



Brussels
September 2013
ESA_13.0667

POSITION

POTENTIAL FOR GROWTH

HEALTHY SEEDS FOR HEALTHY CROPS

ESA European Seed Association's Position on the new Plant Health Regulation

Introduction

Europe's plant breeders and seed producers develop the high quality seeds required for sustainable and competitive farming in Europe. Ensuring that seeds are healthy is the precondition for healthy crops and crucial for agricultural production as well as the environment. Dedicated seed health requirements therefore have always formed an integral part of the EU's general rules for plant health as well as its seed marketing legislation.

The situation today

Planting healthy seeds is the basis for growing a healthy crop. Plant health is of particular importance for plant reproductive material (seed) as, unlike other plant products, it is used for multiplication. If seed is infected with pests or diseases, these pests and diseases may be multiplied manifold in the growing crop. This may then make additional pesticide applications necessary, lead to severe harvest and quality losses, or even produce that is no longer fit for human or animal nutrition.

Today, some seed health requirements fall under the Plant Health directive while others fall under crop-specific directives for seed marketing. This means that different pests appear in different pieces of legislation, with sometimes lack of clarity and coherence.

ESA's vision for tomorrow's EU Plant Health Law

- ESA fully supports the objective of a **strong protection** of Europe's environment and agricultural production against the introduction and spread of plant pests and diseases.
- Strengthening the **cooperation** between public bodies and private operators, e.g. by delegating defined tasks to professional stakeholders, will be key to deliver on this objective. ESA strongly encourages the involvement of **professional operators** in developing the implementing mechanisms foreseen by the Regulation in a spirit of responsible **public-private governance**.
- Bringing together all plant health related rules under a single Regulation should bring about a more **harmonised implementation** of measures across the European Union. ESA fully supports this alignment of the relevant EU rules.
- ESA calls for **ambitious synergies** to be found between the Plant Reproductive Material Law, the Official Controls and the Plant Health Law, in order to reinforce the coherence between those three regimes, through **shared** use of certification schemes, labels and registers. In particular, ESA welcomes the **official register** of professional operators that should ensure there is increased transparency and traceability.

Recommendations for improvement of the Commission proposal

While ESA therefore generally welcomes the scope, main elements and approach set out by the Commission's legislative proposal, some key improvements are still required. Furthermore, it is important to assure that the new system still recognises and addresses the specific characteristics of seed and of the seed sector.

◆ **A broad coverage**

ESA is convinced that breeders and farmers require a broad coverage of the application of this legislation.

Exemptions or derogations to plant health requirements, for certain types of operators or material, could prove fatal to the environment, to plant health or to the livelihood of other operators. There is **no small risk** when it comes to plant health and therefore, **traceability** must be ensured in all cases, whatever the kind of exchange of plants.

◆ **Pest classification**

ESA welcomes the classification of pests into Quarantine and Quality pests and the possible revision of status of some pests.

In this framework, ESA requests the adhesion to the principle of **tolerance thresholds** for the Quality Pests in line with the International Plant Protection Convention (IPPC) definition for Regulated Non-Quarantine Pests and the thresholds defined in the current seed marketing directives and calls for a proper stakeholder consultation in this respect.

◆ **International trade**

The European seed sector is the **largest exporter** in the global seed market, and its seed is travelling across the world at all stages of production. It is not uncommon for a seed company (including SMEs) to

have breeding programmes in 10-15 countries, to produce seeds in more than 20 countries in the northern and southern hemispheres and to distribute commercial seeds to more than 100 countries.

ESA calls for the specific nature of the global seed trade to be reflected in the legislation. Seed is exported and re-exported several times before it is finally sold, unlike other commodities that are exported to a single destination and then processed or consumed directly.

Establishing **clear and workable rules**, in line with relevant international standards and protocols (IPPC), is essential to maintain Europe's **global leadership** in seed exports and at the same time preserve the European Union from harmful pests and diseases. In addition, imports, exports and re-exports would be strongly facilitated by means of an electronic notification/certification and a **web-based database** with search-function per species, product, and country of origin for specific EU phytosanitary requirements for import of plants and plant products, including seed.

◆ **Governance and implementation**

As seed trade continues to increase, optimum **flexibility** is crucial to allow for the movement of seeds both intra-EU as well as to 3rd countries. ESA is convinced that **public-private partnership** governance is essential for a successful implementation of the future plant health legislation. **Delegation of tasks** to private operators with well-functioning Quality Management systems, under official supervision, will allow for **cost reductions** and **greater efficiency**. Private operators in the seed sector already apply best practices and carry out very rigorous internal checks on seed health. Risk mitigation by officially recognised best practices of seed operators should be emphasised in that respect.

While ESA welcomes the positive development of phytosanitary risk management plans for professional operators that want to perform official tasks under supervision, in relation to the issuing of plant passports, this provision should be extended to inspection tasks related to issuing of pre-export certificates and export certificates.

ESA is committed to support fair rules and proportionate requirements for all operators of plant reproductive material that will ensure farmers' access to healthy, high quality seed of the best plant varieties, facilitate the movement of seed, and to safeguard the leading international position of Europe's plant breeders and seed producers.

Consequently, ESA will put forward specific recommendations to Members of the European Parliament and Member States in order to further improve the Commission's legislative proposal.

ESA is the voice of the European seed sector. ESA's members are national associations and individual companies active in research, breeding, production and marketing of seeds of agricultural and ornamental plant species. ESA represents more than 7000 seed businesses in the EU and beyond.

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