of problems:

Use of re-export certificate where EU does not require PC

Difficulties to obtain EU Ph. Comm. document + all AD's

Missing legal basis to use EU Ph. Communication document attached to re-export certificate



### Alignment with ESA priorities:

Not in line with ESA views **KEY POINT**

### Potential impact for seeds:

Continuation of issues and struggles to have seeds (re-) exported if produced in an other MS



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