

<p style="text-align: center;">Evaluation of the Community Plant Health Regime (CPHR) 1993-2008 and alternatives for the future GENERAL SURVEY by the FCEC (Food Chain Evaluation Consortium)</p>

INTRODUCTION

This general survey takes place in the framework of the evaluation of the Community Plant Health Regime (CPHR) for 1993-2008, which is undertaken for the European Commission, Directorate General for Health and Consumers (DG SANCO).

The evaluation covers in particular the implementation of Council Directive 2000/29/EC on plant health and of specific emergency and control measures. The objective is to analyse the results of the CPHR as it has performed during the last 15 years and to define areas for improvement under the future Community Plant Health Strategy. More information on the evaluation can be found on the DG SANCO website: http://ec.europa.eu/food/plant/strategy/index_en.htm

The aim of this general survey is to collect your views on the past CPHR, substantiated as much as possible with your experience, as well as your suggestions for the future. It consists of two questionnaires, one for Competent Authorities, and one for stakeholders. The survey is part of an overall data collection process that also includes analysis of literature, extensive stakeholder interviews as well as analysis of scientific and financial data (a specific cost survey will be developed in this context at a later phase of the evaluation).

An overview of the Community Plant Health Regime is provided in the Terms of Reference for the evaluation, which document is available on the DG SANCO website: http://ec.europa.eu/food/plant/organisms/index_en.htm

The information you provide will be treated on a strictly confidential basis. *The confidentiality of your responses and statements is guaranteed in the sense that your organisation will be identified as having responded to the survey but none of your statements included in the evaluation report will be related to its author.*

Please note the following **abbreviations** are used in this questionnaire:

- CAs: Competent Authorities
- CPHR: Community Plant Health Regime
- HO(s): Harmful Organism(s)
- IAS: invasive alien species
- ISPM : International Standards for Phytosanitary Measures
- MS: Member States
- NPPO: National Plant Protection Organisation
- PoE: Point of Entry
- RASFF: Rapid Alert System for Food and Feed
- RNQPS: Regulated Non Quarantine Pests
- TCs: Third Countries

Please note that the term ‘Competent Authorities (CA)’ refers to the Single Authority (usually the NPPO) and the Responsible Official bodies as defined in articles 1.4. and 2.1(g) of Directive 2000/29/EC.

In case you prefer to fill in this Word version of the questionnaire instead of the on line questionnaire, please return it by e-mail to Sonia Gonzalo (cphr@bvdmc.com).

IDENTIFICATION DATA

- Name of the organisation: Food and Environment Research Agency (Fera)
- Country: UK

- Type of organisation: *Tick the appropriate box.*

Single (national) Authority Other official responsible body

Other (e.g. implementing body)

If other, please specify:

- Competent for the phytosanitary aspects of: *Tick the appropriate box.*

Agriculture

Horticulture

Forestry

Environment

- Name of the person completing the questionnaire: Martin Ward
- Position: COPHS
- Phone number: 01904 465634
- E-mail: martin.ward@fera.gsi.gov.uk

Instructions for filling in the questionnaire

The following questionnaire covers the various areas of the CPHR, with questions grouped into 11 sections in accordance with the European Commission's Terms of Reference for the evaluation, to which you are referred for background information. Not all sections and questions may be relevant to your organisation: when filling in the questionnaire, please focus on the relevant sections. All questions include a box for comments, and it is important in most cases to justify your answer in the box.

This questionnaire is sent to your organisation as the central Competent Authority for plant health. Where certain aspects of policy development and implementation are delegated to other bodies (e.g. at regional/local level; other Ministries and government agencies), please ensure they are consulted on these aspects in order to complete the questionnaire.

Please note that Question 7.7 (diagnostic capacity) needs to be answered in consultation with the relevant diagnostic laboratories in your country.

The questionnaire should be completed in English. Replying in French or German is also possible.

For any questions within these sections that are not relevant to your organisation, please tick the “do not know” box of these questions.

Not all sections and questions may be relevant to your organisation. Please tick among the following sections and jump directly to the sections you have ticked. For an explanation on each section, please consult the Terms of Reference of the evaluation.

Tick the appropriate box(es)

	<i>Tick</i>
Section 1: Objectives and scope of the CPHR	<input checked="" type="checkbox"/>
Section 2: Surveillance and categorisation of HOs	<input checked="" type="checkbox"/>
Section 3 : Imports	<input checked="" type="checkbox"/>
Section 4: Intra-Community trade	<input checked="" type="checkbox"/>
Section 5: Protected zones and regionalisation	<input checked="" type="checkbox"/>
Section 6: Control measures for outbreaks and new findings	<input checked="" type="checkbox"/>
Section 7: Organisational issues	<input checked="" type="checkbox"/>
Section 8: Research and methodology development in support of the CPHR	<input checked="" type="checkbox"/>
Section 9: Coherence with other Community regimes	<input checked="" type="checkbox"/>
Section 10: Forward looking issues	<input checked="" type="checkbox"/>
Section 11: Additional information <i>(Reference to any available data/documents.)</i>	<input checked="" type="checkbox"/>

SECTION 1. OBJECTIVES AND SCOPE OF THE CPHR

1.1. To what extent are the objectives and scope of the CPHR, as it has developed in the period 1993 to date, still being met and still appropriate? *Please indicate your response in terms of the following objectives:*

A. General objectives. *Tick the appropriate box for each item.*

• **Contributing to plant health protection through sustainable production:**

Fully Partly Not at all Do not know

• **Ensuring competitiveness of agriculture and safeguarding rural development:**

Fully Partly Not at all Do not know

• **Ensuring food security:**

Fully Partly Not at all Do not know

• **Safeguarding the natural environment (forests, public and private green, landscape, biodiversity):**

Fully Partly Not at all Do not know

Please justify your answer(s):

"Still being met" and "Still appropriate" are two different questions. Objectives set in 1993 did not mention sustainable production. Terminology and political drivers have changed. The level and type of threat has also evolved with increasing globalisation. Need to use some terminology to cover risks to ornamental gardens, and public gardens.

The objectives of the directive were not clearly stated in 1977 or 1993. The whereas clauses are restrictive – for example they mention criteria for harmful organisms such as in (3) Plant production yields are consistently reduced through the effects of harmful organisms. (4) The protection of plants against such organisms is absolutely necessary not only to avoid reduced yields but also to increase agricultural productivity.

Plant production is not defined, but yield is an economic driver. However, for the UK, these concepts are not part of the legislation and have not been transposed. Instead 'Harmful organism' is defined: 'any species, strain or biotype of plant, animal or pathogenic agent injurious to plants or plant products'. There is no mention of 'quarantine', 'absence from an area', 'regulated', 'regulated in the annexes of this directive'.

Therefore although the stated objectives in 1993 did not include biodiversity and wilderness, and to a large extent they also omitted any reference to amenity it may be argued that they are, and always were, included. Therefore they are still appropriate. However, we are aware that many MS are unable to use this broad definition because of the whereas entries.

The absence of a general requirement to require safeguarding of plant health in the community, and also restricting the requirement to notify alien/non-indigenous harmful organisms to official services, and not to the public or stakeholders suggests that for many MS the directive has never been adequate for any of the newly arisen objectives now being proposed by this questionnaire. In the UK, the interpretation of the legislation prevents the landing, keeping movement etc. of any plant pest not normally present in Great Britain and which is likely to be injurious to plants in Great Britain and also requires any occupier, other person in charge of premises, or otherwise in course of

his duties who becomes aware or suspicious of the presence of any such plant pest notification confirmed in writing.

B. Specific objectives. Tick the appropriate box each item.

- **Providing protection against HOs that so far do not occur in the EU:**

Fully Partly Not at all Do not know

- **Controlling HOs of still limited distribution which are so harmful that strict control on further spread is needed:**

Fully Partly Not at all Do not know

- **Ensuring the availability and use of healthy plant material at the beginning of the plant production chain:**

Fully Partly Not at all Do not know

- **Controlling the spread of HOs through movement of host plants/plant products:**

Fully Partly Not at all Do not know

Please justify your answer(s):

1. 'Partly' because there are examples of Annex IAI and other organisms which still do not occur, but other examples where the regime has failed to prevent the introduction of HOs, both listed and unlisted. Generally poor at responding rapidly to new threats. The nature of the regime makes it reactive, rather than proactive, on the whole. The assumption is that trade is permitted, unless a risk can be demonstrated, which is the reverse of the animal health regime.

2. 'Partly' because there are examples of HOs whose spread has been reduced (e.g. some PZs), while there are also examples of HOs that have spread despite the existence of requirements to prevent this. The concept of regionalisation has not been wholly accepted, with a reluctance to recognise differing patterns of risk and presence across the EU.

3. 'Partly' because the regime has generally helped to ensure freedom from quarantine organisms, at all stages of production, but 'healthy' goes beyond this. Certification and marketing requirements are also relevant and there needs to be a strong relationship between the two regimes. The current difficulty, of not being able to refer to testing for quarantine organisms in the proposed EU fruit certification schemes, needs to be addressed.

4. 'Partly' because risk targeting is not being used effectively. Resources are being used to inspect some produce, which poses little risk, diverting attention away from the many uncontrolled materials, which could pose a substantially greater risk. It has also not been possible to make effective use of the RNQP concept, due to the impracticality of the ISPM.

1.2. Regarding the natural spread (i.e. spread by natural movement or dispersal irrespective of movements of plants and plant products) of HOs that are currently covered by the CPHR: Tick the appropriate box for each item.

a) To what extent is natural spread of HOs currently perceived as a problem?

Fully Partly Not at all Do not know

b) If yes, is it mainly a problem within MS and/or across MS?

Within MS Across MS Within MS and across MS Do not know

c) Is natural spread perceived as being more a problem than in the past?

Yes No Do not know

d) Is there an increased incidence of natural spread?

Yes No Do not know

*If the answer is 'yes', please justify your answer, by referring to any examples:
 What is the definition of natural spread? Is it only either by the organism moving itself and the assistance of natural phenomena (wind, rain etc) or does it include man assisted but not with the movement of plants.
 Natural movement of harmful organisms has been considered for a long time – black stem rust of wheat, Colorado beetle – for example the massive 40 year old volume Johnson,CG 1969 Migration and Dispersal of Insects by Flight. Methuen: London. 763pp. What there is, is an increase in organisms not previously known in the EU (Aculops fuschiae, Eulecanium excrescens, Cacopsylla fulguralis, Paysandisia archon or Europe (Diabrotica virgifera) or southern Med (Rhynchophorus ferrugineus) or known to science at all (Camereria ohridella) and then natural movement, sometimes remarkably rapidly and probably man assisted but not with plants or produce. Disease organisms are perhaps less noticeable. Some are able to spread naturally through air-borne spores etc. but many are quite restricted – for example, water splash for Phytophthora ramorum or kernoviae. Others tend to be very associated with their hosts – Pepino mosaic virus, many viroids etc. but some are mobilised naturally by their vectors – so Frankliniella occidentalis has been followed by spreading of associated tospoviruses.
 Truly natural spread may not have increased. Pathways are often important in sequence - so trade (both commercial and non-commercial) for long distance and then "natural" for short distance. E.g. Phytophthora ramorum almost certainly arrived in Europe on plants but has spread naturally in gardens etc due to a favourable climate and availability of large numbers of susceptible hosts. Natural spread links to the biology of the pest, climatic factors, changes in production and host distribution and susceptibility - eg areas of monoculture.*

e) What is this due to? Tick the appropriate box for each item.

Potential factors	Yes	No	Do not Know
Increasing trade	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Climate change	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Increase in forestry pest incursions	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Changes in stakeholder interests	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Changes in public perception	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Concern with biosecurity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Other (please specify):	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Please justify your answer(s):

Increasing trade is the obvious factor, as without this there would not be the opportunity for organisms to move substantial distances and then spread locally. Where natural spread takes place over longer distances, such organisms would not generally fall within the plant health regime

f) What is the damage caused by natural spread of regulated HOs (listed and non-listed), in terms of: Tick the appropriate box for each item.

Damage caused on:	Scale of damage caused			Do not Know
	High	Medium	Low	
Agriculture	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Horticulture	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Aquaculture	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Forestry	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Public and private green	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Biodiversity and the natural environment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Environmental resources (soil, air, water)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Wider economy	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other (please specify):	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please justify your answer(s):

Without a clear definition of what is meant by natural spread this is difficult to answer. The impact of natural movements of *P.ramorum* and *Diabrotica*, for example, could be substantial. Also, *A. chinensis* is establishing by natural movements in Italy and if this happened in the UK there would be enormous consequences.

Horsechestnut bleeding canker is an example in the forestry sector. First incursion will be plant related, no doubt, but spread to all parts of GB in mature trees must be natural. Same story with OPM.

g) Have you undertaken a quantification of these costs? Tick the appropriate box.

Yes

No

Do not know

If the answer is 'yes', please justify your answer, by referring to any such studies. Attach data and references where available (in Section 11).

See: http://www.nao.org.uk/publications/0203/protecting_england_and_wales_f.aspx

1.3. Has the CPHR had a positive, negative or no impact on the following aspects? Tick the appropriate box for each item.

	Positive	Negative	No impact	Do not know
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Plant health	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Intra-Community trade	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Competitiveness of EU private operators in production/trade chain within EU	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Competitiveness of EU private operators in production/trade chain on the world market	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Biodiversity and environment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Forestry	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other, please specify: Access to imported plants and produce?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Please justify your answer(s):

Difficult to answer. We have assumed this relates to the regime by comparison with what existed before have. Problems but some opportunitites with exporting from a Single Market.

