



European  
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## JRC – DG SANTE TECHNICAL REPORT

# Enforcement, effectiveness, cost and benefits of the phytosanitary measures related to the Plant Passport system

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**2021**



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JRC126789

EUR 30912 EN

PDF

ISBN 978-92-76-44747-4

ISSN 1831-9424

doi:10.2760/20429

Luxembourg: Publications Office of the European Union, 2021

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How to cite this report: Sánchez, B., Di Bartolo, F., Márquez García, M. B., Charels, D., Vágner, R., Soto-Embodas, I., Barreiro-Hurlé, J. *Enforcement, effectiveness, cost and benefits of the phytosanitary measures relating to the Plant Passport system*, EUR 30912 EN, Publications Office of the European Union, Luxembourg, 2021, ISBN 978-92-76-44747-4, doi:10.2760/20429, JRC126789.

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## **Acknowledgements**

This technical report benefits from the support of the Directorate General for Health and Food Safety of the European Commission (DG SANTE) through an Administrative Arrangement with the Joint Research Centre (JRC). The continuous support from Dorothee Andree, Harry Arijns (from DG SANTE) and Emilio Rodriguez-Cerezo (JRC) has enabled smooth collaboration and assured guidance ensuring the methodology and analysis is appropriate for the purpose.

The inputs and feedback from the different stakeholders at EU level via the EU Survey online tool were essential in developing the analysis included in this report. They provided relevant information regarding the enforcement, effectiveness, costs, and benefits of the phytosanitary measures related to the Plant Passport system.

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## Abstract

This report constitutes a technical analysis of the responses to the questionnaire regarding the phytosanitary measures related to the Plant Passport (PP) system under the new plant health legislation, as provided by several stakeholders. The questionnaire - sent in February 2021 - was answered by 177 respondents including National Plant Protection Organisations (NPPOs), certification Competent Authorities (CAs), professional operators, associations (both national and EU-wide), and the general public, from 25 different EU Member States. This report includes an analysis carried out by DG SANTE of policy aspects related to the experience gained from the extension of the plant passport system to all movement of plants for planting within the territory of the European Union, as addressed in the questionnaire, and a cost benefit analysis thereof, carried out by JRC.

Results show the stakeholders' views on the cost and benefits of the extension of the PP requirement to all movement of plants for planting within the territory of the European Union, as well as some other provisions aimed at strengthening the PP system. The results also include evaluation of other relevant policy aspects and alternatives as perceived by the stakeholders: the introduction of an electronic PP, the provisions of distance contracts, the changes related to Regulated Non-Quarantine Pests (RNQPs) regarding the new PP requirements, and the implementation of the new rules on pre-export certificates.

This report is drafted for the preparation of the report to the European Parliament and to the Council according to the legislative obligation of the Commission laid down in Article 79(6) of the Plant Health Regulation (EC 2016/2031)<sup>1</sup>.

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<sup>1</sup> Article 79(6) of this regulation states that *"By 14 December 2021, the Commission shall present a report to the European Parliament and the Council on the experience gained from the extension of the PP system to all movement of plants for planting within the Union territory including a clear cost-benefit analysis for the operators, accompanied, if appropriate by a legislative proposal"*.

# 1 Introduction

Article 79 of the Plant Health Regulation (PHR) (Regulation (EU) 2016/2031) requests that the Commission present a report to the European Parliament and the Council by 14 December 2021 on the experience gained from the extension of the PP system to all movement of plants for planting within the territory of the European Union, including a cost-benefit analysis, along with a legislative proposal where appropriate.

The Plant Health Unit of the Directorate General for Health and Food Safety of the European Commission (DG SANTE), and the Economics of Agriculture Unit of the Joint Research Centre (JRC) organised a survey to assess the impact on the EU environment and economy of the phytosanitary measures related to the Plant Passport system.

This report analyses the results of the Plant Passport (PP) questionnaire on plant health provisions as perceived by the different stakeholders that responded. A total of 70 questions were posed to the different stakeholders covering the cost and benefits of the extension of the PP requirement to all movement of plants for planting within the Union territory, as well as some other provisions aimed at strengthening the PP system: (i) a harmonised format for PPs; (ii) the obligation for an operator to attach a PP to the trade unit; and (ii) obligations for operators to ensure traceability of plants or plant material and to carry out PP examinations. The survey also assessed other relevant policy aspects and alternatives, including the introduction of an electronic PP, the provisions of distance contracts, the changes related to Regulated Non-Quarantine Pests (RNQPs) regarding the new PP requirements, and the implementation of the new rules on pre-export certificates.

Before the survey was administered, a preliminary draft version of the questionnaire was discussed and validated with the representatives of the EU Member States and associations, of the European Commission Expert Group under the Plant Health Regulation Reports of Art. 50 and 79. The final questionnaire was sent to the relevant stakeholders in February 2021. The template of the questionnaire can be found in the Annex. A period of about three months was then provided to respond to the survey with a deadline by 9 May 2021. Several reminders were sent during the process, to ensure the greatest possible participation by stakeholders (Figure 1).

**Figure 1. Timeline of PP questionnaire (Art. 79)**

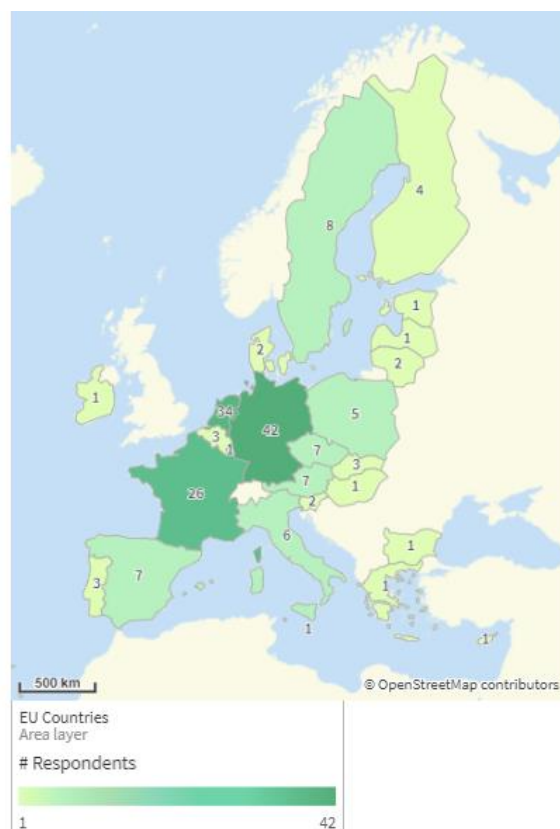


A total of 177 respondents from 25 different EU Member States (MS) responded to the questionnaire (Figure 2). Respondents, in order of highest participation rate were (Figure 2 and 3): 50 replies from the general public from 5 MSs, 44 MS-level associations from 13 MSs, 43 operators from 10 MSs, 24 NPPOs from 24 MSs, 9 Certification CAs from 7 MSs<sup>2</sup>, and 7 EU-wide associations. The sectors where respondents were employed included sectors as diverse as logistics and research. However, the majority of operators and associations were producers, and to a lesser extent traders (Figure 3).

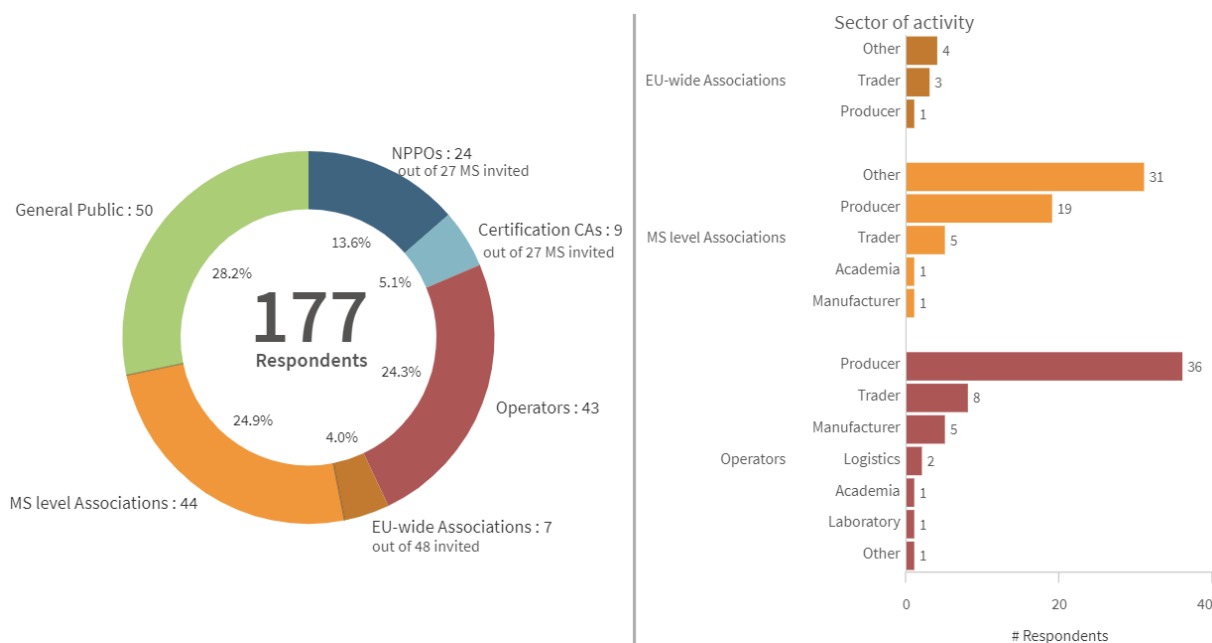
<sup>2</sup> DE, FI, FR, NL, PL, SI, SE



**Figure 2. Number of respondents by country**

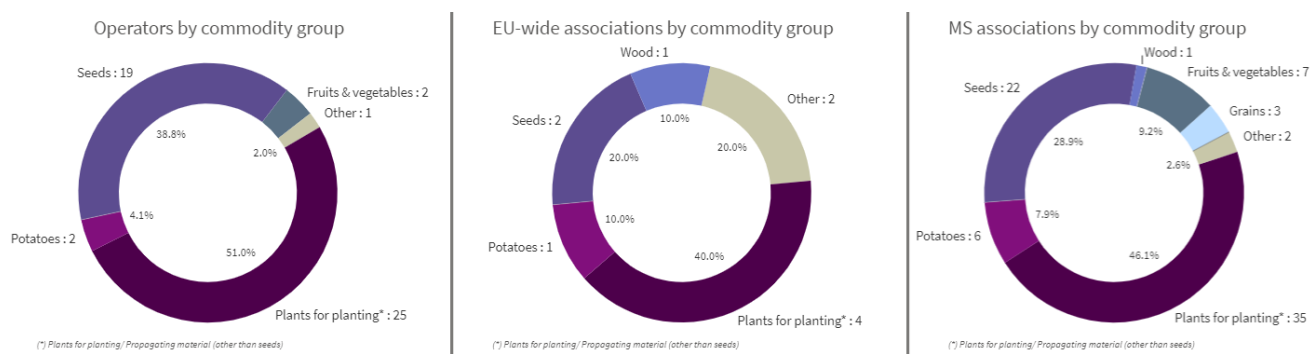


**Figure 3. Types of stakeholders that participated in the survey**



There were two main commodities of interest for the respondent operators and associations: plants for planting, and propagation material and seeds (Figure 4). These two commodities represent 89.8%, 60% and 75% shares of all commodities traded or produced for operators, EU-wide and MS-level associations respectively.

**Figure 4. Type of commodities represented by the different production groups (i.e. operators and associations)**



The results are divided across ten sections that provide analysis of the questionnaire responses according to the main topics assessed, i.e. from Section 2.1 to Section 2.10. In each subsection, the questions are first presented in italics (as in the original questionnaire), followed by analysis of the responses from all the respondents to the question together, and then by type of stakeholder. Conclusions are drawn at the end of each section. A general conclusion is presented at the end of the report.

The European Commission's analysis is hampered by three limitations: first, the limited contribution of EU NPPOs and associations in certain cases, which affected the representativeness of the responses, and the very limited contribution from general public and operators which did not allow for a triangulation of the findings; second, the very short time between the entry into application of the different provisions and the request for feedback which affected the sample size for the analysis; and last, the impact of the COVID-19 pandemic on trade and relevant activities despite the existence of Regulation (EU) 2020/466 on temporary measures to contain risks during certain serious disruption of the Member States' control systems due to COVID-19.

## 2 Plant Passport results

### 2.1 New plant passport requirements

#### 2.1.1 The transition to the new plant passport rules (i.e. their practical application)

*How do you rate the transition to the new rules (i.e. their practical application; Regulation 2016/2031)? (Q1)*

Most respondents perceived the transition to the new PP rules (i.e. their practical application) as either manageable or somewhat/very burdensome.

Mostly positive replies (manageable to effortless) were received from the NPPOs and EU-wide associations. Most MS-level associations also expressed a positive view of the PP examination requirements (Art. 87), and most operators and MS-level associations expressed a positive view of the PP harmonised format (Art. 83).

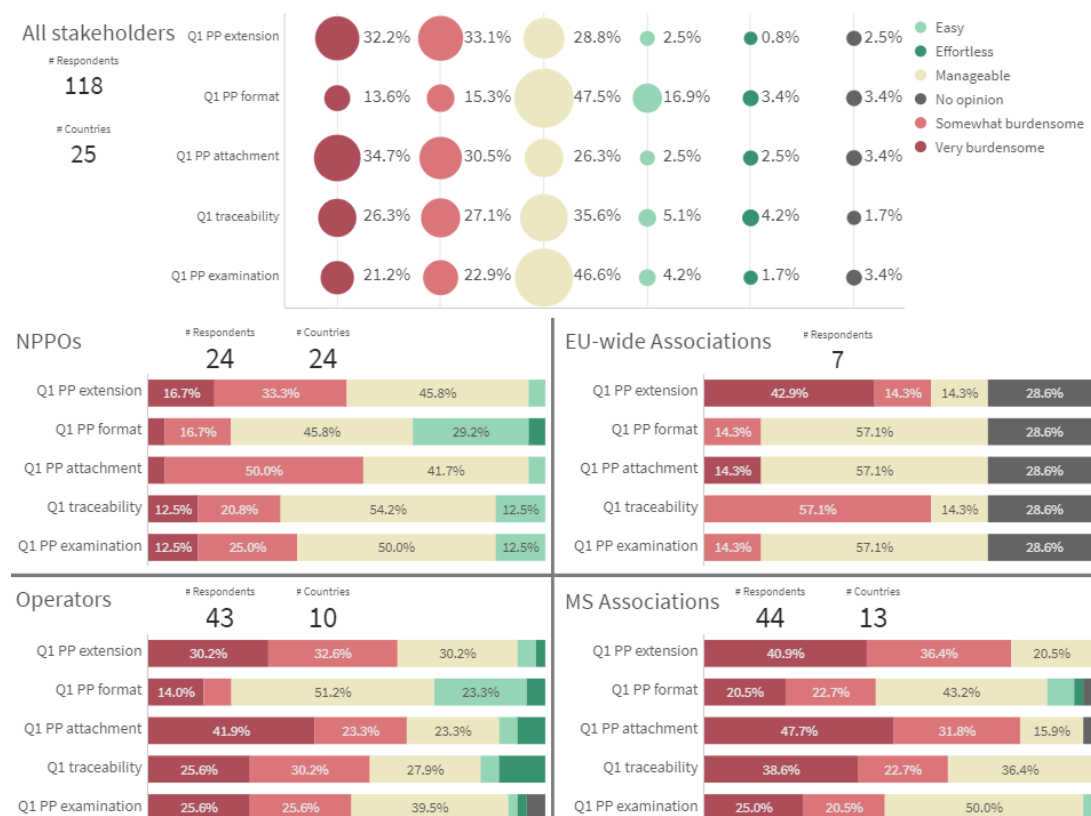
On the other hand, the attachment of the PP to the trade unit (Art. 88) and the extension of the PP to all plants for planting (Art. 79) were considered more burdensome (over 65% of respondents). Over 53% of respondents considered the requirements for ensuring traceability (Art. 69) burdensome.

Responses to the questions regarding the transition to new rules on PP examination requirements (Art. 87) and PP harmonised format (Art. 83) show that both aspects were manageable (about 47% of respondents) or burdensome to a lesser extent (23% and 15% of respondents respectively).

The PP harmonised format was rated as easy and even effortless by over 20% of respondents, mostly driven by NPPOs and operator responses. On the other hand EU-wide associations, mostly rated it as manageable. The transition to the new PP requirements for ensuring traceability were also rated as easy and even effortless by 10% of respondents.

The attachment of the PP has implied additional costs and time for operators and the supply chain, especially for some types of materials (e.g. small trade units, 'frigo' plants or plants kept under specific humidity conditions) and where new IT systems or equipment (e.g., printers, software) have been required. An increase in administrative burden and the need for intensive communication to inform operators was also reported due to the transition to the new PP rules for all stakeholders.

**Figure 5. The transition to the PP new rules (i.e. their practical application)**



The reasons and proposals provided by some of the respondents who responded 'very burdensome' or 'somewhat burdensome' are summarised in Box.1.

**Box 1. Reasons for rating the transition to the PP new rules (i.e. their practical application) as burdensome**

- Transition complicate, and demanding for all stakeholders, and with lack of clear guidance by national authorities even when the national authorities report making a big (and expensive) effort.
- New PP requirements entailed more administrative burden (e.g. to formalise procedures, training, attachment to forestry plants and wood), more time and labour resources (e.g., if label and invoice are used, intensive advice to operators), and IT developments (e.g. new hardware or software).
- Too much effort for a limited gain in plant health terms, as many items for which a PP is newly required are low-risk. It is also unclear which plant pathogens need to be controlled.
- PP extension and attachment resulted in significant additional costs and logistical and administrative burden for operators and the whole supply chain, according to EU-wide associations. Estimates provided for the ornamental sector in just one country on the order of several tens of millions of euros.
- Costs cited for IT systems and equipment, such as new software or printers to fulfil the new PP design requirements, not affordable to small operators.
- Attachment of PPs to trade units can be more complicated, time consuming and costly for some types of materials, for example small production units (as many different labels are necessary), 'frigo' plants or plants preserved under specific humidity conditions, or logs of wood. The requirement results in individual plants being accompanied by a plant passport until they reach the end user, although this is not required.
- Dealing with splitting of consignments is challenging (e.g., lots of plants accompanied by one PP and then split for selling to different producers), as are distance/internet sales.
- Not clear which products need a PP, and especially whether seeds for vegetables do.
- Transition difficult – there should have been more time provided and more interaction with the administration, especially for operators newly requiring PPs.
- Coherence between PHR and marketing directives must be assured.
- Impact higher for small producers – simplified system or help kit?
- Examination requirements for PP too difficult for certain operators.
- Proportionality of the requirement doubtful when the cost of attaching the PP to the trade unit is higher than the value of the trade unit itself (e.g. for bulbs and potted plants).
- Traceability requirements not proportionate to the relatively low risks reported by conservation organisations.

**PROPOSALS PROVIDED BY RESPONDENTS**

- For the exams, all the information should be available to operators in an educational and tailored way, and the requirements must be fixed and harmonised across territories.
- MSs should be authorised to decide whether the examination for PPs should be carried out by the NPPO or authorised operators.
- Digital PP instead of printed stickers on trade units: environmentally friendly, fewer costs, fewer mistakes, and using only a company number (so no plant type names). All to be traceable through operator's system.
- PP on delivery note/invoice should be allowed (not only on the trade unit itself).
- Product labelling versus PP is an option.
- Exemptions to be made clear and not only applied to seeds.
- Only plants/articles sold to another professional operator should require a PP.

## 2.1.2 The implementation of the new plant passport rules (i.e. their official enforcement)

*How do you rate the implementation of the new rules (i.e. their official enforcement; Regulation 2016/2031)? (Q2)*

The implementation of the new PP rules (i.e. their official enforcement) was rated as complicated by at least 40% of respondents.

However, positive replies (manageable to effortless) predominate in responses to the PP harmonised format (Art. 83) from all groups of stakeholders except operators, where positive and negative replies are equal (48.9%). The implementation of the PP harmonised format was rated as simplified by over 66% of NPPOs and 43% of EU-wide associations. EU-wide associations also mostly responded positively (42.9% - manageable) to the examination requirements for PP (Art. 87).

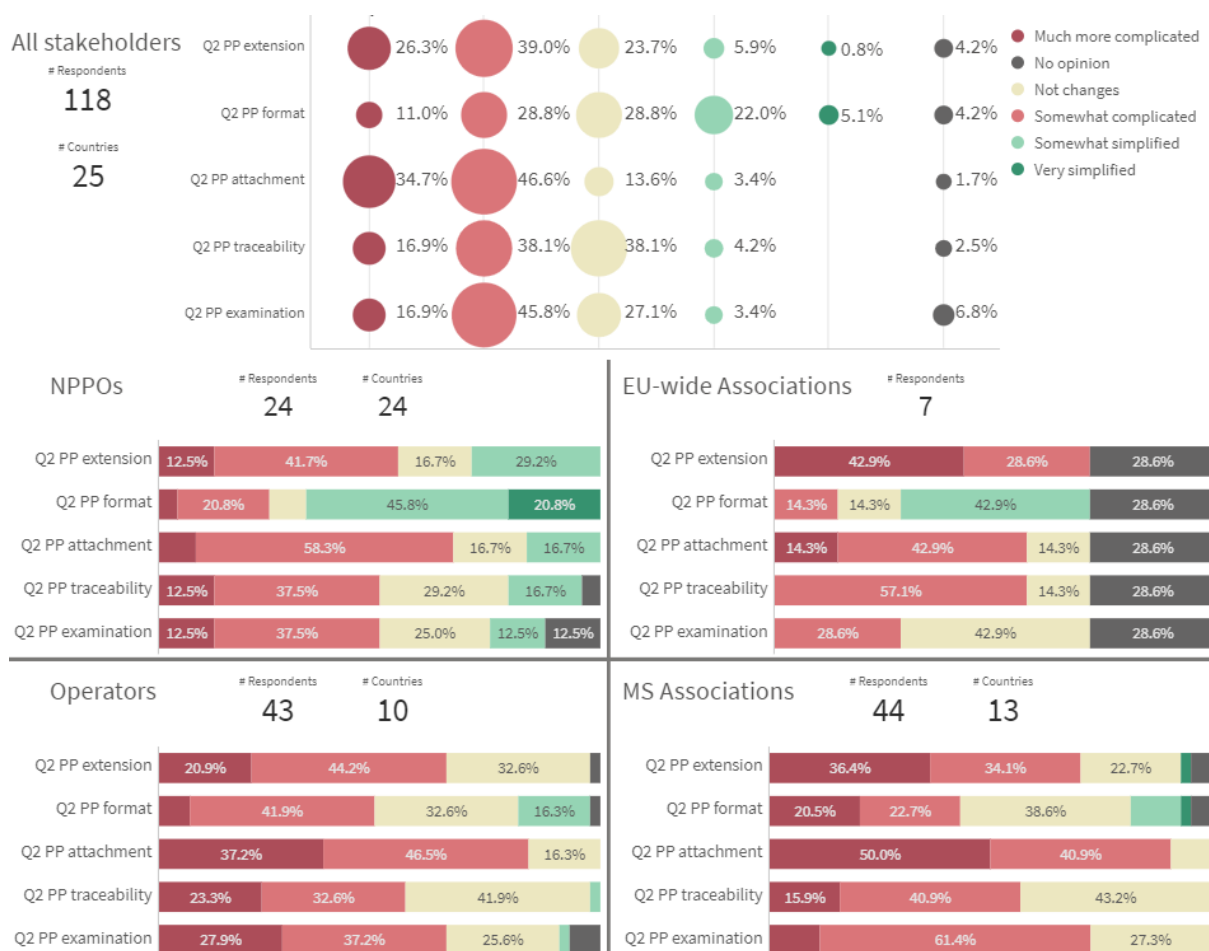
In particular, the attachment of the PP to the trade unit (Art. 88) implementation was rated as somewhat or much more complicated by over 81% of respondents. The extension of the PP to all plants for planting (Art. 79)

and the examination requirements for PP (Art. 87) were also considered more complicated in terms of implementation by more than 60% of respondents.

