

DG SANCO QUANTIFICATION OF COSTS AND BENEFITS OF AMENDMENTS TO THE EU PLANT HEALTH REGIME: SUPPLEMENTARY ECONOMIC STUDY (FCEC)

Survey of Member State (MS) Competent Authorities (CAs)

INTRODUCTION

This survey takes place in the framework of the supplementary economic study commissioned by DG SANCO to the FCEC to quantify the impacts from the amendments to the Common Plant Health Regime (CPHR).

An evaluation of the Common Plant Health Regime (CPHR) was carried out in 2009 - 2010 by the Food Chain Evaluation Consortium (FCEC), led by Agra CEAS Consulting. The evaluation report contains a series of recommendations for the amendments of the regime. These recommendations are the starting point for the review of the regime, which by 2012 should lead to a legal proposal from the Commission to the Council and the European Parliament. The legal proposal will be accompanied by an impact assessment, to be prepared by the Commission Services.

Following a consultation with the stakeholders of the CPHR and the Member States, the European Commission selected the key areas of policy change that are likely to have significant economic, social or environmental impacts:

- Amendment of the scope of the CPHR (possible inclusion of invasive alien species and improving coherence with S&PM regime);
- Introduction of mandatory intra-EU surveillance obligations;
- Amendment of the import regime, such as introduction of post-entry quarantine;
- Improvements to the plant passport system (expansion of the scope and harmonisation of the plant passport document);
- Improvements to the Protected Zones system;
- Introduction of incentives for effective implementation of the provisions of the CPHR (e.g. co-financing of measures against natural spread; coverage of losses of growers).

The aim of this survey is to collect specific information and cost data on these issues, and namely on the introduction of mandatory surveillance (section 1), on the expansion of the EU Solidarity Regime to include natural spread (section 2), and on the amendment to the Plant Passport system (section 3). An introduction describing these issues is provided in the beginning of each section.

It is noted that the scenarios and assumptions presented in the questionnaire are working hypotheses developed by the FCEC for the purposes of calculating the impacts of the options under review and do not constitute in any way the outcome of the final proposals to be put forward by the Commission.

The information you provide will be treated on a strictly confidential basis. All data collected through the survey will be used by FCEC for statistical analysis of the costs related to the Community Plant Health Regime only. *The confidentiality of your responses and statements is guaranteed in the sense that only aggregated statistical data will be published and that you will not be identified as having responded to the survey. In case you consider that some data are too sensitive and should be kept confidential vis à vis the Commission, please mark these figures accordingly; otherwise, data collected through the survey will be transmitted to DG SANCO of the Commission (for their perusal on the same confidentiality terms).* Please note that in the use of the data collected, we conform to the

best practices as described e.g. in the Chapter V on Statistical Confidentiality of Council Regulation (EC) No 322/97 on Community Statistics.

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

- BZ: Buffer Zone
- CAs: Competent Authorities*
- CPHR: Common Plant Health Regime
- HO(s): Harmful Organism(s)
- IAS: invasive alien species
- MS: Member States
- PO: Private operator
- PP: Plant Passport
- PZ: Protected Zone

* 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.

THE FCEC THANKS YOU IN ADVANCE FOR YOUR COOPERATION

Please return this questionnaire by 18 March 2011, by e-mail to:

EUPH-impact-FCEC@ceasc.com

Section 1 Analysis of mandatory surveillance costs

Introduction

The objective of this task of the study is to estimate the costs of introduction of mandatory intra-EU surveillance for key priority HOs. For each HO, an appropriate level of surveillance needs to be defined, and the total annual costs (EU-MS, at 50:50) of introducing mandatory surveillance at these levels should be estimated.

The HO's which are considered for this exercise are the following:

- *Anoplophora chinensis*
- *Bursaphelenchus xylophilus*
- *Erwinia amylovora*
- *Guignardia citricarpa*
- *Phytophthora ramorum*
- Potato Spindle Tuber Viroid
- *Rhynchosporium ferrugineus*
- *Synchytrium endobioticum*
- *Thrips palmi*
- *Xanthomonas axonopodis*

In addition, in order to provide a comparator, the surveillance measures applied on a compulsory basis in the MS under control measures for potato diseases (potato-ring rot - *Clavibacter michiganensis* ssp. *Sepedonicus*, and potato brown rot - *Ralstonia solanacearum*) are also to be considered.