In particular, regarding plant health in your country, which have been the three HOs for which the CPHR has been most effective in terms of providing protection against introduction or spread within your territory? And which have been the three HOs for which the CPHR has been least effective?

Most effective protection	Least effective protection
1. Thrips palmi	1. Soil borne organisms
2. Liriomyza huidobrensis/trifolii	2. Unlisted pests e.g.Pseudomonus syringae pv aesculi
3. Dendroctonus micans	3. Bemisia tabaci

Please justify your answer(s):

Difficult to answer, hard to compare with the "no regime" counterfactual. Some of the best controlled HOs will be the ones we do not hear of, and may even not know of.

Bemisia tabaci – very ineffective with numerous incursions and outbreaks every year.

Liriomyza trifolii and huidobrensis have been very effective. – the alteration of the legislation in the early 2000s appears to permitted a reduction in introductions and outbreaks. And these are pests which have demonstrated a capability of wiping out glasshouse salad and fruit vegetable crops in the UK. Both now eradicated from UK.

Dendroctonus micans - UK PZ status allowed us time to develop and introduce the predator without having to worry about further new introductions.

1.4. What should be done in future to improve the scope and objectives of the CPHR? Tick the appropriate box for each suggestion.

Suggestions	Yes	No	Do not know
Maintain current scope and objectives	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Restrict scope (from the current list of 250 HOs) to focus on priority HOs	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Expand scope to include IAS that have an impact on plant	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

biodiversity in general, while not being directly injurious to plants and plant products			
Expand scope to include IAS that have an impact on human health	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Expand scope to include a more active prevention of natural spread	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Define priority HOs on the basis of:			
<ul style="list-style-type: none"> • extent of impact on agriculture, horticulture and forestry 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<ul style="list-style-type: none"> • extent of impact on the environment and public/private green 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<ul style="list-style-type: none"> • presence or absence in the EU 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<ul style="list-style-type: none"> • prospects for early detection / successful eradication / successful control 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<ul style="list-style-type: none"> • prospects for listing under the Seed & Propagating Materials Regime instead of the CPHR 	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<ul style="list-style-type: none"> • other criteria (please specify): 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Expand scope to include mandatory surveillance of listed harmful organisms	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Expand scope to include laboratory and science support issues	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other suggestions (<i>please specify</i>): - Need to prioritise on basis of PRAs. Mandatory surveillance needs to be risk based and proportionate. - Expand ability of Member States to take early action against non-listed pests. - Include more organisms in Annex IAI, rather than having indicative lists. - Define personal baggage controls in the regulations. - Separately without regulations improve public awareness of risks from movement of unregulated plants and produce.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please provide comments on the above suggestions. In particular, if you suggest to expand the scope, please comment on the impact on resources and funding.

Restrict Scope – No. It is unreasonable to expect society and stakeholders to maintain a financially expensive regime if there is no perception of benefit to them. Even if only commercial crops were to be protected (which we do not agree with) then there are so many such crops how could priorities be set. A yield loss of a few percent can be ruinous for some growers and crops but what priority could be given to a HO which does this, in comparison with one which can kill many plants. It would also make adding to the regulations even more difficult if something had to come off in compensation; so there would be even greater incidence of MS simply letting an emerging pest establish with neither taking action nor notifying other MS – especially if the perception is that it is a lower risk for themselves.

This NPPO has many years of experience of both HO and IAS. When plants are the host of or damaged by an alien organism identifying whether they are an IAS or HO has been impossible. We consider all HOs to be IAS, the categorisation is false. We question whether it is helpful to attempt to categorise every organism into one or other of these boxes. By very clearly redefining that HOs are

ONLY those which have an economic yield effect on plants which are of direct economic benefit to man and associated food animals. Alternatively, drop the differentiation and propose for assessment of whether an organism should be regulated on all of the grounds of previously absent from a (eco)system.

The benefits of increasing the range of plant pests (including those affecting human and animal health) regulated by the one quarantine directive are many, including that the basis for legislation exists, the mechanisms already exist for implementation (inspectors, customs officials, certification and passporting etc) and stakeholders – both commercial and private would know that there was a single piece of legislation embracing all of these aspects.

Expand scope to include a more active prevention of natural spread - Laudable aim, but not sure how this could be achieved.

SECTION 2. SURVEILLANCE AND CATEGORISATION OF HARMFUL ORGANISMS

2.1. Current categorisation of HOs in Directive 2000/29/EC:

- a) Are there HOs which should be listed in the Directive (and are not currently listed)? Which ones? Tick the appropriate box.

Yes

No

Do not know

If the answer is 'yes', please justify your answer, by identifying or listing any such HOs and specifying for what reason they should be listed:

See attached UK requests and outstanding recommendations from the Annexes Working Group.

- b) Are there HOs which are currently listed in the Directive and should not be listed? Which ones? Tick the appropriate box.

Yes

No

Do not know

If the answer is 'yes', please justify your answer, by identifying or listing any such HO and specifying for what reason they should not be listed:

See answer above. Needs better mechanism for moving organisms from quarantine to RNQP status (eg marketing directives).

- c) Are there HOs which are currently not regulated under the Directive, but under the Directives on the Marketing of Seed and Plant Propagating Material, and should be transferred to the plant health Directive 2000/29/EC? Tick the appropriate box.

All

Some

None

Do not know

Please justify your answer:

The Marketing Directives require 'substantial freedom' from all quality affecting organisms on the genera/species covered. Therefore it is possible that some of the organisms we have proposed for listing, may by default be covered by the marketing Directives. But in terms of the organisms that are specifically referred to in the implementing measures accompanying the Marketing Directives we are not aware that any of these should be transferred to the Plant Health Directive.

- d) Are there HOs which are currently listed in the plant health Directive 2000/29/EC but should be transferred to the Directives on the Marketing of Seed and Plant Propagating Material? Tick the appropriate box.

All

Some

None

Do not know

Please justify your answer:

By default, if we delist a quarantine organism it is then covered (as regards relevant genera/species) by the marketing regime. Strawberry blackspot is a recent example.

e) **The listing of HOs should be based on reliable information being available for appropriate risk assessment / risk management (including data on pest status and scientific data for biological impact and economic analysis). To what extent is reliable information available as concerns:** *Tick the appropriate box for each item.*

• **Presence and distribution of the currently listed HOs?**

Generally yes Sometimes Generally no Do not know

• **Presence and distribution of HOs recently considered for listing?**

Generally yes Sometimes Generally no Do not know

• **Scientific data for biological impact of the currently listed HOs?**

Generally yes Sometimes Generally no Do not know

• **Scientific data for biological impact of HOs recently considered for listing?**

Generally yes Sometimes Generally no Do not know

• **Scientific data for economic analysis of HOs of the currently listed HOs?**

Generally yes Sometimes Generally no Do not know

• **Scientific data for economic analysis of HOs recently considered for listing?**

Generally yes Sometimes Generally no Do not know

If the answer is 'sometimes' or 'generally no', please indicate whether this refers to your country, the Community, or to both: Continuing problem with getting adequate economic data on costs and benefits of measures and proposed measures. EFSA inability to involve itself in this area does not help.

f) **Currently, Annex I of Directive 2000/29/EC lists HOs banned in all cases, whereas Annex II lists HOs banned only if they are present on certain plants and plant products. Each Annex subsequently distinguishes between HOs for which the entire EU territory needs to be protected (Section A) and HOs for which only a limited part (Section B) needs to be protected (protected zones). Is this approach for structuring of the Annexes appropriate for providing effective protection?** *Tick the appropriate box.*

Yes No Do not know

*If the answer is 'no', please justify your answer.
Annex II good for distinguishing risks from plants and produce (eg many citrus pests which are only quarantine listed when on plants, not on fruit), but problems when quarantine status only on certain genera. Ambiguous as to whether action can be taken when found on something new, which is actually a sign of increased risk e.g. action required against Erwinia chrysanthemi to protect potatoes but it is listed only on Dianthus.
Application of the RNQP concept is yet to be resolved.*

2.2. On which HOs (from the lists of the Directive) are the plant protection services in your country currently focusing as a matter of priority? Please list and indicate the main reason for prioritising.

Priority HOs:	Reasons for prioritisation:			
	Phytosanitary risk	Socio-economic impact	Both	Do not know
Phytophthora ramorum, kernoviae, pseudosyringae	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Potato ring rot	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Potato brown rot	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Bemisia tabaci	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fireblight	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Anoplophora	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Diabrotica	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Liriomyza trifolii & huidobrensis	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PSTVd and other Pospivroids	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Tomato and Chrysanthemum viroids	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Scirrhia pini	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Oak processionary moth	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Tuta absoluta	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Emerald ash borer	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Ips typographus Ceratocystus fagacearum	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2.3. Are there HOs which present an important phytosanitary risk and/or economic impact in your country but on which your plant protection services cannot sufficiently focus on at present? Tick the appropriate box.

Yes No Do not know

If the answer is 'yes':

a) Please justify your answer, by referring to any examples of such HOs:

It is not possible to focus on the many uncontrolled trades at import, due to the emphasis on inspecting all trades (including produce) at 100%, except where reduced checks apply. There are some organisms (e.g. A. chinensis) where current resources are insufficient to deal with a major incident.

b) Please indicate the reasons why your plant protection services can not sufficiently focus on the above HOs? Tick the appropriate box(es).

Possible reasons	Please tick
Insufficient staff in general	<input checked="" type="checkbox"/>
Insufficient suitably qualified and trained staff	<input type="checkbox"/>
Insufficient testing and diagnostic capacity	<input type="checkbox"/>
Insufficient training and R&D backup to deal with these HOs	<input type="checkbox"/>
Other (please explain): Limited resources	<input checked="" type="checkbox"/>

2.4. Do the plant protection services in your country experience difficulties in effectively dealing with all the regulated HOs (many of which are non-European), in terms of: Tick the appropriate box for each item.

- **The expertise required for inspection?**
 Generally yes Sometimes Generally no Do not know
- **Staff resources required for inspection?**
 Generally yes Sometimes Generally no Do not know
- **The expertise required for diagnostics?**
 Generally yes Sometimes Generally no Do not know
- **Staff resources required for diagnostics?**
 Generally yes Sometimes Generally no Do not know

Please justify your answer(s):

Regime needs to recognise what can be visually detected and what needs lab tests.

Many Annex IV measures were introduced in advance of the ISPM glossary. Therefore, the Inspection entries were intended to include the concept of testing etc. for organisms which could not be visually seen – many viral pathogens, soil-borne organisms etc. Since then the Commission has insisted that inspection means ‘visual’ as in the glossary and inspections methods are now inappropriate for many of the regulated and emerging HOs.

2.5. Surveillance/monitoring programmes explicitly required by EU legislation

a) **Do you implement in your country surveillance/monitoring programmes required by EU legislation, i.e. for protected zones (PZs) and in relation to Community emergency measures?** Please attach relevant national legislation and plans. Tick the appropriate box.

Fully Partly Not at all Do not know

b) **What is the speed of reporting survey results to DG SANCO?** Tick the appropriate box.

Within legal deadline Within 1 month after deadline > 1 month after deadline
 Do not know

Please justify your answer(s):

Information available from the Commission re b). It is generally not possible to gather sufficient information in order to make an informed report which would assist other MS within a 2-day deadline.

2.6. Other surveillance/monitoring programmes

- a) **What active surveillance/monitoring programmes for listed and non-listed HOs do you conduct in your country other than those required by EU legislation, i.e. other than for PZs and Community emergency measures?**

Please list the surveillance/monitoring programmes conducted in your country, and provide brief description and/or background documents (in Section 11).

In addition to surveys for specific HO's in EU legislation we undertake quarantine surveillance on plant material at all points in the production and marketing chain looking for all and any HO's whether listed or not.

Surveillance is also undertaken for organisms on the EPPO alert list, following outbreaks (Gypsy moth, termites) or newly intercepted organisms (Blueberry midge).

Other examples are: *Epitrix similaris* on potatoes - inspectors have been asked to be alert for this, especially from Portugal.

Rhizomania on fodder beet - we do a survey annually to support exports of potatoes.

Dickeya spp/solani – inspectors took samples from blackleg plants during seed potato GSI's this year.

Please specify which HOs you actively survey (listed/not listed) and type of plant / crop protected.

HOs for which active surveillance in place	Type of plants/crop protected
Viroids, <i>Tuta absoluta</i> , <i>Keifferia lycopersicella</i> , <i>Liriomyza</i> , <i>bemisia</i>	Protected fruit-vegetable crops
Any unexplained biotic agent seen to affect the health of trees in forests and woodlands	Chrysanthemum
	Poinsettia
	Trees in forests and woodlands

- b) **Within what timeframe does the plant protection organisation in your country usually notify outbreaks and findings of new organisms resulting from surveillance/monitoring to the Commission and the Member States? Tick the appropriate box.**

2 days 2 days – 1week > 1 week Do not know

*If more than 1 week, please specify:
New organisms - takes time to identify and do provisional PRA.*

2.7. What should be done in future at EU/MS level to improve surveillance of HOs? Tick the appropriate box for each suggestion.

Suggestions	Yes	No	Do not know
Increase number of listed HOs	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Decrease number of listed HOs	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Change the approach for structuring of Annexes I and II	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Focus surveillance on priority HOs, defined on the basis of phytosanitary risk and significant socio-economic impact	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Introduce explicit Community legislation for global surveillance/monitoring for listed/non listed HOs, other than those covered by the legislation concerning protected zones and emergency measures)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Improve staff resources/training for national authorities (plant protection services)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Enhance capacity building in MS (diagnostics, laboratories, R&D etc.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Reinforce phytosanitary import control to reduce the risk of introducing HOs	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Develop a notification system (outbreaks/new findings) similar to the Rapid Alert System for Feed and Food (RASFF*)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Involve persons / organisations not belonging to the Competent Authority in surveillance and rapid alert / early warning systems	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other (<i>please specify</i>): - Reporting and release of information – earlier/greater access for stakeholders.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please provide comments on the above suggestions. In particular, please comment on the impact of your suggestions on resources and funding.