55% and 40% respectively of all respondents rated the implementation of the requirements for ensuring traceability (Art. 69) and the PP harmonised format (Art. 83) as complicated.

Similarly to transition, the complicated implementation of the new PP rules was mainly due to PP attachment issues, e.g., unclear definition of 'trade unit', or difficulties in attaching the PP to the trade units. Increased risks and lower safety were also associated with assigning inspection/examination obligations to operators.

**Figure 6. The implementation of the new PP rules (i.e. their official enforcement)**



The reasons and proposals provided by some of the respondents who responded 'much more complicated' or 'somewhat more complicated' are summarised in Box.2.

**Box 2. Reasons for rating the implementation of the new PP rules (i.e. their official enforcement) as complicated**

- New rules challenging for NPPOs
- Attachment to the trade unit complicated.
- Collecting and keeping PPs for traceability is difficult.
- Trade unit definition unclear.
- Uncertainties with the marketing of seeds in small packages intended for end consumer.
- Not all gene banks are authorised operators who may issue plant passports.
- Special treatment of non-commercial operators.
- Double labelling complication - plant origin and PP.
- Risk of reduced safety due to assigning inspection obligation to operators.
- Differentiation of need between distance sale (not needed) and direct sale (needed) is distorting.
- PP is kept until the end user even when this is not necessary

- Impact is high as it does not distinguish with regards to unit size and for some units can be difficult to implement.
- The assessment is taking place too early to judge the pros and cons of the examination requirements for PP.

#### **PROPOSALS PROVIDED BY RESPONDENTS**

- Allow PP not on product but on accompanying documentation.
- Harmonisation of e-commerce requirements – suggestion to organise a working group.
- PP requirements should apply to marketing of seeds/plants for commercial purposes.
- Allow exemption from PP when the movement is within the same company prior to marketing.

### **2.1.3 Overall complexity of the process for issuing or replacing a plant passport**

*Following the changes introduced in the Plant Health Regulation (Regulation 2016/2031), how do you consider that the overall complexity of the process of issuing or replacing a plant passport has become due to the following aspects? (Q15)*

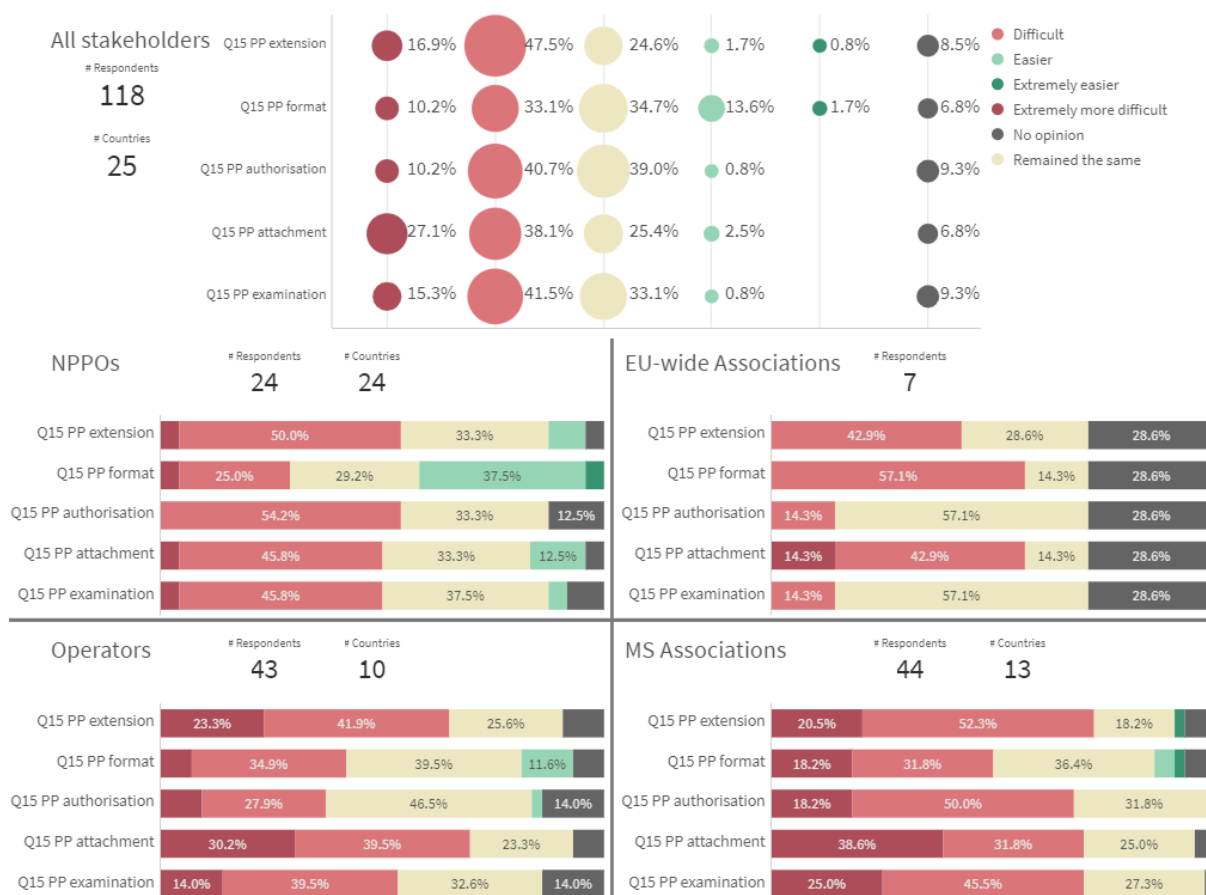
The overall complexity of the process for issuing or replacing a PP was, like PP transition and implementation, considered more difficult by more than half of respondents. The attachment of the PP (Art. 88) and the extension of the PP to all plants for planting (Art. 79) were again considered especially complicated.

Issuing or replacing a PP involves a series of difficulties that can be grouped into three categories. First, some specific types of plants or plant material do not facilitate the physical attachment of a PP (e.g. stand-alone logs, turf in rolls, consignments with multiple small lots, lots with multiple species or multiple species in a single pot). Secondly, some types of operators carry out activities which by their nature combine multiple plants, or plants that need and do not need a PP (e.g. research activities, gene banks, distance sales and material early in the chain not ready for end users). Finally, some requirements seem inadequate or disproportionate (e.g. use of multiple botanical names on a single PP, problems with the colour of a combined label/PP, etc.). Some respondents expressed concerns regarding the proportionality and justification of the PP requirement which doesn't distinguish the level of risk associated with specific types of plants.

In order to overcome these difficulties, enhanced outreach, training, awareness activities and longer transitional periods would be most welcome. These activities should take account of the specific traits of small producers (e.g. those with advanced age). Also, the content of these activities should focus on a set of issues which are rated as unclear in the feedback received from stakeholders. These include coherence between PP requirements and marketing directives, conditions for self-checking by operators, and information on RNQPs which are new to operators.

In particular, stakeholders were quite explicit regarding the need to regard the electronic PP as a facilitating tool and the possibility of including the PP in the commercial documents, rather than attaching it physically to the plant itself. The possibility of waiving or adapting the PP for some goods that by their nature are not suited for physical attachment of the PP should also be considered.

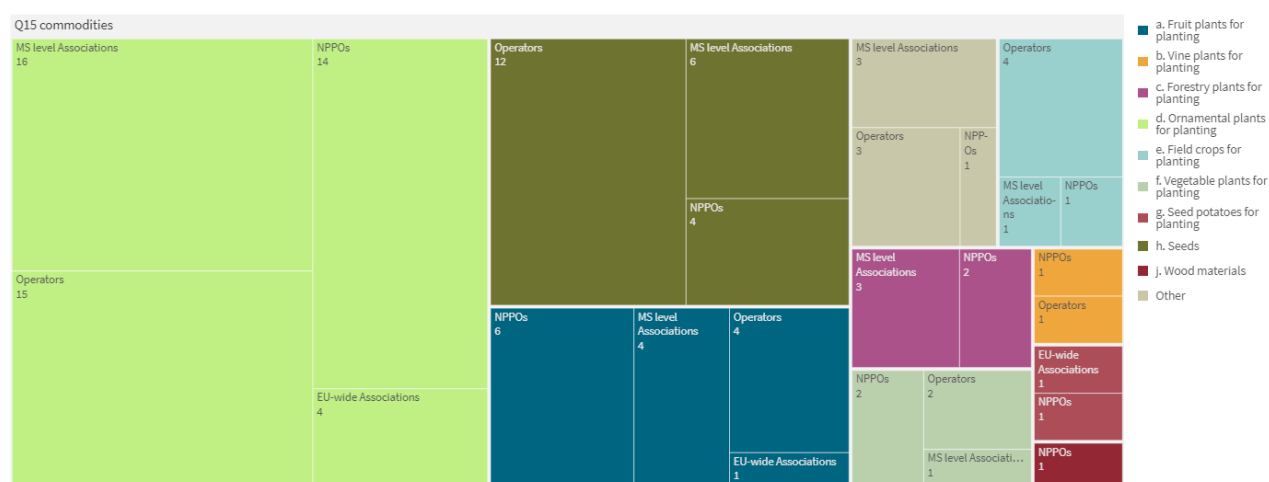
**Figure 7. Overall complexity of the process of issuing or replacing a PP since the changes introduced in Regulation (EU) 2016/2031**



The top three commodities with the most difficult process for issuing or replacing a PP since the changes introduced in the Regulation (EU) 2016/2031, as selected by most respondents, were:

- Ornamental plants for planting (49 responses).
- Seeds (22 responses).
- Fruit plants for planting (15 responses).

**Figure 8. Commodities with the most difficult process for issuing or replacing a PP since the changes introduced in Regulation (EU) 2016/2031**



The reasons and proposals put forward by respondents which selected 'more difficult aspects' (especially in relation to Art. 83 and 88) are summarised in Box.3.

**Box 3. Reasons for identifying more difficult aspects in the process of issuing or replacing a PP**

- While the measures in place have increased the burden, there is also recognition of the benefits in terms of increased security.
- The PP requirements become so burdensome that it is impractical or even impossible to comply with:
  - Mixtures of plants (especially for small plants sold in a tray or cart with multiple species).
  - Pots with multiple species.
  - Lawn.
  - *Solanaceae* seeds.
  - Loose goods.
- While legislation would seem to allow for passports at the lot level, de facto the PP is being implemented at the level of single plants.
- Certain specific types of activities/trade seem to face more difficulties with the attachment of a PP:
  - Research activities.
  - Material not for end users (within-company trade or from primary producer to transformation).
  - Sales for distance contracts.
  - Gene banks dealing with huge variety of species.
- Confusion for operators that deal with both plants that need a PP and plants that do not.
- Thresholds for identifying presence of pests do not seem to be based on risk assessments.
- Traceability does not require that the PP is attached to the trade unit.
- Production by SMEs sometimes fails to adhere to standards and traceability is compromised.
- The age structure of producers, with some operators being relatively old, complicates authorisation procedures.
- Moving to an electronic PP would probably solve the issue of attaching the PP to the trade unit.
- The transition period should have been longer.
- Lack of clarity regarding the possibility of using more botanical names in plants for planting ready for sale.
- There seems to be confusion regarding the compatibility of requirements under the RNQP and the marketing directives. These are too restrictive.
- Lack of clarity on sampling and testing conditions for RNQPs.
- How to deal with products that have been traded before the PP requirement entered into force.

**PROPOSALS PROVIDED BY RESPONDENTS**

- The PP should be attached to the delivery note or a similar document; this would solve the problems of small units, multiple species in one consignment, and loose products (e.g. wood logs, turf in rolls).
- Multiple lots should be allowed to be accompanied by a single PP.
- Paperless PPs should be allowed (e.g. scanned PP on a driver's mobile phone).
- Exceptions should be considered for those plants that, due to their physical nature, make it nearly impossible to attach a PP, for seeds moving between gene banks or for scientific and educational purposes, trials, varietal selections or breeding, for material early in the chain (not ready for the end user), and for material sold to end users through distance contracts.
- Issue harmonised guidance document(s) that will unify, provide guidance on, and resolve practical aspects of the PP system, so the operators have certainty about the requirements; in particular, they should clarify which plants need and do not need a PP.
- Change specific expiry requirement for some kind of coding reflecting types of duration (months, years, no expiry date).
- Provide more support to producers in terms of training and awareness, or publicise more the existing initiatives more. This seems to be especially needed in relation to the conditions for self-checking by operators.
- Longer transitional period, as this is not simply an issue of changing the format of the PP, but rather of changing the behaviour and roles of different operators.
- Allow individual MSs to decide who should carry out the examination of the PP (authorised operators or the NPPO).
- The PP should be required for plants that really pose a risk, not for all plants.
- More information efforts on QP, as many producers have no experience with these pests because they are not present in the EU.



## 2.1.4 Attachment of the plant passport to the trade unit

The plant passports, according to Art. 88 (Regulation 2016/2031), are required to be attached to the trade unit of plants, plant products or other objects. In your view

.....has this requirement proven to be useful?

...does this requirement contribute to an increased prevention of spreading plant quarantine pests? (Q3)

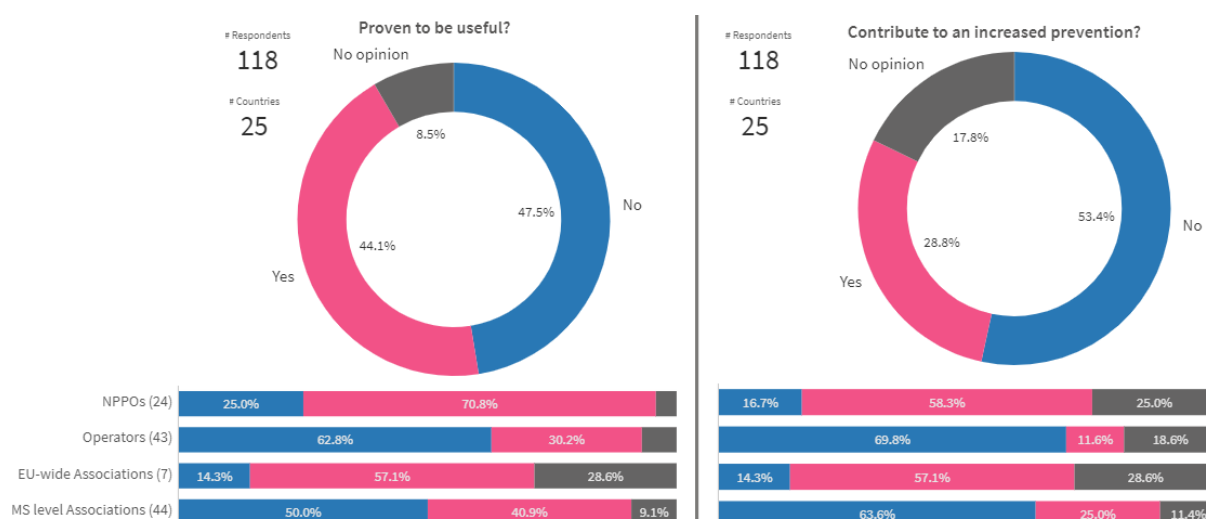
The requirement to attach the PP to the trade unit (Article 88) of plants, plant products or other objects, was rated as useful (44.1%) and not useful (47.5%) by an approximately equal number of respondents.

A higher share of NPPOs (70%) and EU-wide associations (57.1%) considered that the PP attachment requirement had proven to be useful. On the other hand, a higher share of operators (62.8%) and MS-level associations (50%) considered that this requirement had proven not to be useful.

More than half of NPPOs and EU-wide associations believed that the requirement to attach the PP to the trade unit had contributed to increased prevention of the spread of plant quarantine pests. On the other hand, a higher share of operators (70%) and MS-level associations (63.6%) considered this requirement to have not contributed to increased prevention.

Overall, NPPOs and EU-wide associations had a favourable perception of the requirement to attach the PP in terms of usefulness and protection against plant pests. On the other hand, operators and MS-level associations had a negative perception of this requirement.

**Figure 9. The requirement to attach the PP to the trade unit of plants, plant products or other objects**



The reasons and proposals provided by some of the respondents when they responded 'no' are summarised in Box.4.

**Box 4. Reasons for rating the requirement to attach the PP to the trade unit of plants, plant products or other objects as not useful and not contributing to prevention**

- Too complex and no real benefit.
- Cost-benefit analysis between risk and requirement is needed.
- PP itself is not a guarantee of security, but instead a well-trained and aware workforce could help.
- Attaching the PP provides an opportunity for inspection by an operator, but not certain that this is done.
- Although traceability has increased, there are easier alternative options available for improving it.
- Making the person with a financial vested interest responsible for implementing the checks may be risky. Better to keep it with the administration.
- The state cannot just shift responsibilities.

**PROPOSALS PROVIDED BY RESPONDENTS**

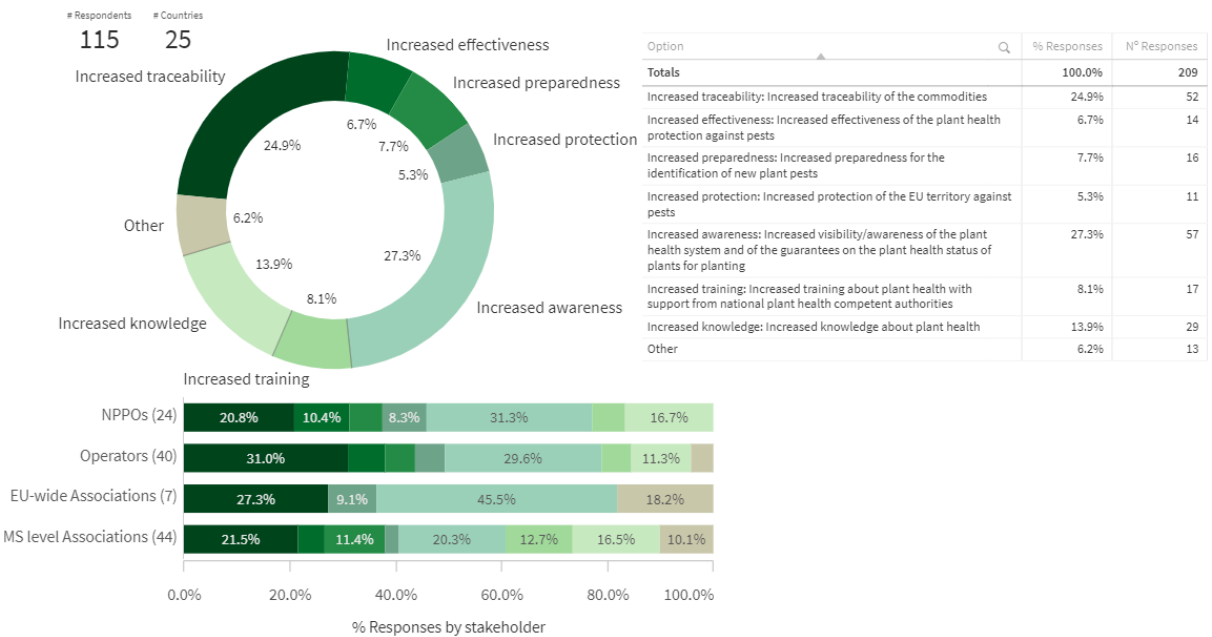
- Allow PP to be included in the delivery documents (at least for e.g. small seed packages).
- Digitise PP.

2.1.5 Most significant positive and negative impacts

Please choose the 2 aspects in which you have experienced the most significant positive and negative impacts due to the changes to plant passports under Art. 79, 83, 87, 88 & 93 (Regulation 2016/2031) (Q4 & Q5)

Most respondents agreed on the two areas that have seen the most positive impacts resulting from the changes to plant passports under Art. 79, 83, 87, 88 and 93. These two areas were: i) increased visibility and awareness of the plant health system and of the guarantees on the health status of plants for planting (27.3%) and ii) increased traceability of commodities (24.9%). The area chosen third most often as seeing a significant positive impact was increased knowledge of plant health (13.9%).

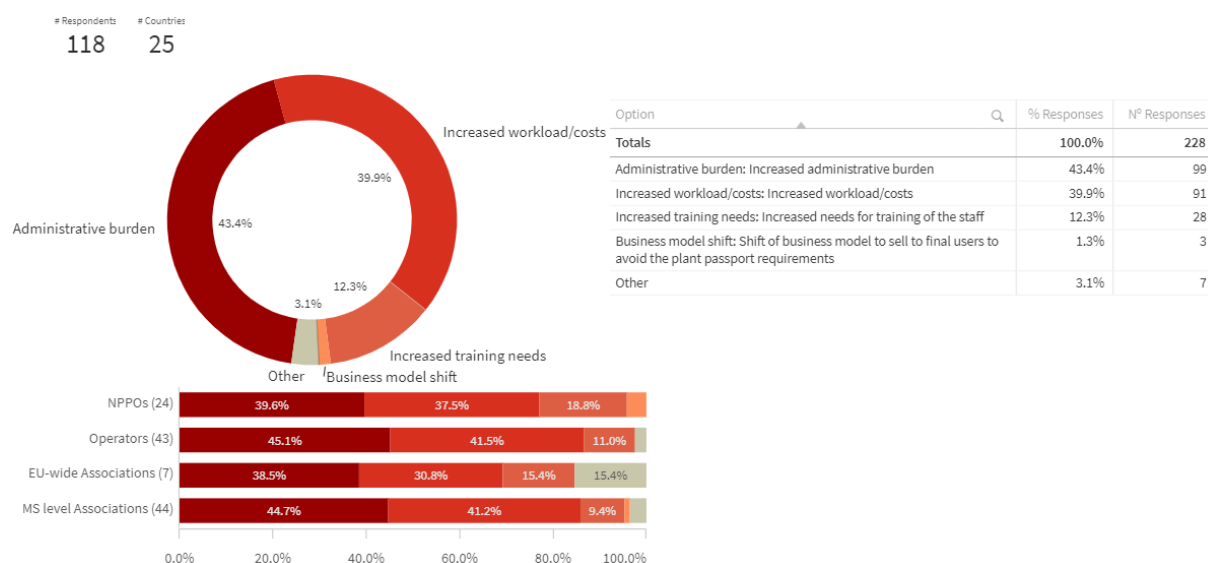
Figure 10. Most significant positive impacts due to changes to plant passports under Art. 79, 83, 87, 88 & 93



All respondents agreed on the two areas that have seen the most negative impacts resulting from the changes to plant passports under Art. 79, 83, 87, 88 and 93. These two areas were: i) Increased administrative burden (43.4%) and ii) increased workload and/or costs (39.9%). The area chosen third most often as seeing a significant negative impact was an increased need for training of staff (12.3%).

Other negative impacts of the changes to plant passports, as expressed by respondents, were: i) increased costs of software, printers, additional labels; ii) increased time, traceability demands, and iii) strict labelling of each unit

**Figure 11. Most significant negative impacts resulting from changes to plant passports under Art. 79, 83, 87, 88 & 93**



### Conclusions regarding the new plant passport requirements

The transition to the new PP rules (i.e. their practical application) has been challenging and required a large effort from all stakeholders. It was more demanding for small operators. In particular, the attachment of the PP to the trade unit (Art. 88) and the extension of the PP to all plants for planting (Art. 79), especially in the ornamental sector, were the two requirements considered most burdensome.

Similarly to transition, the implementation of the new PP rules was considered challenging mainly due to the issues surrounding attachment of the PP - e.g., unclear definition of 'trade unit', or difficulties in attaching the PP to trade units (Art. 88), the extension of the PP to all plants for planting (Art. 79) and the examination requirements for the PP (Art. 87). Increased risk and lower safety standards were associated with assigning inspection and examination obligations to operators. Administrative burden and a need for intensive communication to inform operators were also considered to be increased for all stakeholders due to the transition and implementation of the new PP rules.

