

## **COURTESY TRANSLATION**

### **Note from the French authorities to the European Commission Directorate - General for Health and Consumers (SANCO)**

Object: The position of the French NPPO regarding the evaluation of the Community Plant Health Regime

The French plant protection authorities have the pleasure of communicating to the European Commission a summary of the position of the French NPPO concerning the evaluation of the Community Plant Health Regime (CPHR). The aim is summarise in as succinct and comprehensible manner as possible the considerations offered in response to the general questionnaire sent on 17 December 2009 by France to the FCEC (Food Chain Evaluation Consortium).

This document also includes the conclusions of the general health consultation process (*États généraux du sanitaire* – EGS) held in France from January to April 2010 at the instigation of the minister for agriculture, with the aim of bringing together the various actors in the animal and plant health field to engage in collective reflection on the current status and future prospects of the health system in France and the European Union (EU).

In the course of 34 meetings over nearly 3 months, the discussions, in four thematic working groups, including one group dealing specifically with “plant health” and a horizontal group on “funding – pooling of resources”, made possible very wide-ranging exchanges of views and experience between all the stakeholders in both public and private sectors, and at national and local levels.

In addition to highlighting a number of major points of convergence, the debates helped clarify the respective positions of the various partners and are likely to facilitate future exchanges with a view to concrete implementation of the policy focuses that will emerge from the evaluation of the CPHR.

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Despite the generally positive impact of the CPHR, the goals of plant protection, sustainable development, competitive performance in the agricultural sector, rural development and protection of the environment have not been completely achieved for certain types of plant and production due most notably to the introduction and spread of pests particularly harmful to plant health observed across EU territory.

During the EGS consultation process, there was common agreement on the reality of increasing “pressure” from bioaggressors, both emerging and traditional.

For example, the annual number of interceptions at the point of entry into the EU rose from 1,400 to 3,000 over the period 1999-2004, and to more than 5,500 during the years 2005-2009 (peaking at 8,000 in 2006), of which 25% to 30% were due to the presence of quarantine pests over the period 2005-2009. In France, interceptions due to pests totalled 800 to 900 in each year of the period 2006-2009, a figure representing 3% to 4% of inspected shipments.

France has seen the discovery on its national territory of forty or so new pests in the space of twenty years, and today others are already at the borders of metropolitan France and its overseas territories. Despite this, there are many instances in the EU and around the world of costly failures to eradicate.

The French NPPO is proposing ten ways forward to improve and overhaul completely the CPHR; they have been supported by all stakeholders in the context of the EGS consultation process. We describe them below.

## **SUMMARY**

### **1. Definition of pests of priority importance in terms of risks to plant health**

- a) Restriction of the scope of application of the CPHR to pests presenting a high level of plant health and socio-economic risk
- b) Identification of particularly high-priority pests and the planning of appropriate emergency measures
- c) Transfer of some pests specific to certain plants or plant products from directive 2000/29/EC to the directives on the marketing of seed and plant propagating material

### **2. Application of general surveillance of the phytosanitary situation on EU territory**

- a) Making surveillance of pests identified as priority risks an explicit obligation
- b) Application of general surveillance of the phytosanitary situation on EU territory using formalised surveillance networks and a phytosanitary precautionary surveillance
- c) Involvement in surveillance and rapid alert systems of individuals and organisations not part of the competent authority
- d) Opening up EU solidarity funds to the funding of such mandatory surveillance of pests identified as priority risks
- e) Development of a system of notification (outbreaks, new discoveries) similar to the Rapid Alert System for Food and Feed (RASFF) for contaminated lots or the system in place in the animal health sector (Animal Disease Notification System – ADNS) for the notification of outbreaks
- f) Organisation of the execution of an annual EU overview report (with mapping and raw data), paying particular attention to protected zones and areas where pests classified as absent are occasionally present

### **3. Stronger controls on imports from third countries for prevention of entry and establishment of pests in the EU**

- a) Strengthened import requirements
- b) Improvement of the facilities at points of entry to the EU (PoE) through a Community assessment of PoEs
- c) Improvement of the reduced frequency checks system on imports
- d) Harmonisation of documentation and reinforcement of information systems
- e) Improved cooperation with customs authorities (link between DG TAXUD and DG SANCO)

### **4. Stronger checks on intra-EU trade in order to prevent the spread of pests across EU territory**

- a) Adoption of a system of prior approval of establishments wishing to put in movement plants that require Plant Passports (PP)
- b) Oversight and harmonisation of the PP self-issuance system
- c) Improved communication of information on material circulating within the EU