Increase/decrease number of listed HOs - Depends on phytosanitary developments and consideration of PRAs.

Change the approach for structuring of Annexes I and II - The inclusion of named host plants in Annex II is unhelpful as, for many, it is not a definitive listing of hosts. As well as it restricting action when the HO is associated with another host it is also not possible to restrict the introduction of the organism in an isolated state. Retain current structure until position on RNQP is clear.

Introduce explicit Community legislation for global surveillance/monitoring - There should be a requirement for a low level surveillance of all imported plants and plant produce from whatever source, targetting those which do not require a phytosanitary certificate. Internal surveillance should be restricted to a degree of surveillance at places of plant production using imported planting material.

Surveillance should also used enhanced publicity with a requirement for notification to official services of any organism suspected to be a harmful organism not normally present, either in the EU, or within a designated area of a member state, as appropriate.

Involve persons / organisations not belonging to the Competent Authority in surveillance and rapid alert / early warning systems – Yes, as defined above. Surveillance by non CA people is very important (e.g Colorado beetle). However, the notification should be to the NPPO and not directly to the Commission services.

Reporting and release of information – Earlier/greater access for stakeholders. At present there is considerable reliance on reports back from the competent authorities to keep industry up to date.

As in any field of activity it would be possible to do more if more resource was available. Whatever level of resource allocation is determined politically it is necessary for the regime to make the most effective use available of resources through evidence based targetting of risks and sharing of responsibility and costs with growers and traders where appropriate.

* RASFF offers advantages of speed and accessibility to stakeholders. More information on RASFF can be found at: http://ec.europa.eu/food/food/rapidalert/index_en.htm

SECTION 3. IMPORTS FROM THIRD COUNTRIES

3.1. During the last 15 years, have the plant health procedures and requirements for commercial imports of plants/plant products been effective in preventing the introduction of HOs into the Community? Tick the appropriate box for each item.

Plant health requirements and procedures	Effective for prevention of introduction of HOs into EU		
	Yes	No	Do not know
Fulfilment of minimum requirements for Border Inspection Posts (BIPs)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Border controls			
- Documentary checks	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
- Identity checks	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
- Plant health checks	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Possibility for identity and plant health controls and release of consignment at place of final destination instead of point of entry	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Controls at final destination			
- Identity checks	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
- Plant health checks	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Registration of importers	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Notification of interceptions (EUROPHYT)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Measures to deal with non-compliance	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Phytosanitary certificate	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Phytosanitary certificate for re-export	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Additional declaration on phytosanitary certificate	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Plant health movement document (checks at final destination)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Reduced frequency checks (imports of end products)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other (<i>please specify</i>): - Consistency between customs and plant health legislation (e.g. transit)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

If the answer is 'no', please justify your answer, by referring to any examples of the introduction of HOs due to the above measures on imports from third countries:

None of these measures has been fully effective on its own. Still problems of communication and traceback when consignments are moved from a point of entry in one MS to a point of destination in another. Problems of not applying measures sufficiently quickly or uniformly to prevent, particularly new risks eg longhorn beetle.

Complexity of additional declarations and how they are interpreted means that inspectors frequently feel that the exporting country is unlikely to have understood the objective of the requirement and

that when the wording is correct this may be more a tribute to their linguistic ability rather than scientific rigor.

Misunderstanding of purpose of EUROPHYT which originally was a fast notification system between BIPS so as to prevent a refused consignment being diverted to another port, or to alert all EU inspectors to new risks. The omission of intra-community trade was always opposed by the UK, most incursions and outbreaks in UK are introduced from EU and not from third countries. Also, the system is now so full of trivial non-compliances, often repeating the same non-compliance simply because of a minor difference – say the naming of several hosts – means that few make the effort to examine the reports in any detail, and even fewer would examine them on a daily basis. It is not clear whether RASFF would have any additional benefits. Unfortunately non compliances are far far more numerous in plant health than in animal or food health. This might be improved if there was selection of priorities for notification, or it was more easily split into commodity groups., for example so that plant health inspectors do not receive notification of numerous ISPM 15 mark omissions as is currently happening.

3.2. Do reduced frequency checks apply in your country for imports of end products? Tick the appropriate box.

Yes

No

Do not know

If 'yes', for which end products? Please list:
All available

If the answer is 'no', please explain why:

Are you satisfied with the reduced frequency checks system, as currently applied by MS on an optional basis? Tick the appropriate box.

Yes

No

Do not know

If the answer is 'no', please explain

Support reduced checks regime and would like to see it extended. This has been a very valuable assistance releasing some resource to target higher risk material.

Consideration should be given to making the reduced checks more responsive with more frequent adjustments to the levels according to pest findings and inspection levels.

It is also questionable whether the use of consignment numbers is the only criteria which should be used for evaluation of reduced frequency checks in future years, for example quantity by weight or individual numbers of units (of fruit or vegetables) may also be suitable.

3.3. Are Community derogations* from import requirements or prohibitions being used in your country? If yes, please specify in which case: Tick the appropriate box(es)

** Derogations create an exemption from the normal import procedures or prohibitions, for specific products from specific third countries of origin under specific additional import requirements and for a limited time.*

Derogation	<i>Tick</i>
Commission derogation Decisions (Directive 2000/29/EC article 15.1) with alternative import requirements (including systems approach)	<input checked="" type="checkbox"/>
Imports from certain third countries for which a specific status for HOs is recognised at Community level	<input checked="" type="checkbox"/>
Scientific and breeding material (Directive 2008/61/EC)	<input checked="" type="checkbox"/>
Small quantities for non commercial purposes (incl. passenger transport)	<input checked="" type="checkbox"/>
Other (please specify):	<input type="checkbox"/>

Is there a potential risk from the current implementation of these derogations? Tick the appropriate box.

Yes

No

Do not know

If the answer is 'yes', please explain and provide examples:

Passenger baggage concessions are difficult to apply - needs an EC wide approach in order to publicise them to passengers and raise awareness.

Scientific and breeding – there are differences of interpretation. We are aware that some MS restrict the regulation of introduction of HOs for scientific use only to those named in the annexes.

As Annex II is about a HO on a host it is questionable whether regulation of these HOs in isolation is permissible – although the UK would do this.

However, the omission of a non-indigenous organism from either Annex I or II has been based, partially, on pathway analysis. Therefore, the risk of deliberate nurturing of these organisms and the accompanying possibility of a population escaping has not been considered. Therefore, a different risk analysis (more conservative) is necessary. It is also questionable how many MS consider the risk to other parts of the Community when they are using the scientific and trial licencing regulations.

Attempts to add additional annexes to 2008/61/EC for certain plants, a requirement of the directive when a MS develops a suitable management regime, have been ignored by the Commission Services. Examples can be supplied.

3.4. What is the average speed of notification (introduction into EUROPHYT) for findings at import:

- **regulated (=listed) HOs:** *Tick the appropriate box.*

2 days 2 days – 1week > 1 week Do not know

If more than 1 week, please specify:

Recent FVO mission suggested that we were currently operating at 28 days.

- **non-listed HOs:** *Tick the appropriate box.*

2 days 2 days – 1week > 1 week Do not know

If more than 1 week, please specify:

As above.

If the delay is >1week, please explain why and provide examples:

There was a substantial delay in 2008 due to staff cuts. The UK approach is to await a final diagnosis before making a notification, which inevitably introduces a delay beyond the deadline specified.

*Difficulty of system accepting a generalised notification – eg a *Liriomyza* spp. or *Tephritidae* which then is corrected to the full determination when available. The original remains on the system and the new one appears very delayed.*

We simply do not have the resources to input the numerous minor non-compliances.

3.5. Are notification data from EUROPHYT used to determine risk probability for official controls? Tick the appropriate box.

Yes No Do not know

If the answer is 'yes', please explain and provide examples:

Through the reduced checks system. Also contributes to intelligence supporting the quarantine surveillance programme.

They have been necessary to convince the Commission that there are risks with trades which have not been regulated – a number of alterations to requirements for Liriomyza, Thrips palmi etc. were based on Europhyt notifications of non regulated trades. However, it can and has been argued that Plant health inspectors should not be making such inspections and even if they do, not making such notification. This view has improved and MS are increasingly using Europhyt for such notifications, but it remains poor with too much resource being used to check-inspect produce which has arrived with a valid phytosanitary certificate.

3.6. How many non-compliant consignments have been intercepted for HOs (in absolute numbers and in proportion to the total number of consignments) during the reference period (1993-2008), in particular the three most recent years? How many HOs were concerned by these interceptions? Please provide data per year, according to the following table.

	Consignments intercepted for HO		Number of HOs
	Nb of consignments	% of total number of consignments	
2008	Data available from EUROPHYT		
2007			
2006			
Total (1993-2004)	For wood and wood products, very few, if any in the period(excludes WPM and then very low.		

For the 10 most frequently intercepted HOs in your country, please provide number of consignments intercepted and HO name.

	HO 1	HO 2	HO 3	HO 4	HO 5	HO 6	HO 7	HO 8	HO 9	HO 10
Name of HO										
2008										
2007										
2006										
Total (1993-2004)										

3.7. Are any special requirements applied in your country for the import of plant products from Annex VI? Tick the appropriate box.

Yes

No

Do not know

If the answer is 'yes', please explain and provide examples:

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3.8. To what extent is the current mechanism for adopting additional Community legislation for specific listed or non listed HOs (so-called ‘emergency measures’) reacting rapidly and effectively to frequent interceptions from Third Countries? Tick the appropriate box.

Fully Partly Not at all Do not know

If the answer is ‘partly’ or ‘not at all’, please explain:

A few instances yes - P. ramorum was an example of a rapid response (but this was not triggered by interceptions from third countries).

Rhynchophorus was slow, taking about 15 years. Thaumetopea processionaea is now over 2 years . Anoplophora glabripennis was also very slow. There has been some speeding up of emergency measures – Gibberella circinata, Dryocosmus kuriphilus and Anoplophora chinensis have some improvement, although the lack of measures for the more dangerous A glabripennis is to be regretted. Priority has been given to proving the extent of internal infestations, demanding extensive surveys etc. before taking the most important phytosanitary measure of all, which is to stop new re-introductions. If an eradication campaign cannot reduce re-introduction to manageable levels then all other measures make the HO a regulated non quarantine pest, at best.

The concept of ‘infested area’ is needed.

3.9. What should be done in future at EU/MS level to improve controls on the presence of HOs on imports from third countries, and possibly to facilitate trade? Tick the appropriate box for each suggestion.

Suggestions	Yes	No	Do not know
Tighten the enforcement of current legal provisions concerning import controls at both CA and industry levels	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Introduce appropriate sanctions for infringements	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Tighten current legal provisions at EU level	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Relax current legal provisions at EU level	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Improve the cooperation between plant health authorities and Customs	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Improve the link between plant health and Customs nomenclature	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Improve the link between plant health and Customs IT systems	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Improve staff resources/training for national authorities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Improve the risk basis of controls	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Improve the use of notifications by the Member States for better preparedness to risk	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Develop a notification system similar to	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

the Rapid Alert System for Feed and Food (RASFF*)			
Improve/revise the system of reduced frequency checks	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Evaluate temporary derogations after several years, potentially with a view of transferring these into a permanent provision on a case-by-case basis	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Further develop the use of electronic certification	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Improve control on the correct use of the additional declaration on the phytosanitary certificate	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Introduce measures to address passenger transport	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Enhance capacity building in Third Countries	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Improve the Community emergency measures system	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Strengthen the implementation of the Community emergency measures system	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other (<i>please specify</i>): - Improve formal links between CAs, particularly on traceback and results through Inspectorates - Additional resources for FVO – so that they can follow up on interceptions and other non-compliances and indicate sanctions that would be imposed on trade from third countries. - Temporary prohibitions on trades when there have been regular interceptions or non-compliances and only allowing that trade to resume once third countries can meet requirements. - Require the (original) country of origin to be stated for seed. - Require more laboratory testing for organisms where a visual inspection will not guarantee freedom from an organism (especially for high risk trades). - Inclusion of size of material during risk assessment. (Generally larger specimens tend to pose a higher risk e.g. palms.) - Tighten controls on movement of planting material imported into one Member State and then moved to another - final recipient MS may not be aware of its third country/high risk origin. - Consider post-entry quarantine for certain high risk trades. - Consider introduction of action	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

thresholds (e.g. extension of current controls on potatoes from Egypt to other trades).			
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* RASFF offers advantages of speed and accessibility to stakeholders. More information on RASFF can be found at: http://ec.europa.eu/food/food/rapidalert/index_en.htm

Please provide comments on the above suggestions. In particular, please comment on the impact of your suggestions on resources and funding.

As in any field of activity it would be possible to do more if more resource was available. Whatever level of resource allocation is determined politically it is necessary for the regime to make the most effective use available of resources through evidence based targetting of risks and sharing of responsibility and costs with growers and traders where appropriate.

SECTION 4. INTRA-COMMUNITY TRADE

4.1. During the last 15 years, have the plant health rules for intra-Community trade been effective in a) contributing to the prevention of HO spread caused by the movement of plants and plant products, and b) ensuring the free circulation of plants and plant products within the EU? Tick the appropriate box under a) and b) for each plant health rule.