The overall complexity of the process of issuing or replacing a PP was, like the PP transition and implementation, rated as more difficult by more than half of respondents. Attachment of the PP to the trade unit (Art. 88) and the extension of the PP to all plants for planting (Art. 79) were again considered especially complicated.

Issuing or replacing a PP involves a series of difficulties that can be grouped into three categories. Firstly, some specific types of plants or plant material do not facilitate the physical attachment of a PP (e.g. stand-alone logs, turf in rolls, consignments with multiple small lots, lots with multiple species or multiple species in a single pot). Secondly, some types of operators carry out activities which by their nature combine multiple plants, or plants that need and do not need a PP (e.g. research activities, gene banks, distance sales and material early in the chain not ready for end users). Finally, some requirements seem inadequate or disproportionate (e.g. use of multiple botanical names on a single PP, problems with the colour of a combined label or PP). Some respondents expressed concerns regarding the proportionality and justification of the PP requirement, which makes no distinction as to the level of risk associated with specific types of plants.

In terms of usefulness and protection against plant pests, NPPOs and EU-wide associations perceived the requirement to attach the PP more favourably, and operators and MS-level associations perceived it more negatively. The requirement for PPs to have a harmonised format (Art. 83) was perceived more positively by all stakeholders (especially NPPOs and operators), in terms of making transition, implementation, and issuing or replacing a PP easier and simpler.

In order to overcome these difficulties, enhanced outreach, training, awareness activities, and longer transitional periods would be most welcome. These activities should take account of specific traits of small producers (e.g. those with advanced age). Also, the content of these activities should focus on a set of issues which are identified as unclear in the feedback received from stakeholders. These include coherence between PP requirements and marketing directives, conditions for self-checking by operators, and information on RNQPs which are new to operators.

In particular, stakeholders are quite explicit regarding the need to consider the electronic PP as a facilitating tool and the possibility of including the PP in the commercial documents rather than attaching it physically to the plant itself. The possibility of waiving or adapting the PP for some goods that by their nature are not suited for physical attachment of the PP should also be considered.

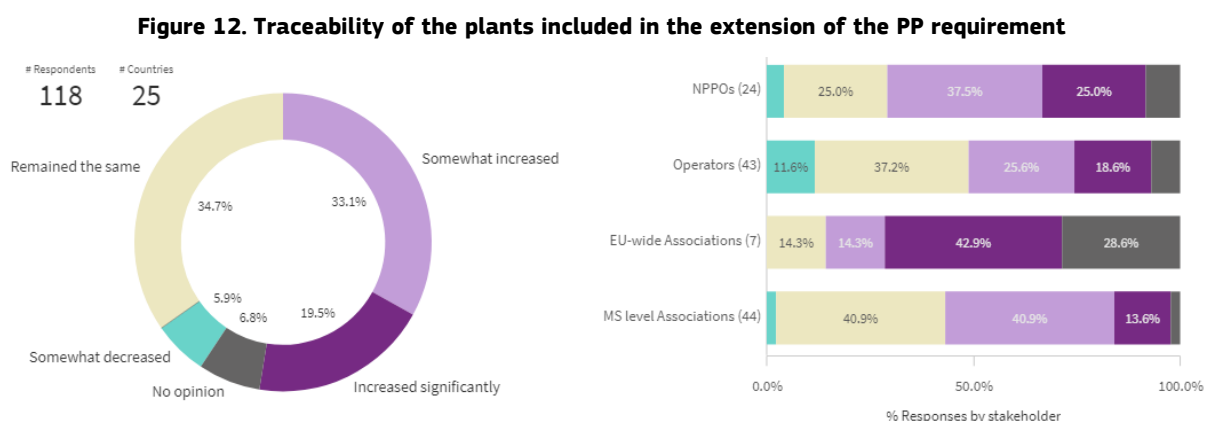
Overall, the most positive impacts, as perceived by stakeholders, resulting from the changes to plant passports under Art. 79, 83, 87, 88 and 93 were increased visibility and awareness or knowledge of the plant health system, and the guarantees as to plant health status. The most negative impacts were increased administrative burden (e.g., software, printers, more labels) and increased workload and costs (traceability demands, strict labelling of each trade unit).

## 2.2 Extension of the plant passport requirement to all plants for planting

### 2.2.1 Changes related to traceability of the plants that newly require a plant passport

*Regarding the traceability of the plants that now newly require a plant passport under the extended plant passport regime, do you consider it has? (Q6)*

More than half of respondents (52.6%) believed that the plants that newly require a PP have become more traceable since the extension of this requirement to all plants for planting. A smaller proportion (34.7% of respondents) believed that traceability had remained the same, and less than 6% of respondents, stated that it had somewhat decreased. According to one NPPO, traceability depends on the administration of the companies. Generally, NPPOs and EU-wide associations believed that traceability had increased by more than other respondents did.



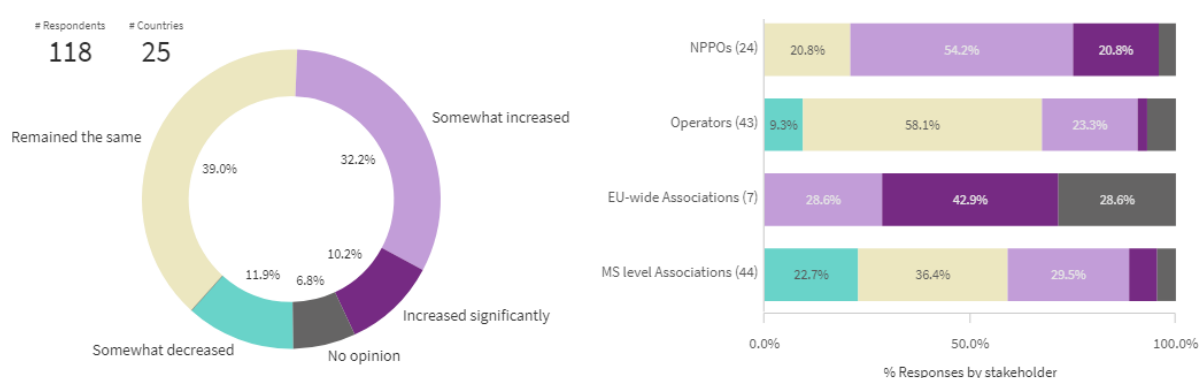
### 2.2.2 Effectiveness of protection against plant quarantine pests since the extension of the plant passport to all plants for planting

*How do you rate the change in effectiveness of the plant health security in terms of protection against plant quarantine pests since the plant passport has been extended to all plants for planting? (Q7)*

The effectiveness of protection against plant quarantine pests since the extension of the PP requirement to all plants for planting was rated either as having increased (42.4%) or as having remained the same (39%) by all respondents. Specifically, over 70% of NPPOs and EU-wide associations considered that the effectiveness of protection against plant quarantine pests had increased.

Only four operators and 10 MS-level associations considered the effectiveness of protection against plant quarantine pests somewhat decreased since the extension of the PP requirement. According to the MS-level associations, some of the reasons for such decreases are: i) the capacities of operators and official services might have remained the same, while the workload has substantially increased with every plant – even low-risk ones – now having to be controlled and labelled; ii) the difficulty involved in operators reaching the same level of knowledge as specialised inspectors; and iii) the disengagement of the public administration from inspections, with possible negative impacts on phytosanitary security.

**Figure 13. Effectiveness of protection against plant quarantine pests since the extension of the PP to all plants for planting**



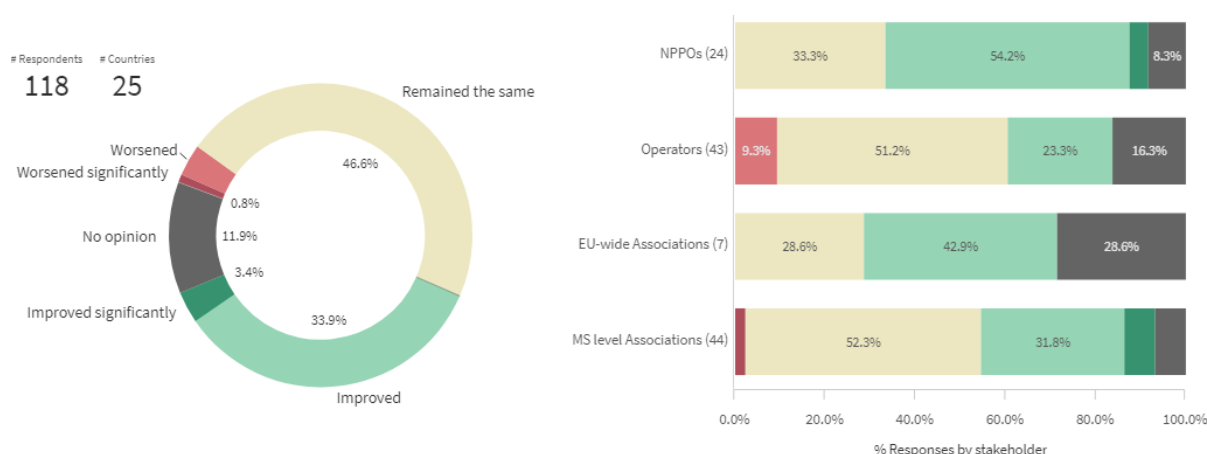
### 2.2.3 Preparedness for the identification of new plant pests of concern for the EU territory since the extension of the plant passport to all plants for planting

*Regarding the preparedness for the identification of new plant pests of concern for the Union territory, since the plant passport has been extended to all plants for planting, do you consider it has? (Q8)*

Preparedness for the identification of new plant pests of EU concern, , was either rated as having improved (40.7%) or as having remained the same (46.6%) since the extension of the PP requirement by most respondents.

No NPPO or EU-wide association considered the preparedness for the identification of new plant pests to have worsened. In fact, only one MS-level association stated that it has worsened significantly, and four operators stated that it has worsened.

**Figure 14. Preparedness for the identification of new plant pests of EU concern since the extension of the PP to all plants for planting**

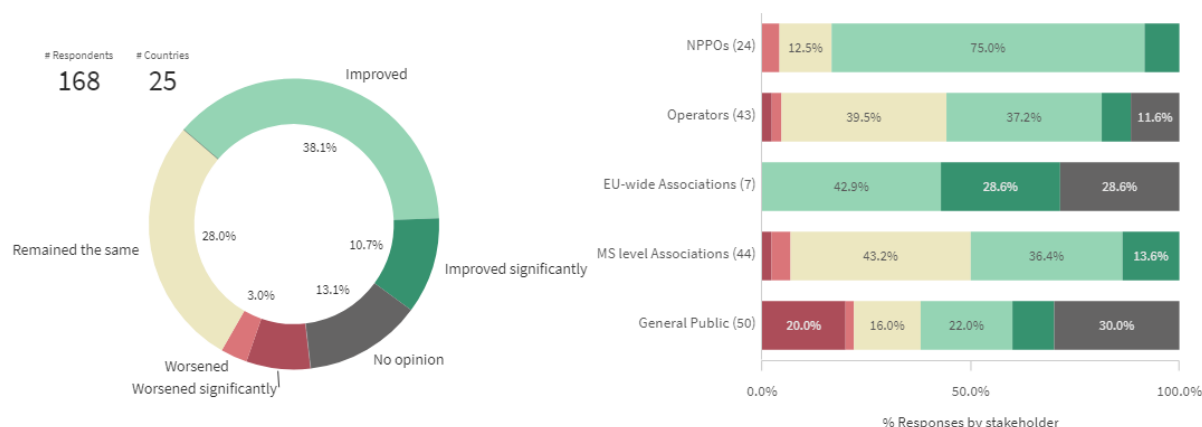


### 2.2.4 Relevant stakeholders' understanding and awareness of the importance of plant health since the extension of the plant passport to all plants for planting

*Regarding the understanding and awareness of relevant stakeholders on the importance of plant health, since the plant passport has been extended to all plants for planting, do you consider it has? (Q9)*

Relevant stakeholders' understanding and awareness of the importance of plant health seems to have improved since the extension of the PP requirement, according to almost half of respondents. In particular, more than 71% of NPPOs and EU-wide associations and more than 44% of operators and MS-level associations perceived an improvement. To a lesser extent, over 32% of respondents from the general public rated this requirement positively.

**Figure 15. Relevant stakeholders' understanding and awareness of the importance of plant health since the extension of the PP requirement**



### Conclusions regarding the extension of the plant passport requirement to all plants for planting

The extension of the PP requirement to all plants for planting (Art. 79) was not rated very positively in terms of transition, implementation or issuing and replacing a PP. However, it seems to have had a very positive impact in terms of traceability and the effectiveness of protection and preparedness against new plant pests for the EU, and has been essential in improving relevant stakeholders' understanding and awareness of the importance of plant health.

## 2.3 Issuance of the plant passport

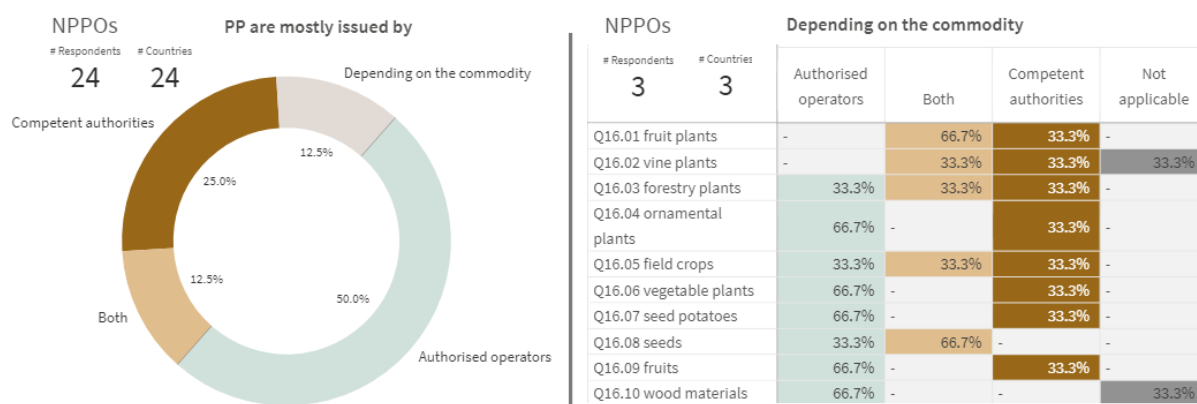
### 2.3.1 Responsibility for issuing the plant passport

*In your country, plant passports are mostly issued by..? (Q16)*

*Do you consider that for some type of plants, plant products or other objects, only the Competent Authorities instead of an operator should issue plant passports? (17)*

Half (12) of NPPOs confirmed that in their countries, the PP is mostly issued by authorised operators. 25% (6) of NPPOs declared that the PP is mostly issued by the competent authorities (CAs) and 12.5% (3) that it is issued by both (operators and CAs). There were three NPPOs that declared that responsibility for issuing the PP depended on the commodity; in those cases, it seems that for many commodities responsibility mainly lay with the operator.

**Figure 16. Responsibility for issuing the PP by type of stakeholder and by type of commodity**

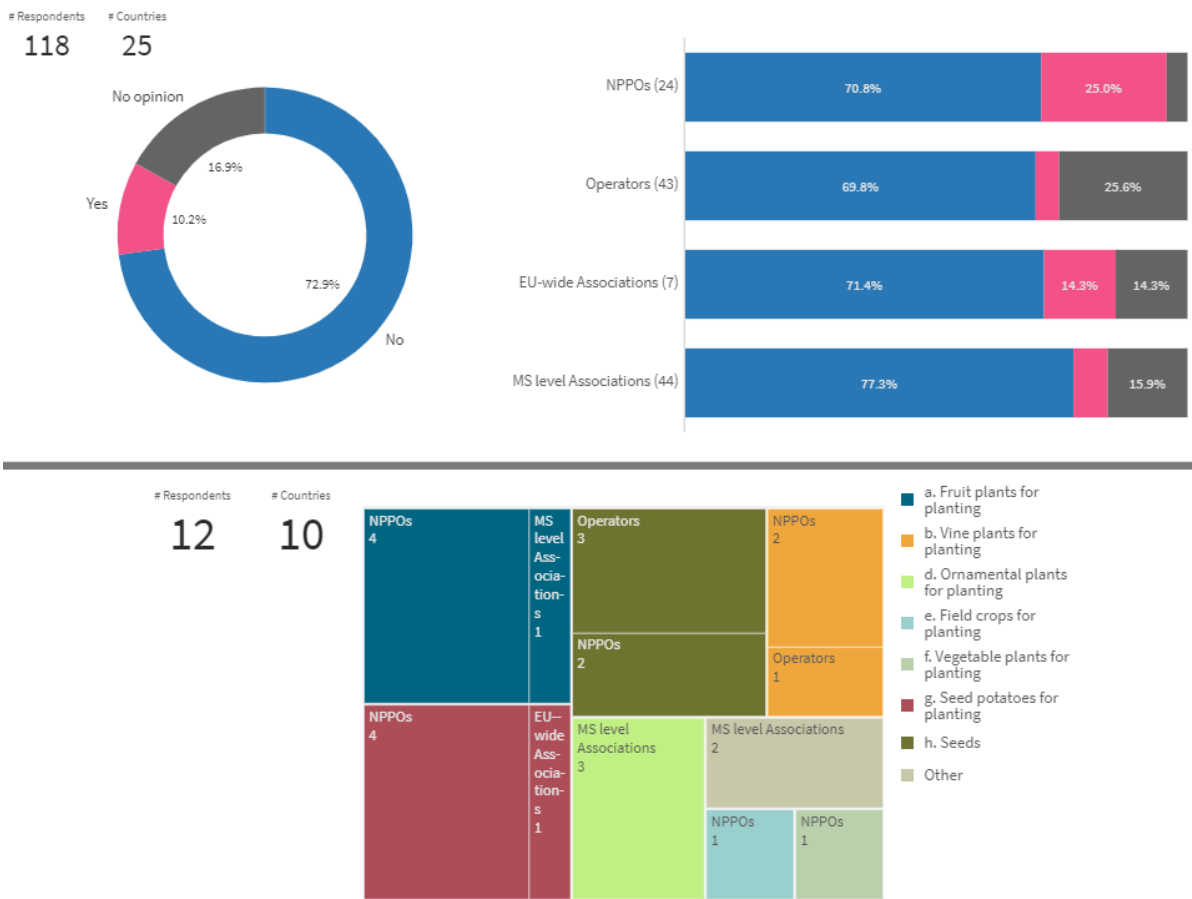


More than 70% of respondents did not consider it necessary for the competent authority to be required to issue the PP for certain plants, plant products, or other objects.

Of those stakeholders that considered that the competent authorities should issue PP for certain plants, plant products and other objects, the top three commodities that were considered the most important, as selected by most respondents were:

- Fruit plants for planting (five responses)
- Seed potatoes for planting (five responses)
- Seeds (five responses).

**Figure 17. Opinion on whether only the competent authorities instead of operators should issue the PP for certain plants, plant products and other objects**



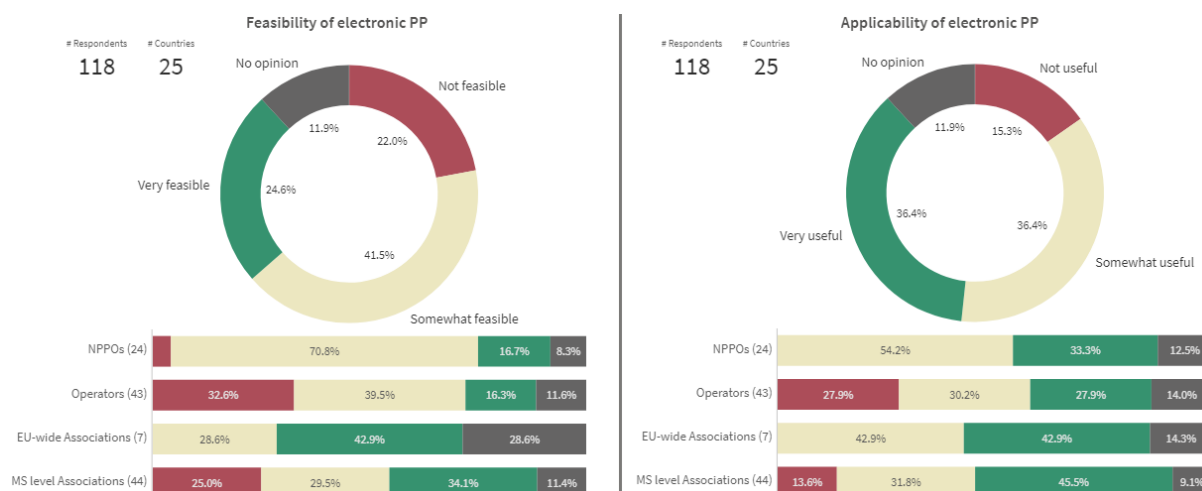
### 2.3.2 Feasibility and applicability of the introduction of electronic plant passports

*How would you rate a possible introduction of an electronic plant passport (replacing the current paper form) for the movement of plants at business-to-business level: In terms of feasibility / In terms of applicability (Q14)*

The introduction of an electronic PP was considered feasible and applicable by more than half of respondents. In particular, a share of 61.5% of respondents responded that an electronic PP would be feasible, and 72.8% of respondents responded that an electronic PP would be useful.

With regard to both aspects, operators were the group of stakeholders that had the most negative view on this question, but still more than half of them responded that an electronic PP would be feasible and useful. Both operators and NPPOs were less enthusiastic regarding the feasibility and usefulness of electronic PPs, with the ‘very feasible’ or ‘very useful’ response being provided by 16.3% and 27.9% respectively of operators, and by 16.7% and 33.3% respectively of NPPOs.

**Figure 18. Feasibility and applicability of an electronic PP**



The reasons provided by some of the respondents who rated an electronic PP as feasible are summarised in Box.5.

**Box 5. Reasons for feasibility ratings for electronic PPs**

Very feasible

- Some companies have already asked for it
- Stronger digitalisation is seen as positive, but implementation at EU level not believable
- Must be very possible
- Highly desirable, will reduce costs
- Should be prioritised by the EU
- Might mean less administrative burden
- A lot of stakeholders use electronic systems to issue and receiving invoices
- Can guarantee more efficacy, and flow of data controlled and rapid
- Very helpful if all registered professional operators are officially controlled by CA and only approved planting material can be traded
- Will reduce costs, should be feasible as electronic certification

Somewhat feasible

- Standardised system, like QR code
- Depends how - if new IT systems are required, not feasible
- Tricky, but producers are obliged to label all plants as they don't know if they will be sold through distance sales
- Many companies don't have informatics tools
- Could help harmonisation
- Would need transitional period
- Challenge to set up and manage reliable IT system
- Benefits for large companies
- Concerns about small companies, not feasible for them or will be a burden
- Safety and reliability
- Feasible if IT system provided by the EU, like TRACES
- Improved traceability, and would facilitate controls
- Depends how it is implemented
- Both options should be open
- Private companies able to build their software and have authorisations to generate and send electronic PP, would reduce costs

Not feasible

- Ineffective for hobby growers
- Tools and money, some traders not trained for these technologies
- Small traders not equipped with proper electronic tools
- Too time-consuming and bureaucracy
- Difficulties in adapting business operations, challenge to adapt e-signature and secure system, no request received so far



## PROPOSALS PROVIDED BY RESPONDENTS

→ EU to provide the IT system (as it has done for TRACES)

→ Both possibilities – paper and electronic – should be available to facilitate small producers

### 2.3.3 Fees charged by the competent authorities related to plant passport issuance

*The fees charged by the competent authorities in your country for the following procedures are (if applicable)..? (Q18)*

*Do you charge fees for the official controls (according to Art. 92; Regulation 2016/2031) at the operator's premises subjected to the plant passport compliance? If yes - What is the basis for calculating the fee (e.g., time, area, number of passports)? / How much cost each approximately in EUR/hour; EUR/ha; EUR/plant passport; EUR/inspection*

*Do you fully cover the costs incurred in providing the service with the charged fees?*

*Does the level of the fee depends on the number of plant passports?*

*Does the level of the fee takes into account whether the operator has a pest risk management plan? (Q36)*

The recurrence of the fees charged by the competent authorities related to the PP was provided by less than half of respondents.