**5. Ensuring that prevention is at the heart of the plant health regime by associating industry professionals and making them accountable**

- a) Encouragement of industry professionals to define and to implement good practice either collectively or individually
- b) Creation of a specific body for the consultation of stakeholders by DG SANCO on topics relevant to plant health, in association with the MS, with the aim of improving communication with sector professionals

**6. Greater consideration for the economic dimension**

- a) Definition of transparent rules for the compensation of producers based on the principle of co-financing by MS, EU and the industry
- b) Extension of the financial contribution of the European Commission (solidarity fund) to cover the management of outbreaks deriving from the natural spread of pests in order to improve the measures for the control of such outbreaks
- c) Institution of a harmonised system of fees for all inspections leading to PP issuance, and systematic revision of the levels of such fees to reflect the real cost of the service provided for the inspection of imported plants and plant products and inspections carried out in connection with PP issuance, in order to avoid distortion of competition between MS

**7. Constant adjustment of the regulations to match changes in the phytosanitary situation and in order to promote regulatory clarity**

- a) Speedy revision of the lists of pests (protected zones included), and of the bans and requirements contained in the current annexes of directive 2000/29/EC
- b) Shorter lead-times for the adoption of emergency measures, following interceptions for example, through the setting up of a dedicated EU emergency team
- c) Allocation of enhanced resources to the execution of phytosanitary risk analysis (PRA) and socio-economic analysis
- d) Adoption of legislation establishing specific measures applicable to French overseas departments (*Départements français d'Outre-Mer* – DOM)
- e) Clarification of the structure of the current annexes in directive 2000/29/EC

**8. Harmonisation and enhancement of the effectiveness of inspection procedures**

- a) Replacement of the EU directive by an EU regulation in order to improve the harmonisation of procedures across MS

- b) Transposition into the plant health domain of the approach adopted in regulation 882/2004/EC concerning official controls
- c) Improvements to inspector qualification by setting up a EU training programme in order to harmonise the competencies of inspection services as far as possible
- d) Facilitation of exchanges of good practice between inspectors
- e) Comparative inspections targeting issues designated as having high priority along the lines of inter-laboratory testing ("*ring-tests*")
- f) Creation of EU-Reference Laboratories to promote the networking of operations

## **9. Supporting and developing research**

- a) Inclusion of issues relating to scientific support within the scope of plant health
- b) Fostering research and interdisciplinary cooperation

## **10. Combining plant health strategy with other EU policies**

- a) Convergence between EU policies on plant health and on the marketing of seed and plant propagating material (currently in progress in the context of the "*Better Regulation*" project)
- b) Convergence between EU policies on plant health and on the environment with consideration being given to the scope of application of the CPHR by including invasive alien plants impacting general biodiversity and alien agents for biological control of pests
- c) Provision to producers of effective and authorised means for the control of the whole range of pests
- d) Account to be taken in the future CPHR of the objectives of directive 2009/128/EC on the sustainable use of pesticides, given the coherence of their respective goals regarding reduced pesticide use
- e) Use of the mutual funds made possible by the CAP Health Check to help finance efforts to control pests
- f) Convergence between policies on plant health and access to third-country markets

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## THE POSITION IN DETAIL

### **1. Definition of pests of priority importance in terms of risks to plant health**

#### **a) Restriction of the scope of application of the CPHR to pests presenting a high level of plant health and socio-economic risk**

The ranking of pests in terms of their priority should be based on the importance of their impact firstly on agriculture, horticulture and forestry (the principal criterion), followed by the environment and public and private green spaces, as a function of their presence or absence in the EU, and lastly the prospects of early detection and successful control and eradication experiments.

Technical analysis of the risk for plant health and the effectiveness of the available methods for controlling such pests must be supplemented by socio-economic analysis as a tool for guidance of public policy.

#### **b) Identification of particularly high-priority pests and the planning of appropriate emergency measures**

The ranking of pests in terms of their priority must lead in operational terms to the preparation of contingency plans for those that are particularly dangerous and which are on the point of entering our territory. This is so because while the regulations must treat all the hundreds of regulated pests with equal rigour, it is not reasonable to expect operational planning of equal intensity for all of them. There is a need to identify the most serious threats and to:

- prepare contingency plans for concerted action defined at national level according to guidelines laid down at EU level,
- put in place appropriate resources and procedures for their implementation.