Plant health rules	a) Effective for preventing the spread of HOs			b) Effective for ensuring the free circulation in plants/plant products		
	Yes	No	Do not Know	Yes	No	Do not Know
Overall	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Registration of producers, collective warehouses and dispatching centres	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspection of producers, collective warehouses and dispatching centres	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Issuing of plant passport by NPPO (procedure)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Issuing of plant passport by authorised nurseries under NPPO supervision (procedure)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Plant passport (document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Official checks (i.e. occasional and regular checks by official services)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Official plant health movement document linked to inspection at final destination and re-export (Dir. 2004/103/EC)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
The intra-community phytosanitary communication document for transit (Roosendaal Group)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other (please specify):	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If the answer is 'no', please justify your answer, by referring to any examples of a) spread of HOs related to intra-Community trade, and/or b) problems in free circulation, if any:

*Strongly support delegation of responsibility to growers for issue of plant passports and associated checks, supported by official audits. Open to addressing problems if passport information is not clear, but generally favour flexibility on documents. Experience has shown that for some trades, particularly relating to PZ's, the passporting regime has not prevented the spread of HO's e.g. *Bemisia tabaci*.*

As there is no agreement on what an HO is this is very difficult to answer. Overall it has been a little better for listed pests than non listed previously alien pests, however there is a strong tendency towards using the legislation to harmonise the establishment of pests across all of the community as this then permits free trade. An important component of the failure has been the reluctance to make

use of protected zones. This may be for political reasons or the resource required – the difficulty of annual reviewing and other maintenance – together with the lack of border controls (and for PZs they do not have to be political borders), the non compliance by export MS and their growers have all led to unnecessary spread.

When it comes to non listed organisms there are problems that some MS do not believe they have any rights to interfere with a contaminated trade, or do anything about outbreaks. Whilst others may protect their own conditions but do not accept that they should take emergency action and manage a risk on behalf of the entire community.

When new pests establish in small parts of the community the Commission has been unacceptably slow to adopt intra-community measures and therefore this has also prevented adequate import measures. In some cases, such as Rhy. Ferrugineus there is ample demonstration that the lack of import controls has led to new geographically distinct areas of infestation which are not caused by intra-community movement.

4.2 Does the plant passport system:

- **Sufficiently take into account risk analysis?** *Tick the appropriate box.*

Yes

No

Do not know

If the answer is 'no', please justify your answer, by referring to any examples where the current system has not been sufficient:

*The difference between a plant being subject to passport restrictions or not is considerable. Therefore some HOs are only regulated on a limited range of hosts – the limitation can be that the controls are only on plants moving to another commercial grower (annex VAI 2.1) or only of hosts considered to be a greater risk. This was certainly the case with the *Liriomyza trifolii* and *huidobrensis* passport requirements, although this has been rectified recently – although it is acknowledged that “herbaceous plants” is a difficult listing to interpret. The discussion of whether *Rosaceae* should be included in the list of *Anoplophora chinensis* hosts is a more recent discussion. Undoubtedly this host is not favoured, and because there is uncertainty at the acceptability it could not be justified to extend passporting to this very large group of commonly grown, economically important, plants which are not subject to plant passport controls.*

- **Provide sufficient guarantee that plants and plant products are safe to move within the EU? Tick the appropriate box.**

Yes

No

Do not know

If the answer is 'no', please justify your answer, by referring to any examples where the current system has not been sufficient:

Not fully effective and we should not preclude the possibility that a prohibition may be appropriate for movement of higher risk material from an outbreak site or area. Where passports are required for some movements (e.g. of third country material and from an outbreak area) but not others (e.g. the *Anoplophora* Decision), monitoring of compliance must be at the boundary where it is clear whether a passport is needed.

- **Allow sufficient traceability for plants and plant products moving within the EU? Tick the appropriate box.**

Yes

No

Do not know

If the answer is 'no', please justify your answer, by referring to any examples where the current system has not been sufficient:

Traceability in many cases is adequate, but there are exceptions, such as seed of unknown origin, which justify a 'no' rating. Doesn't provide any traceability for non passported plants – and this is extensive and can be cross continental for sale from commercial to retailer. Arrangements for auctions is particularly unsatisfactory.

4.3 Is the plant passport document:

- **Sufficiently harmonised? Tick the appropriate box.**

Yes

No

Do not know

If the answer is 'no', please justify your answer, by referring to any examples of lack of harmonisation:

Evidence needed of problems before any changes are suggested. But open to suggestions of a simplified approach. Coding of PZ compliance is unsatisfactory, done in different ways. Not clear why the names of the organisms cannot be stated as it is accrediting that they are absent.

- **Easily readable and understandable when issued in other Member States?** *Tick the appropriate box.*

Yes

No

Do not know

If the answer is 'no', please justify your answer, by referring to any examples of lack of harmonisation:

Variable from Member State to Member State.

4.4 Are registered producers in your country authorised to issue plant passports under official supervision? Tick the appropriate box.

Yes

No

Do not know

If the answer is 'no', please explain why:

If the answer is 'yes', please explain why and suggest improvements:

Shares risk, pragmatic, increases awareness by trade, provides some incentive for them to monitor plants etc for HO's. There is no alternative, legally it is an expectation of the passporting system and the official service could not justify the resource required to make and issue all passports.

4.5 Is the authorisation system for registered nurseries to issue plant passports under NPPO supervision functioning properly and reliably? Tick the appropriate box.

Fully

Partly

Not at all

Do not know

If the answer is 'partly' or 'not at all', please explain why and suggest improvements:

4.6. Are there exemptions in your country for (a) small producers serving the local market and (b) for products destined for final consumption? Tick the appropriate box under a) and b).

a) Yes

No

Do not know

b) Yes

No

Do not know

If the answer is 'yes', please list these exemptions:

No products required to be passported to final retail end purchaser. Local movement generally within 50 Km.

If the answer is 'no', please provide reasons why:

Is there a potential risk from the current implementation of these exemptions? Tick the appropriate box under a) and b).

a) Yes

No

Do not know

b) Yes

No

Do not know

Please justify your answer(s):

Any exemption will involve a certain degree of risk. The issue is whether the level of risk is acceptable. Generally, the degree of risk from the current exemptions is acceptable. Hard to address without disproportionate regulation. Needs more clarification and harmonisation, but have to exempt local movement at some level to avoid absurdities.

Impossible to prevent movement of unregulated, home produced plants and produce with personal baggage from one end of Europe to the other in a single market , so very difficult to justify local controls when the organism is present in the area and from commercial growers where some degree of phytosanitation will be effected to ensure goods are fit for sale.

4.7. What should be done in future at EU/MS level to ensure that plant health rules make a greater contribution to improved and safe intra-Community trade in plants and plant products?

Tick the appropriate box for each suggestion.

Suggestions	Yes	No	Do not know
Improve the producer registration system	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Modify the system for exemptions for:			
• small producers serving the local market	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• for products destined for final consumption	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Abolish the system for exemptions for:			
• small producers serving the local market	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
• for products destined for final consumption	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Revise the plant passport system	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Abolish the plant passport system	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Increase number of official checks / tighten rules on intra-Community trade	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Decrease number of official checks / relax rules on intra-Community trade	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Expand the scope of plants and plant products for which plant passports are required	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Reduce the scope of plants and plant products for which plant passports are required	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Improve the risk analysis of the current system	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Improve staff resources/training for national authorities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Improve resources for implementation of requirements	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Harmonize the plant passport document	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Setting up an EU wide electronic database of Plant Passport information for consultation and information exchange by MS CAs	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Simplify documentation requirements	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Improve traceability	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Attach plant passport to individual plants or smallest units	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Drop the option that the plant passport can consist of two documents	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other (<i>please specify</i>): - Closer links between inspectorates and individual inspectors to deal with problems and traceback	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please provide comments on the above suggestions. In particular, please comment on the impact of your suggestions on resources and funding.

The main problems with intra-community trade seem to be continued introductions of listed pests on passported material and the regular introduction of non-listed pests on passported and non-

passported material (many from third countries). These problems may be due to a lack of adequate action/resources in MS, which is difficult to change or address in the CPHR. Inadequate controls on people authorised to issue plant passports could result in pests being spread in trade and, for non-listed pests, many MS do not consider they need to take action. Increased harmonisation of procedures might start to address these issues, but that can cause problems because of differences between MS. For some problems, e.g. pests in large ornamental trees/soil associated with them, could the introduction of plant passporting requirements make a difference? Some of the suggestions in the table would be good, but require more resources. Changes in the regime should not be based on an assumption that more resources can be made available. (See previous comments on responsibility sharing.)

SECTION 5. PROTECTED ZONES AND REGIONALISATION

5.1. During the last 15 years, how many protected zones (PZ) have been established in your country? Among them, how many have kept their status of “PZ” and how many have lost it?

Number of protected zones established since 1993: 15

Gremmeniella abietina*

Dendroctonus micans*

Ips duplicates

Ips typographus

Ips amitinus

Ips cembrae*

Ips sexdentatus*

Bemisia tabaci

Leptinotarsa decemlineata

Liriomyza bryoniae*

Beet necrotic yellow vein virus*

Erwinia amylovora*

Cephalcia lariciphila*

Gilpinia hercyniae*

Hypoxyton mammatum *

Pissodes spp.*

Cryphonectria parasitica

*parts of UK

Among which,

- Number of protected zones which have kept their status: All, although some have been revised, e.g. Beet necrotic yellow vein virus.

Please provide examples and identify factors of success:

UK has remained free of Leptinotarsa decemlineata despite its establishment on the continent. One important factor has been a co-ordinated campaign between the respective parts of the UK and France to minimise the likelihood of spread from French territory.

- Number of protected zones which have lost their status:

Please provide examples and identify factors of failure:

The Beet necrotic yellow vein PZ has changed following outbreaks in England. This illustrated the difficulties of eradicating a soil borne organism once present and in controlling movement of soil via machinery and equipment.

5.2. During the last 15 years, has any evolution been observed in the way MS define PZ in their country? Tick the appropriate box.

Yes

No

Do not know

If the answer is 'yes', please explain how and provide examples:

MS have adopted different approaches with some defining PZs according to administrative/legal areas, while others have based them on detailed geographical descriptions using roads etc as boundaries. Both are justified in particular circumstances, but there needs to be clarity and consistency.

Some MS appear to continue to want to keep PZ status when information from MS suggests that they are continuing to lose the battle against the pest and should drop their PZ status.

5.3. What is the level of guarantees that protected zones in the EU are indeed free from the respective HOs? More than one answer possible - Tick the appropriate box(es).

High

Low

Depends on MS

Depends on HO

Do not know

If the answer is 'Depends on MS' and/or 'Depends on HO', please specify for which HO the level of guarantees is low:

For most PZs the relevant HO may be present on a temporary basis. For others (e.g. PCN), the HO may be present for longer periods, but at low levels. In some cases (e.g. Erwinia amylovora) the HO can be present for sustained periods, with the PZ being redefined as appropriate. Eradication within 2 years is the usual threshold, but this has not always been applied consistently. It remains a useful benchmark.

High for forestry pests.

5.4. Do protected zone plant passports provide sufficient guarantee that plants and plants products entering the protected zones are safe for the relevant HO? Tick the appropriate box.

Yes

No

Do not know

If the answer is 'no', please explain why and provide suggestions on how to improve it:

The UK regularly receives material infested with Bemisia tabaci which has been accompanied by the relevant plant passport.

For Colorado beetle there is no specific requirements for passporting of hosts (potatoes mainly) or carrier plant material (e.g. parsley or other leafy veg) which is first crop after infested potato crop.

Yes for forestry related plant passports.

5.5. Is the EU approach for regionalisation, primarily involving Protected Zones, adequate? Tick the appropriate box.

Yes

No

Do not know

If the answer is 'no', please justify by indicating the disadvantages of the current PZ concept. Please also indicate which alternative form of regionalisation would be more appropriate and why.

Account also needs to be taken of climatic/geography differences, and intended use of products, to consider appropriate regionalised risk management options. Concept needs to have imposition of PZs on MS, so freeing other MS from having internal controls on established pests – or permitting an alteration in status to RNQP. Regionalisation of controls on citrus pests in order to target risks more effectively while minimising impact on trade.

If the answer is 'yes', please justify by indicating the advantages of the current PZ concept.

5.6. Should the Protected Zone principle be upgraded so as to more closely reflect the Pest Free Area principle of ISPM No. 4 (Requirements for the establishment of Pest Free Areas)? *Tick the appropriate box.*

Yes

No

Do not know

*If the answer is 'yes', please indicate for what reasons:
And areas of low pest prevalence, to avoid an all or nothing approach?*

SECTION 6. CONTROL MEASURES FOR OUTBREAKS AND NEW FINDINGS

6.1. How many outbreaks and new findings (excluding findings at import) of HOs have been notified in your country during the reference period (1993-2008), in particular the three most recent years? Please provide data per year, according to the following table.

	Number of outbreaks	Number of new findings
2008	1 (Pine tree Lappet)	As left
2007	1 (OPM)	As left
2006		
Total (1993-2004)	HCBleeding Canker, P ramorum P kernoviae, HC leaf miner, Acute Oak Decline	As left

6.2. Have you undertaken a quantification of the costs/impacts associated to any of these outbreaks? Tick the appropriate box.

Yes

No

Do not know

If the answer is 'yes', please justify your answer, by referring to any such studies. Attach data and references where available (in Section 11).

[Phytophthora]

6.3. During the last 15 years, to what extent has the CPHR successfully prevented the entry, establishment and spread of HOs in your country? Tick the appropriate box.