To this end, the present targeted survey aims at gathering data on:

1. Surveillance plans in place in the MS for the specified HOs (and/or information on the principles on which surveillance is based for those HOs for which emergency measures and surveillance for Buffer Zones (BZs) and Protected Zones (PZs) are not in place¹);
2. Data on the unit costs of the various components of surveillance, and namely:
 - Inspections (differentiating between forestry/non forestry);
 - Diagnostics;
 - Traps;
 - Information campaigns.

Please note that data on inspections related to the issuing of Plant Passports should not be included here, as these are covered by separate questions under section 3 of this questionnaire.

¹ *Synchytrium endobioticum*, *Thrips palmi*, *Xanthomonas axonopodis*.

1. Surveillance plans

1.1 Taking into account the environmental and climatic conditions of your country, the distribution of host plants, and the results of surveys conducted in previous years (where applicable), how would you define the risk level for the following HOs in your country?

For each HO below, please indicate the level of risk the HO is considered to pose in your country (i.e. low / medium / high), and the reason why (please tick).

	Risk level:	Reason why HO is considered a risk in your country:			
	Low/ Medium/ High	Past outbreaks	Environmental/ climatic conditions	Distribution of host plants	Economic importance
HOs subject to mandatory surveillance under emergency measures and BZs/ PZS:					
<i>Anoplophora chinensis</i>					
<i>Bursaphelenchus xylophilus</i>					
<i>Erwinia amylovora</i>					
<i>Guignardia citricarpa</i>					
<i>Phytophthora ramorum</i>					
Potato Spindle Tuber Viroid					
<i>Rhynchosporium ferrugineus</i>					
<i>Gibberella circinata</i>					
Other HOs:					
<i>Synchytrium endobioticum</i>					
<i>Thrips palmi</i>					
<i>Xanthomonas axonopodis</i>					
Control measures for potato diseases:					
<i>Clavibacter michiganensis</i>					
<i>Ralstonia solanacearum</i>					

1.2 With regard to the following HOs subject to mandatory surveillance under emergency measures and BZs/ PZs, please indicate:

- 1.2.1 The susceptible area (in ha), per type of site;
- 1.2.2 The susceptible number of sites;

- 1.2.3 The area (in ha) currently subject to visual inspections, per type of inspected site;
- 1.2.4 The number of inspected sites, per type²;
- 1.2.5 The number of samples for testing per site or ha;
- 1.2.6 Where applicable, the number of traps per ha.

Note: If data per type of site below are not available please provide total. Please provide number of sites and/or hectares (ha), as applicable per type of site and depending on data available (if data are not available on ha, please provide data on numbers of sites and vice versa).

	TOTAL	Per site:				
		Places of production (farms, nurseries)	Production sites (orchards, fields)	Garden centres	Forestry	Public green
	Surveyed/susceptible	Surveyed/susceptible	Surveyed/susceptible	Surveyed/susceptible	Surveyed/susceptible	Surveyed/susceptible
	ha / sites	ha	ha	sites	ha	sites
<i>example</i>		3000 ha / 15000 ha		200 sites / 500 sites		
HOs subject to mandatory surveillance under emergency measures and BZs/ PZS:						
<i>Anoplophora chinensis</i>						
No of samples (per ha or site)						
<i>Bursaphelenchus xylophilus</i>						
No of samples (per ha or site)						
No of traps (for vector) per ha.						
<i>Erwinia amylovora</i>						
No of samples (per ha or site)						
<i>Guignardia citricarpa</i>						
No of samples (per ha or site)						
<i>Phytophthora ramorum</i>						
No of samples (per ha or site)						
Potato Spindle						

² Please note that data on inspections related to the issuing of Plant Passports should not be included here, as these are covered by separate questions under section 3 of this questionnaire.

	TOTAL	Per site:				
		Places of production (farms, nurseries)	Production sites (orchards, fields)	Garden centres	Forestry	Public green
	Surveyed/susceptible	Surveyed/susceptible	Surveyed/susceptible	Surveyed/susceptible	Surveyed/susceptible	Surveyed/susceptible
Tuber Viroid						
No of samples (per ha or site)						
<i>Rhynchochorus ferrugineus</i>						
No of samples (per ha or site)						
No of traps per ha						
<i>Gibberella circinata</i>						
No of samples (per ha or site)						
Control measures for potato diseases:						
<i>Clavibacter michiganensis</i>						
<i>Ralstonia solanacearum</i>						

Please indicate whether any of the inspections above are combined for several HO's and which ones:

1.3 With regard to the following other HO's, to the extent these are relevant for your country and are currently subject or could be subject to surveillance, please indicate:

- 1.3.1 The susceptible area (in ha), per type of site;
- 1.3.2 The susceptible number of sites;
- 1.3.3 The area (in ha) subject to visual inspections³;
- 1.3.4 The number of sites subject to visual inspections;
- 1.3.5 Where applicable, the number of samples for testing per site or ha.