#### **c) Transfer of some pests specific to certain plants or plant products from directive 2000/29/EC to the directives on the marketing of seed and plant propagating material**

The purpose of this would be to transfer pests that are widely spread throughout EU territory for which there are no specific protected zones and for which effective management measures are available.

This would also make it possible to ensure closer convergence between the concept of the harmful organism (pest) in directive 2000/29/EC and the "quarantine pest" concept in the IPPC, which can be seen to be highly desirable for clearer understanding of the CPHR in the international context.

### **2. Application of general surveillance of the phytosanitary situation on EU territory**

#### **a) Making surveillance of pests identified as priority risks an explicit obligation**

This is needed because, except in certain special cases for which EU decisions notably provide, the surveillance plans specific to certain plants or pests are implemented as and when needed by NPPOs. This approach is inadequate if there is to be genuine knowledge of the phytosanitary situation across EU territory, and especially of the whole range of pests judged to be priority risks.

**b) Application of general surveillance of the phytosanitary situation on EU territory using formalised surveillance networks and a phytosanitary precautionary surveillance**

A formalised, responsive epidemiological surveillance network is essential for the triggering of rapid and effective reactions in the event of the detection of pests in order to limit their spread and economic impact, especially where emerging pests are concerned. Such a network must enable development of an international precautionary surveillance to foster cooperation between countries and the taking of international decisions.

**c) Involvement in surveillance and rapid alert systems of individuals and organisations not part of the competent authority**

Organisation of cooperation between all professionals affected by plant health policy and encouragement for them to take part in such formalised surveillance networks, emphasising the benefits they would derive therefrom, may be a pragmatic and effective means of improving generalised surveillance. Where the risk justifies this, such networks should be extended to include non-professional actors in the field, especially local authorities.

**d) Opening up EU solidarity funds to the funding of such mandatory surveillance of pests identified as priority risks**

**e) Development of a system of notification (outbreaks, new discoveries) similar to the Rapid Alert System for Food and Feed (RASFF) for contaminated lots or the system in place in the animal health sector (Animal Disease Notification System – ADNS) for the notification of outbreaks**

**f) Organisation of the execution of an annual EU overview report (with mapping and raw data), paying particular attention to protected zones and areas where pests classified as absent are occasionally present**

Such an overview might for example be produced by the Food and Veterinary Office (FVO).

**3. Stronger controls on imports from third countries for prevention of entry and establishment of pests in the EU**

The discussions conducted in the context of the EGS consultation process highlighted the fact that the failure of controls in a single country or point of entry into the EU can have major consequences for the other countries or regions. National efforts can only be fully significant in the presence of vigilance and biosafety measures at the borders, and these must be provided by all Member States (MS). This observation of fact echoes the unanimous conclusions of the Agricultural Council meeting of 18 December 2008 concerning controls on imports and the French authorities will be particularly attentive in this regard to the report the European Commission is to produce on this topic before the end of 2010.

**a) Strengthened import requirements**

The aim is to generalise the ban on imports from all third countries of certain materials that may potentially be vectors for quarantine pests, such as soil adhering to plants for example. Some countries (e.g. United States, Thailand, Australia) have based their own regulatory controls on a general ban in principle with authorisation only for those products for which a risk analysis has demonstrated that they present no danger of introducing quarantine pests. The system of protection in the EU must move in the direction of an equivalent system.

**b) Improvement of the facilities at points of entry to the EU (PoE) through a Community assessment of PoEs**

Such an assessment, as a supplement to regular audits carried out by the MS concerned, must be conducted prior to the opening of any PoE and at regular intervals thereafter.

Improvement of facilities should involve a better definition of the mandatory regulatory specifications for PoE infrastructures, operation and approval procedures. In order to secure and to harmonise checks, these requirements should be embodied in regulations at EU level and responsibility for approval of PoEs should be given to the European Commission, as is already the case in the veterinary sector (BIPs).

**c) Improvement of the reduced frequency checks system on imports**

The reduced frequency checks system on imports must prioritise the use of risk analysis, taking due account of PoE interceptions. In addition, it is necessary to improve speed of reaction in the event of interceptions, with a rapid upward revision of the minimum frequency of plant health checks at EU level where the risk situation justifies this. In addition, there need to be fewer possible levels of reduced frequency in order to simplify the procedure.