Fully

Partly

Not at all

Do not know

Please comment by providing examples of success or failure. Highlight concrete cases where policy has worked (preventing a potential outbreak) and where it has not worked (major outbreak not sufficiently prevented) - highlight lessons to be learnt.

Difficult to know. Would only know if knew of consignments destined for UK which had HO's present and consignment was prevented from moving to UK by relevant authority in country of origin. But we never get to know of these cases. But we do know that many of the outbreaks we have had have been as a result of the failure of the system either in the third country or other member state. For example, all potato ring rot outbreaks in UK have been linked to infection in seed potatoes of NL origin. All Bt outbreaks are result of failure in third country of origin and/or failure in other member states. Diabrotica similar to Bt. Anoplophora the same.

6.4. What difficulties have been experienced in defining and implementing official measures for the eradication or containment of HOs? Tick the appropriate box for each possible difficulty.

Possible difficulties	Yes	No	Do not know
Difficulties in identifying HO (i.e. not listed in the Directive 2000/29/EC)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Delays in notification of outbreaks by MS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lack of sharing between Member States of eradication expertise that is built up during national eradication campaigns	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lack of access to the latest scientific information during national eradication campaigns	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Lack of incentive for the producers to declare new findings of HO	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Lack of resources to conduct Pest Risk Analysis	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lack of capacities to conduct Pest Risk Analysis	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Delays in implementing the official measures	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Lack of resources at MS level to survey the presence of the HO	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Lack of capacity at MS level to survey the presence of the HO	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other (please specify) :	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If the answer is 'no', please justify your answer, by referring to any examples of introduction of harmful organisms:

For unlisted organisms a process needs to be followed to produce a PRA and then decide on a course of action. There are limited resources for this work and uncertainties often have to be addressed. Actions have to be prioritised according to the benefits of and prospects for eradication. For listed organisms the situation is more clearcut, but there needs to be reliance on third countries and other member states in communicating information to ensure a rapid response.

6.5. What instruments were set up by the competent authorities in your country for rapid intervention against outbreaks of new HOs? For each item, tick the appropriate box and list the relevant HO/plant concerned.

Possible instruments	Yes	No	Do not know	If yes, HO/plant concerned
Contingency plan	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
National laboratories	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Emergency funds	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Official agreement with other MS for sharing of expertise in case of outbreak	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Other (please specify): - Access to other official Inspectorates and official scientific expertise	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

In case you have contingency plan(s), please specify the extent to which this contingency plan incorporates latest scientific information.

Standard Operating Procedures are produced for the main organisms that Inspectors are likely to encounter, as well as general instructions. They are reviewed regularly to ensure they reflect the latest scientific and other developments

For the other instruments (Laboratories, emergency fund, access to external expertise), please briefly describe their characteristics.

Fera is the national laboratory, equipped to deal with the diagnosis of quarantine organisms, operating in accordance with quality standards (e.g. ISO 9001). Similar laboratories operate in Scotland and Northern Ireland. There is close liaison and co-operation between the laboratories. Scientific and Inspectorate resources elsewhere can be drawn upon as necessary. Emergency funds from within Government are available in the event of major incidents.

6.6. During the last 15 years, have the EU emergency measures been effective in eradicating the targeted pests, and have the EU Control Directives been effective in containing/reducing the respective pests? Tick the appropriate box.

Yes

No

Do not know

Please specify per main HO. Fill in the table for your country : Tick the appropriate box for each item.

HO for which emergency or control measures exist	HO is controlled/reduced			HO is eradicated			HO is spreading		
	Yes	No	Do not Know	Yes	No	Do not Know	Yes	No	Do not Know
Emergency measures									
<i>Thrips palmi</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Phytophthora ramorum</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Diabrotica virgifera</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Pepino mosaic virus</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Pinewood nematode</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Dryocosmus kuriphilus</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Rhynchophorus ferrugineus</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Potato spindle tuber viroid</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Gibberella circinata</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Anoplophora chinensis</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Control measures									
<i>Clavibacter michiganensis ssp. sepedonicus</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Ralstonia solanacearum</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Potato wart disease</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Potato cyst nematode</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Carnation leaf-rollers</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please comment and explain the reasons why emergency measures have or have not been effective in eradicating the targeted pest, or why the Control Directives have or have not been effective in containing/reducing the respective pests:

Pinewood nematode, *Dryocosmus kuriphilus*, *Rhynchophorus ferrugineus*, and *Gibberella circinata* are all absent from the UK.

PCN needs to be separated into the two species – *G pallida* & *G rostochiensis* as different approaches/options apply. Also, the pest is spreading in ware potato production, but seed potato production remains clean. On carnation leaf rollers, these Directives are obsolete and should be revoked. The UK has produced PRAs to support this view.

For some HO's, e.g. potato wart disease and potato ring rot control Directives, it may take several/many years before able to say it is eradicated. In other cases e.g. potato brown rot, eradication from most watercourses is not feasible. For other HO's e.g. Pepino mosaic virus, outbreaks are eradicated but new introductions take place - predominantly through seed due to opacity of true origin of seed and no, or failure of, control measures in country of origin. For other organisms e.g. Potato cyst nematode, it is so widespread that it fails to meet the international definition of a quarantine organism and cannot be controlled so the PCN Directive is nothing more than ineffective window dressing.

6.7. Should the Community Plant Health Regime be revised in order to have more focus on prevention and early action? Tick the appropriate box.

Yes

No

Do not know

Please comment and explain:

CPHR has been too slow to react in many cases. It needs to react much more quickly and to be more proactive (with horizon scanning and contingency plans) and less reactive.

6.8. What should be done in future at EU/MS level to ensure better preparedness to prevent and control the introduction/spread of HOs? Tick the appropriate box for each suggestion.

Suggestions	Yes	No	Do not know
Improve the availability of up-to-date MS Contingency Plans	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Develop an EU emergency team	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Introduce new legal instruments for rapid intervention by the Commission against outbreaks of new harmful organisms	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Improve the knowledge of private operators in the production and trade chain on HOs (characteristics, potential damage to plants/plant products, etc.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Improve the import control system	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other (<i>please specify</i>): - Research coordination and collaboration. Improved co-operation between inspectorates. No more institutions!	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please provide comments on the above suggestions. In particular, please comment on the impact of your suggestions on resources and funding.

See comments in Section 8: a continued broadening and deepening of phytosanitary research coordination between phytosanitary research programmes that builds on the current EUPHRESO ERA-Net.

SECTION 7. ORGANISATIONAL ISSUES

Note: The questions below relate to the implementation of the requirements of the CPHR (Directive 2000/29/EC) at MS level, in your country.

7.1. Implementation of the 'Single Authority' and 'Responsible Official Bodies' concept in your country: *Tick the appropriate box under a), b) and c).*

- a) **Is the NPPO the Single Authority for coordination and contact with the Member States and the Commission within the meaning of Article 1.4 of the Directive 2000/29/EC?**

Yes No Do not know

If not, name the service which has been designated as Single Authority:

- b) **Is the NPPO the Responsible Official Body within the meaning of Article 2.1(g) of the Directive 2000/29/EC?**

Yes No Do not know

If not, indicate which State authority at national level or national authorities at regional level are the responsible official bodies (please attach in section 11 a schematic diagram and an explanation):

There are responsible official bodies in each of the devolved territories of the UK, along with the forestry commission, with Fera being the NPPO and a responsible official body (for England) in its own right.

- c) **Is the legal framework for defining the position of the Single Authority and the Responsible Official Bodies adequate to fulfill their duties?**

Yes Partially No Do not know

If the answer is 'partially', please specify the improvements needed:

7.2. Delegation of implementation of duties and tasks in your country:

- a) **Are duties and tasks of the Directive in your country assigned or delegated to other bodies or legal persons within the meaning of Articles 1.4 and 2.1(g) of the Directive 2000/29/EC, under the authority and supervision of the responsible official bodies?** *Tick the appropriate box.*

Yes No Do not know

If yes, indicate which duties and tasks are assigned or delegated, to which bodies / legal persons, and whether these bodies / legal persons are public or private:

Tick	Duties/tasks delegated	Responsible body	Public or private
<input type="checkbox"/>	Coordination and contact with the Commission (DG SANCO) and MS		Please, select the appropriate item
<input type="checkbox"/>	Coordination of official checks, controls and inspections		Please, select the appropriate item
<input checked="" type="checkbox"/>	Conducting official checks, controls and inspections (<i>please specify which, if necessary</i>): Forestry Commission has a private sector contractor resource.		Private
<input type="checkbox"/>	Conducting official laboratory analyses		Please, select the appropriate item
<input type="checkbox"/>	Issuing phytosanitary certificates		Please, select the appropriate item
<input type="checkbox"/>	Carrying out pest risk assessments		Please, select the appropriate item
<input type="checkbox"/>	Imposing measures		Please, select the appropriate item
<input type="checkbox"/>	Drawing up contingency plans		Please, select the appropriate item
<input type="checkbox"/>	Drawing up and implementing surveillance and monitoring programmes		Please, select the appropriate item
<input type="checkbox"/>	Dealing with international organisations		Please, select the appropriate item
<input type="checkbox"/>	Other (<i>please specify</i>):		Please, select the appropriate item

b) Are the public resources devoted in your country to the duties and tasks derived from the Directive sufficient? Tick the appropriate box.

Yes No Do not know

Please, justify your answer:

Resources are inadequate to achieve 100% import inspections and associated requirements. As in any field of activity it would be possible to do more if more resource was available. Whatever level of resource allocation is determined politically it is necessary for the regime to make the most effective use available of resources through evidence based targetting of risks and sharing of responsibility and costs with growers and traders where appropriate.

c) If the answer is no, is there a need or opportunity for further delegation of tasks to other bodies or legal persons? Tick the appropriate box.

Yes No Do not know

If yes, indicate which duties and tasks could be assigned or delegated, and whether these bodies / legal persons could be public or private:

While there are no immediate plans for delegation, it will be helpful to explore the possibilities under which this might be appropriate and relevant.

d) Can quality, independence and impartiality be ensured when duties and tasks are delegated? Tick the appropriate box.

Yes

In some cases

No

Do not know

If the answer is 'yes', please list the key elements to ensure this:

FC bar anyone who has any commercial interests in the activity they perform and their work is monitored and assessed on a regular basis. Contract inspectors' powers are limited so that decisions on remedial measures are still taken by inspectors employed by the FC.

If the answer is 'no', please specify for which specific tasks and duties:

e) Does the delegation of duties and tasks stimulate companies to take professional responsibility for plant health in the production and trade chain? Tick the appropriate box.

Yes

No

Do not know

If the answer is 'yes', please specify for which tasks and duties:

Companies are permitted to issue their own plant passports, which gives them a greater stake in the process of achieving and maintaining plant health standards.

7.3. Availability of incentives for the effective implementation of the CPHR

a) Are there currently incentives other than legal requirements for private operators in the production and trade chain to contribute to the effective implementation of the CPHR? Tick the appropriate box.

Yes

No

Do not know

If the answer is 'yes', please justify your answer, by referring to any examples of such incentives:

The incentives for CAs and private operators for timely reporting may be that the impact of any statutory action could be less (depending on the pest) if organisms are notified quickly rather than if an outbreak has been allowed to develop and spread has occurred.

b) Are there currently incentives other than legal requirements for the timely reporting of outbreaks? Tick the appropriate box for each item.

	Yes	No	Do not know
Incentives for CAs (and delegated bodies)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Incentives for private operators in the production and trade chain	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

*If the answer is 'yes', please justify your answer, by referring to any examples of such incentives:
See above answer.*

- c) Are there currently incentives other than legal requirements for the effective implementation of control measures? Tick the appropriate box for each item.**

	Yes	No	Do not know
Incentives for CAs (and delegated bodies)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Incentives for private operators in the production and trade chain	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

*If the answer is 'yes', please justify your answer, by referring to any examples of such incentives:
See above.*

- d) Is there liability in the case of failure to fulfil the requirements of the Directive? Tick the appropriate box for each item.**

	Yes	No	Do not know
Liability for CAs (and delegated bodies)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Liability for private operators in the production and trade chain	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

*If the answer is 'yes', please justify your answer, by referring to any such liability provisions:
Liability is not prescribed in plant health legislation, but general consumer and industry rules would apply. Private operators could take legal action against the Government if they felt that there had been negligence.*

- e) Has, during the last 15 years, any legal action been taken in your country for failure to fulfil the requirements of the Directive? Tick the appropriate box for each item.**

	Yes	No	Do not know
Legal action of stakeholders against CAs (and delegated bodies)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Legal action of CAs against private operators	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If the answer is 'yes', please justify your answer, by referring to any examples of legal action taken:
Have been close to court cases, in both directions. Issue of statutory Notices is a legal action, and is common and warning letters has been issued in a number of cases.

7.4. To what extent do FVO plant health inspections contribute to the harmonised implementation of Community provisions by MS and improved compliance of import requirements by third countries? Tick the appropriate box under a) and b).

a) Harmonised implementation by Member States:

Fully Partly Not at all Do not know

b) Improved compliance by Third Countries:

Fully Partly Not at all Do not know

If the answer is 'partly' or 'not at all', please indicate how the effectiveness of the FVO can be improved:

Some mis-understandings would be avoided by better involvement of FVO at all SCPH – there is a tendency for them to be present to only present their findings and rarely to make a contribution. Another advantage would be to follow the FAO Glossary definitions more accurately, and associated ISPMs.

Templates for survey returns should be made clear at the start of the reporting period.