Note: if data per type of site below are not available please provide total.

³ Please note that data on inspections related to the issuing of Plant Passports should not be included here, as these are covered by separate questions under section 3 of this questionnaire.

	TOTAL	Places of production (farms, nurseries)	Production sites (orchards, fields)	Garden centres
	Surveyed/ susceptible	Surveyed/ susceptible	Surveyed/ susceptible	Surveyed/ susceptible
<i>Example:</i>		200 sites / 500 sites 3000 ha / 15000 ha		
<i>Synchytrium endobioticum</i>				
No of samples (per ha or site)				
<i>Thrips palmi</i>				
No of samples (per ha or site)				
<i>Xanthomonas axonopodis</i>				
No of samples (per ha or site)				

Please indicate whether any of the inspections above are combined for several HOs and which ones:

1.4 Where available, could you please briefly describe the principles on which surveillance (of the specific HOs, or surveillance more generally) is based in your country?

This may refer to type of surveillance e.g. delimiting surveys or detection surveys, methodology for setting up inspection and testing targets, level of statistical confidence sought etc. Please indicate for which HO the information is available and attach the surveillance plans, if available, in separate documents.

	Surveillance principles
HOs subject to mandatory surveillance under emergency measures and BZs/ PZS:	
<i>Anoplophora chinensis</i>	
<i>Bursaphelenchus xylophilus</i>	
<i>Erwinia amylovora</i>	
<i>Guignardia citricarpa</i>	
<i>Phytophthora ramorum</i>	
Potato Spindle Tuber Viroid	

	Surveillance principles
<i>Rhynchophorus ferrugineus</i>	
<i>Gibberella circinata</i>	
Other HOs:	
<i>Synchytrium endobioticum</i>	
<i>Thrips palmi</i>	
<i>Xanthomonas axonopodis</i>	
Control measures for potato diseases:	
<i>Clavibacter michiganensis</i>	
<i>Ralstonia solanacearum</i>	

1.5 Is the level of surveillance (i.e. inspection and sampling intensity) currently applied in your country, per HO, considered to be sufficient to address your needs? *Please indicate.*

If not, what level of surveillance would be considered necessary and reasonable (i.e. technically justified for the particular reasons for which you carry out surveillance in your country, as identified in Q 1.1)? *Please indicate the estimated need for increase in inspections and sampling (% increase on current levels).*

	Level of surveillance currently applied	If current level not sufficient, level of surveillance considered necessary	
	<i>Sufficient/not sufficient</i>	<i>% increase in inspections</i>	<i>% increase in sampling</i>
<i>Anoplophora chinensis</i>			
<i>Bursaphelenchus xylophilus</i>			
<i>Erwinia amylovora</i>			
<i>Guignardia citricarpa</i>			
<i>Phytophthora ramorum</i>			
Potato Spindle Tuber Viroid			
<i>Rhynchophorus ferrugineus</i>			
<i>Gibberella circinata</i>			
<i>Synchytrium endobioticum</i>			
<i>Thrips palmi</i>			
<i>Xanthomonas axonopodis</i>			

Comments:

2. Costs

2.1 Could you please indicate the average fee rates (€/hour) for the inspectors, and the number of hours required on average for an inspection (including the taking of samples)?

Place of inspection	Average fee rates (€/hour)	Average time per inspection (number of hours)
Places of production (farms, nurseries)		
Production sites (orchards, fields)		
Garden centres		
Forestry sites		
Public green		

2.2 Could you please indicate the general operational costs involved? Please include the cost of setting up the survey, preparing annual reports, annually reviewing survey targets etc. Where possible, please differentiate between one off costs (e.g. start up) and recurring costs (e.g. annual reviews and reporting). If necessary (e.g. because there are substantial differences in costs), please differentiate between HOs:

HO (please indicate)	Total operational costs (€)	One off costs (€)	Recurring costs (€/year)

2.3 Could you please indicate whether private operators contribute to any of the surveillance costs and to which extent (% cost sharing PO/CA)? For those HOs for which emergency legislation is not in place and for which surveillance is not currently carried out in BZs and PZs, please indicate whether mandatory surveillance would involve POs and to which extent.