**d) Harmonisation of documentation and reinforcement of information systems**

Customs clearance procedures are made more complex by the lack of a single harmonised document attesting to the compliance of lots of plants and plant products. This is particularly true in cases where operators wish to clear their goods through the customs of a MS other than that of the PoE where the imported plants are subject to inspection. A harmonised phytosanitary permit similar to the Common Veterinary Entry Document (CVED) should therefore be created, which would certify that the plant health checks have been duly carried out on import.

There is also a need to develop networking through an integrated information system at EU level. The Europhyt database currently permits only a listing of interceptions of non-compliant commodities, which is inadequate, especially for the production of the reliable statistics that would be useful for enhancing the responsiveness of border inspection services. Such an integrated computer system could be designed on the same lines as the "TRACES" system used for livestock.

**e) Improved cooperation with customs authorities (link between DG TAXUD and DG SANCO)**

The aim here would be most notably to define detailed correspondences between the list of products subject to plant health inspections on the one hand and, on the other, the customs tariff nomenclature (TARIC codes), and also to take into account any changes in the customs nomenclature without delay.

**4. Stronger checks on intra-EU trade in order to prevent the spread of pests across EU territory**

**a) Adoption of a system of prior approval of establishments wishing to put in movement plants that require Plant Passports (PP)**

**b) Oversight and harmonisation of the PP self-issuance system**

The criteria whereby this facility is granted should be clearly defined (e.g. a "phytosanitary management plan" is in place, the establishment has a high index of

confidence), along with print-out standards (e.g. positioning and sizing of passport rubrics), in order to maximise safeguards when this option is taken up.

**c) Improved communication of information on material circulating within the EU**

As in the case of imports, the registration using harmonised methods of all plant movements on the territory of the EU or in certain circumstances prior to export, with real-time information display, would enable risk to be managed at all times and any necessary corrective action to be taken without delay.

There is also a need to develop a unified template for the PP. The purpose of this would be to clarify and simplify the PP document and give it a distinctive identity by standardising it in order to enhance its ease of recognition and value. To achieve this, it would be desirable to develop a new PP presentation format, to revise certain rubrics in it and to clarify details regarding plant traceability.

**5. Ensuring that prevention is at the heart of the plant health regime by associating industry professionals and making them accountable**

**a) Encouragement of industry professionals to define and to implement good practice either collectively or individually**

The French EGS consultation process has highlighted the advantages of action by actors in the agricultural sector through prevention programmes, which may involve changes to usual practice and organisation. Generally speaking, any system of “good practice” defined collectively across a sector on the basis of guidelines will be an integral part of prevention programmes.

Moreover, major producing firms or those active far upstream in the production chain should be encouraged to implement organised systems for the management of phytosanitary risks in every establishment: a “phytosanitary management plan”. This new risk management method should be made part of directive 2000/29/EC as amended in the form of a preferred alternative scheme for the management of phytosanitary risk. The development of such a preventive approach would lead to greater corporate responsibility for self-inspection procedures and reaffirm the fact that official phytosanitary inspections occur at a second level, the goal being to arrive at a general improvement in phytosanitary quality.

**b) Creation of a specific body for the consultation of stakeholders by DG SANCO on topics relevant to plant health, in association with the MS, with the aim of improving communication with sector professionals**

Discussion with the relevant industry sectors should be systematic prior to any change in the regulations (e.g. revisions of lists of pests, control measures to be implemented), in order to enhance the sense of responsibility of the relevant actors and improve the enforcement of the regulations. In general, transparency is an essential accompaniment to action for pest prevention and control. Consequently, it would be appropriate to set up a special advisory committee on phytosanitary issues.

**6. Greater consideration for the economic dimension**

**a) Definition of transparent rules for the compensation of producers based on the principle of co-financing by MS, EU and the industry**

The virtuous circle of plant health policy must be based on the following three core components: early detection, immediate implementation of phytosanitary measures and swift compensation. All too often, inadequate management of a pest, because of a lack



of appropriate and rapid reaction due to problematic discussion of the economic aspects, ends up in the long-term establishment of the relevant pest. Detection of an emergency gives way to declaration of a crisis, followed by chronic problems that make the problems of economic management all the worse. Given this, it is essential that the terms on which producers are compensated should be defined on the basis of transparent, predetermined rules.

The possibilities of compensation must cover income lost due to the measures that need to be taken to control the pest, including the withdrawal of the Plant Passport (PP) for a number of years.

