

COPA-COGECA RESPONSE TO THE POLICY OPTIONS FOR THE FUTURE EU PLANT HEALTH REGIME

Copa-Cogeca is pleased to provide some additional views and comments on the policy options presented by DG SANCO for the future plant health regime.

Copa-Cogeca has extensively contributed to the ongoing debate at EU level¹ on the new plant health regime and encourages the European Commission to consider it in the current impact assessment.

We believe that the way the policy options have been drafted and presented may lead to some misunderstanding and conclusions which are too simplistic. Further discussions are needed.

The four policy options presented are:

- **If the budget for plant health remains the same**

Policy option 1 – improve only the form and clarity of the regime: updating, simplifying and clarifying the text.

Policy option 2 – improve the substance of the regime: new measures for high risk trade; mandatory surveillance for EU priority pests; reinforcing the eradication and containment of outbreaks; upgrading the plant passport and protected zones systems; introducing mandatory fees for plant passport controls; and improving the regime's coherence with the plant reproductive material regime.

- **If the budget for plant health is increased**

Policy option 3 – improve the substance of the regime (excluding IAS). This includes options 1 and 2, but also improves the control regime for plant pests and pathogens, allows the co-financing of mandatory surveillance and compensation of financial losses incurred by operators for EU priority pests.

Policy option 4 – improve the substance of the regime and include IAS plants not only for legal provisions, but also for EU co-financing. IAS plants are not taken into consideration in options 1, 2, and 3. This will require substantial additional budgetary resources for solidarity co-financing of eradication actions and for extra staff at Commission and MS level.

Copa-Cogeca has always fully supported the need to update, simplify, clarify and improve the current plant health regime since it has demonstrated several weaknesses which need to be resolved. Copa-Cogeca has also been in favour of reinforcing instruments for eradicating and containing outbreaks, improving the plant passport and protected zones systems, as well as improving coherence between the plant health regime and the plant reproductive material regime in order to increase effectiveness and reduce costs for operators.

¹ [PHY\(11\)2076 \(rev.2\)](#) [PHY\(09\)6852 \(rev.13\)](#) [PHY\(11\)466 \(rev.2\)](#)

However, Copa-Cogeca feels that options 1 and 2 may not be enough to achieve the objectives of a new ambitious plant health regime that aims, on the one hand, to ensure an economically viable farming and forestry sector in the EU, and on the other hand, to ensure sound protection of public and private green spaces, forests, and the landscape, including the natural environment.

Copa-Cogeca has always called on the European Commission to guarantee that farmers are not left alone to assume the responsibility for and the cost of measures to control the spread of harmful organisms (HOs) and their consequences. Despite appropriate preventative measures, farmers and forest owners are faced with threats over which they have little, and in most cases, no control. This should be recognised.

Copa-Cogeca believes it is particularly important to address the threats and economic risks posed by Invasive Alien Species (IAS) (pathogens, pests and harmful plants) to the agricultural sector and to the entire economy. We consider that the concept of IAS within the plant health regime should be broadened in order to include pathogens and pests which are equally important and which are not included in the list of IAS plants.

However, Copa-Cogeca would be in favour of the plant health regime only focusing on those Invasive Alien Species which have a considerable environmental impact on farmland ecosystems and an economic impact at farm level. It should be recognised that imposing zero-tolerance for certain IAS which are already well-established in certain EU MSs would be impractical.

The Services of DG Environment of the European Commission are currently developing a new strategy to address Invasive Alien Species in Europe. Copa-Cogeca would be in favour of fully harmonising the control of plant health-related IAS with the new plant health regime. Priority should be given to the plant health regime, and the IAS strategy should come into play where gaps are identified which are beyond the scope of the plant health regime. This would prevent duplication of legislative requirements and work needed on the ground. Moreover, it would be more resource-efficient and improve the consistency between different policies of the European Union. Rapid action and prompt crisis management measures should be at the heart of the new plant health regime and protection against relevant IAS should benefit from them.

Combating and controlling IAS in the plant sector is a global issue and crucial if we want to ensure an economically viable farming sector. Indeed, it is all the more vital as it is associated with preserving the EU economy as a whole, given that consequential losses from IAS can be devastating.

Copa-Cogeca believes that plant health funds should not be channelled towards eradicating IAS as such. The financing of such measures should be viewed more broadly. We believe that DG Environment should play a role in supporting this policy, as in most cases the need for coordinated action goes beyond the farmer's responsibility.

It is important to bear in mind when discussing option 2 that introducing mandatory general epidemio-surveillance at EU level for priority HOs may also have a significant impact on MS and EU budgets for plant health. In such situations, the benefits and costs of this kind of proposal should be carefully considered on a case by case basis. We would support the concept of improving and harmonising surveillance methods at EU level. Moreover, delegating certain tasks to stakeholders under the supervision of official authorities would help to optimise resources.

Finally, Copa-Cogeca is against any cut to the CAP budget. Therefore, additional financial resources would be needed in order to expand the new plant health regime. Farmers are facing significant economic challenges as clearly shown by the fact that farm income in the EU is only 50% of average earnings in the rest of the economy. A strong CAP post 2013 is, therefore, crucial.