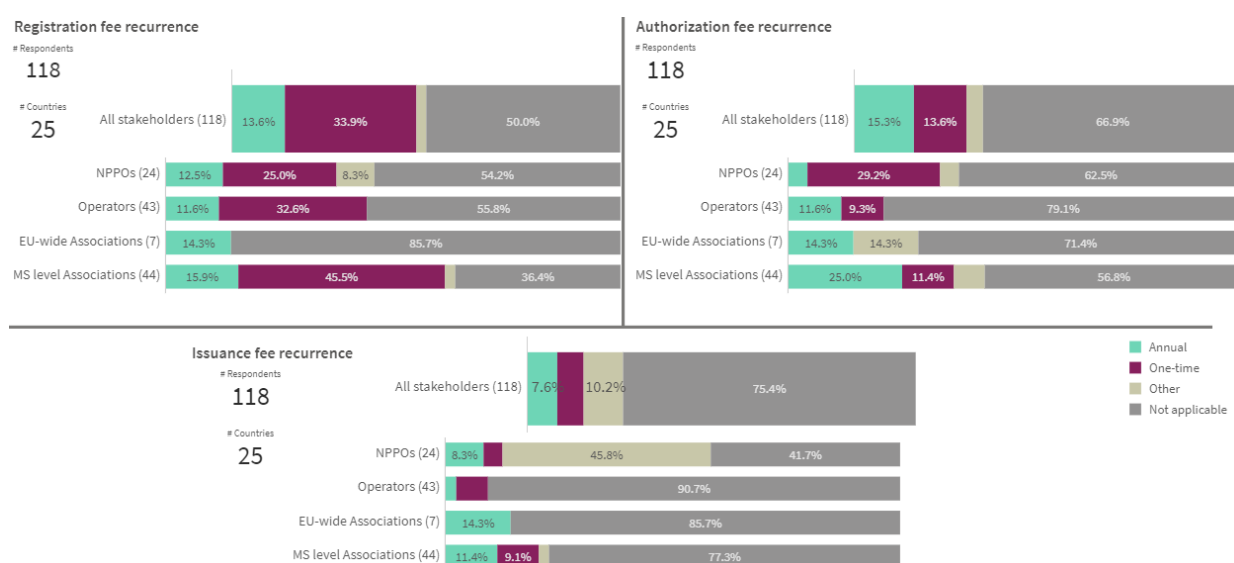
For the registration of professional operators, 34% (40) of respondents responded that the fees charged by the competent authorities were a one-time fee, and somewhat fewer that it was an annual fee (13.6% of respondents). A large discrepancy was found in the registration fees for operators between the values provided by stakeholder type, even for the same country. In the cases when other fees than one-time or annual fees were applied, the value is highly variable.

For the authorisation of professional operators, the responses referred either to a one-time fee (15.3%) or an annual fee (13.6%). A large discrepancy was again found in the authorisation fees for operators between the values provided by stakeholder type.

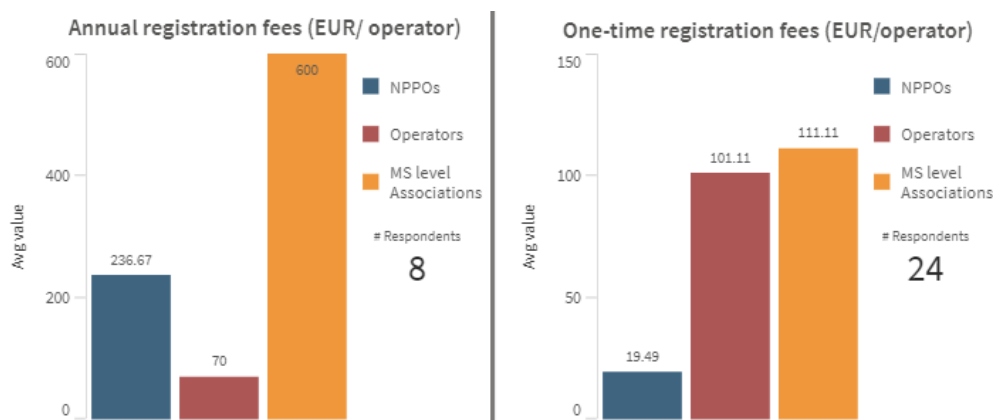
For the fee for issuance of the PP if it is carried out by the CA, a lower number of respondents provided data (five), but still with large variability across the different stakeholders.

Overall, there seems to be a large degree of variability in the fee values, mainly associated to the following aspects, according to some of the comments provided by the respondents: i) fees vary by MS or even region, ii) annual fees may be based on the size of the operator; iii) fees may vary according to the driving distance for the inspector or from the headquarters of the CA; and iv) fees depend on the type and quantity of plant material.

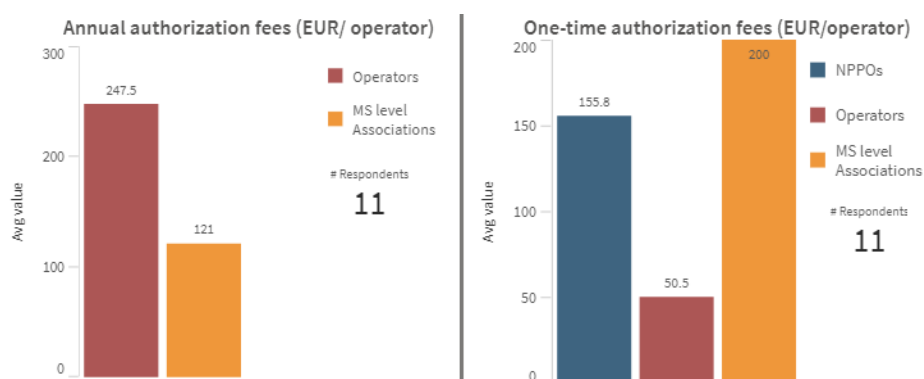
**Figure 19. Recurrence of the fees charged by the competent authorities related to the PP**



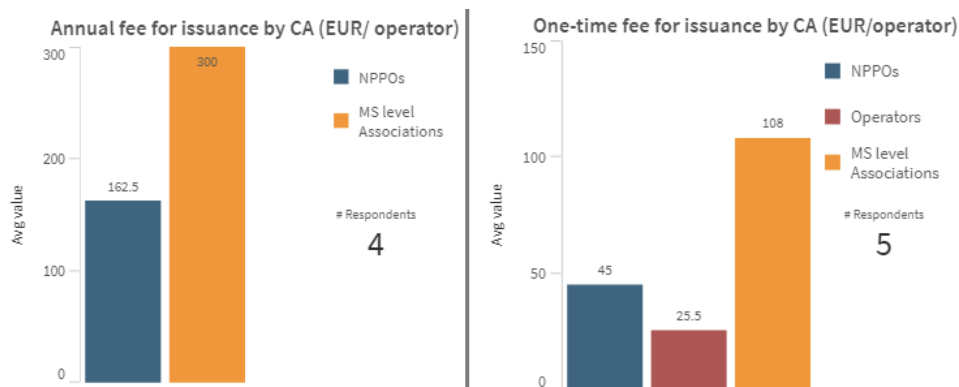
**Figure 20. Registration fee for each operator handling regulated plant materials subject to the PP**



**Figure 21. Authorisation fee for each operator for issuance of the PP**



**Figure 22. Fee for issuance of the PP if carried out by the CA**



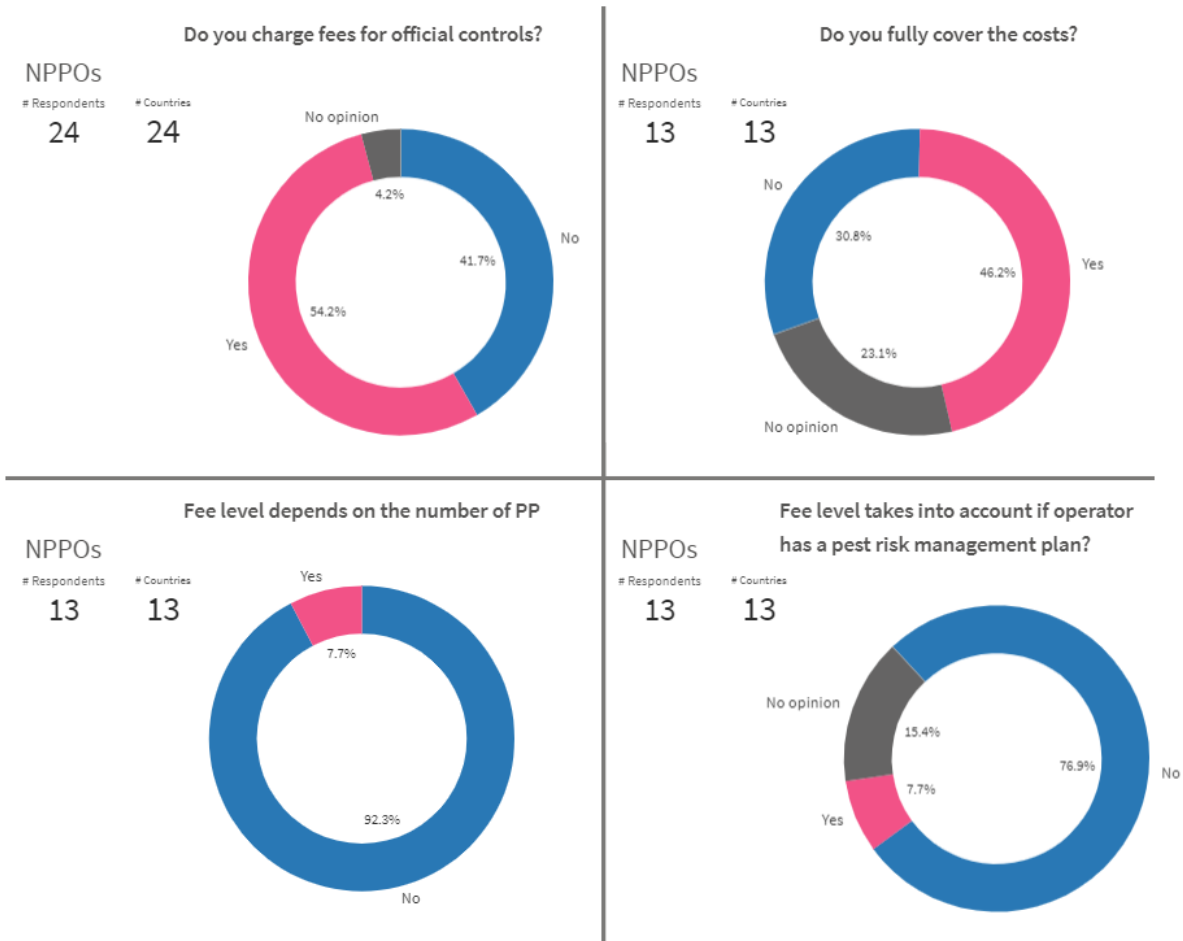
54.2% (13) of NPPOs confirmed that they charge a fee to carry out the official controls at the operator's premises subject to PP compliance (according to Art. 92; Regulation 2016/2031). Of those NPPOs charging fees, 6 NPPOs declared that they fully cover the costs incurred in providing the service with the fees, and 4 declared that they did not fully cover the costs.

Most NPPOs charging fees stated that the level of the fee does not depend on the number of PPs, nor does it take into account whether the operator has a pest risk management plan. A share of 38.5% (5) of NPPOs charging fees considered the time spent as the basis for calculating the fee. Other bases for calculating the fee were proposed by some respondents, and included:

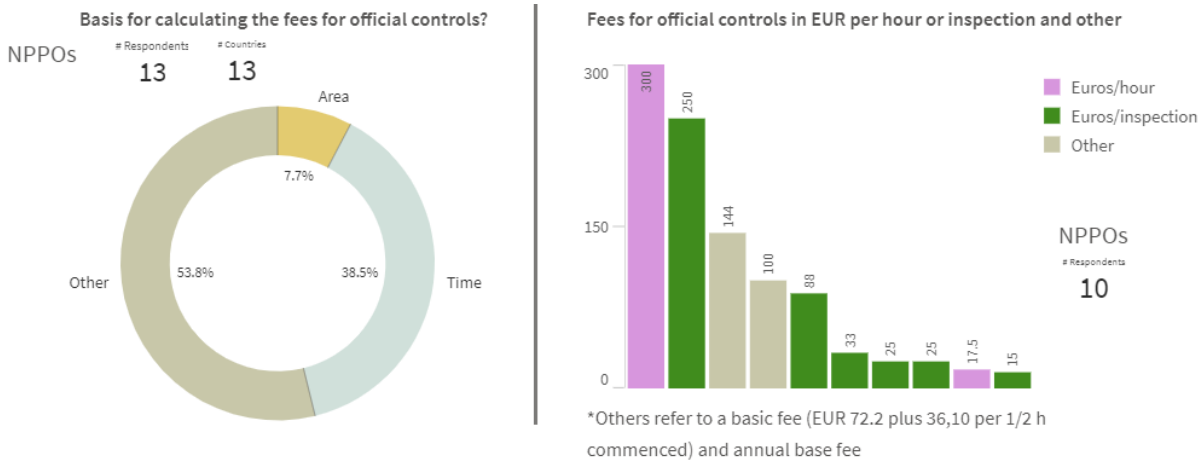
- Fees charged on an annual basis, or one annual inspection
- Fee based on labour, driving distance, working tools
- Fee based on time, area or turnover, number of lots or plants, type of plant.

Large differences were found in the cost of fees to carry out the official controls at the operator’s premises between different NPPOs, from EUR 15 to 250 per inspection, or from EUR 17.5 to 300 per hour.

**Figure 23. Fees for the official controls carried out by the CA at the operator’s premises subject to PP compliance**



**Figure 24. Fees charged for official controls by the CA**



### 2.3.4 Authorisation fees for operators to issue plant passports

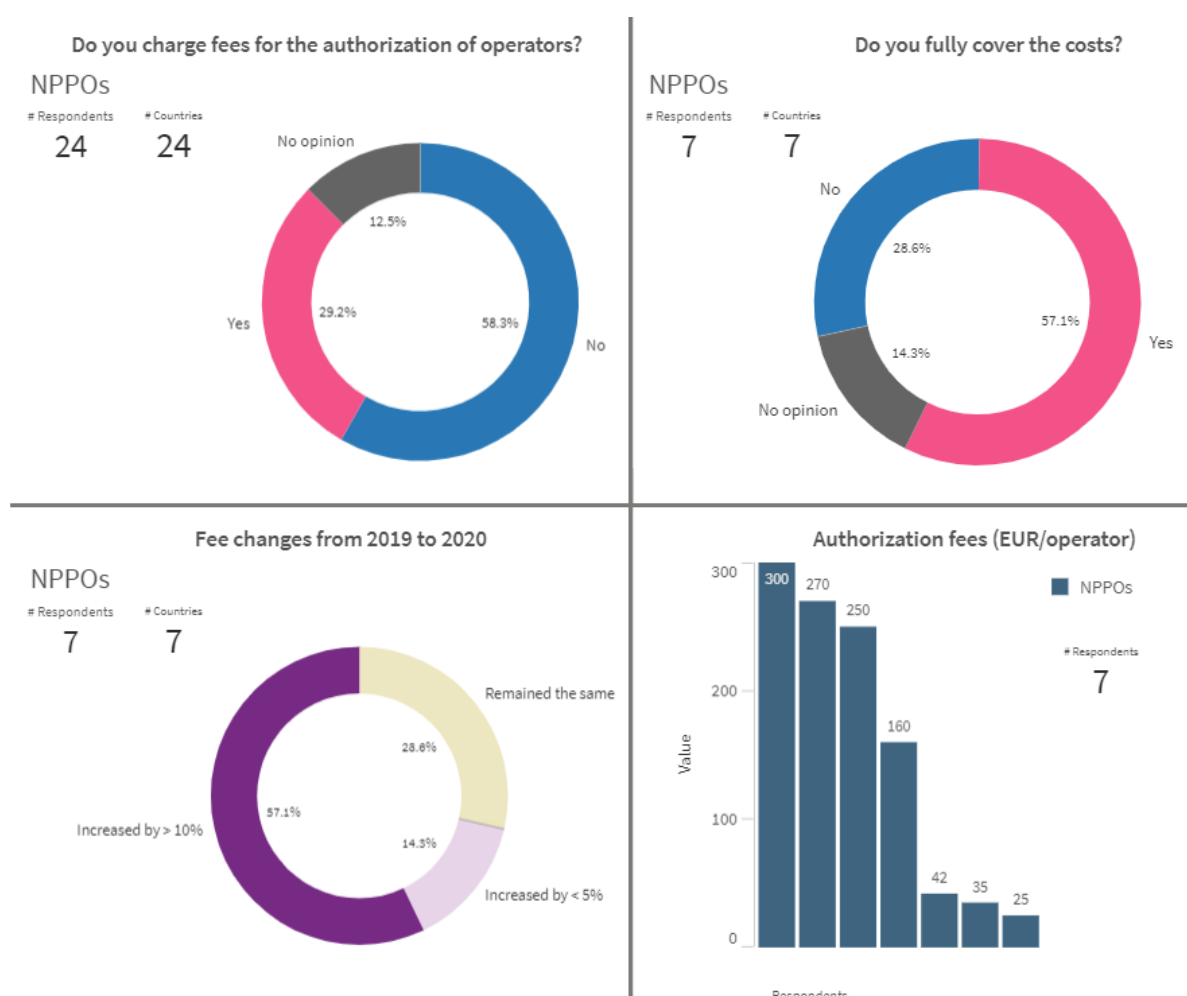
*Do you charge fees for the authorisation of operators to issue the plant passports? If yes, by how much cost each approximately / If yes, do you fully cover the costs incurred in providing the service with the charged fees? / If the fees cost has changed in comparison with 2019, please specify the percentage of change from 2019 to present. (Q32)*

Only 29% (7) of NPPOs declared that they charge authorisation fees for operators to issue the PP. Of those NPPOs charging fees, four NPPOs declared that they fully cover the costs incurred in providing the service with the fees and two declared that they did not fully cover the costs.

More than half (four) of NPPOs that charge authorisation fees for operators have seen an increase of the fee of more than 10% since 2019. One NPPO had seen an increase of the fee by more than 5%, and the other two NPPOs stated that the amount of the fee has remained the same.

Values for the fees in EUR per operator authorised were very different across MS, from a minimum value of EUR 25 per operator to a maximum value of EUR 300.

**Figure 25. Authorisation fees for operators to issue the PP charged by the competent authorities CA**



2.3.5 Professional operators registered and authorised to issue the plant passport

Are you registered as Professional Operator and authorised to issue plant passports? (Q19)

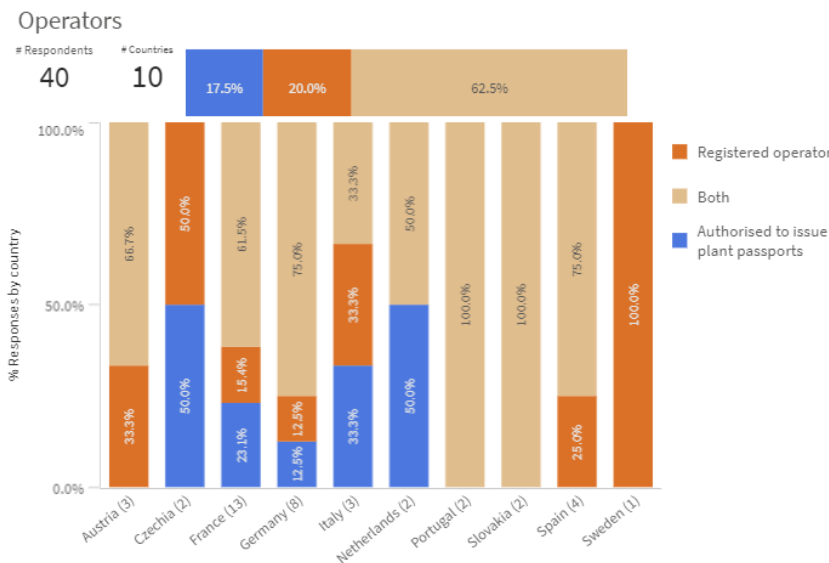
Are all professional operators in your country falling under the provisions of Art. 65 registered (Regulation 2016/2031)? (29)

Can you provide the number of registered operators subjected to the plant passport for the following years in total and approximately by sector? (Q30)

Can you provide the total number of operators issuing plant passports (for the years 2018 and 2019) and authorised to issue plant passports (for the year 2020) and approximately by sector? (Q31)

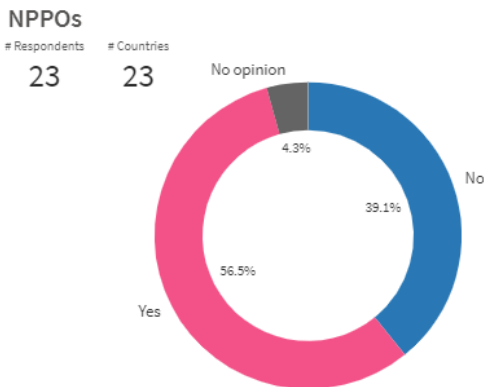
Professional operators responding to the questionnaire were mostly both registered and authorised to issue the PP, in seven EU countries out of 10 from which the replies to this question were provided.

Figure 26. Professional operators registered and authorised to issue the PP



Of the 23 NPPOs that responded to the question of whether the professional operators in their country were registered following the provisions of Article 65 of Regulation (EU) 2016/2031, more than half (56.5%) (13) of them responded in the affirmative. Those NPPOs that responded that not all their operators are registered have explained that the process is still ongoing for various reasons, as shown by the reasons provided by some respondents in Box 6.

Figure 27. Professional operators falling under the provisions of Art. 65



The reasons provided by some of the respondents when they responded 'no' are summarised in Box.6.

**Box 6. Reasons for responding “No” given by professional operators falling under the provisions of Art. 65**

- Exemptions set out in paragraph 3a or Art. 65 (exclusive and direct supply – other than distance sales – of small quantities of plants to end users)
- B2B all registered, distance sales not clear if all registered or not
- Not all new operators are registered yet, new IT system for registration
- Not all new operators affected by PP are aware of the need for registration
- Differences in the federal states, most operators have been registered, but some still pending (mainly active in low-risk situations)
- Some not yet registered despite the fact they were informed by the NPPO
- Working towards full registration of forestry operators, but there are many companies never before involved with forest services in plant health
- Known operators are registered but there may be companies trading plants unknown to the authorities
- Professional operators are registered for phytosanitary purposes or in other registers in the agriculture or forestry sectors

A total of 16 NPPOs provided data for the total number of registered operators and authorised operators subject to the PP for the years 2018, 2019 and 2020. By sector, (plants for planting/propagating material (other than seeds)), data was provided by 12 and nine NPPOs respectively.

According to data provided, since 2019 the total number of registered operators has increased by 17.1%. The seed sector and the sector of forestry plants for planting has shown a very significant increase, compared with other sectors, from 2019 to 2020 in the number of registered operators.