7.5. Does the EUROPHYT tool adequately address the needs for the exchange of information on interceptions in a timely manner? Tick the appropriate box under a) and b).

a) Interceptions of imports:

Fully Partly Not at all Do not know

b) Interceptions in internal market movement:

Fully Partly Not at all Do not know

If the answer is 'partly' or 'not at all', please provide examples:

Needs to be developed into a rapid alert system. The legal requirements need to be adjusted to reflect practicalities e.g. the deadline for submission should apply once a diagnosis has been completed.

It is too full of trivial, repetitive non-compliance. Some MS will not use it for intra-community trade. Adjustments of diagnosis – which are inevitable if time limits are to be adhered to – is too difficult. and some diagnosis take 2 years when an immature wood boring larvae is intercepted.

The absence of a system for notifying outbreaks and incursions is more important. MS vary considerably in the speed of notification and degree of notification – for example what non regulated HOs they will notify. There are also 'difficulties' between MS when a MS is accused of sending non compliant plants which start an incursion or outbreak, but the outbreak is only found

at a place of production and sometimes several weeks later as a small incursion or latency manifests.

7.6. Effectiveness of communication and consultation procedures

a) **To what extent does the CPHR take into account the interests of stakeholders and sectors affected by the current policy?** *Tick the appropriate box.*

Fully

Partly

Not at all

Do not know

If the answer is 'partly' or 'not at all', please provide examples:

Consultation at EC level is not well established, and certain sectors (conservation bodies) not consulted at all.

Doubtful many stakeholders are content with the regime. For traders it imposes regulations which are possibly of little benefit to them and often of doubtful benefit to their region of the EU; to their customers it only gives partial protection as most (indigenous) HOs are unregulated, so quality is compromised. The uncertainty as to the extent of what is regulated – are they only economically damaging HOs or those affecting wild plants or even a human/animal health risk means that many other sectors are dissatisfied.

b) **Is the information and communication on the CPHR provided by the Commission / Member State authorities adequate?** *Tick the appropriate box for each item.*

• **Information/communication to EU stakeholders**

Fully

Partly

Not at all

Do not know

• **Information/communication on import requirements to Third Country trading partners (CAs)**

Fully

Partly

Not at all

Do not know

If the answer is 'partly' or 'not at all', please provide examples:

EU import requirements are complex but only limited published guidance is available to assist third countries in achieving compliance.

As mentioned communication on newly emerging pests, outbreaks etc varies considerably between MS. Partially the priority given to certain HOs in different MS means that communication is variable.

c) Are import requirements under the CPHR clear to third countries trading partners, especially in the developing countries? Tick the appropriate box.

Fully

Partly

Not at all

Do not know

If the answer is 'partly' or 'not at all', please provide examples:

See above answer.

The legislation makes no mention of viability of a HO at import. Is the presence of dead organism a non compliance? There is no harmony over appropriate level of protection – this varies according to MS – and this may be because the pathway analysis is quite justifiably different – rarity of crops, temperatures or rainfall affecting natural dispersal, but also because the risk from different life stages of an HO vary and some MS will accept say some caterpillars but not pupae or adults of the same organism.

There are listed HOs which have no Phyto measures, not even a requirement for a phytosanitary certificate. When there are PMs it is often unclear whether field inspections are required, how often, whether testing is needed in addition to visual inspection.

Then there is the concept of appropriate measures which are not specified. Part of the reasoning for this is that the availability of many measures varies – pesticides are not harmonised world wide. Also some MS do not want to mention unacceptable biocides, although they will accept imports treated with them. Also, by specifying a measure if that fails then the import regime can be blamed – whereas the requirement is simply ‘appropriate to kill the HO’

There is no explanation given of how strictly the measures should be interpreted. Absolute freedom may be possible from a Pest Free Area, but less likely from an infested area with other measures in place.

Please note that the following Question 7.7 (diagnostic capacity) needs to be answered in consultation with the relevant plant health laboratories that carry out the official diagnostic analyses in your country.

7.7. Diagnostic laboratories carrying out official analyses

a) Does the current diagnostic infrastructure allow for rapid and reliable diagnosis of all regulated HOs? Tick the appropriate box.

Fully

Partly

Not at all

Do not know

If the answer is 'partly' or 'not at all', please justify your answer, by indicating where gaps exist and for which HOs:

b) Is the necessary diagnostic expertise available for all disciplines (entomology, acarology, nematology, mycology, bacteriology, virology)? Tick the appropriate box.

Yes

Yes but threatened

Partly

Partly and threatened

No

Do not know

If the answer is 'yes but threatened', 'partly' or 'partly and threatened', please indicate what gaps or threats exist:

c) Is the laboratory infrastructure adequate and is the necessary equipment available? Tick the appropriate box.

Yes

Partly

No

Do not know

If the answer is 'partly' or 'no', please indicate what problems exist:

d) Are well-maintained reference collections available for all listed HOs and is future availability of these collections ensured? Tick the appropriate box.

Yes Yes but threatened Partly Partly and threatened No
 Do not know

If the answer is 'yes but threatened', 'partly', 'partly but threatened' or 'no', please indicate what gaps or threats exist:

The situation differs slightly according to discipline. The entomologists (including acarology) have an extensive reference collection but it does not include all HOs. They also have access to the collections in the Natural History Museum in London. The Fera collection of plant-parasitic nematodes, which incorporates the international Rothamsted Nematode Collection, is 'threatened' in terms of quality content unless extra resource is found for curation. Fera houses the National Collection of Plant Pathogenic Bacteria which has all HOs; Mycology have reference specimens for 17 out of 100 listed organisms; and Virology has a collection of isolates. As is the case for Nematology, quality of these collections is being compromised by a lack of dedicated resource. There is an increasing databank of accredited DNA extracts.

e) For how many listed HOs are ring-tested and validated diagnostic and detection methods available? Tick the appropriate box.

All HOs 100-250 HOs 50-100 HOs <50 HOs
 Do not know

f) How many of the 250 regulated HOs can the official laboratories in your country detect / diagnose by themselves? Tick the appropriate box.

All HOs 100-250 HOs 50-100 HOs <50 HOs
 Do not know

If not all HOs can be detected / diagnosed, please indicate how outsourcing is organised for the others:

There are thousands of regulated HOs, not 250. The USA claims there are more than 300 regulated B. tabaci vectored viruses. There are thousands of Tephritidae, and even if only those that there is international agreement on their economic impact is listed it is still hundreds. And so it should be, the number of potential HOs is tens of thousands.

Please indicate examples of HOs for which diagnostic capacity in your country is sufficient or for which there are currently gaps and scope for improvement:

HOs for which diagnostic capacity is:	
Sufficient	Requires improvements
Most Bacterial HOs that appear in the EPPO A1 and A2 lists Can isolate DNA and obtain a sequence	Exceptions to EPPO A1 list are Liberibacter africanum/asiaticum exceptions to the EPPO A2 list are X. fragariae and Xylophilus.
All acarological and entomological HOs	

Mycology can do most HOs	Forestry pathogens, especially rusts.
All Nematological HOs.	
Virology can do most HOs but note that for some, e.g. Strawberry latent C virus, the pathogen in question is itself not known.	The exceptions include some exotic viruses not seen in Europe, and/or where no DNA sequence data has been published.

g) Are adequate resources available? Tick the appropriate box.

Yes

No

Do not know

Please justify your answer:

Generally, adequate resources are available for all disciplines for the diagnosis of interceptions. However, for outbreaks, curation of collections, developing and evaluating diagnostic protocols, resource is lacking. This poses a particular problem where taxonomic expertise for the discipline is limited.

h) Should Community Reference Laboratories (CRLs) be established for plant health (similar to those existing for animal health under Regulation (EC) 882/2004)? Tick the appropriate box.

Yes

No

Do not know

Please indicate what, in your view, would be the advantages/disadvantages of this approach. (Specify as necessary):

Advantages	Disadvantages
Easy access to 'type' specimens in a nominated collection for morphological reference	Individual states may be deterred from developing their own reference collections, which might be regionally important.
Improved utilisation of most favoured resources; they could be concentrated on improving proficiency, validation, collections and molecular	Some specialists in countries without CRLs may become isolated unless communication

standards for the benefit of all, to make available images and information via the Internet (currently some taxonomic expertise is only available from retired nematologists).	is improved.
More than one site of reference for a particular organism should be established as part of contingency planning.	Resource would have to be found to catalogue and move some collections, and possibly expertise.
Dedicated staff in CRLs would improve location of accredited sequences, identification keys and descriptions, which from international sources are often unreliable or are often in obscure publications respectively	There would be a drain of expertise from countries without CRLs, or the expertise would be drained of resource necessary to continue their work.
May provide confidence in diagnosis of certain pests if methods are harmonised and the acknowledged experts are available to provide assistance to MS.	Too many organisms to have community reference labs for all. May be appropriate for a few organisms or certain commodities e.g. where there is a community testing regime laid down in legislation (e.g. ring rot/brown rot /post entry quarantine testing)
	Too early - need to continue to improve and harmonise methods before implementing reference labs.
	No standardised EU protocols (apart from ring rot/brown rot/PCN resistance testing). PCN testing in the PCN directive just says testing "shall involve methods for the extraction of potato cyst nematodes ... EPPO standards".
	Concentration of main expertise in one or a few labs could disadvantage other labs which could be perceived to be inferior.
	Potential reduction in expertise outside the reference labs – no incentive to work on particular organisms. Decrease the diversity of views or approaches to diagnosis.
	Could lead to requirement for an accreditation scheme, which is costly and an additional burden on the accrediting lab and MS

Please justify your answer(s):

A decision about the establishment of CRLs depends on their terms of reference. They may become centres of expertise but if resources are concentrated here this may also result in a dilution or disintegration of expertise elsewhere. All national laboratories need a basic level of resource to process intercepted samples in that country, and in most cases the process of detection and identification is best done in the region of interception for reasons of speed and efficiency. Reference collections are a basic tool of trade for all diagnosticians and local ones are part of larger historic collections of wider scope and with associated expert knowledge. However, for certain groups of HOs, specialist centres could be developed for those housing important collections and expertise, but not for routine processing of samples. Thus EU resources maybe better focussed on supporting these specialist centres to raise quality and save 'type' material for the benefit of all states. Decline of international and national funding for taxonomists, who may not be located in designated CRLs, does stimulate such considerations.

i) If CRLs were to be considered, for how many HOs would they be needed from a technical point of view? Tick the appropriate box.

<10

10-30

>30

Do not know

Please explain for what reason:

There are hundreds of HOs that should be considered. Diagnosticians have to identify HOs but also need to distinguish them from other, non-HOs. The questionnaire appears to be concentrating on HOs listed in the Plant Health Directive, when in fact most work is done on assessing whether other, non-listed organisms should be listed as regulated, non-quarantine species, and this covers hundreds of different generic groups. Thus a CRL would also have to house reference specimens for a wide range of genera containing plant-parasitic forms, together with associated biological data such as geographical distribution, so that PRAs could be completed. Perhaps set up centres of excellence for commodities where testing is listed in 2008/61 – e.g. Citrus, Malus, Prunus, Vitis, potato etc.

j) If CRLs were to be considered, which HOs should be targeted as a priority? Tick the appropriate box for each item.

	Yes	No	Do not know
HOs listed in Annexes IA and IIA of Directive 2000/29/EC	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
HOs listed in Annexes IB and IIB of Directive 2000/29/EC	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
HOs for which protected zones exist	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
HOs for which emergency measures are in place	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
HOs for which control directives are in place	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
HOs which are technically difficult to diagnose/detect	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

HOs which have a large phytosanitary and socio-economic impact	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other criteria (<i>please specify</i>): - HOs involved in economically important trades (e.g. ornamental plants) or industries (e.g. turf) [not sure this is the same as above] - HOs where harmonised EU methods are in place	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please justify your answer(s):

Priorities constantly change, because at any one time a particular organism may be important because of an outbreak (e.g. pinewood nematode) or because of a particular trade (e.g. ornamental plants). To maintain a coherent contingency plan all HOs should have equal priority to provide a broad base of cover for contingency purposes.

7.8. Training of staff

a) **Is sufficient training provided to your plant health inspectors?** *Tick the appropriate box.*

Yes

No

Do not know

What are the resources available for training at national level? *Indicate total amount of available funds in the period 1993-2008 (if not possible, please provide data for 2006, 2007 and 2008)*

b) **Have you benefitted from EC-funded training (Better Training for Safer Food Programme (BTSF))?** *Tick the appropriate box for each item.*

Yes

No

Do not know

Does the Better Training for Safer Food Programme fulfil the needs for harmonised training of inspectors?

Yes

No

Do not know

Should training for plant health diagnosticians be included in the Better Training for Safer Food Programme (as is the case for animal health)?

Yes

No

Do not know

If your country has not benefitted from the BTSF programmes in the area of plant health, please explain reasons why:

BTSF is Not sufficient on its own. The regime also needs inspectorates to work together / communicate on a daily basis, for example between different points of entry handling the same trade, and between points of entry and growing sites for imported plants.