	Place of production (farms, nurseries)	Production sites (orchards, fields)	Garden centres	Forestry	Public green
	PO/CA %	PO/CA %	PO/CA %	PO/CA %	PO/CA %
HOs subject to mandatory surveillance under emergency measures and BZs/ PZs:					
<i>Anoplophora chinensis</i>					
<i>Bursaphelenchus xylophilus</i>					
<i>Erwinia amylovora</i>					
<i>Guignardia citricarpa</i>					
<i>Phytophthora ramorum</i>					

	Place of production (farms, nurseries)	Production sites (orchards, fields)	Garden centres	Forestry	Public green
	PO/CA %	PO/CA %	PO/CA %	PO/CA %	PO/CA %
Potato Spindle Tuber Viroid					
<i>Rhynchochophorus ferrugineus</i>					
<i>Gibberella circinata</i>					
Other HOs:					
<i>Synchytrium endobioticum</i>					
<i>Thrips palmi</i>					
<i>Xanthomonas axonopodis</i>					
Control measures for potato diseases:					
<i>Clavibacter michiganensis</i>					
<i>Ralstonia solanacearum</i>					

2.4 Testing:

2.4.1 Please indicate the costs of diagnostic tests in your country:

Please indicate the cost per test and the estimated cost of labour. Please differentiate between types of tests, only to the extent different tests with significantly different costs are used for the different HOs, and specify test.

Note: The cost of taking samples should be included in the inspection time under 2.1 above.

2.4.2 Please indicate whether sufficient diagnostic capacity is in place, and whether there would be a need to invest further in case surveillance activity is intensified:

	Fee (€/hour)	Cost of test (€/per unit)	Diagnostic capacity	
			Sufficient (Y/N)	Need to invest (Y/N)
Please complete with specific test used in your country (as applicable, per HO):				
<i>e.g. Molecular tests (PCR/gene sequencing); specific test per HO etc.</i>				

2.5 Traps:

2.5.1 Please indicate the costs of traps in your country for the following HOs:

2.5.2 Please indicate the costs of monitoring of traps for the specific HOs:

	Cost of setting trap (€/trap)*	Cost of trap inspection (€/trap)	Number of traps	Frequency of trap inspection
<i>Anoplophora chinensis</i>				
<i>Bursaphelenchus xylophilus</i>				
<i>Phytophthora ramorum</i>				
<i>Rhynchophorus ferrugineus</i>				
<i>Thrips palmi</i>				

*Note: to include both the cost of the trap as such and the cost of installing the trap.

2.6 Could you please indicate the cost of information campaigns, if any, in your country, for the specific HOs?

	Information campaigns	
	Carried out? (Yes/No)	Cost (total in €)
HOs subject to mandatory surveillance under emergency measures and BZs/ PZS:		
<i>Anoplophora chinensis</i>		
<i>Bursaphelenchus xylophilus</i>		
<i>Erwinia amylovora</i>		
<i>Guignardia citricarpa</i>		
<i>Phytophthora ramorum</i>		
Potato Spindle Tuber Viroid		

	Information campaigns	
	Carried out? (Yes/No)	Cost (total in €)
<i>Rhynchophorus ferrugineus</i>		
<i>Gibberella circinata</i>		
<i>Synchytrium endobioticum</i>		
<i>Thrips palmi</i>		
<i>Xanthomonas axonopodis</i>		
Control measures for potato diseases:		
<i>Clavibacter michiganensis</i>		
<i>Ralstonia solanacearum</i>		

Section 2: Analysis of the financial impact of expanding the EU Solidarity Regime to include natural spread

Introduction

The objective of this task of the study is to estimate the costs of the expansion of the EU Solidarity regime so as to in future also cover prevention measures for natural spread.

If all kinds of outbreaks would become eligible (i.e. without distinguishing between natural and man-assisted spread), in your view, what would be the impact on the dossiers submitted by your country for solidarity funding (volume and value)?

	Solidarity dossiers submitted under current eligibility rules:			Solidarity dossiers that would have been submitted if all kinds of outbreaks were eligible *:		
	Number of dossiers	Outbreaks (HOs) concerned	Estimated total value (in €)	Number of dossiers	Outbreaks (HOs) concerned	Estimated total value (in €)
2010						
2009						
2008						

** Note: assuming no change to the other criteria of the solidarity regime in terms of types of costs covered*

Section 3: Analysis of impacts of amendments to the Plant Passport (PP) system

Introduction

The objective of this task of the study is to evaluate the potential impact of various possible amendments to the current plant passport (PP) system, in particular the following options:

