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# POSITION



## PLANT HEALTH IMPORT CONTROLS

**A better and more harmonised enforcement across the EU is key**

Respecting plant health rules is crucial for all sectors involved in breeding, growing or trading of plants or plant products, whether they are seeds, fruits and vegetables, pot plants or cut flowers. Not only is plant health an essential aspect of the quality and safety of the products, but outbreaks of plant pests can also have damaging impacts on the environment and on the livelihood of operators. Appropriate levels of checks and control are therefore fundamental.

The European Union is a major importer, producer and exporter of plants and plant products and, as a key player in these sectors, operates within increasingly global supply-chains. That is why the EU and Member States are party to a number of international standards and agreements, such as the International Plant Protection Convention (IPPC) and its International Standards for Phytosanitary Measures (ISPMs), that facilitate the movement of plants and products across international borders.

In light of this, the European Commission's proposal on protective measures against pests of plants strikes the right balance between the protection of the EU territory against risks of plant pests and the operational needs of the plant-based sectors. The proposal has been developed since 2009 along with a thorough impact assessment and consultation of stakeholders. The European Seed Association (ESA), the European Potato Trade Association (Europatat), the European Fresh Produce Association (Freshfel) and the International Flower Trade Association (Union Fleurs) strongly support the approach of this proposal, focused on risk-targeted measures, and call for maintaining its main principles.

Despite the Commission's proposals to introduce new tools (increased surveillance, restrictions on new high-risk trade) to prevent the introduction

of new pests via imports, there have been calls for a reversed strategy on imports (i.e. to develop a closed system). Portrayed as a silver bullet solution to prevent the introduction of new pests and alleviate the organisation of import controls (paid by operators), serious concerns arise within our sectors as to the cost-benefit equation and effectiveness of such a strategy.

First, developing a closed system approach where plants can only be imported from defined origins if these are present on a positive list – contrary to today's 'open system' where plants can be imported from any origin, unless prohibited - will not guarantee the EU will stay free of any new pest outbreaks in the future. Countries operating under a closed system have not been less exposed to the introduction of harmful organisms than those operating under an open system. Regardless of the system approach, it is the enforcement of the underlying rules which is critical for its effectiveness.

Second, the closed system approach was discarded in the impact assessment mainly due to associated additional costs and administrative burden on the European Commission, EU Member States, exporting countries, and operators as well as the huge international trade implications. The administration to handle all authorisations from third countries would imply a massive workload and quickly result in a bottleneck situation exacerbated by budget cuts in the public administration.

Thirdly, retaliatory measures by trading partners cannot be excluded. A critical issue considering that Russia, the largest EU export market for plants and plant products, is currently reviewing its plant health legislation (open system) with a view to full harmonisation within the Eurasian Customs Union. Likewise, Member States' negotiating position in market access discussions may become more difficult as trading partners will demand progress on their products at EU-level.

EU exporters of plants and plant products are often confronted with unjustified market access restrictions when exporting to third countries operating under a closed system. The revision of the current EU regime should not lead to the introduction of a closed system which would be similar to the one that EU exporters are facing and criticizing. It should rather be an opportunity to call for greater reciprocity and mutual recognition on the basis of the current EU open system.

ESA, Europatat, Freshfel and Union Fleurs therefore cannot agree with the development of a fully fledged reversed strategy on imports of plants and plant products.

We call instead for an effective and harmonised enforcement across all EU Member States of the current plant health rules, as well as in the future those proposed by the European Commission. This, we believe, can be achieved by integrating plant health checks under the overall EU official controls system. In addition, a swifter follow-up and appropriate response to recurrent interceptions and negative FVO audits should be systematically pursued, coordinated and enforced at national and EU level.

Considering the above arguments, we request that any paradigm shift or any significant change to the Commission proposal regarding import controls, especially as they are emerging in such a late moment in the policy-making process, should in any case be preceded by a thorough cost-benefit analysis of the enforcement requirements, trade implications and effectiveness compared to the Commission proposal.



Europatat is the European Potato Trade Association. It gathers national associations and companies involved in the trade of seed potatoes and ware potatoes from all over Europe. The EU is a global leader when it comes to the potato sector, with highly innovative companies exporting their knowledge and products throughout the world. In terms of trade the EU exports 650.000 MT of seed potatoes (20% of EU production) and 550.000 MT (1% of EU production) of ware potatoes to 100 countries, while importing 400.000 MT of early potatoes from the Mediterranean basin. The EU has a resulting trade surplus of more than 300 million EURO.

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Freshfel Europe, the European Fresh Produce Association, is the forum for the fresh fruit and vegetables supply chain in Europe and beyond. Its members and associated members are associations and companies that have an interest in the European fresh fruit and vegetable sector, including production, trade, logistics, retailing and other services providers. The EU imports approximately 12,5 million MT (11 billion EURO) of fresh fruit and vegetables from which corresponds to 15% of the EU supply. The EU exports 5 million MT (4 billion EURO) of fresh fruit and vegetables to third country markets, of which 50% to the Eurasian customs union.

Email: [info@freshfel.org](mailto:info@freshfel.org), website: [www.freshfel.org](http://www.freshfel.org), EU Transparency Register under N°1637225479-02



Union Fleurs is the international umbrella organisation for national associations and companies active in the floricultural trade (cut flowers, cut foliage and pot plants). Union Fleurs has members in 20 countries worldwide. The EU is traditionally a large producer, trader and consumer of ornamental products. Markets are functioning along very dynamic flows on a worldwide scale; innovation, development of new varieties and products as well as well-managed and efficient logistics chains are key elements for the growth and competitiveness of the sector. The value of the EU production of cut flowers and plants amounts to 21 billion EURO. Imports into the EU amount to 1.5 billion EURO. Exports from the EU amount to 1.9 billion EURO, of which 24 % to Russia. The EU trade balance in cut flowers and plants has been positive since 2002.

Email: [info@unionfleurs.org](mailto:info@unionfleurs.org) - Website: [www.unionfleurs.org](http://www.unionfleurs.org) - EU Transparency Register under N° 14864192565-82

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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