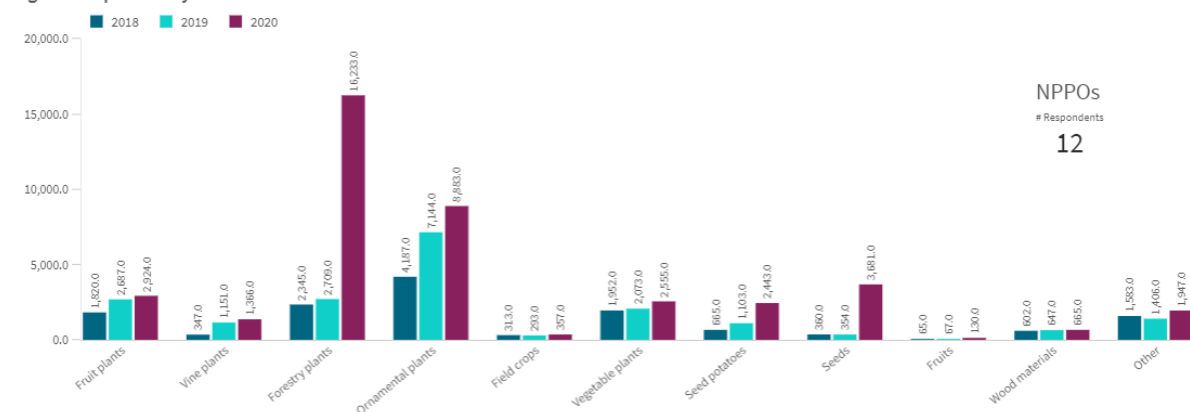
In addition, the total number of professional operators authorised to issue the PP has more than doubled between 2019 and 2020. In this case, most sectors have significantly increased the number of authorised operators. In particular, the seed sector and the plants for planting sectors of fruit and field crops showed the highest percentage increases in the number of authorised operators.

**Figure 28. Number of registered operators subject to the PP (years 2018-2020) in total and by sector**

Total number of registered operators and by sector

NPPOs # Respondents 16		2018 total value	% change 2018 - 2019	2019 total value	% change 2019 - 2020	2020 total value	Total value
Q30 Registered operators		35,380.0	15.9% ▲	41,017.0	17.1% ▲	48,014.0	
Q30.01 Fruit plants - registered operators		1,820.0	47.6% ▲	2,687.0	8.8% ▲	2,924.0	
Q30.02 Vine plants - registered operators		347.0	231.7% ▲	1,151.0	18.7% ▲	1,366.0	
Q30.03 Forestry plants - registered operators		2,345.0	15.5% ▲	2,709.0	499.2% ▲	16,233.0	
Q30.04 Ornamental plants - registered operators		4,187.0	70.6% ▲	7,144.0	24.3% ▲	8,883.0	
Q30.05 Field crops - registered operators		313.0	-6.4% ▼	293.0	21.8% ▲	357.0	
Q30.06 Vegetable plants - registered operators		1,952.0	6.2% ▲	2,073.0	23.3% ▲	2,555.0	
Q30.07 Seed potatoes - registered operators		665.0	65.9% ▲	1,103.0	121.5% ▲	2,443.0	
Q30.08 Seeds - registered operators		360.0	-1.7% ▼	354.0	939.8% ▲	3,681.0	
Q30.09 Fruits - registered operators		65.0	3.1% ▲	67.0	94.0% ▲	130.0	
Q30.10 Wood materials - registered operators		602.0	7.5% ▲	647.0	2.8% ▲	665.0	
Q30.11 Other - registered operators		1,583.0	-11.2% ▼	1,406.0	38.5% ▲	1,947.0	

Registered operators by sector



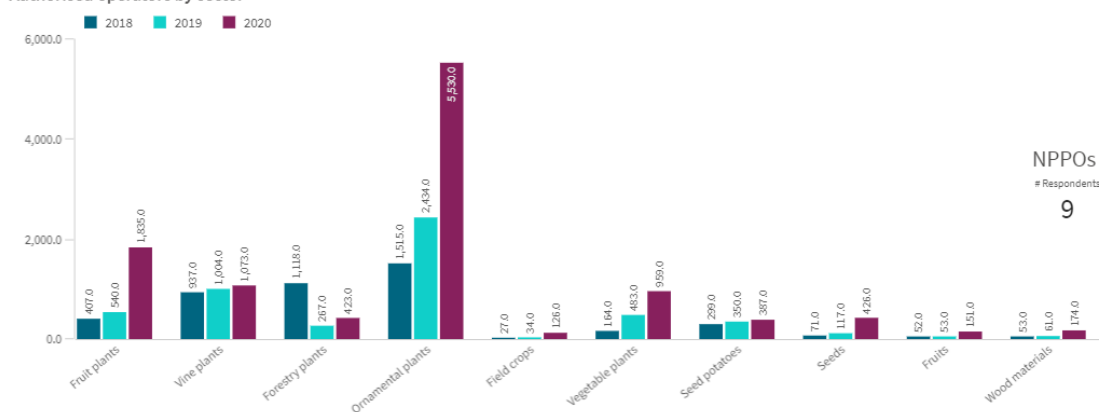
**Figure 29. Number of authorised operators issuing PPs (2018-2019) and authorised to issue PP (2020) in total and by sector**

Total number of authorised operators and by sector

NPPOs  
# Respondents  
16

	2018 total value	% change 2018 - 2019	2019 total value	% change 2019 - 2020	2020 total value	Total value
Q31 Authorised operators	11,269.0	14.3% ▲	12,876.0	103.7% ▲	26,222.0	
Q31.01 Fruit plants - authorised operators	407.0	32.7% ▲	540.0	239.8% ▲	1,835.0	
Q31.02 Vine plants - authorised operators	937.0	7.2% ▲	1,004.0	6.9% ▲	1,073.0	
Q31.03 Forestry plants - authorised operators	1,118.0	-76.1% ▼	267.0	58.4% ▲	423.0	
Q31.04 Ornamental plants - authorised operators	1,515.0	60.7% ▲	2,434.0	127.2% ▲	5,530.0	
Q31.05 Field crops - authorised operators	27.0	25.9% ▲	34.0	270.6% ▲	126.0	
Q31.06 Vegetable plants - authorised operators	164.0	194.5% ▲	483.0	98.6% ▲	959.0	
Q31.07 Seed potatoes - authorised operators	299.0	17.1% ▲	350.0	10.6% ▲	387.0	
Q31.08 Seeds - authorised operators	71.0	64.8% ▲	117.0	264.1% ▲	426.0	
Q31.09 Fruits - authorised operators	52.0	1.9% ▲	53.0	184.9% ▲	151.0	
Q31.10 Wood materials - authorised operators	53.0	15.1% ▲	61.0	185.2% ▲	174.0	
Q31.11 Other - authorised operators	13.0	38.5% ▲	18.0	344.4% ▲	80.0	

Authorised operators by sector



### 2.3.6 Professional operators issuing the plant passport before 14 December 2019

*Did you issue plant passports before 14 December 2019? (Q20)*

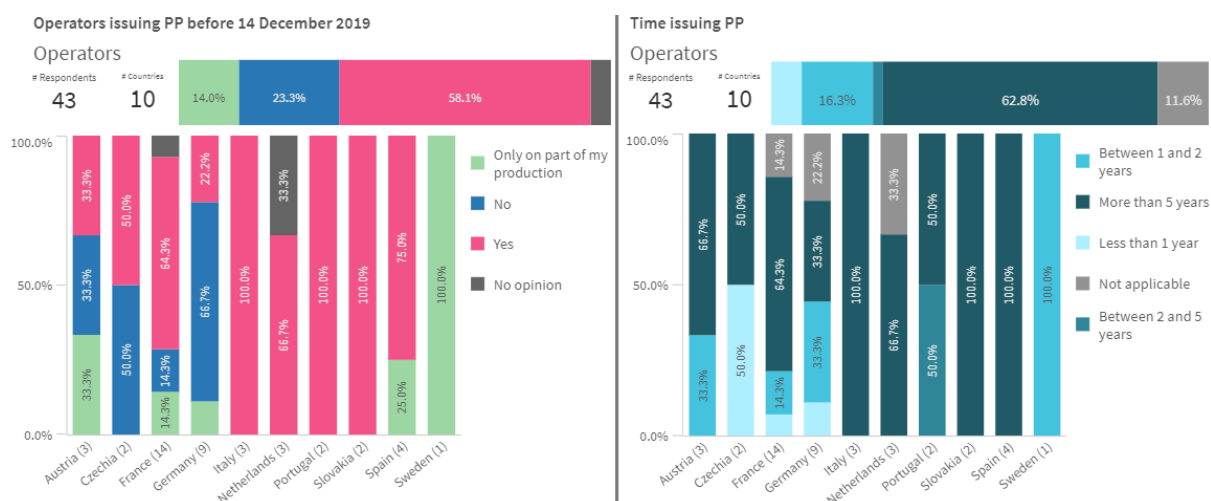
*How long have you been issuing plant passports? (Q21)*

*What percentage of the members of your association who are professional operators under the new Plant Health Regulation (Regulation 2016/2031) were issuing plant passports before 14 December 2019? (Q22)*

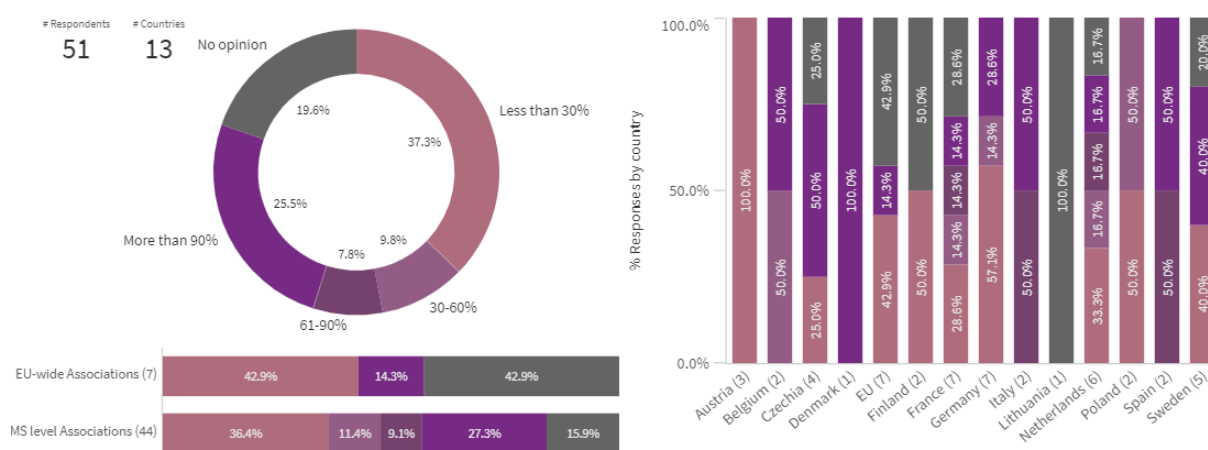
More than half of the operators that responded to this question (25) were already issuing PPs before 14 December 2019, when the new requirements of Regulation (EU) 2016/2031 were implemented. In fact, 63% (27) of operators declared that they have been issuing PPs for more than five years.

According to EU-wide and MS-level associations, the percentage of their members that were operators issuing PPs before 14 December 2019 was less than 30% of operators for 37.3% of respondents, and more than 30% of operators for 43.1% of respondents Overall, large differences across EU Member States were reported on this aspect.

**Figure 30. Professional operators issuing the PP before 14 December 2019 as declared by operator respondents**



**Figure 31. Professional operators issuing the PP before 14 December 2019 as declared by association respondents**



### 2.3.7 Exceptions where the plant passport is required for end users

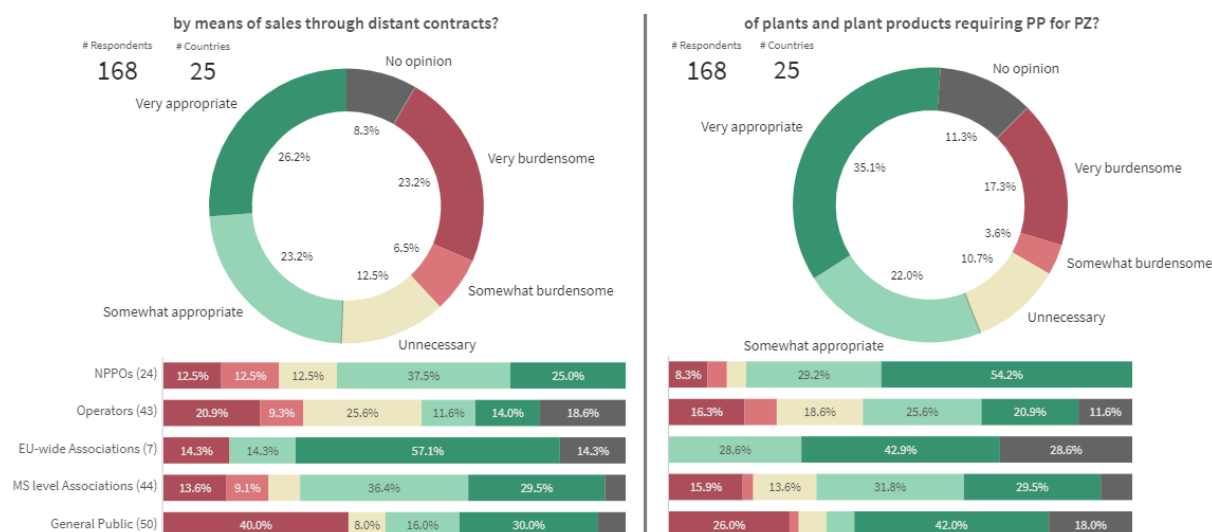
*How do you rate the provision of Article 81 (Regulation 2016/2031) whereby a plant passport is required for plants supplied directly to a final user: - receiving those plants and plant products by means of sales through distance contracts (eCommerce) -/ of plants and plant products for which a plant passport for protected zones is required (Q10)*

The requirement that a PP has to accompany plants and plant products to the final user when they are received by means of sales through distance contracts was considered appropriate by 49.4% of respondents, burdensome by 29.7%, and unnecessary by 12.5%. The analysis of the replies by stakeholder group showed that 62.5% of the NPPOs, 71.4% of EU wide associations, and 65.9% of MS-level associations believed that this requirement was appropriate, compared with only 25.6% of operators.

The requirement that a PP has to accompany plants to the final user when a PP for protected zones is required was considered appropriate by 57.1% of respondents, burdensome by 20.9%, and unnecessary by 10.7%. The analysis of the replies by stakeholder group showed that 83.4% of the NPPOs, 71.5% of EU-wide associations, and 61.1% of MS-level associations considered that this requirement was appropriate, compared with 46.5% of operators.



**Figure 32. PP required for plants supplied directly to a final user**



The reasons provided by some of the respondents when they responded 'Very burdensome' or 'somewhat burdensome' are summarised in Box.7.

**Box 7. Reasons for rating the requirement for a PP for plants destined to end users when bought by means of sales through distant contracts or for plants and plant products requiring PP for PZ as **very burdensome** or **somewhat burdensome****

- Requirements for distance sales not proportionate to the risks
- Only administrative burden
- Useless information for consumers
- Extra workload, needs to be digitised
- Don't see any reason why PP is needed for end user via internet and not shop. Disagreement with PP for e-commerce
- Not clear that/why the risk is higher, difficult to identify and check these operators
- Awareness-raising, but producers arrange for pre-printed pp on new unused pots
- Not clear risk in this, unless PZ pests are considered
- Mixed opinions – final consumer doesn't need to keep the PP, but it is easy to trace anyway because the consumer's contact details are available. PP in a delivery document to make rules more suitable for e-commerce.
- Only makes sense if all plants have PPs

#### PROPOSALS PROVIDED BY RESPONDENTS

- Focus should be on web shops selling material from outside the EU.
- For garden centres, it should not be different according to whether they send the plants or plants are picked up in store.
- To strengthen on-farm conservation, marketing to amateur gardeners should be PP-free

### 2.3.8 Enforcement and clarity of the provisions of distance contracts

*In your view, the way in which the provisions of Art 81(1)(a) (Regulation 2016/2031), in respect of 'means of sales through distance contracts', are enforced, is... ? (Q11)*

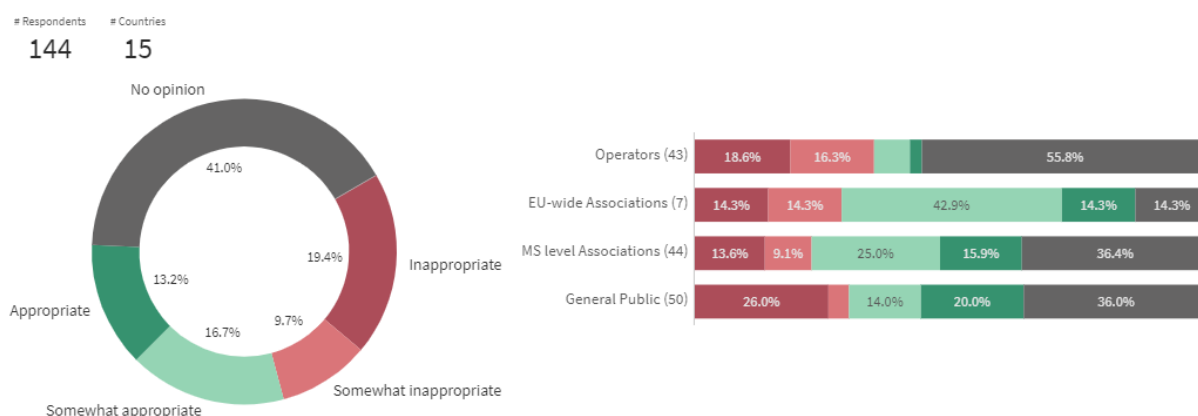
*In your view, the clarity of the provisions of Art 81(1)(a) (Regulation 2016/2031), in respect of 'means of sales through distance contracts', for the purpose of its official enforcement, is... ? (Q12)*

*How would you rate the need for a more harmonised approach for the use of plant passports in relation to sales through distance contracts to private citizens (final users)? (Q13)*

The enforcement of the provision of PP to final users receiving plants, plant products or other objects by means of sales through distance contracts was considered appropriate by 29.9% of respondents and inappropriate by 29.1% of respondents. EU-wide associations were the group of stakeholders with the highest share, 63.5% (4), stating that this requirement is appropriate.

The operators is the group with the most negative perception of this requirement. 34.9% (15) of operators considered this requirement inappropriate and only 9.3% (4) of operators considered this requirement appropriate.

**Figure 33. Enforcement of the provision of PPs to final users receiving plants, plant products, or other objects by means of sales through distance contracts**



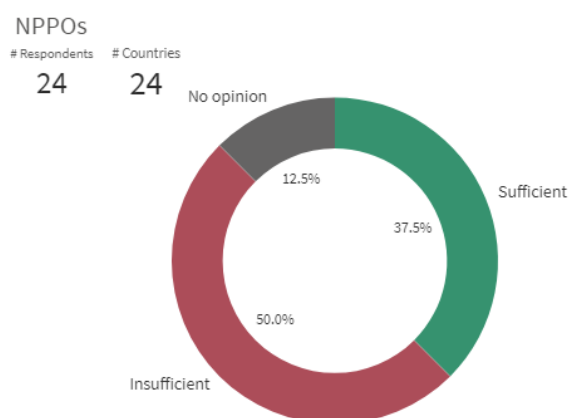
The reasons provided by some of the respondents when they responded 'much more complicated' or 'somewhat more complicated' are summarised in Box 8.

**Box 8.** Reasons for rating the **enforcement** of the provision of PPs to end users receiving plants, plant products or other objects by means of sales through distance contracts as **inappropriate**.

- Distance contracts – challenges. For final users there should be no obligation. Exemption set out in Art. 81 needs clarification
- Invoice should suffice
- Not implemented, need to clarify distance contracts
- PP negative impact on conservation organisations
- Distance contracts to end consumers has the same risk and need to be regulated same as B2B. Same requirements in all MSs
- No enforcement to large internet sales companies
- No reason to have PP via the internet and not in the shop. Do not agree with his requirement
- It is controlled

The clarity of the provisions of PP to final users receiving plants, plant products or other objects by means of sales through distance contracts was considered insufficient by half (12) of NPPOs responding to this question, while 37.5% (nine) of NPPOs considered the clarity of this requirement to be sufficient.

**Figure 34. Rating of the clarity of the provisions of PP to final users receiving plants, plant products or other objects by means of sales through distance contracts**



The reasons provided by some of the respondents when they responded 'insufficient' are summarised in Box 9.

**Box 9.** Reasons for rating the provision of PP to end users receiving plants, plant products or other objects by means of sales through distance contracts as **insufficiently clear**

- The scope of “by means of sales through distance contracts” is unclear
- New area, should have been described to what extent this covers click and collect, and if there should be exemptions (e.g. pet shops trading herbs for animals)
- No common approach
- Not defined
- Need for harmonised and clear definition
- Clarity is insufficient
- Postal service - Not clear in which cases PP is required, MSs have different approaches
- For distance selling: all traders must be registered and trade with PP
- Clarity, harmonisation, and experience required
- Questions about the exception - unclear difference between direct delivery and web shop. No PP to end user. But when is a user an end user? Web shops unknown to authorities
- The requirements are bypassed by avoiding the word “sale”
- Explanation needed of online, phone or catalogue orders with direct delivery done by operators.

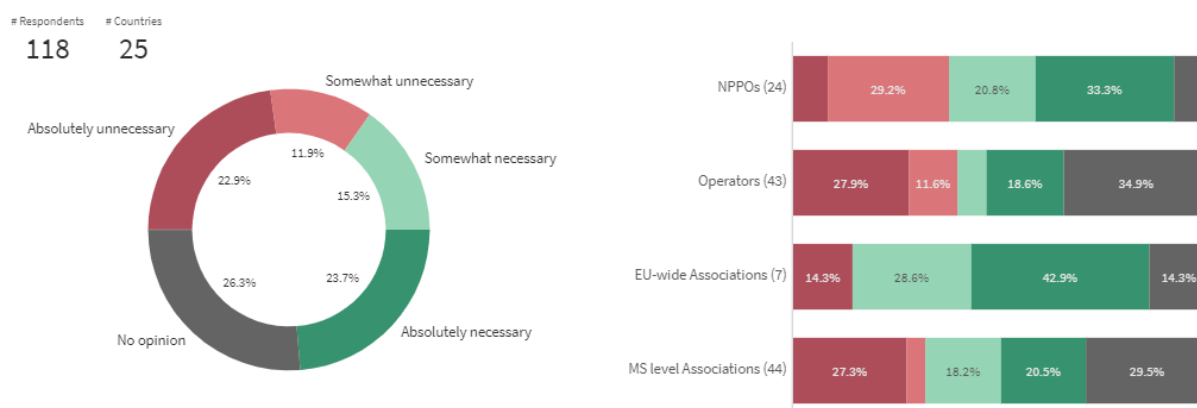
#### PROPOSALS PROVIDED BY RESPONDENTS

→ More clarity and harmonisation needed for both distance sales and postal services.

Opinion on the need for a more harmonised approach for the use of plant passports in relation to sales through distance contracts to final users was evenly distributed between necessary (39%) and unnecessary (34.8%).

A higher share of NPPOs (54.1%) and EU-wide associations (71.5%) considered that there is a need for harmonisation in the approach for the use of PPs to final users in relation to sales through distance contracts. On the contrary, the operators were the group of stakeholders with the highest share (41.3%) considering this harmonisation unnecessary.

**Figure 35. Need of harmonised approach for the use of PP in relation to sales through distance contracts to final users**



The reasons provided by some of the respondents when they responded ‘somewhat necessary’ or ‘absolutely necessary’ are summarised in Box.10.

**Box 10.** Reasons for the **necessity of a harmonised approach** for the use of PP in relation to sales through distance contracts to end users

- There is no definition of distance contract, rules should be clear and uniform.
- Harmonisation is useful. If applied to citizens, will increase awareness, but the same rule for e-commerce and direct distribution to final user.
- Risk is the same in selling at distance or traditional supply chain. Rules for PP should be uniformly applied for all sales channels.
- Distance contracts poses risk and should be regulated like B2B. Rule should be clear and uniform.
- Due to COVID-19, more online sales. Entrepreneurs producing goods have set up web shops as supplementary channels, to be considered when amending Regulation. Sales for non-commercial use should be exempted.

