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Necessary changes to the Community Plant Health Regime according to the French National Plant Protection Organization (NPPO)

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The Community Plant Health Regime (CPHR) aims to prevent the introduction and spread of plant pests in the European Union's territory. This protection applies to crops and wild flora across all environments (cropland, forests, open spaces, the natural environment, etc.). This regime is mainly based on Directive 2000/29/EC, which in particular includes the provisions of a Community Directive dating from 1977. However, recent decades have seen significant developments in this context:

- an escalation in risk factors (significant increase in international trade, expansion of the European Union, climate change),
- increasing limitations on the competent authorities' human and financial resources,
- a rapidly evolving environment (new global and regional standards, new organisations including the European Food Safety Authority (EFSA), new societal expectations, etc.).

Under the leadership of the French Presidency, in November 2008, the Council of the European Union (EU) concluded that there was a need to revise the current regulatory system. An assessment of the CPHR was conducted from June 2009 to May 2010 and led to the formulation of 15 recommendations that specifically demonstrate the need to modernise the plant health regime through:

- a greater focus on prevention;
- prioritising risks for better targeting;
- enhanced solidarity for identifying the best courses of action on issues important to the Community.

This assessment and resulting recommendations formed the basis for discussion and debate in the Member States and the European Commission, especially within the framework of "task forces" set up in 2010 and 2011 that aimed to achieve a consensus about the desired changes among the 27 Member States.

At the same time, the National consultation on the health sector (EGS) was held in France from January to April 2010 at the request of the Ministry of Agriculture, for the purpose of bringing together the different animal and plant health stakeholders for a joint review of the current situation and prospects for the French and Community health systems. This work led the French National Plant Protection Organization (NPPO) to define ten priorities for the new Community strategy on plant health that are largely in line with the avenues for improvement considered by its European partners:

- determining priority pests based on risks to plant health;
- carrying out general surveillance of the status of plant health within the EU's territory;
- reinforcing the requirements and controls on imports from third countries to prevent the entry and establishment of pests in the EU;

- enhancing the control of intra-community trade to prevent the spread of pests within the EU's territory;
- making prevention the central focus of the plant health regime by involving and empowering the professionals;
- emphasising economic considerations;
- continually adapting regulations to developments in the plant health situation and improving their comprehension;
- harmonising and improving the efficacy of inspection practices;
- supporting and developing research;
- integrating plant health strategy with other EU policies.

Within this context, the French NPPO advocates certain specific changes that it considers necessary for a truly effective Community plant health strategy.

Firstly, reversal of the current EU import strategy is deemed essential for more effective protection of Community territory. This would mean transitioning from the current system, in which everything that is not explicitly prohibited is allowed, to a system in which, at least for new trades of plants for planting, a prior pest risk analysis (PRA) should be conducted before imports can be authorised. Imported plant products would thus be subject to more stringent requirements that would be above all more closely adapted to the risks they pose, ensuring their phytosanitary quality.

Furthermore, the French NPPO favours expanding the scope of the CPHR to cover certain invasive alien plants that are harmful to plants and have a significant economic or environmental impact. In effect, the CPHR should come within the scope of the International Plant Protection Convention (I PPC) and its definition of pests in the broader sense ("Any species, strain or biotype of plant, animal or pathogenic agent injurious to plants or plant products").

Finally, the French NPPO considers it necessary to move to a system of prior accreditation of institutions that put into circulation plants subject to an EU plant passport (PP) and that are authorised to self-print PPs. This accreditation would be issued after verifying the institution's competence, especially with regard to its internal risk management system (good practices, traceability, internal controls, etc.). This is because facility inspections within the framework of the PP should include not only an examination of materials present on the day of the inspection (current PP control), but also and more importantly, a second level control that verifies the facility's orderly conduct, i.e., plant production conditions, in order to prevent plant health problems. The frequency of these inspections would be adapted to the type of institution and the risk analysis carried out by the plant protection authorities, i.e. in particular, based on a formal pest management plan established by the business itself. This accreditation system would lead to greater efficiency of official controls and a higher level in the overall phytosanitary quality through greater company accountability.



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Because of the substantial burden anticipated for small businesses (especially the ornamental plant sector), operators would have the option of not joining this accreditation system, and in this case they would be subject to tighter official controls. In all cases, however, the businesses, whether or not they are authorised to issue their own PPs, should comply with general requirements of internal pest risk management to be defined at the Community level, which should go beyond mere traceability requirements for plant products.

These are the avenues for improvement the French NPPO hopes in the new European regulation, whose formal proposal by the European Commission is expected in 2013.

The French Plant Health Network (RFSV): a new tool for protecting plant health

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The national consultation on the health sector (Etats généraux du sanitaire) organised by the French Ministry of Agriculture in 2010 demonstrated the strategic importance of managing crop and forest health in order to reconcile the economic and environmental challenges of our agriculture sector.

With this in mind, the Directorate General of Food (DGAL) asked various bodies (ACTA – the Network of agricultural technical institutes, ANSES – the French Agency for Food, Environmental and Occupational Health & Safety, INRA – the National Institute for Agricultural Research, and UIPP – the French Plant Protection Industry Union, which together make up the secretariat) to set up the new French Plant Health Network (RFSV). This network, which met for the first time in October 2011 at the initiative of ANSES, has grown rapidly since then and now boasts around a hundred members. Its role is to help improve knowledge of plant health.

For this purpose, the RFSV's mission is to foster research partnerships between public and private sector players, throughout the system, from the field to the testing laboratory. It seeks primarily to enhance diagnostic capabilities, while also investigating bioaggressor control methods.

On this basis, the network has identified priority objectives and ten working groups have been set up to address a variety of topics:

- Improving comprehension of the available offer in terms of analysis, skills and research; directories are to be compiled and compared to actual needs. A scheme for skills development is also planned.
- Identifying needs in terms of new laboratory analytical methods and pest control methods; innovative tools and initiatives will be proposed and tested. It will also be necessary to establish channels for transferring methods from public and private research laboratories to routine laboratories.
- Improving knowledge on the evolution of bioaggressors and their characterisation, as well as plant resistance and tolerance to them. Knowledge will also be developed in epidemiology, based on laboratory and field data.

For further information: www.rfsv.fr