In particular, compensation for producers must be linked to the implementation by the actors concerned of practices aimed at preventing phytosanitary risk.

Moreover, payment of compensation to producers on the basis of co-financing by the public authorities and the industry constitutes a further effective lever for making producers more accountable. Solidarity funds must be set up by the various industry sectors, where applicable for designated geographical areas, plants or pests.

The EU must also contribute to this compensation scheme, in a manner consistent with the mutual funds proposed in the context of the Health Check of the Common Agricultural Policy (CAP).

The respective contributions of industry solidarity funds, MS and the EU must be defined in accordance with the level of priority and the “emerging” nature of the pest, the type of financial risk (costs incurred directly or indirectly) and in compliance with mandatory provisions. The work to define the levels of priority of pests would also make it possible to rank public actions in order of importance and to provide focus for the division of responsibility between public and private-sector actors. Resources and procedures must be redeployed and mobilised in this direction if public policies are to be effective.

- b) Extension of the financial contribution of the European Commission (solidarity fund) to cover the management of outbreaks deriving from the natural spread of pests in order to improve the measures for the control of such outbreaks**
- c) Institution of a harmonised system of fees for all inspections leading to PP issuance, and systematic revision of the levels of such fees to reflect the real cost of the service provided for the inspection of imported plants and plant products and inspections carried out in connection with PP issuance, in order to avoid distortion of competition between MS.**

#### **7. Constant adjustment of the regulations to match changes in the phytosanitary situation and in order to promote regulatory clarity**

- a) Speedy revision of the lists of pests (protected zones included), and of the bans and requirements contained in the current annexes of directive 2000/29/EC**

Such swift responses are essential in order to take into account the on-going changes in the phytosanitary situation on EU territory and in the rest of the world, and to make it possible to conduct more responsive, targeted control of pests that are a source of real problems for MS.

- b) Shorter lead-times for the adoption of emergency measures, following interceptions for example, through the setting up of a dedicated EU emergency team**

Fast reaction and reflection will be made easier if permanent structures are already in place, and if procedures have already been defined at both national and EU levels, and if there is close cooperation between such teams.

**c) Allocation of enhanced resources to the execution of phytosanitary risk analysis (PRA) and socio-economic analysis**

PRA provides the technical and scientific basis necessary for the taking of decisions at all levels: on regulation, deregulation and changes in existing regulations (e.g. changes in annex, changes in status with regard to protected zones).

Phytosanitary and socio-economic analysis must be carried out on an on-going basis with coordination and annual programming at EU level in line with the resources available to EPPO, EFSA and MS.

**d) Adoption of legislation establishing specific measures applicable to French overseas departments (*Départements français d’Outre-Mer* – DOM)**

It would be appropriate to put in place an PP scheme specifically applicable to the movement of commodities from the continental EU to French overseas departments, between such departments and within each of them and to maintain the obligation of systematic checks at PoEs on the relevant plants imported from the continental EU zone into such DOMs.

**e) Clarification of the structure of the current annexes in directive 2000/29/EC**

Interpretation of EU plant health regulations is made even more complex by the system of derogations and emergency measures that overlay those regulations in certain circumstances. It is imperative that the annexes to directive 2000/29/EC include all pests covered by emergency measures. The scientific names of those pests must be kept up to date. Annex IV should specify that “official statements” must be covered by “additional declarations” in the phytosanitary certificate.

**8. Harmonisation and enhancement of the effectiveness of inspection procedures**

**a) Replacement of the EU directive by an EU regulation in order to improve the harmonisation of procedures across MS**

**b) Transposition into the plant health domain of the approach adopted in regulation 882/2004/EC concerning official controls**

An approach of this kind would make it possible, as is the case in the food domain and, in the near future, in that of animal health, to define clearly at EU level the responsibilities and obligations of inspection services (e.g. organisation, possibilities for delegation of tasks) and operators.

**c) Improvements to inspector qualification by setting up a EU training programme in order to harmonise the competencies of inspection services as far as possible**

Within MS services, it is essential to maintain and reinforce all the necessary technical skills acquired by means of a programme of initial and continued training of good quality.

In this connection, the training courses dispensed as part of the BTSF (*Better Training for Safer Food*) programme should be reinforced and their content improved.

**d) Facilitation of exchanges of good practice between inspectors**

Analysis of interception notifications also highlights very clearly the fact that certain MS are “specialists” in the detection of certain pests, especially on import. Exchanges of good practice between inspectors would allow each MS to benefit from the experience of the others.