- To ensure that plant passports (PPs) accompany even the smallest number of plants or plant material used in the Business-to-Business trade;
- Idem, but in the Business-to-Consumer trade (i.e. up to the final consumer);
- To extend the compulsory use of PPs to sales outside protected zones or demarcated areas (but limited to the plants/plant material subject to PPs under the present regulations for such protected zones and demarcated areas);
- To extend the compulsory use of PPs to **all** plants/plant material and to **all** geographical zones;
- In the aforementioned four cases, PPs can keep the existing formats; but the study should also investigate the feasibility and the impact of the compulsory use of a **fully harmonised** format (or a set of formats, depending on the conditioning and packaging of the plants/plant material), retaining all the actual data fields (in principle, 10 fields);
- As a variant of the last case, the study should also investigate the feasibility of introducing a **simplified but still fully harmonised format** (so-called: logo), containing only a subset of the actual 10 data fields, but still guaranteeing the possibility of traceability of the origin of the plants/plant material.

Assessing the impact of these possible amendments will need to be based on available qualitative and especially also quantitative data. In order to follow a methodology that can yield reliable information within the timeframe of the study, we need from the national Competent Authorities the following data. *Where the requested data are not available, it would be useful to indicate where such information might be available.*

1. How many operators are authorized to issue PPs in your country?

Number

Comments

2. Does this number include operators selling to the final customer (such as garden centres)?

yes	
no	
don't know	

If yes, how many are they? *In case you cannot provide a precise figure, please estimate as a percentage of the total number of operators authorized to issue PPs.*

Number or percentage

Comments

3. How many operators are involved in the trade of plants or plants products (both of passported and non passported plants)?

Number

Comments

4. Do you have information on the number of PPs, issued by operators, per type of passport? Please give the numbers per type on annual basis:

Numbers	conventional PP	replacement PP	PP for trade in protected zone
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yes			
no			

If no, do you know where such information might be available (*please specify*)

Other comments

5. Do you have information on the volume of plants produced in your country (both passported and non-passported species) ? Please give the volume on annual basis, distinguishing, if possible, between passported and non passported plants. Please also indicate the unit in which this volume is expressed (number, lots, etc.):

	passported plants	non passported plants	total
yes			
unit in which this number is expressed			
no			
don't know			

If no, do you know where such information might be available (*please specify*)

Other comments

6. Do you have information on the percentage that passported plants represent in the total production volume, expressed in number of plants produced?

yes	
no	
don't know	

If no, do you know where such information might be available (*please specify*)

Other comments

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7. Do operators in your country already use a standardised format or set of formats for PPs they are authorised to issue? Please distinguish between a standardised set elaborated by the Competent Authorities, and a standardised set elaborated by the plant industry itself:

yes, operators use a standardised format prescribed by the competent authorities	
yes, operators use a standardised format elaborated by the plant industry itself	
no, every operator uses his own format	
don't know	

Comments

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8. In the case there exists in your country a standardised format elaborated by the competent authority, is its use by the operators optional or compulsory?

optional	
compulsory	
don't know	

Comments

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9. In case the use of the format or set of formats elaborated by the competent authority is optional:

9a) Do you know how often this optional format is used?

always or nearly so	
most of the time	
it is hardly used	
it is not used	
don't know	

Comments

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9b) Do you know why operators prefer to use their own format?

yes, for the following reason	
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don't know	
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Comments

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10. In the case there is no compulsory format or set of formats, does the competent authority accept that the PP is composed of several parts, with some data on a commercial document used by the operator (e.g. invoice, shipping list, transportation document), and some other data on a complementary document ?

PP can consist of several parts	
PP has to be 1 single document	
don't know	

Comments

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11. Do you have an idea on the number of cases in which PPs have actually been used to trace back the origin of a phytosanitary problem, e.g. since the year 2000?

yes	
no	

If possible, please provide details or other comments

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12. In the case it would be considered to issue a PP for all plant material for planting (as defined in article 2 of Directive 2002/29/EC), are there species or categories of plants (e.g. plants for indoor use only) for which you consider that a PP would not be useful, because they play no role in the spread of harmful organisms, or for any other reason? If so, could you please specify the species or plant categories and the reason for which a passport would not be useful?

species or categories of plants	reasons why a PP would not be useful

species or categories of plants	reasons why a PP would not be useful

Other comments

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13. Can you provide the coordinates of operators or their representatives or other experts we could contact in order to have a good understanding of the computer systems operators actually use to manage their business (stock keeping, invoicing, transportation, issuing of PPs)? *Please note that expert(s) can be from the competent authorities, research centres or universities as well as from organisations representing the operators.*

name of operator	
if possible, telephone number or other contact data	

Comments

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