- The final destination is unknown, so it contributes to traceability.
- Interesting to have some control over sale of plants to private citizens.
- Online sales for plants of various origins to end consumers.
- Different application across EU Member States.
- Needs harmonisation.
- PP no for final consumers.
- Product sell by e-commerce need to meet OCR and PH, should be dealt as B2B.
- Harmonisation needed.
- Harmonised approach will ensure that plants sold through distance contracts are grown by registered operators.
- Harmonised for all professional operators and private citizens.
- Not clear PP is needed. More harmonised approach for sales via Facebook or social networks.
- Cross-border sales should be controlled in harmonised way.
- Aim of implementation of distance contracts is unclear and there is no good definition in legislation.
- Need for harmonised and clear definition of “by means of sales through distance contracts”.
- Different interpretations by EU Member States.
- Lack of clarity in some aspects, is exchange of genetic resources or botanical gardens a distance contract?
- In case of findings, traceability is required.
- Only for trade outside EU or internet-only traders.
- This form of sales causes increased mobility of plants, harmonisation needed.
- Explanation needed as regards online, phone, or catalogue orders.
- Harmonised approach would facilitate monitoring of this type of sale. It is usually small amounts, so no excessive complication for PP. Guarantees end user and forces operators to be registered.
- It is a regulation, so there should be a harmonised approach and not different interpretations across EU Member States.

#### **PROPOSALS PROVIDED BY RESPONDENTS**

- The same rules should apply to e-commerce and direct distribution to final user.
- Sales for non-commercial use and exchange of genetic resources, especially for conservation purposes, should be exempt.
- Reflect on and consider a wider use of web shops as a post-COVID reality.
- Harmonisation, and a clear definition of “by means of sales through distance contracts”, are needed.
- Apply the same rules to business to business (B2B) and distance contracts.

#### **Conclusions regarding the issuance of the plant passport**

The authorised operators were reported as being responsible to issue the PP in most EU Member States (12). Fewer PPs are being issued by CAs (six), by either authorised operators or CAs (three), or depending on the commodity (three). In general, more than 70% of respondents considered that it is not necessary that the CA issue PPs for certain commodities.

The introduction of an electronic PP was considered feasible and applicable by more than half of respondents. In particular, 61.5% of respondents said that an electronic PP would be feasible and 72.8% of respondents said that an electronic PP would be useful.

Limited information was provided by respondents on the fees related to PPs. For the registration of professional operators, 34% (40) of respondents agreed that the fee is usually paid on a one-off basis, and somewhat fewer annually (13.6% of respondents). For the authorisation of professional operators, fees seem to be charged either on a one-off basis or annually (15.3% and 13.6% of respondents respectively).

For the fee to carry out the official controls at the operator’s premises on PP compliance (Art. 92), there was not consensus across NPPOs on the same basis for calculating this fee (e.g., per area, per time, annually, per number of plants or type of sector, etc.). However, most NPPOs agreed that the level of the fee does not depend on the number of PPs, nor takes into account whether the operator has a pest risk management plan.

Seven NPPOs (out of 24 responding) declared that they charge authorisation fees for operators to issue the PP, and from them, four declared that they fully cover the costs incurred in providing the service with the fees. To carry out the official controls at the operator’s premises subject to PP compliance, 13 NPPOs confirmed that they charge fees, of which six declared that they fully cover the costs incurred in providing the service with the fees.

Values provided for the fees to authorise operators, in EUR per operator authorised, varied widely across EU Member States, from EUR 25 to EUR 300. Values provided for the fees to authorise operators, in EUR per operator authorised, varied widely across EU Member States, from EUR 25 to EUR 300.

Large differences were also found in the cost of fees to carry out the official controls at the operator's premises across the different NPPOs, from EUR 15 to 250 per inspection or from EUR 17.5 to 300 per hour.

Overall, a large discrepancy was found between all fee values provided by stakeholders, even for the same country. Fees depended on many factors, such as i) time, area or turnover, ii) MS or even region, iii) the size of the operator; iv) the labour, driving distance of an inspector or working tools; and v) the type and quantity of plant material.

Of the 23 NPPOs that responded to the question of whether all the professional operators in their country were registered following the provisions of Article 65 of Regulation (EU) 2016/2031, more than half (56.5%) (13) of NPPOs responded in the affirmative. Those NPPOs that responded that not all their operators are registered explained that the process is still ongoing, for various different reasons.

According to data provided by 16 NPPOs, since 2019 the total number of registered operators has increased by 17.1%. The seed sector and the sector of forestry plants for planting showed a very significant increase from 2019 to 2020 in the number of registered operators, compared with other sectors.

In addition, the total number of professional operators authorised to issue PPs has more than doubled between 2019 and 2020. In this case, most sectors have significantly increased the number of authorised operators. In particular, the seed sector and the plants for planting sectors of fruit and field crops had the highest percentage increases in the number of authorised operators.

According to operators responding to the questionnaire, more than half (25) were already issuing PPs before 14 December 2019, when the new requirements of Regulation (EU) 2016/2031 were implemented. In fact, 63% (27) of operators declared that they have been issuing PPs for more than 5 years.

Large differences between EU Member States were also reported, by EU-wide and MS-level associations, in the percentage of their members that were operators issuing PPs before 14 December 2019.

The requirement that a PP has to accompany plants and plant products to the final user when they are received by means of sales through distance contracts was deemed appropriate by 49.4% of respondents, burdensome by 29.7%, and unnecessary by 12.5%. The requirement that a PP has to accompany plants to the final user when a PP for protected zones is required was considered appropriate by 57.1% of respondents, burdensome by 20.9%, and unnecessary by 10.7%.

The enforcement of the provision of PPs to final users receiving plants, plant products or other objects by means of sales through distance contracts was considered appropriate (29.9%) and inappropriate (29.1%) by almost equal numbers of respondents. In their response to the question on the clarity of the provision of PP to final users receiving plants, plant products or other objects by means of sales through distance contracts, half (12) of the responding NPPOs considered the clarity insufficient, while 37.5% (nine) of NPPOs considered the clarity of this requirement to be sufficient.

Opinion on the need for a more harmonised approach for the use of plant passports in relation to sales through distance contracts to final users was evenly split between necessary (39%) and unnecessary (34.8%).

## 2.4 Compliance and administrative costs related to the new plant passport requirements

### 2.4.1 Changes to the staff involved with administrative procedures

*How has the staff involved with administrative procedures related to plant passports changed in your organization due to the modifications specified below, introduced in 2019 with the new Plant Health Regulation (Regulation 2016/2031)..? (Q23)*

The vast majority of respondents considered that the staff involved with administrative procedures related to the new PP requirements has mainly remained the same, or increased.

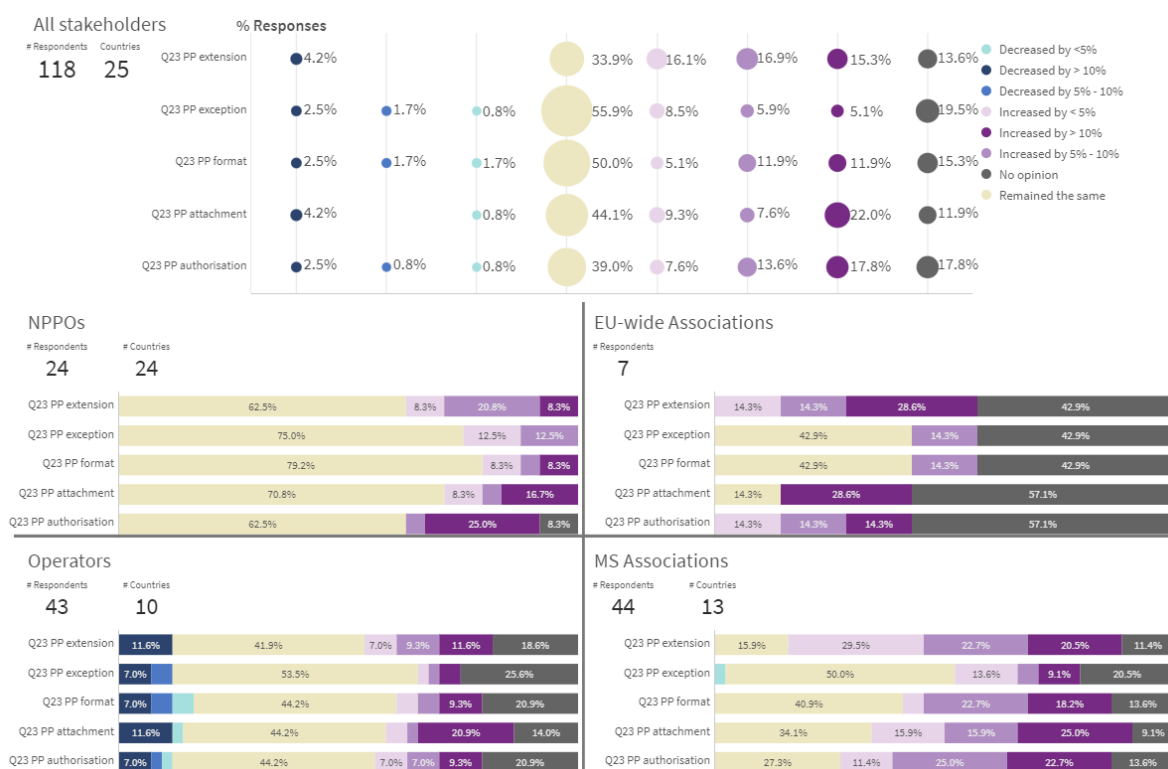
In particular, the extension of the PP to all plants for planting (Art. 79), the PP requirements on authorised operators (Art. 69, 87, 89 and 90), and the attachment of the PP to the trade unit (Art. 88) were deemed to have increased the staff involved with administrative procedures (over 39% of respondents).

On the other hand, less than 30% of respondents considered the exception for direct supply to end users (Art. 81(1)(a)) and the PP harmonised format (Art. 83) to have required the same staff.

For more than half of NPPOs and operators, the staff involved with administrative procedures has remained the same for all the new PP requirements, and for somewhat fewer operators (less than 16%), the number of staff has even decreased.

For more than half of EU-wide and MS-level associations, the new PP requirements have increased the number of staff involved with administrative procedures, excluding the exception for direct supply to end users and the PP harmonised format.

**Figure 36. Changes to the staff involved with administrative procedures related to the new PP requirements**



## 2.4.2 Changes to administrative workload

*How has the administrative workload (plant passport issuance, operator approval, issuance validation functions, knowledge transfer to operators, technical guidelines preparation, training of the staff, etc.) changed in your organization due to the modifications introduced in 2019 with the new Plant Health Regulation (Regulation 2016/2031)...? (Q24)*

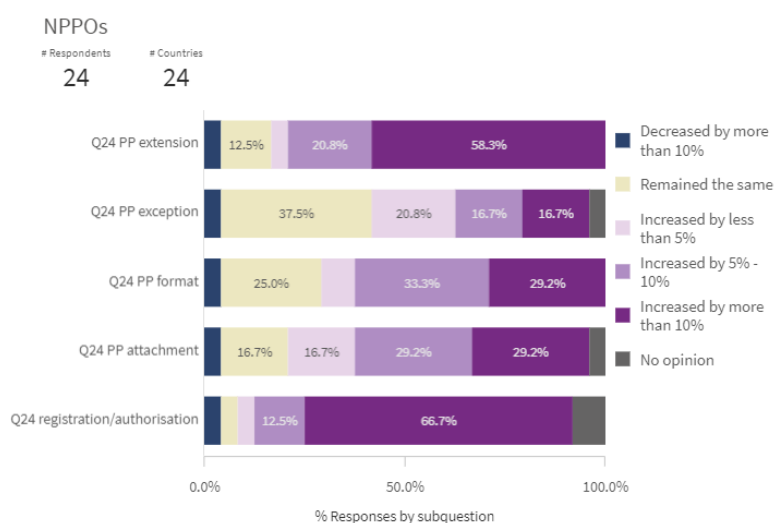
*How has the administrative workload (plant passport issuance, traceability procedures, validation functions, examination before issuing plant passports, reporting to competent authorities) changed in your organization due to the modifications specified below, introduced in 2019 with the new Plant Health Regulation (Regulation 2016/2031)? (Q26)*

Overall, the administrative workload has increased for most respondents related to the new PP requirements. The exception for direct supply to end users (Art. 81(1)(a)) followed by the PP harmonised format (Art. 83) were the requirements considered by NPPOs to have increased to a lower extent the administrative workload or either remained the same.

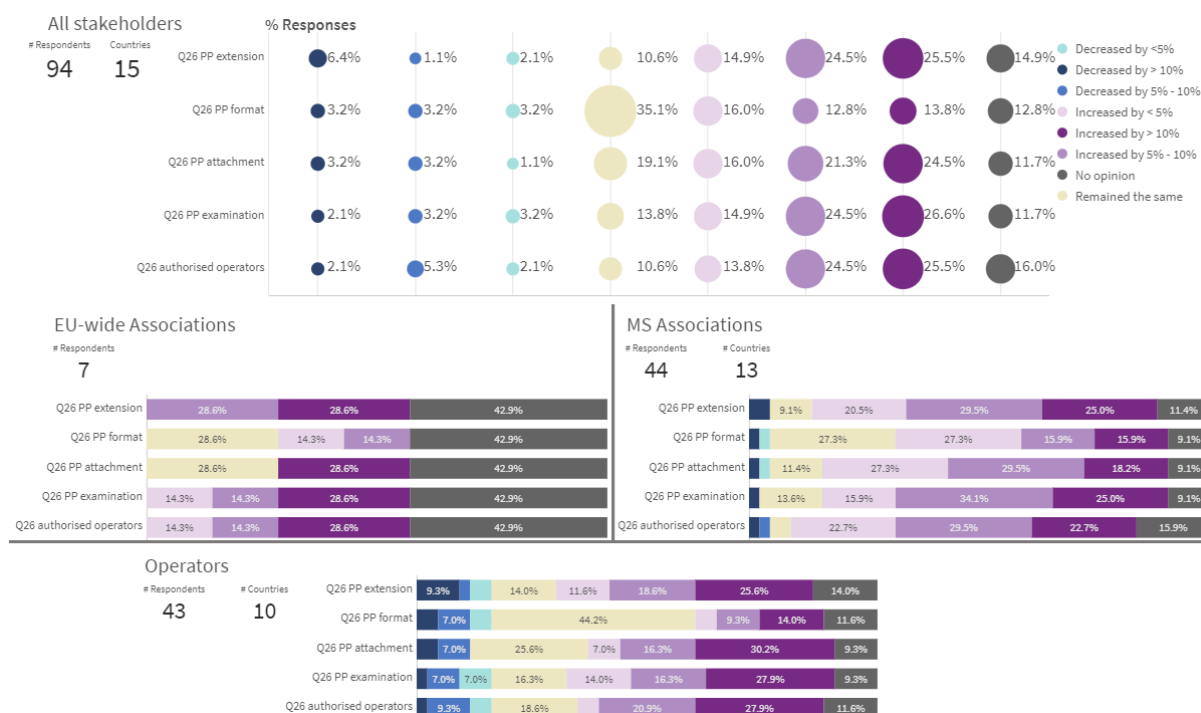
Over 83% (20) of NPPOs considered that the administrative workload have increased the most regarding the PP extension to all plants for planting (Art. 79) and for the registration and authorisation of professional operators (Art. 66 and 89).

For more than half associations (EU-wide and MS-level) and operators, responding to this questionnaire, the administrative workload related to the new PP requirements have increased. The PP harmonised format and the attachment of the PP were considered to have remained the same administrative workload by more than 35% and 19% of respondents respectively.

**Figure 37. Changes on the administrative workload of NPPOs related to the new PP requirements**



**Figure 38. Changes on the administrative workload of associations and operators related to the new PP requirements**



## 2.4.3 Access to technical guidance on the examinations for plant passport issuance

*Article 89 of the Plant Health Regulation and Regulation 2019/827 require the Competent Authorities to ensure that professional operators have access to a technical guidance on the criteria to be fulfilled in the examinations relating to the issuance of plant passports. Have you ensured that access? (Q25)*

*Article 89 of the Plant Health Regulation (Regulation 2016/2031) and Regulation 2019/827 require the Competent Authorities to ensure that professional operators have access to a technical guidance on the criteria to be fulfilled in the examinations relating to the issuance of plant passports. Has that technical guidance been provided in your country?*

*If yes: how would you rate the quality of the technical guidance provided in your country (Q66)*

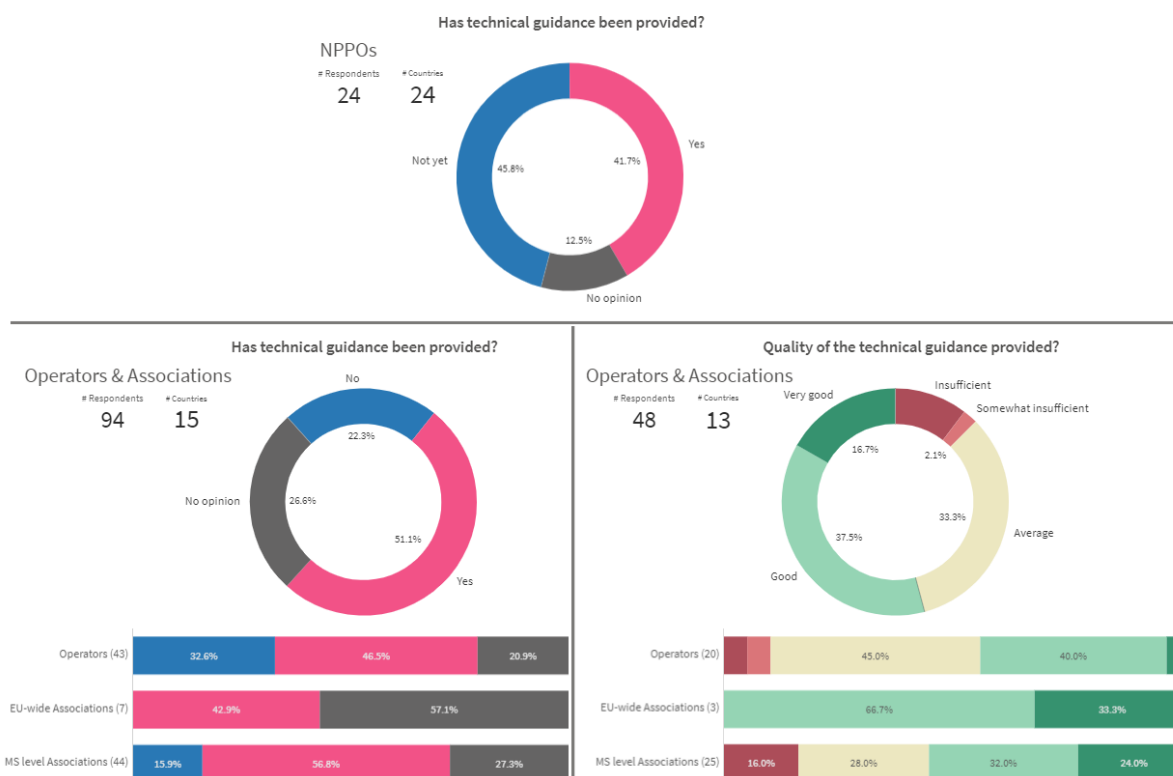
41.7% (10) of NPPOs responding the questionnaire, have already provided access to technical guidance to professional operators on the examinations for PP issuance, as required by Regulation 2016/2031 (Art. 89) and Regulation 2019/827. The different methods they reported using for this purpose included: i) training courses (some online), guidelines submitted to operator (total cost of ca. EUR 6000 per year reported by one NPPO); and ii) the majority of NPPOs published the guidelines on their official website.

45.8% (11) of NPPOs have not yet provided access to technical guidance to professional operators. They stated that access will be provided in a maximum period of 12 months. Most work to provide technical guidelines is still under development and being further improved. Delays are mainly due to the increased workload caused by the new requirements of the PHR and OCR, and limited staff. One NPPO has to introduce the procedure for authorisation of professional operators to issue plant passports into national legislation. The other 12.5% of NPPOs (three) responding to this questionnaire expressed no opinion.

On the other hand, over half of professional operators and associations (EU-wide and MS-level) who responded stated that technical guidance was provided. They mostly rated the quality of this technical guidance as good (37.5% (18)), average (33.3% (16)), or very good (16.7% (8)). Few operators (two) and MS-level associations (four) rated the technical guidance provided as somewhat insufficient or insufficient, and commented that it was mainly due to lack of publicity or delayed access.



**Figure 39. Access to technical guidance on the examinations for PP issuance**



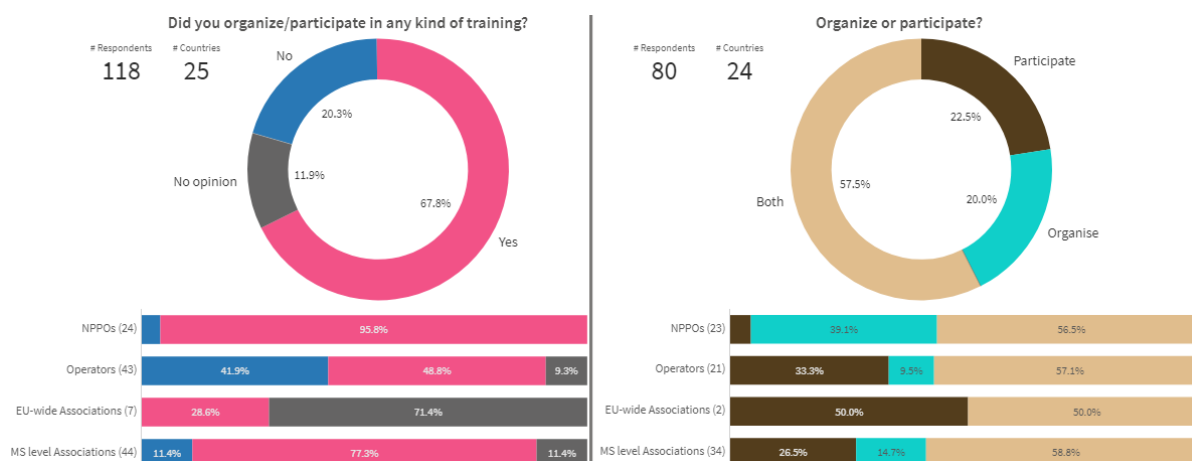
## 2.4.4 Time and costs of training for obtaining skills and acquiring knowledge related to the new plant passport requirements

*Did you have to organize and/or to participate in any kind of training for obtaining new skills and acquiring knowledge on the changes to the requirements related to the plant passports? (Q27)*

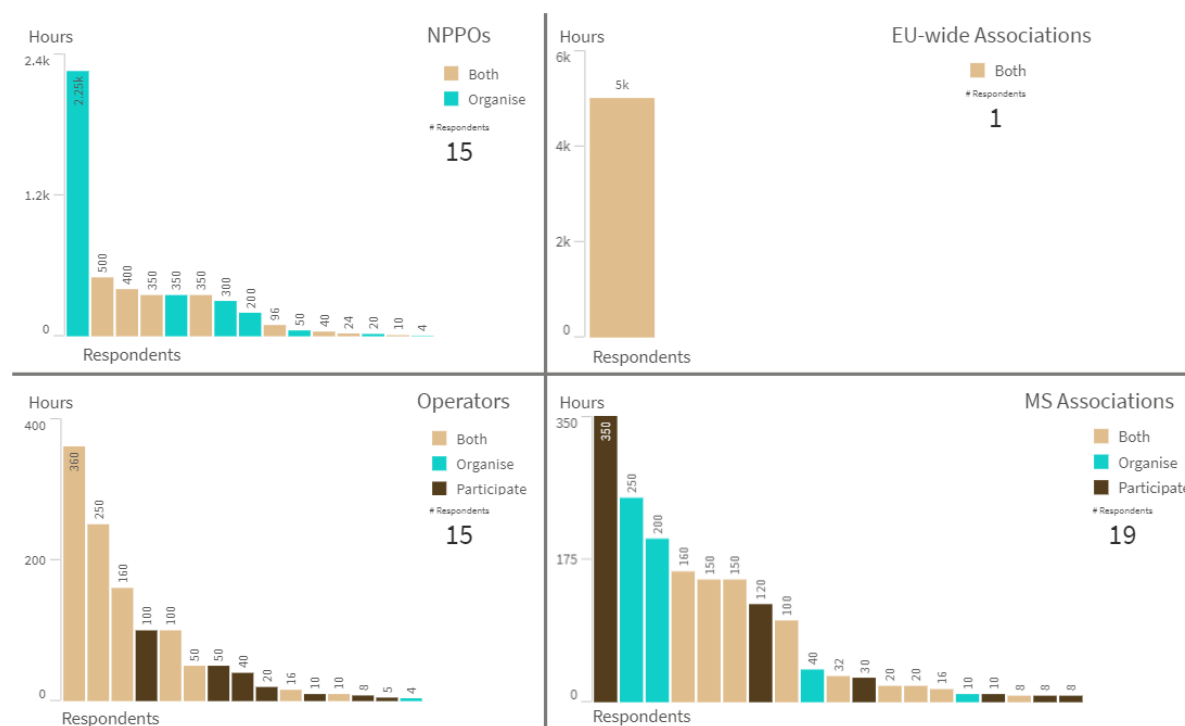
67.8% of respondents confirmed that they have organised or participated in training for obtaining new skills and acquiring knowledge on the new PP requirements. This was especially significant for NPPOs, since 23 out of 24 confirmed that they have either organised (39%) or both (56.2%), organised and participated. Similar results were found for MS-level associations organising or participating in training related to the new PP requirements (77.3%). Over half of operators confirmed that they have organised or participated in training.