**e) Comparative inspections targeting issues designated as having high priority along the lines of inter-laboratory testing (“ring-tests”)**

If comparative inspections are carried out at regular predetermined intervals on topics designated as having high priority, along the lines of inter-laboratory tests (“ring-tests”), this would allow inspection procedures to be harmonised for high-priority issues.

**f) Creation of EU-Reference Laboratories to promote the networking of operations**

The designation on a consensual and transparent basis of a lead entity for each defined thematic area (National and/or EU-Reference Laboratories), along the lines of regulation 882/2004/EC, is one option that would allow practice to be harmonised. In particular, the harmonisation of diagnostic protocols is of major importance.

**9. Supporting and developing research**

**a) Inclusion of issues relating to scientific support within the scope of plant health**

Maintenance of a capacity for fundamental and applied research is essential for the existence of relevant biovigilance, especially in light of the emerging risks, in order to choose measures to limit the risk of spread.

**b) Fostering research and interdisciplinary cooperation**

While the need for research is very substantial in genetics, biology and fundamental ecology, it is nevertheless true that it is manifestly of primary importance to reinforce inter-disciplinary work through partnerships, especially at EU level. Cooperation between research and technical institutes should also be encouraged.

**10. Combining plant health strategy with other EU policies**

Technical, biological and epidemiological analysis of health-related emergencies or crises continues to be essential, but societal, economic and international political analysis must also be developed. The technical quality of decisions and options can only be enhanced by setting practice in the health sphere against the broader backdrop of the economic, social, ideological and environmental aspects.

**a) Convergence between EU policies on plant health and on the marketing of seed and plant propagating material (currently in progress in the context of the “Better Regulation” project)**

Full consistency between these two bodies of regulations is necessary in order to allow simplification of the application of the regulations by the actors, and to enhance the effectiveness and economic viability of inspections without compromise to phytosanitary requirements.

This is so because seed and plant propagating material of Community origin must abide by both the rules of the marketing regime (according to case: labelling; quality in terms of health, variety and physiology of the material marketed; identification, surveillance and verification of critical points, and so on) and the CPHR rules for the movement of such plants in accordance with their phytosanitary status (PP). These sets of rules have in fact some points in common, which notably leads to duplication of inspections, repetition of

certain entries in documents and complex classifications of pests (quarantine pest, regulated non-quarantine pest). Improved interfacing between the two sets of regulations would result in greater effectiveness.

**b) Convergence between EU policies on plant health and on the environment with consideration being given to the scope of application of the CPHR by including invasive alien plants impacting general biodiversity and alien agents for biological control of pests**

The scope of the CPHR should be identical to that of the IPPC, which covers both cultivated plants and wild flora and takes into account the direct and indirect effects of pests. The initial introduction into EU territory of alien agents for biological control of pests should also be considered in this context, as provided in International Standard for Phytosanitary Measures (ISPM) no. 3.

**c) Provision to producers of effective and authorised means for the control of the whole range of pests**

While derogation from the ban on the use of plant protection products is possible in the case of outbreak control, this is not always true of preventive measures.

**d) Account to be taken in the future CPHR of the objectives of directive 2009/128/EC on the sustainable use of pesticides, given the coherence of their respective goals regarding reduced pesticide use**

This is relevant because an effective EU regime on plant health with a focus on prevention will necessarily result in a smaller number of outbreaks of pests and in the early detection of the latter, and by the same token in a diminution of the use of plant protection products. Moreover, the CPHR can encourage the use of alternative measures, for example by prioritising crop rotation to control certain pests.

The general aim of reducing use of phytosanitary products also requires greater attention to be paid to alternative methods of protecting plants against bioaggressors when defining control measures.

**e) Use of the mutual funds made possible by the CAP Health Check to help finance efforts to control pests**

The setting up of “mutual funds” for health and environmental issues as provided by Article 71 of EU regulation 73/2009 in the context of the CAP Health Check should make it possible to cover compensation for “economic losses” suffered by farmers and growers as a result of a health crisis.

**f) Convergence between policies on plant health and access to third-country markets**

The development of a network of a formalised, fast-reacting epidemio-surveillance network in addition to contingency plans is likely to increase the confidence of third countries in the EU export certification scheme and facilitate access to third-country markets for EU plants and plant products. In this regard, it will be important for socio-economic analyses to take into account the impact on EU exports of the introduction and spread of pests.