7.9. How should organisational aspects be developed and improved in future to ensure the effective implementation of plant health provisions? *Tick the appropriate box for each suggestion.*

Suggestions	Yes	No	Do not know
Increase funding of plant health services at national level	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Re-define funding priorities within the national plant health budget	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Delegate tasks and duties under the Directive to other bodies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Centralise more the tasks and duties under the Directive to the 'Responsible Official Bodies'	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Provide incentives for the timely reporting of outbreaks:			
<ul style="list-style-type: none"> • Increase administrative sanctions (as a disincentive for failure to act) 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<ul style="list-style-type: none"> • Introduce compensation to operators for mandatory destruction of infected materials 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Provide incentives for the effective implementation of control measures (including disincentives for failure to act):			
<ul style="list-style-type: none"> • Increase administrative sanctions (as a disincentive for failure to act) 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<ul style="list-style-type: none"> • Introduce compensation to operators for mandatory destruction of infected materials 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<ul style="list-style-type: none"> • Introduce liability between producers in the production and trade chain 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Improve the rapid alert and stakeholder accessibility aspects of EUROPHYT (as is the case with the RASFF* notification system for food and feed)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Improve diagnostic infrastructure:			
<ul style="list-style-type: none"> • Consider the establishment of CRLs for priority organisms (to be defined) 	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<ul style="list-style-type: none"> • Intensify cooperation with EPPO 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Improve the training provided and the funds available for training:			
<ul style="list-style-type: none"> • Develop harmonised inspection methods / systems 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<ul style="list-style-type: none"> • Expand BTFSF for plant health in general 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<ul style="list-style-type: none"> • Expand BTFSF to also include training for diagnosticians 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<ul style="list-style-type: none"> • Promote co-operation between plant health inspectors to ensure effective risk targeting and harmonised application of the CPHR 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Improve communication and consultation of stakeholders	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other (<i>please specify</i>):	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

* RASFF (Rapid Alert System for Food and Feed) offers advantages of speed and accessibility to stakeholders. More information on RASFF can be found at: http://ec.europa.eu/food/food/rapidalert/index_en.htm

Please provide comments on the above suggestions. In particular, please comment on the impact of your suggestions on resources and funding.

Rather than focus on compensation there needs to be a discussion on respective roles and responsibilities between NPPOs and stakeholders.

SECTION 8. RESEARCH AND METHODOLOGY DEVELOPMENT IN SUPPORT OF THE CPHR

8.1. In the last 15 years, several projects have been commissioned by the European Commission, DG RESEARCH, to support the CPHR:

a) **Are you aware of these research projects?** *Tick the appropriate box for each item*

	Yes	No
In general (FP6, FP7 and previous framework programmes)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
In particular, the ERA-net EUPHRESKO (under FP6)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

b) **If yes, how satisfied are you with these research projects?** *Tick the appropriate box for each item*

	Fully	Partly	Not at all	Do not know
In general (FP6, FP7 and previous framework programmes)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
In particular, the ERA-net EUPHRESKO (under FP6)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If the answer is ‘partly’ or ‘not at all’, please justify your answer, by referring to any R&D areas with which you have not been fully satisfied:

Framework Programmes: The EU have supported plant health generally quite well in the framework programmes though in a fairly ad hoc way before FP7; topics previously appeared to emerge more from lobbying by individual member states without a more over-arching and strategic overview: projects tended to be pest specific and commissioning timescales have often meant that research could not respond as quickly as needed to emergency situations. There have been some more general projects (e.g. PORTCHECK and DIAGCHIP, developing on-site diagnostic methods or diagnostic chip approaches respectively). In FP7, plant health was only included within the main lines after lobbying by the COPHS (EU Council Working Party of Chief Officers of Plant Health Services); its eventual inclusion was appreciated, but the original omission perhaps reflects the lower prioritisation or recognition of plant health at the EU level. In FP7, topics have been included in all annual workprogrammes so far: the topics have been more strategically aligned with plant health needs by way of EUPHRESKO advising on FP7 plant health research priorities under a mandate from the COPHS; the need to maintain the ability for EU FP7 funding to also address some pest-specific topics (e.g. PWN) which cannot be financed through national funding is welcome. There is a clearer recognition and strategy on the type of research that is more appropriate for funding by EU framework programmes (larger and/or more strategic projects) and that which is more appropriate to be financed via transnational (i.e. via EUPHRESKO) projects using national funds (smaller, more applied projects responding quickly to urgent policy and operational needs); in FP7, EUPHRESKO has been able to coordinate EU and transnationally-funded research to ensure complementarity and added value for both EU and national funds.

SUMMARY:

- Plant health needs to be considered in subsequent FP7 work programmes and afforded its own status (i.e. there is a tendency for plant health to be lumped together with broader crop protection).

- FP7 topics need to reflect both strategic and pest-specific needs and be complementary to EUPHRESKO transnational research projects, i.e. continued coordination of EU-funded and transnationally-funded research.

- The role of EUPHRESKO and amount of transnational research commissioning may have to be increased if opportunities for plant health research in FP8 (2014+) diminish.

EUPHRESKO mapping and analysis report (January 2008): Deliverable Report 2.2
<http://www.euphresco.org/downloadFile.cfm?id=225>

8.2. During the last 15 years, has research & methodology development in the EU been targeting the right priorities in the field of plant health, in terms of: Tick the appropriate box for each item.

• **EC funded research (FP6, FP7 and previous framework programmes)?**

Fully Partly Not at all Do not know

• **MS funded research?**

Fully Partly Not at all Do not know

Please further assess according to the following criteria: Tick the appropriate box for each item.

	Fully	Partly	Not at all	Do not know
EC-funded R&D priorities:				
• are in line with the relevant policy areas of the CPHR	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• EC-funded R&D is adapted to stakeholder needs	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
MS-funded R&D priorities:				
• are in line with the relevant policy areas of the CPHR	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• EC-funded R&D is adapted to stakeholder needs	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If the answer is 'not at all', or 'partly', please justify your answer, by referring to any R&D areas which have not been sufficiently addressed:

Before EUPHRESKO (2006), MS-funded research only really addressed national plant health and national stakeholder needs and priorities, and not necessarily or explicitly any wider EU plant health or European stakeholder priorities. In general terms, some areas such as diagnostics and general biological studies have been well addressed by research, but other areas such as the development of detection tools and of eradication, containment, control and pest management tools have been somewhat neglected until recently and should be prioritised. In FP7, it has been good to have had projects (championed via EUPHRESKO) developing more generic approaches with a longer-term EU-wide application, e.g. development of pest risk analysis science (PRATIQUE), DNA-barcoding approaches (QBOL) and detection tools for inspection services (QDETECT). EUPHRESKO has advised that a topic on intervention strategies (eradication, containment and management methods for difficult to control pests of statutory importance) was a priority for FP7 in 2010: it is a potential indicative topic for 2011, but the Commission has currently made the potential call topic much wider than quarantine plant health (i.e. it covers broader crop protection issues) which is not ideal. EUPHRESKO has enabled MS-funded research to be more trans-national and to address EU plant health policy issues more directly, e.g. the DEP project looking at pospiviroids in support of

developing EU policy on these viroids and its implementation; and PEKID, on kiln drying methods in support of measures in the plant health directive. As with EU-funded research, areas such as diagnostics and wider biological studies are relatively well represented; transnational projects addressing detection and pest management approaches (eradication, containment, control) are again not as well represented, though pest management research is quite well represented at the national level (see EUPHRESKO Report DL2.2: Mapping and analysis of national research programmes). At the national, transnational and the EU level, taxonomic research that underpins many of the broader plant health activities (from diagnostics to regulation) is lacking or poorly prioritised. This is a key research infrastructure issue, together with collections.

EUPHRESKO mapping and analysis report (January 2008): Deliverable Report 2.2
<http://www.euphresco.org/downloadFile.cfm?id=225>

8.3. Availability of relevant scientific expertise:

- a) **During the last 15 years, has EC-funded research allowed the development of better or new products & tools to prevent and control the spread of HOs?** *Tick the appropriate box for each item.*

	Fully	Partly	Not at all	Do not know
Development of techniques for classical biological scientific expertise on HOs and plant pathology	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Development of innovative molecular identification and detection methods	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Development of plant health risk assessment science and impact assessment (including cost-benefit)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Development of decision support tools for pest management	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Scientific response to new challenges and in anticipation of future needs	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please justify your answer, by referring to examples of new/improved products and tools developed by EC-funded research:

Classical: there is a recognised erosion of classical expertise, especially in the area of taxonomy, and also the wider areas of plant pathology and entomology (see EPPO state of emergency declaration for plant health, 2004). Although the EC has funded pest-specific projects dealing with aspects of pest biology and often some taxonomic-related studies, it has not supported the underpinning infrastructure so directly (taxonomic infrastructure, both in terms of the actual scientific expertise/personnel, and the supporting collections).

Molecular: there has been significant advances in the development and application of molecular diagnostic techniques via both MS-funded and EU-funded research. However, novel detection methods that can be used by inspection services on-site has only partly been addressed; uptake of available on-site methods by inspection services has not been universal across the EU, perhaps reflecting either a failure to transfer technologies into their hands, or through poor linkages and dialogue between national inspectorates.

Risk assessment: The EC has funded various pest-specific risk analysis projects (e.g. Karnal bunt; Phytophthora ramorum (RAPRA), Pepino mosaic virus (PEPEIRA), maize root worm (DIABROTICA) pine wood enmatode (PHRAME; plus another potential pinewood nematode project in 2010), which have contributed to building expertise and capability through the scientific collaborations and outputs. It has also funded an important and more strategic project developing pest risk analysis methods. EFSA have also funded research to support pest risk assessment development, though this has not been very well coordinated with FP7-funded research (poor or no coordination between EFSA and DG-Research).

Responsiveness and horizon scanning: EC-funded projects have tried to respond to emerging issues. However, only a few have been done this in advance of actual problems occurring (e.g. the Karnal bunt project, which improved the risk assessments and addressed risk management issues via contingency plans in advance of any outbreaks, though there had been interceptions by European countries on imported grain). Most projects have tended to respond to problems as they occurred though, so are reactive rather than proactive; in such cases the time taken to get projects initiated may have been too slow to have an effective impact on successful action or policy development for such pests.

b) Is sufficient expertise currently available in the EU in support of the above objectives (to prevent and control the spread of HOs)? Tick the appropriate box for each item.

	Fully	Partly	Not at all	Do not know
Classical biological scientific expertise on HOs and plant pathology	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Expertise in innovative molecular identification and detection methods	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Expertise in plant health risk assessment and economic impact assessment (including cost-benefit)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Expertise in foresight techniques to prepare scientific response to new challenges	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Please justify your answer, by referring to examples where further expertise is needed:

See comments under 8.3a

8.4. During the last 15 years, have sufficient efforts been made to coordinate research in the field of plant health as commissioned by the various research players? Tick the appropriate box for each item.

	Fully	Partly	Not at all	Do not know
Coordination between EC-funded research and MS funded research	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Coordination between the research funded by the	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

various MS				
Coordination between EC-funded research and relevant research funded by major third country trading partners	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

If the answer is 'partly' or 'not at all', please justify your answer, by referring to any examples where more effort is needed to coordinate research:

Between EC and MS: only since the EUPHRESKO ERA-Net (2006 to present). EUPHRESKO is a funder's consortium composed of key national research programmes dealing with plant health. It aims to better coordinate national programmes with themselves but also its trans-national research (deploying MS-funds in jointly funded transnational projects) with EC-funded research. EUPHRESKO has done this via a mandate from the COPHS to advise the EC on plant health research priorities in FP7; this mandate is recognised by the EC's DG-Research.

Between MS and MS: very little, if any, before EUPHRESKO, but now improved since 2006 through the establishment of the EUPHRESKO ERA-Net (research funder's network).

Between EC and 3rd countries: no direct coordination as far as we are aware at the funder's level, though EC projects have involved science partners from 3rd countries in specific projects (e.g. USDA in Karnal bunt, RAPRA, etc.). EUPHRESKO is hoping to develop funding or research collaborations further with 3rd countries (though at the transnational level, not the EC-funded level).

8.5. During the last 15 years, has the amount of available funds for research and methodology development in the field of plant health been sufficient to address actual needs? Tick the appropriate box for each item.

• **EC funded research (FP6, FP7 and previous framework programmes)?**

Fully Partly Not at all Do not know

• **MS funded research?**

Fully Partly Not at all Do not know

If the answer is 'partly' or 'not at all', please justify your answer, by indicating where more funding is needed:

The total national budgets of partners in EUPHRESKO (24 partners across 17 countries, representing nearly all of the national plant health research funding across Europe) amounts to only about 15 million euros per year; additional funding from the EC for plant health research typically amounts to an additional 2 million euros per year on average. Budgets are therefore small in relation to other areas (animal health being the obvious comparison). The EUPHRESKO mapping and analysis exercise clearly identified that research funding did not address all the many needs. Unlike the animal health side (where the number of regulated pathogens is small), plant health has over 300 pests listed in the EC Plant Health Directive and there are many more unknown and/or emerging quarantine/exotic pests that are of potential statutory concern. Key gaps or issues from the EUPHRESKO mapping and analysis include:

- Only 16% of EC listed pests were studied: viruses, fungi and insects were least well covered; nematodes and bacteria were proportionately better covered perhaps due to the smaller number of listed species, or their relative importance?
- Invasive alien plants are not well researched (only 2% of national budgets).

- Clearly not all MS have research programmes dealing with plant health.

- Some MS have seen a significant decline (e.g. UK and NL) in their national plant health research budgets in the last 3 years. Some national budgets showed an increase between 2006-2008, whilst others remained static; overall there is a general downwards trend.

- National programmes are generally very applied, so opportunities for more strategic projects are limited, other than via EC-funding, or potentially via EUPHRESCO-mediated transnational projects in the future.

- Most nationally-funded projects are small (61% of projects were <80,000 euros per year)

EUPHRESCO mapping and analysis report (January 2008): Deliverable Report 2.2
<http://www.euphresco.org/downloadFile.cfm?id=225>
 See pages 13-22

8.6. What should be done in future to improve the contribution of the EC-funded research in the plant health field to the achievement of the CPHR objectives? Tick the appropriate box for each suggestion.