The average cost of training for obtaining skills and acquiring knowledge on the new PP requirements, as provided by several respondents, was about EUR 65 per hour. Training related to the new PP requirements took from a minimum of 4 hours to a maximum of 500 hours. Two exceptions were reported by one NPPO and one EU-wide association, which needed 2 500 and 5 000 hours respectively for these trainings.

**Figure 40. Training for obtaining skills and acquiring knowledge related to the new PP requirements**



**Figure 41. Training time for obtaining skills and acquiring knowledge related to the new PP requirements**



## 2.4.5 Changes in operational processes for administrative procedures

*Did you have to change or improve your operational processes for administrative procedures (e.g. IT systems, labelling, packaging etc.) subjected to the new plant passport requirements (Regulation 2016/2031)? (Q28)*

More than half of operators and associations, responding to this questionnaire, had to change or improve the operational processes for administrative procedures (e.g. IT systems, labelling, packaging, etc.) related to the new PP. Less than 30% of NPPOs confirmed that they had made changes or improvements to operational processes for administrative procedures.

**Figure 42. Changes in operational processes for administrative procedures related to the new PP requirements**

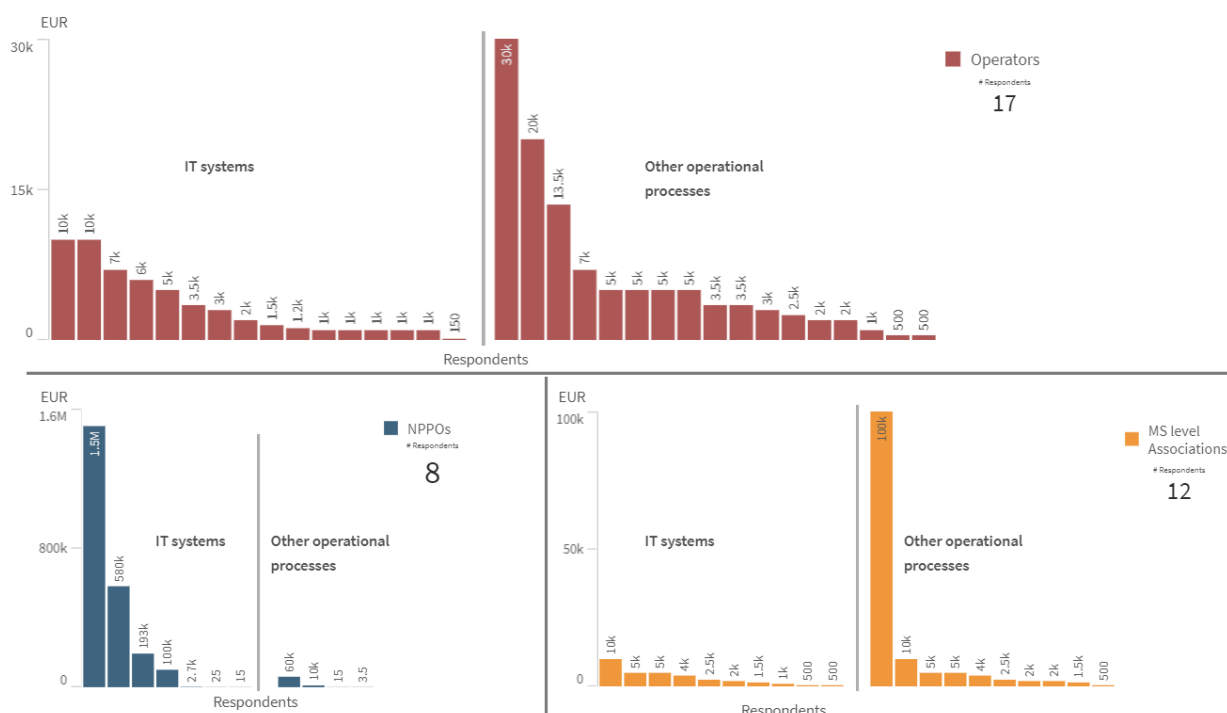


A total of eight NPPOs provided estimates of the total costs of changing or improving operational processes for administrative procedures related to the new PP requirements. The data shows that they had higher costs than other stakeholders and very diverse costs across countries, and that in general the costs of IT systems were higher than those of other operational processes for NPPOs. Costs of changes or improvements to IT systems ranged from EUR 15 to EUR 1.5 million, and costs of changes or improvements on other operational processes ranged from EUR 3.5 to EUR 60 000.

Costs of changes or improvements to IT systems were very similar for the operators and MS-level associations that provided data (17 and 12 respectively). On average, costs for IT systems were around EUR 3 300. In this case, higher costs were declared for other operational processes, on average from EUR 6 000 to EUR 13 000, with a few specific cases above these values.

Only one EU-wide association provided data for IT system change or improvement of about EUR 200 000.

**Figure 43. Costs of changes in operational processes for administrative procedures related to the new PP requirements**



## Conclusions regarding the compliance and administrative costs related to the new plant passport requirements

According to the questionnaire results, compliance and administrative costs related to the new PP requirements have increased as a result of certain increases in the staff involved with administrative procedures, and especially as a result of an increased administrative workload for most respondents.

Higher impact on compliance and administrative costs, in terms of staff and workload, was highlighted for the extension of the PP to all plants for planting (Art. 79), the PP requirements for registered and authorised operators (Art. 66, 69, 87, 89 and 90), and the attachment of the PP to the trade unit (Art. 88).

Low or no impact on compliance and administrative costs, in terms of staff and workload, was associated with the exception for direct supply to final users (Art. 81(1)(a)) and the PP harmonised format (Art. 83).

Overall, impacts on the staff involved with administrative procedures and on the administrative workload were lower for NPPOs and operators than for EU-wide and MS-level associations.

The access to technical guidance for professional operators on the examinations for PP issuance, as required by Regulation 2016/2031 (Art. 89) and Regulation 2019/827, has already been provided by 10 NPPOs, mostly on their official website. Most work to provide technical guidelines is still under development and being further

improved. NPPOs that have not yet provided access to technical guidance pledge to provide it in a maximum period of 12 months. Professional operators and associations (EU-wide and MS-level) with access to the technical guidance mostly rated the quality of this guidance as good or average, and to a lesser extent as very good.

Other compliance and administrative costs are those associated with the trainings for obtaining new skills and acquiring knowledge related to the new PP requirements. A large proportion of respondents (67.8%) said that they had organised or participated in training. The majority of NPPOs and MS-level associations and over half of operators confirmed that they have organised or participated in training related to the new PP requirements. On average, training costs were reported to be about EUR 65 per hour, and the time spent ranged from a minimum of 4 hours to a maximum of 500 hours.

Costs associated with the changes or improvements to the operational processes for administrative procedures (e.g. IT systems, labelling, packaging, etc.) related to the new PP were reported by more than half of the operators and associations, and by less than 30% of NPPOs.

Cost estimates provided by the NPPOs showed that they had higher costs than other stakeholders and that these costs varied widely across countries, and that in general costs related to IT systems were higher than those for other operational processes. Costs of changes or improvements to IT systems ranged from EUR 15 to EUR 1.5 million, and for other operational processes from EUR 3.5 to EUR 60 000.

Costs estimates for IT system changes or improvements provided by professional operators and MS-level associations were very similar. On average, costs for IT systems were around EUR 3 300 and costs for other operational processes, on average, from EUR 6 000 to EUR 13 000.

## 2.5 Changes to phytosanitary control measures related to the extension of the plant passport requirement to all plants for planting

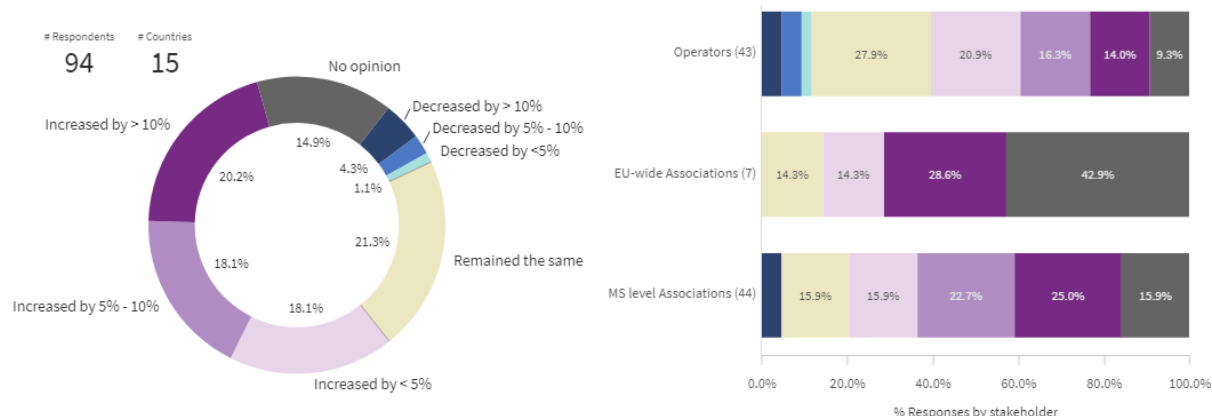
### 2.5.1 Changes related to the staff involved in the examinations at the operator's premises

*How has the staff / number of person-hours involved in the examinations at the premises (under competent authorities' supervision) and for assisting the controls carried out by the competent authorities for the issuance of the plant passports changed since the plant passport has been extended to all plants for planting? (Q33)*

Over half of respondents to this question, which was asked to associations and operators, considered that the number of staff involved in the examinations at the operator's premises has increased since the PP was extended to all plants for planting. MS-level associations reported larger staff increases than operators.

On the other hand, over 21.3% (20) of respondents reported that the staff involved in the examinations at the operator's premises has remained the same and somewhat fewer, 7.5% of respondents (seven), reported that the staff has decreased.

**Figure 44. Changes related to the staff involved in the examinations at the operator's premises since the extension of the PP to all plants for planting**

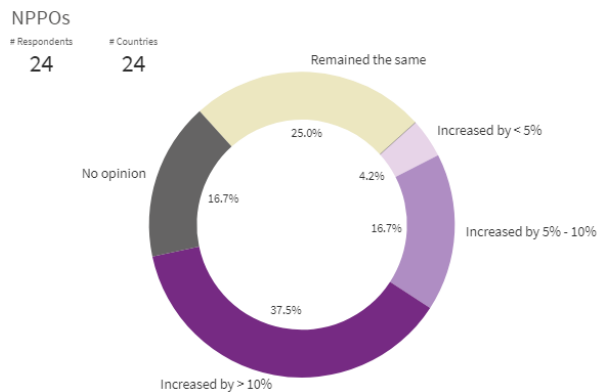


2.5.2 Changes related to the NPP0 staff involved in the official controls

How has the staff / number of person-hours involved in the official controls, to verify that the professional operators comply with the plant passport criteria, changed since the plant passport has been extended to all plants for planting? (Q35)

58.4% (14) of NPPOs reported that the number of staff involved in the official controls, to verify that professional operators are complying with the PP criteria, has increased. 25% (six) reported that their staff has remained the same and the remaining 16.7% of NPPOs expressed no opinion.

Figure 45. Changes related to the NPP0’ staff involved in the official controls since the PP was extended to all plants for planting



2.5.3 Official controls carried out by the NPPOs for the issuance of the plant passport

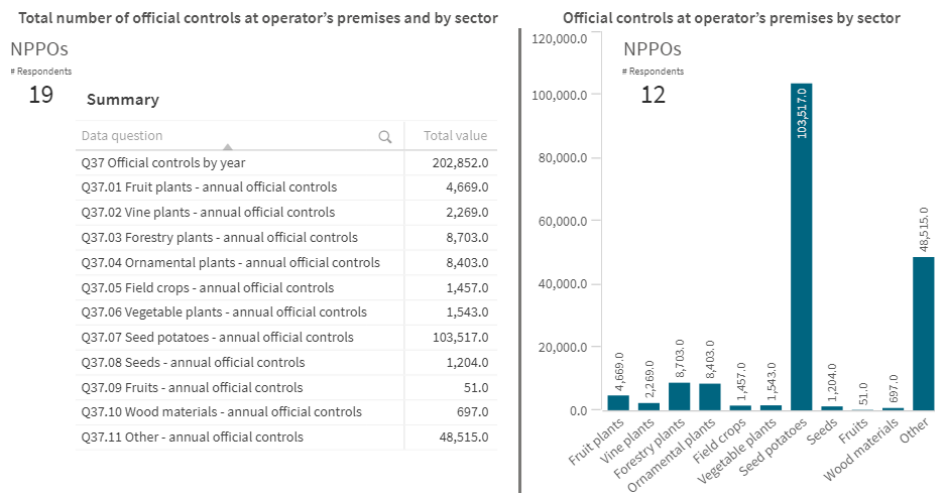
Please specify how many official controls at authorised operator’s premises are approx. carried out annually and how they are distributed approximately by sector? (Q37)

How has the number of regular official controls at the operator’s premises related to the plant passport issuance changed, since the plant passport system/requirement has been extended to all plants for planting? (Q38)

How has the number of examinations by the Competent Authority on the plants for planting at the premises of operators to prevent the presence and spread of the plant quarantine pests changed, since the operators are authorised to issue plant passports? (Q39)

According to data provided by 19 EU NPPOs, a total of 202 852 official controls at authorised operator’s premises are carried out approximately annually in the reporting EU Member States. In particular, the sector of seed potatoes is the one with the highest number of annual official controls compared to the other sectors.

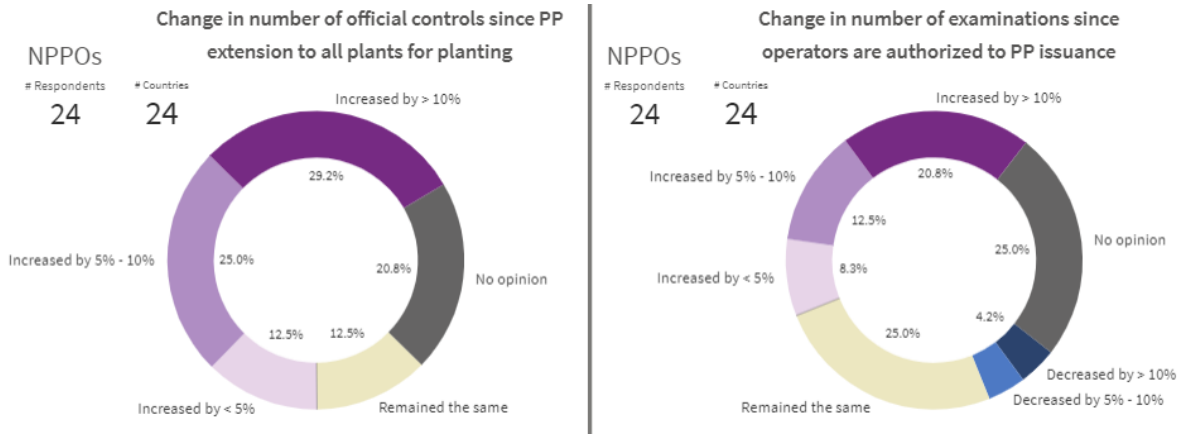
Figure 46. Total number of official controls at authorised operator’s premises carried out annually and distributed approximately by sector



The number of official controls, which are carried out by CAs at the authorised operator’s premises, has increased to a certain level as expressed by 66.7% of NPPOs (16) since the PP requirement was extended to all plants for planting. 12.5% of NPPOs (three) in turn declared that the number of official controls has remained the same.

The number of examinations, since the operators are authorised to issue a PP, has increased, as expressed by 41.6% of NPPOs (10). A third of NPPOs (six) declared that the number of examinations has remained the same. Two NPPOs said that the number of examinations had decreased.

**Figure 47. Changes in the number of official controls and the number of examinations at authorised operator’s premises carried out by CAs related to the new PP requirements**



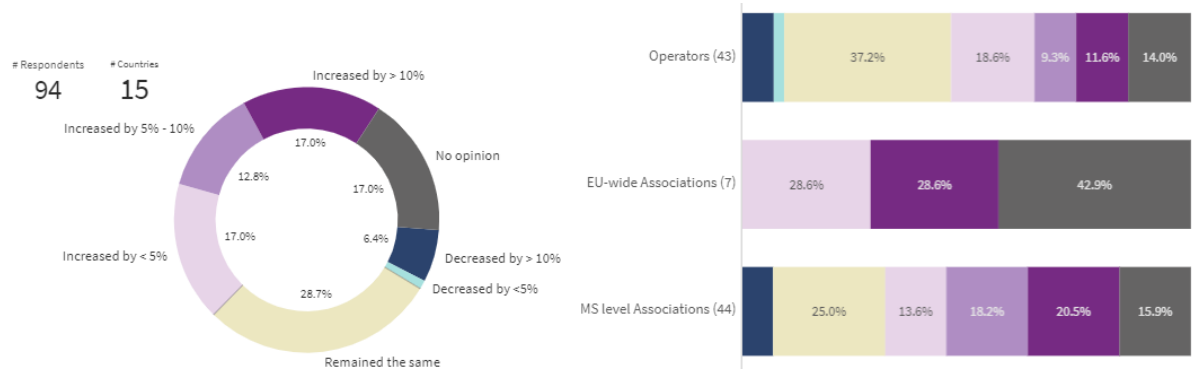
**2.5.4 Examinations by authorised operators to prevent plant quarantine pests**

*How has the number of examinations by the authorised operator at the operator’ premises to prevent the presence and spread of the plant quarantine pests changed, since examinations have to be carried out by authorised operators (Art. 87; Regulation 2016/2031) and plant passports have been extended to all plants for planting? (Q34)*

46.8% of respondents to this question (44), which was asked to operators and associations, stated that the number of examinations carried out by authorised operators at their premises has increased to a certain level, since the new PP requirements. On the other hand, 28.7% (27) considered that the number of examination has remained the same, and to a lesser extent 7.5% (7) of respondents that it has decreased. 17% of respondents (16) expressed no opinion about this potential change.

The perception of an increase was expressed especially by the EU-wide associations (57.2%), and to a slightly lesser extent by the MS-level associations (52.3%), while only 39.5% of operators reported it, compared to 46.5% who reported either no change (37.2%) or a decrease.

**Figure 48. Changes in the number of examinations at authorised operators’ premises carried out by operators since the new PP requirements came into force**



2.5.5 Time and costs of training for obtaining skills and acquiring knowledge related to the applicable rules relevant to the examinations/official controls

Did you have to organise or to participate in any kind of training for obtaining new skills and acquiring knowledge on the applicable rules relevant to the examinations/official controls at the premises for the issuance of the plant passports, since the plant passport has been extended to all plants for planting? (Q40)

48.3% of respondents (57) confirmed that they have organised or participated in training for obtaining new skills and acquiring knowledge on the applicable rules relevant to the examinations/official controls, since the PP extension to all plants for planting. Higher shares of NPPOs (70% (17)) and MS-level associations (54.5% (24)) were involved in these trainings to both organise and participate. Over 32% of operators (14) confirmed that they have organised or participated in training.

The average cost of training for obtaining skills and acquiring knowledge related to the applicable rules relevant to the examinations/official controls, as reported by several respondents, was about EUR 49 per hour. Training relevant to the examinations/official controls took from a minimum of 4 hours to a maximum of 500 hours. Only one NPPO reported more time than the maximum for this type of training.

Figure 49. Training for obtaining skills and acquiring knowledge on the applicable rules relevant to the examinations/official controls

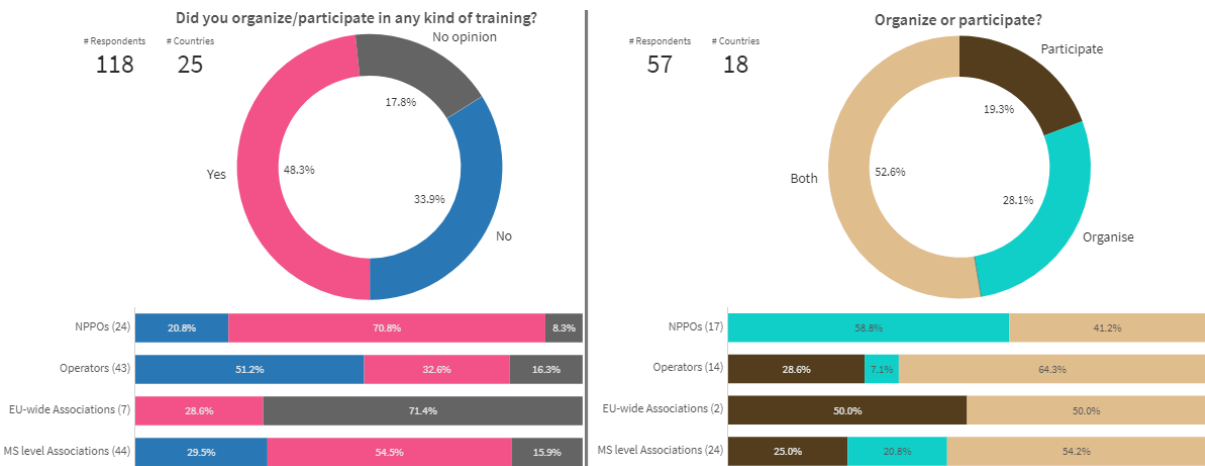
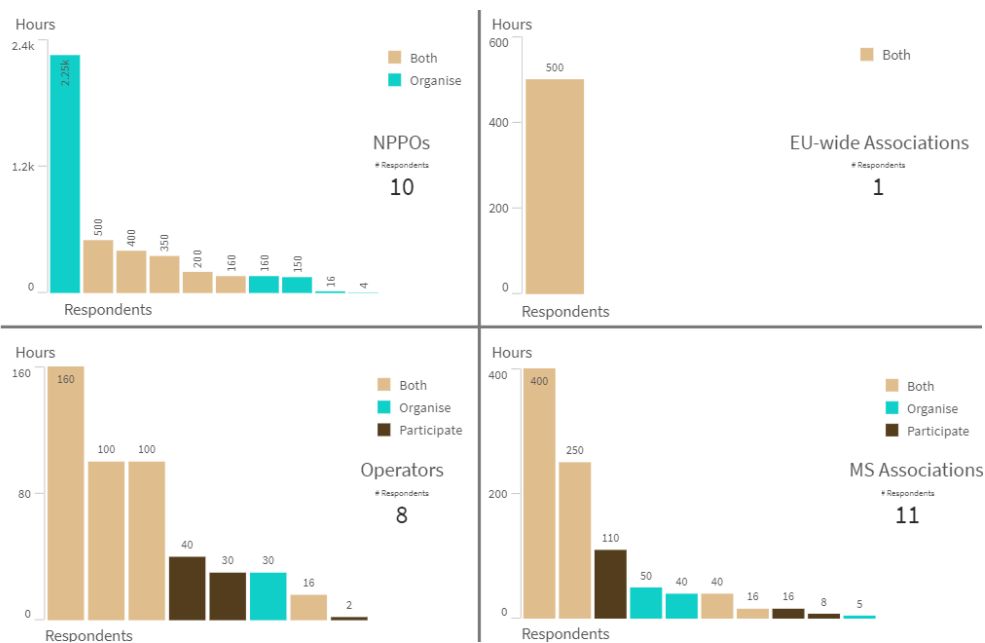


Figure 50. Time spent on training for obtaining skills and acquiring knowledge related to the applicable rules relevant to the examinations/official controls



## 2.5.6 Changes related to facilities/infrastructure required to perform the official controls

*Did you have to change or improve your facilities/infrastructures to perform the official controls related to the plant passport issuance - due to its extension to all plants for planting? / - due to the requirement of attaching plant passport to the trade unit? (Q41)*

*Did you have to change or improve your facilities/infrastructures to perform the required examinations for the issuance of the plant passports - due to its extension to all plants for planting? / - due to the requirement of attaching plant passport to the trade unit? (Q44)*

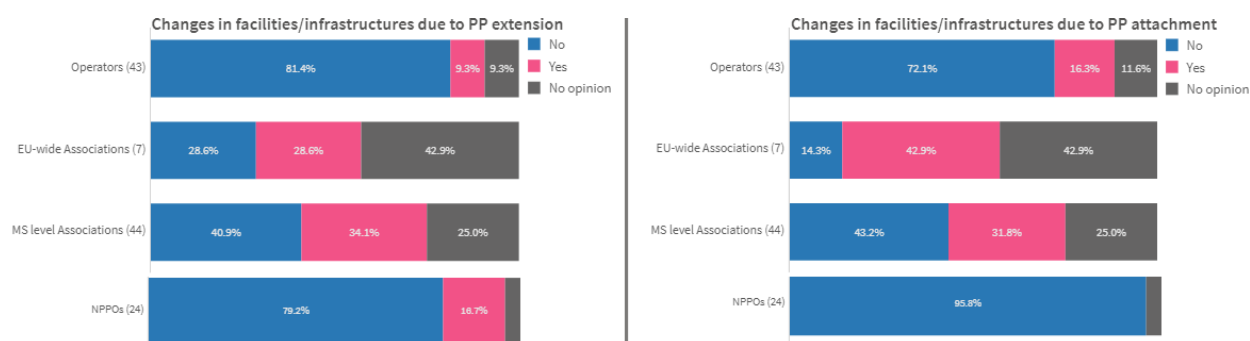
Overall, few respondents confirmed changes or improvements in the facilities/infrastructure to perform the official controls related to the new PP requirements. Less than half of EU-wide or MS-level associations responding to this questionnaire confirmed changes in facilities/infrastructures due to the extended PP and the attachment of the PP to the trade unit. The fewest changes to facilities/infrastructures were confirmed by NPPOs and operators. Only 16.7% of NPPOs (four) and 9.3% of operators (four) confirmed changes due to the extended PP. No NPPOs and only 16.3% of operators (seven) confirmed changes due to attachment of the PP to the trade unit.

