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Anthos is The Royal Dutch Trade Association for Flowerbulbs and Nurserystock. On behalf of the trade companies we look after their interests worldwide, especially when it relates to phytosanitary requirements. We consulted our members to get their opinion on the impact of the proposed (temporary) EU importstop for 39 nursery stock genera.

The proposed importstop will for certain have a big impact on a large number of companies. The 39 genera represent the backbone of the assortment of the nursery stock industry. It will directly effect their daily operation and result in financial losses. For some companies the effect will be huge and may even result in their bankruptcy.

First of all we oppose to the fact that the proposed EU measures block the import of products that have been imported for many years (sometimes even decades). To our opinion traditional import should be exempted from the importstop. We strongly feel that the proposed measures are not in line with the WTO rules which require that phytosanitary measures should be least trade restrictive.

We are interested to hear what criteria were used to determine and decide what genera qualified to be added to the list of High Risk Plants and which ultimately were not placed on the list. We for instance wonder why genera like Olea and Vitis are not mentioned on the list.

The importstop is a general measure that affects the import of all genera mentioned on the list of High Risk Plants no matter what the country of origin is. However there may be differences between countries of origin with respect to the pest status for which a certain genera was put on the list of High Risk Plants. Furthermore, we feel that phytosanitary safeguards should not be generated by an importban. To our opinion they should be achieved by imposing phytosanitary requirements that have to be met by the production facility in the country of origin. Complicance should be verified and authorised by the NPPO of the country of origin.

With respect to the increase in international trade of plants for planting and plant products we understand that the EU is looking for options to prevent the introduction of harmful pests and diseases in the EU. To our opinion this should be achieved by an approach that allows companies to anticipate to new phytosanitary requirements, thereby being able to continue their business. It is crucial to look for a balance between phytosanitary requirements that can be met in practice



and at the same time are economically affordable for operators. We strongly urge the EU to take this in consideration.

The import of seed of the genera on the list of High Risk Plants is also blocked. Although the import volumes of seed (for instance: Acer, Alnus, Betula, Eucalyptus, Fraxinus, Hamamelis, Ligustrum, Malus, Syringa, Taxus, Quercus, Robinia, Sorbus, Cornus, Berberis, Tilia, Prunus, Fagus) may not seem that substantial and valuable they are the source for the production of millions of trees. Moreover for certain species import of seed is the sole source to start production because no seed is produced in the EU. We strongly request to exempt seed from the import stop.

Also import of cuttings, graftwood and scions of the 39 genera will be prohibited. A large number of companies are depending on import of this type of product. For which pests and diseases does the EU want to protect itself? We strongly request to exempt this plant material from the import stop.

Companies also import small quantities of the genera mentioned on the High Risk Plant List (for instance Acer, Tilia, Quercus from the USA) for propagation in the EU in order to introduce new varieties. This option will be blocked by the importban.

Some Dutch companies have invested in Malus and Prunus production in a Non European country with the goal to market the final product in the EU again. They use Dutch propagation material. It concerns a production cycle of a few years. Because both products are on the list of High Risk Plants their business strategy and investment all of a sudden becomes worthless.

We also would like to make a reference to Brexit. A lot of our members will be faced with the uncertain consequences of Brexit (both with regard to export to the UK and import in the EU from the UK). The List of High Risk Plants will directly block the possibility to import either of the 39 genera from the UK which up till now can be freely transported in the EU common market.

A lot of our members made the following general remark: *'what are the consequences of the EU importstop for the High Risk Plants with respect to our export position to countries outside the EU'*. We anticipate that some countries will probably 'retaliate' by imposing stricter phytosanitary measures. Since The Netherlands is one of the biggest exporters of plants for planting worldwide it is obvious that Anthos is therefore totally against any kind of EU phytosanitary measure that may negatively affect our export position.

The EU importstop for the 39 genera is in principal 'temporarily'. Based on a Pest Risk Analysis (PRA) the EU may decide to allow import of a genera. The country of origin has to submit information to the EU and subsequently EFSA will perform a Pest Risk Analysis. Anthos is totally not in favor that the EU introduces the PRA procedure. It seems to be an objective approach to decide if a product can be safely imported in the EU. However our experience is that it is a bureaucratic and time-consuming procedure. EFSA will be confronted with an incredible number of PRA's that have to be evaluated. Operators will probably have to wait years before a decision is taken on their PRA file.

In conclusion Anthos strongly condemns the importstop for the 39 nursery stock genera. We hope that the EU will reconsider their approach and will refrain from initiating an import stop.