Suggestions	Yes	No	Do not know
Increase overall EC funding for research in the field of plant health	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Decrease overall EC funding for research in the field of plant health	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Redefine prioritisation of EC-funded research activities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Increase co-operation and co-ordination between research players, in particular: <ul style="list-style-type: none"> • Between the EU and the MS • Between MS • Between the EU and major third country trading partners 	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
Other (<i>please specify</i>):	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please provide comments on the above suggestions, if any:

See earlier comments.

EC funding should not be decreased since the small national budgets are not so able to tackle the larger and more strategic projects that are needed to address EU-wide plant health issues. EUPHRESCO sees a continuing need for both EC-funded and transnational (nationally funded) research with a clear recognition of the type of research appropriate to each; however, the prospects for continued EC funding for plant health in future framework programmes (i.e. FP8 onwards) is unclear at present. EUPHRESCO, with its broad representation across MS, can have a clear role in coordinating national (MS), transnationally-funded (via EUPHRESCO) and EC-funded research and providing strategic direction to ensure optimum use of available funds.

There is a clear need to maintain and increase effective coordination of MS, transnational and EC research, as well as ensuring that mechanisms are in place to effectively identify and prioritise research needs and commission work quickly and responsively to address emergency and longer-

term science, policy and operational needs. It is important that such research coordination, identification and prioritisation is policy-led. The Commission (DG-SANCO) and also the COPHS have important roles in ensuring that research is policy-led.

MS not already involved in trans-national research funding collaborations should consider the benefits and added value of this (so as to broaden the EUPHRESKO funders network); strengthening of regional funding collaborations (within regions of Europe with often regionally-specific plant health issues) and within various sectors (e.g. forestry plant health) should also be an aim. MS without existing national research programmes should be encouraged to establish them. MS already involved directly in EUPHRESKO should continue to build on the current transnational funding collaborations and seek to deepen and enhance the transnational collaborations and coordination.

EUPHRESKO can also seek to broaden its funding collaborations to potentially include 3rd countries that either share the same plant health problems that Europe does, or with 3rd countries that are exporters to the EU and therefore represent sources of pests of statutory concern. There is also potential for increased funding collaborations with various 'industry' stakeholders.

SECTION 9. COHERENCE WITH OTHER COMMUNITY REGIMES

9.1. Does CPHR overlap with any of the following EU policy areas, as currently implemented by existing legislation? If yes, is such overlapping a source of inconsistency/ conflict of objectives?

Tick the appropriate box for each item in terms of overlapping and source of inconsistency/conflict and list the subject concerned whenever relevant.

Policy areas	Overlapping			Subject concerned	Source of inconsistency/ conflict of objectives		
	Yes	No	Do not know		Yes	No	Do not know
Seed and Plant Propagating Materials (e.g. listing of HOs, plant health requirements)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Some organisms are listed in both. Position on RNQPs remains unclear.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Food Law (e.g. Regulation 882/2004 on official controls and Regulation 178/2002 on General Food Law)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Environment policy	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	need to check on emerging strategy IAS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Plant Protection Products - PPPs (Directive 91/414)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Links - one is taking away controls used by the other!	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Common Agricultural Policy (I and II pillars)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Regimes need to remain separated.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Community Customs Provisions	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Regimes are not completely aligned.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Community Animal Health Strategy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Some common interest, e.g. import of invertebrates, need to avoid duplication/contrary requirements.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other (please specify):	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

In case of overlap, please comment by providing examples of measures which create incoherence or conflict of objectives:

In relation to the seeds and marketing legislation, some quarantine organisms are also listed (e.g. Directive 2002/56 on seed potatoes). The legislation needs to be clear, but requirements should also be clear for operators, about the conditions they need to meet on both quality and quarantine organisms. For EU certification schemes (seed potatoes and fruit) there should be no artificial redaction of quarantine requirements from the marketing legislation/schemes as this would introduce a lack of clarity.

On customs, the plant health import system operates alongside customs requirements. As the two systems are interdependent, they should also be completely aligned. There should also be a means of automatically updating TARIC codes in the plant health Directive.

In relation to animal health, arrangements for inspecting consignments of invertebrates under licence need to avoid duplication and plant health risks. At present, such consignments are subject to veterinary surveillance, as well as plant health controls.

9.2. Should any revision of the CPHR in future be guided by any of the principles developed under the following EU policy areas? Tick the appropriate box for each item listed in the table.

Policy areas	Yes	No	Do not know	Principle concerned
Seed and Plant Propagating Materials (e.g. delegation of specific tasks to third parties)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The two regimes should be complementary with an effective process for transferring organisms from one to the other. EU certification schemes must cover all relevant requirements, on both quality and quarantine organisms. The concept of RNQP needs to be addressed to consider whether and how this category fits in.
Food Law (e.g. Regulation 882/2004 on official controls and Regulation 178/2002 on Food Hygiene Recast)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Environment policy (e.g. biodiversity, nature conservation, invasive alien species, forest protection)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The EU strategy on Invasive Alien Species needs to complement the plant health regime and avoid overlaps/duplication. There needs to be a clear boundary between the two.
Plant Protection Products (e.g. EC thematic strategy on pesticides)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The need to have sufficient products for plant health purposes should be addressed.
Common Agricultural Policy, Pillars I and II (e.g. cross compliance requirements, use of resistant varieties, rotation provisions)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The possibility of using cross compliance as a means of ensuring good plant health practice is attractive, but there are risks in developing dependencies between the regimes, e.g. that availability of Solidarity funds will be linked to CAP compliance, rather than plant health objectives.
Community Customs Provisions	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The two regimes should grow and develop together as they are interdependent
Community Animal Health Strategy (e.g. regionalisation concept, Community Reference Laboratories)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The regionalisation concept should be incorporated, as well as consideration of the approach on animal health, which places greater emphasis on demonstrating that there is no unacceptable risk before a trade is permitted.
Other (please specify):	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

If yes, please indicate in which way:

SECTION 10. FORWARD LOOKING ISSUES

Note: Questions regarding your suggestions for the future have been included at the end of each individual thematic section (sections 1-9 above). The purpose of this section is to collect more general comments on current and future challenges and options for the future.

10.1. To what extent is the current CPHR suitable to mitigate risks of future challenges, in particular the control of new HOs entering or spreading in the Community as a consequence of climate change? Tick the appropriate box.

Fully

Partly

Not at all

Do not know

If the answer is 'partly' or 'not at all', please indicate what improvements are required:

The regime has some strong aspects and some weaker aspects. But it has been place for a long period and the world has changed. The EU is larger, meaning that there is a more diverse range of climatic and pest situations to address than ever before, and trade is now truly global with new sources and products being introduced all the time and often over very short timescales. The plant health regime needs to respond to these developments, by improving what works well and strengthening the areas that are not working so well. Evolution rather than revolution is needed.,

10.2. Does the CPHR sufficiently take into account of the IPPC guidelines and WTO-SPS rules? Tick the appropriate box.

Fully

Partly

Not at all

Do not know

If the answer is 'partly' or 'not at all', please provide examples where improvement is needed:

*Greater account could be taken of IPPC concepts, such as pest free areas, and the application of ISPM Standards
Interprets WTO-SPS too strictly – trade has been allowed a priority over crop protection , so is not adhering to IPPC guidelines which are to safe guard all plants..*

10.3. Do the differences between EU legislation and the legislation applied by key international trading partners have an impact on EU production costs and competitiveness in trade? Tick the appropriate box.

Positive impact

Negative impact

No impact

Do not know

In case of impact, please assess whether it is: Tick the appropriate box.

High

Moderate

Low

Do not know

If the answer is 'negative', please provide examples:

[Empty box]

10.4. Which are the 3 most important suggestions you would formulate for the future of the Community plant health policy?

Please specify:

Suggestion N° 1

Timely decisions on risk management - The plant health regime needs to respond rapidly to emerging risks, identifying pests which pose a threat to plants in Europe before they arrive here, and detecting outbreaks of new pests as early as possible so that eradication measures can be considered while the costs of such measures are low and the chances of success are high. Collaboration with non-EU countries through multilateral networks is key to identifying these emerging threats. Regulation needs to cover all potential trades and pathways in a proportionate manner, applying the precautionary principle when necessary to deal with uncertainty over risks from trades or pathways of which there is little or no experience. Conversely, pests for which a risk analysis shows that eradication or containment is no longer effective or appropriate, should be deregulated or moved from quarantine to RNQP regulation.

Better mechanisms should be established for timely consultation of stakeholders in relation to regulation and deregulation, as risk assessments change. In the decision making processes, use of limited resources should be optimised through effective collaboration between Member States, the Commission (including EFSA) and EPPO, avoiding duplication of effort.

We are concerned that the regime does not always adequately address the risks from newly discovered unlisted pests, and that the need for appropriate action on interceptions of unlisted pests which may pose a risk is not clearly addressed by the current wording of the Plant Health Directive.

Slow decision making and communication under the current regime means that:

- Pests arrive, establish and cause losses before they have been considered for regulation (e.g. *Epitrix similaris*, *Dasineura circinata*, *Phytophthora kernoviae*),
- Outbreaks spread before action is taken, making eradication less likely (e.g. *Rhynchophorus ferrugineus*, *Paysandisia archon*, *Thaumatopoea proceSSIONEA*),
- Organisms which are widespread in the Community continue to be inappropriately regulated as quarantine pests for the whole of the EU (e.g. *Ditylenchus dipsaci*, *Colletotrichum acutatum*).
- Trades and pathways of which there is no prior experience develop with little scrutiny, posing unacceptable risks, and sometimes it is only after those risks are realised and new pests have become established that risk management measures are applied (e.g. wood packaging material, tomato fruit, vaccinium plants).
- Conversely risk management measures continue to be applied against some trades which have a long record of compliance and pose very low risk (e.g. apples from New Zealand and USA).

Suggestion N° 2

Better risk targeting - More rapid decision making would also lead to better risk targeting. This includes targeting the import pathways which present most risk, and targeting geographical areas where the risks of spread are highest. The number of risks targeted should not be artificially restricted, but should be subject to review.

In general terms effort should be redirected from those large established trades in plant produce which have a good record of compliance, to new and emerging trades in plants and propagating material which pose a high risk, or for which there is a high degree of uncertainty about risk. Evidence from pests which have become established in Europe over the last 15 years would support this reallocation of effort.

For plants and propagating material there should be some shift from inspections at the point of entry, where detection of latent pests and diseases is difficult, to inspections at growing sites. This requires official control and better communication between inspectors at the point of entry and those at the growing site, as well as better communication between plant health and Customs services. These improved communications should include the evolution of communications between the IT systems of Customs and plant health services.

For plant produce the reduced checks regime should be developed and extended.

In many cases risks are effectively managed simply by the requirement for a phytosanitary certificate from the exporting country. Unregulated produce is not subject to this risk mitigation, and some checks of unregulated trades should be carried out to ensure that all risk pathways are subject to appropriate regulation.

With the increasing size of the EU we continue to favour a regionalised approach for certain import controls, such as those directed at pests of citrus and cotton. For pest outbreaks in the EC, controls should be focussed at the boundaries between infested and uninfested areas and on relevant pathways from the infested areas, since it is movement of pests across those boundaries and on plants being distributed out of the area that leads to further spread. Opportunities for consistency with IPPC concepts, such as Pest Free Areas, should be explored.

Suggestion N° 3

Better co-ordination between Inspectorates - There is good communication between policy officials in the different Member States, at the Standing Committee and other official fora. There are also networks of plant health scientists across the EC, the wider European and Mediterranean region (through EPPO) and internationally (through the IPPC). Contacts between plant health inspectors in different Member States are much less well developed. Although there is a single EC plant health regime, differences of implementation between Member States (or even within regionalised Member States) lead to inconsistencies of approach and complaints from stakeholders (not just in the UK) about the lack of a level playing field. These inconsistencies can expose the EC to increased risks if trades shift to the points of entry perceived to have the least effective controls.

The FVO has an important role in auditing the application of plant health controls, and the plant health courses organised by EFSA under the “Better Training for Safer Food” programme have been a welcome development. But mechanisms also need to be developed for direct collaboration between inspectorates in relation to import controls, plant passporting, eradication and containment, and trace-back and trace-forward when pests are intercepted. These mechanisms need to take

account of the fact that language may be more of an obstacle to communication between inspectors than it is for policy officials or scientists who are increasingly used to working in English .

High risk planting material often cannot be inspected effectively at the point of entry. The plants may be too large to inspect, and pests and pathogens may be present in a dormant or latent state. Flow of information between the point of entry and the plant health service covering the growing site could facilitate follow up inspections at a time when pests and pathogens are more likely to be detectable.

Better co-ordination between Inspectorates could also lead to opportunities for sharing experience and resources, for example when an outbreak in one Member State requires a concerted response to prevent spread to other parts of the Community.

10.5. How would you, as a Competent Authority, be willing to contribute in order to improve the current Community plant health policy (at EU level)?

Please specify:

UK willing to continue to contribute to the steering group and any subsequent working groups.

SECTION 11. ADDITIONAL INFORMATION

11.1. Please make reference here to any available data/documents that support your answers, or indicate sources where such data/documents can be found.

Please specify per Question number:

For Question 8:

EUPHRESCO website: www.euphresco.org

EUPHRESCO report (Deliverable 2.2) on the mapping and analysis of national phytosanitary research programmes: EUPHRESCO mapping and analysis report (January 2008): Deliverable Report 2.2

<http://www.euphresco.org/downloadFile.cfm?id=225>

EPPO state of emergency in plant health (Madeira declarations, 2004): see EPPO website.

We thank you very much for your valuable contribution!