The changes to facilities/infrastructures to perform the official controls that were listed by the four NPPOs which had to introduce changes included: i) IT system improvements or changes to operator checking systems; ii) buildings for staff, laptops, smartphones, vehicles; and iii) complete reorganisation of national legislation. Only one NPPO reported actual cost values (EUR 2 700 for IT improvements).

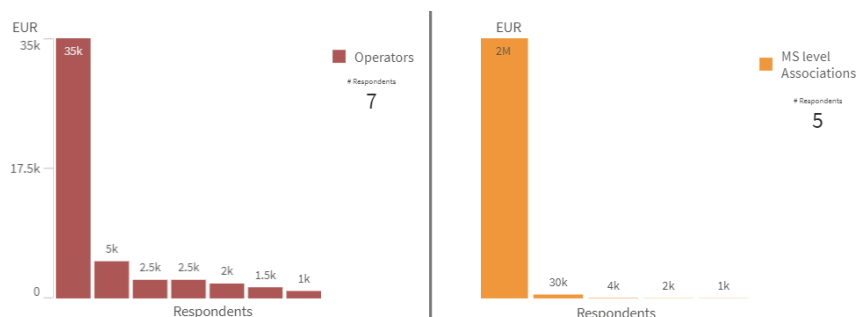
The main improvements that needed to be undertaken by operators and associations included (in decreasing order of frequency of mentions by stakeholders): IT systems, labelling equipment (printers for the PP) and some changes in the physical infrastructure of the companies. The latter was only mentioned by three associations. Only one operator mentioned investment in facilities. In one Member State, the change in PP requirements has led to more automation and a change in the logistics.

Cost estimates for changes related to facilities/infrastructures to perform the official controls due to new PP requirements provided by operators averaged around EUR 2 400, excluding one extreme value of EUR 35 000. Cost estimates provided by MS-level associations were very diverse, varying from EUR 1 000 to EUR 2 million.

**Figure 51. Changes related to facilities/infrastructures to perform the official controls due to new PP requirements**



**Figure 52. Costs of changes related to facilities/infrastructure to perform the official controls due to new PP requirements**





## 2.5.7 Changes related to the possibility of identifying plant quarantine pests at operators' premises

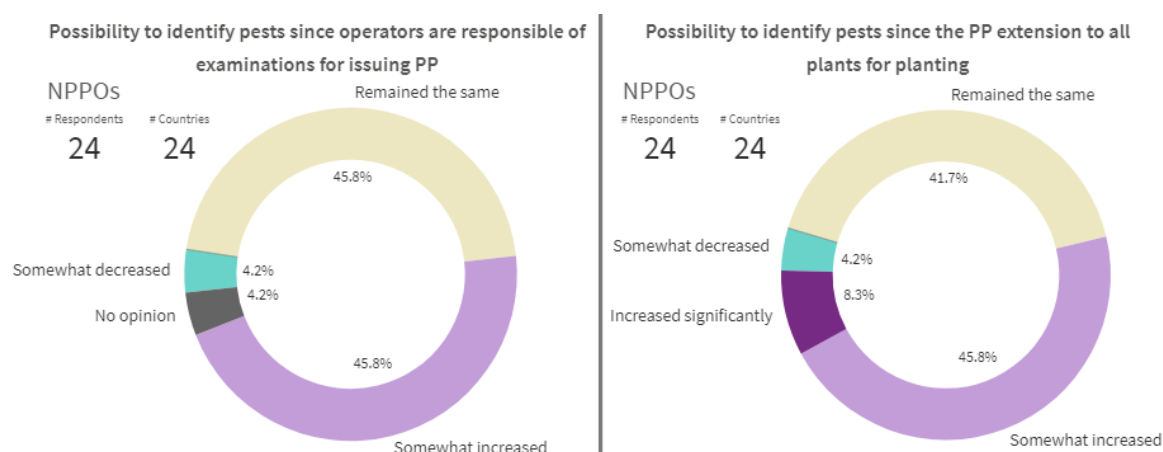
*How do you rate the possibility to identify plant quarantine pests at the premises of operators, since - operators are given responsibilities under Art. 87 regarding examinations for issuing plant passports? /the plant passport has been extended to all plants for planting? (Q42)*

*Please specify how you ensure the detection of plant quarantine pests on your premises? (Q45)*

A clear benefit resulting from the new PP requirements is the possibility of identifying plant quarantine pests at the premises of operators, since most NPPOs rated this possibility to either have somewhat increased or remained the same.

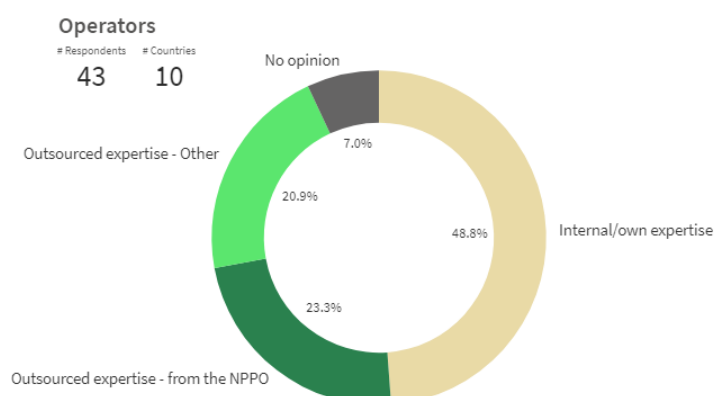
Only one NPPO considered that the possibility of identifying pests has decreased since operators have been responsible for the examinations for issuing PPs, because they believed that operators do not have the same knowledge to identify pests as inspectors.

**Figure 53. Changes related to the possibility of identifying plant quarantine pests at the premises of operators due to new PP requirements**



Of the operators that responded to the questionnaire, almost half (48.8% (21)) used their internal/own expertise to detect quarantine pests in their premises, 23.3% outsourced expertise from the NPPOs, and 20.9% used outsourced expertise from other sources.

**Figure 54. Expertise used by the operators to ensure the detection of plant quarantine pests on their premises**



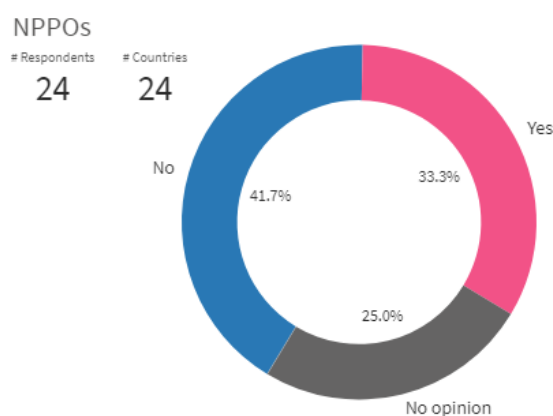
## 2.5.8 Other additional changes

*Do you consider that in addition to the changes related to the plant passport mentioned above, there has been any other change in the additional control requirements you need to implement at the operator premises? (Q43)*

33.3% of NPPOs (eight) considered that there have been other changes in the additional control requirements that need to be implemented at the operator's premises, besides those mentioned in the questionnaire. The changes listed by the NPPOs were:

- Need for operators to comply with the requirements of Commission Delegated Regulation (EU) 2019/827
- New obligations under Art. 89, 90 and 91 of Regulation (EU) 2016/2031:
  - compliance of operators to be authorised to issue PP
  - obligation for operators to identify and monitor the points of its production process which are critical and keep for at least 3 years the records concerning the identification and monitoring of these points
  - obligation of competent authorities to approve operators' pest risk management plans.
- New methodologies for testing for *Xylella fastidiosa* and Tomato brown rugose fruit virus
- Control extended to RNQPs.
- Wider scope of traceability controls
- The controls include more questions about the traceability of the company's trade.

**Figure 55. Other changes in the additional control requirements that need to be implemented at the operator's premises related to PPs**



### **Conclusions regarding the changes to phytosanitary control measures related to the extension of the plant passport requirement to all plants for planting**

Most associations and operators agreed that the staff involved in the examinations at the operators' premises have either increased or remained the same since the PP was extended to all plants for planting. Likewise, most NPPOs considered that their staff involved in the official controls, to verify that the professional operators are complying with the PP criteria, has either increased or remained the same. Moreover, approximately half of respondents declared an increased number of official controls and number of examinations related to the new PP requirements.

Certain increases in the staff involved in the official controls and the examinations at the operators' premises related to the new PP requirements have probably resulted in higher costs for all stakeholders. However, a clear benefit, highlighted by almost half of the NPPOs, was the increased possibility of identifying plant quarantine pests at operators' premises. The majority of operators (48.8%) use their internal/own expertise to ensure that plant quarantine pests are detected on their premises.

More than half of the NPPOs and MS-level associations and a third of operators confirmed that they have organised or participated in training for obtaining new skills and acquiring knowledge related to the applicable rules relevant to the examinations/official controls, since the extension of the PP to all plants for planting. The average estimate of this training cost, as provided by several respondents, was about EUR 49 per hour. Training relevant to the examinations/official controls took from a minimum of 4 hours to a maximum of 500 hours.

Overall, few respondents reported changes or improvements of the facilities/infrastructures to perform the official controls related to the new PP requirements. Less than half of associations (EU-wide and MS-level), four NPPOs and seven operators who responded to this questionnaire reported changes.

Changes to facilities/infrastructures to perform the official controls as listed by the four NPPOs included: IT system improvements or changes to operator checking systems; ii) buildings for staff, laptops, smartphones, vehicles; and iii) complete reorganisation of national legislation.

The main improvements that needed to be undertaken by operators and associations included (in decreasing order of frequency of mentions by stakeholders): IT systems, labelling equipment (printers for the PP) and some changes in the physical infrastructure of the companies (e.g. more automation or change in the logistics).

Cost estimates of changes related to facilities/infrastructures to perform the official controls due to new PP requirements provided by operators averaged about EUR 2 400, excluding one extreme value of EUR 35 000. Cost estimates provided by MS-level associations were very diverse, varying from EUR 1 000 to EUR 2 million.

2.6 Trade changes due to the extension of the plant passport requirement to all plants for planting and the attachment of the plant passport to the trade unit

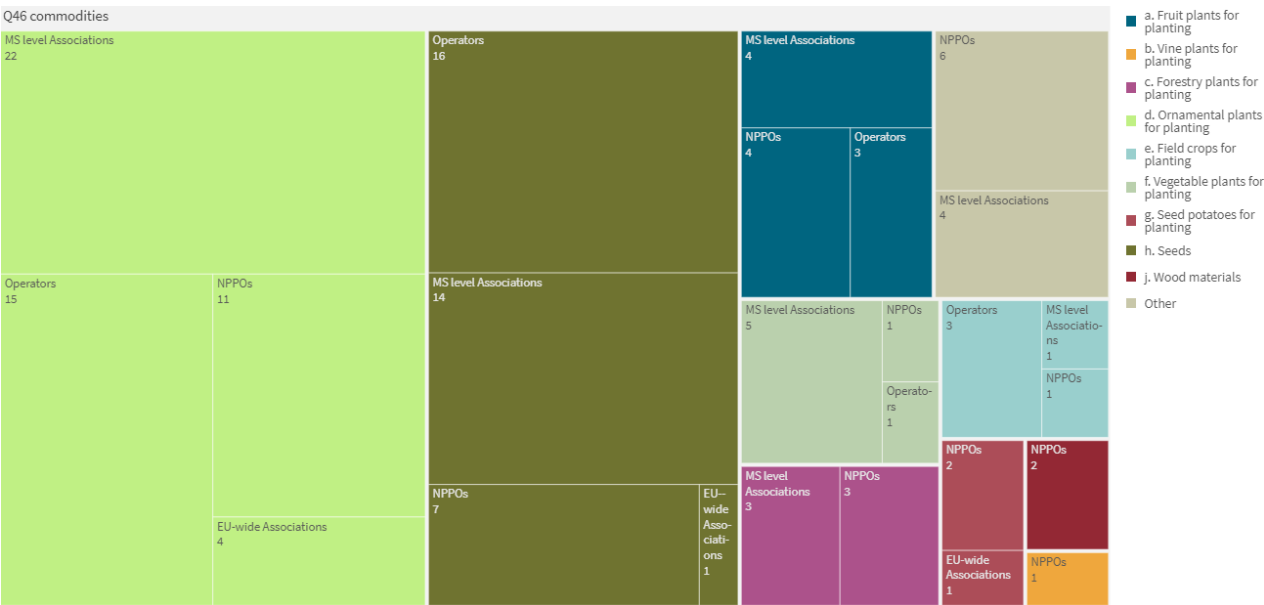
2.6.1 Groups of plants with the most technical difficulties and greater technical ease to issue the plant passport since the extension of this requirement to all plants for planting

Please could you list the main plants or groups of plants (up to 3) for which you have experienced the most technical difficulties/ experienced greater technical ease when having to issue the plant passport, since the plant passport has been extended to all plants for planting? (Q46 & Q47)

The top three groups of plants with the most technical difficulties to issue the PP since the extension of this requirement to all plants for planting according to the respondents were:

- Ornamental plants for planting (52 responses)
- Seeds (38 responses)
- Fruit plants for planting (11 responses)

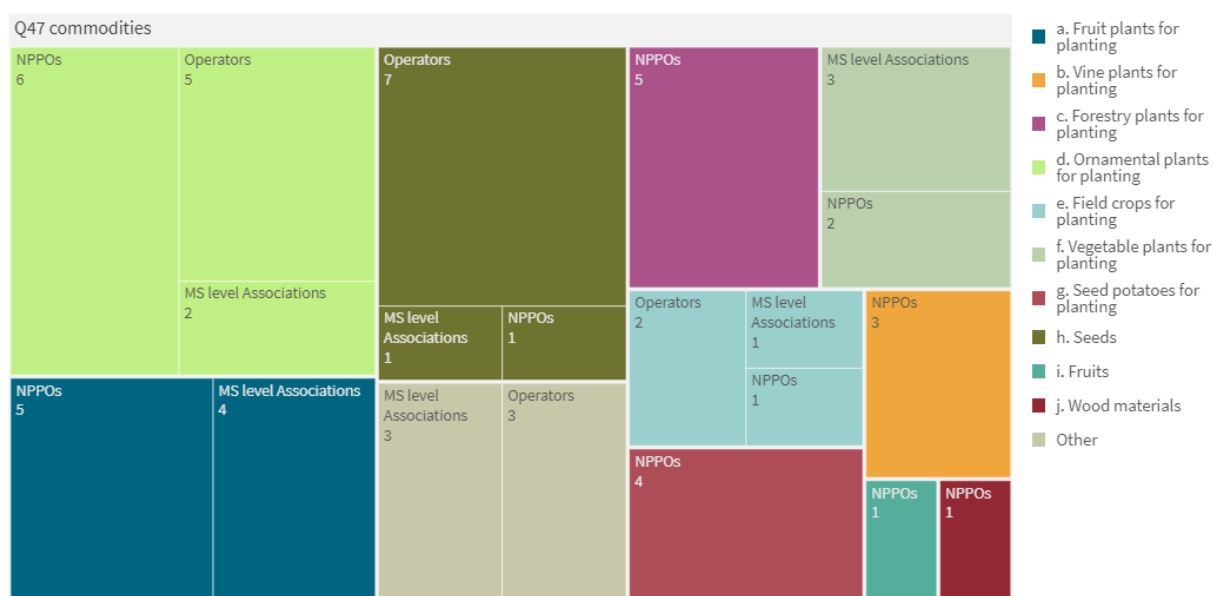
Figure 56. Groups of plants with the most technical difficulties to issue the PP since the extension of this requirement to all plants for planting



The top three groups of plants with the greater technical ease to issue the PP since the extension of this requirement to all plants for planting according to the respondents were:

- Ornamental plants for planting (13 responses)
- Seeds (nine responses)
- Fruit plants for planting (nine responses)

**Figure 57. Groups of plants with the greater technical ease to issue the PP since the extension of this requirement to all plants for planting**



According to these results, it seems that a majority of respondents agreed that the three most relevant groups of plants that have been somewhat affected by the extension of the PP requirement to all plants for planting were ornamental plants for planting, seeds and fruit plants for planting.

These three groups of plants were considered either to have both the most technical difficulties and the greater technical ease to issue the PP since the extension. However, the number of responses was higher for the most technical difficulties experience.

## 2.6.2 Changes in production and trade of the plants for planting that require a plant passport as of 14 December 2019

*Following the extension of the requirement of a plant passport to all plants for planting, would you consider that the volume of production of these products has changed (at your respective level, i.e. in your company if your reply as an operator, or in your country if you reply as a national association, or in the EU if you reply as an EU association)? (Q48)*

*Following the extension of the requirement of a plant passport to all plants for planting, would you consider that the volume of intra EU-trade for those products has changed? (Q49)*

*Do you think that the market price of plants for planting for which the requirement to have plant passport has been extended has changed? (50)*

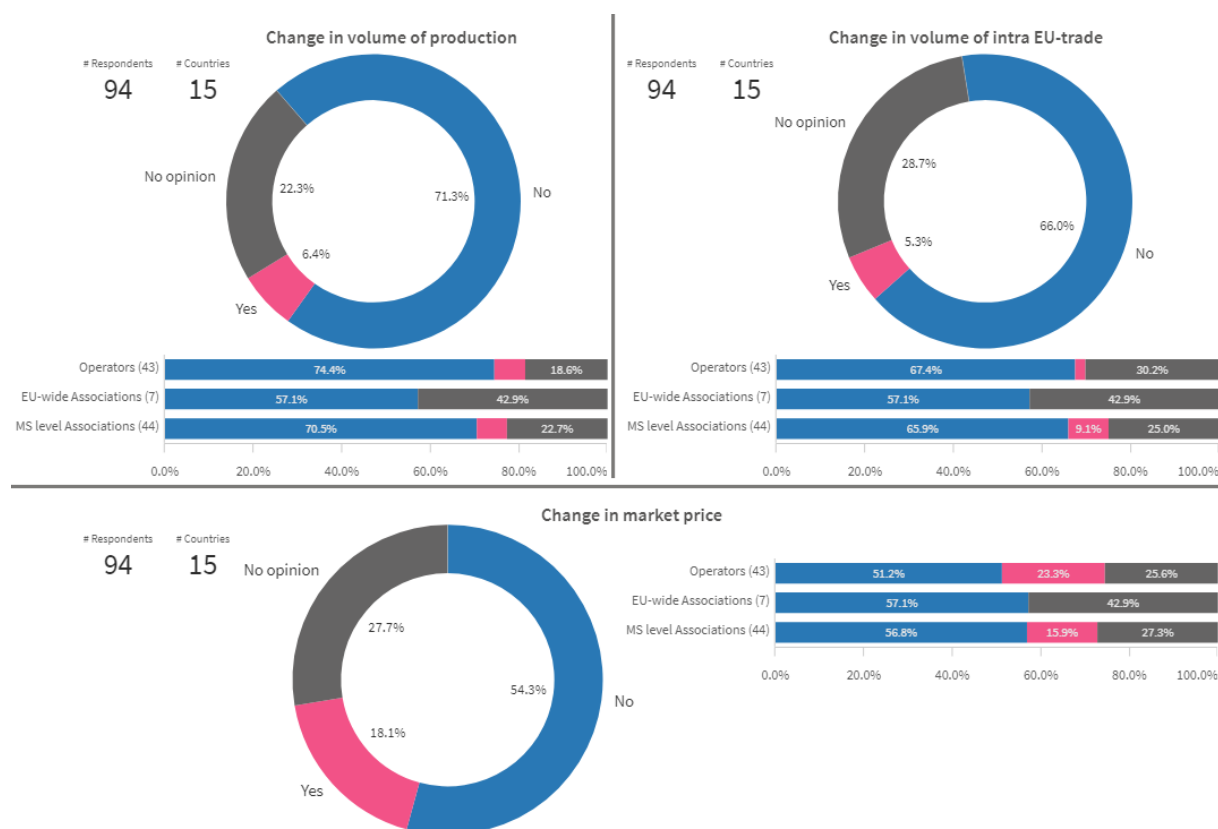
Only six respondents (less than 6.4%) - including operators and associations - confirmed changes in the volume of production and the volume of intra EU-trade of the plants for planting that since 14 December 2019 require a PP.

Similar results were found across all the different type of stakeholders. Over 71.3% (67) of respondents declared no changes in the production volume and 22.3% (21) expressed no opinion. 66% (62) of respondents considered no changes in the volume of intra EU-trade and 28.7% (27) expressed no opinion.

No changes in the market price were considered by more than half of respondents. However, changes in the market price were considered slightly higher than production or trade changes, as confirmed by 18.6% (17) of respondents.

There were no consensus among stakeholders on the direction of the changes (increases or decreases) of the market price of the different groups of commodities.

**Figure 58. Changes in production, trade and market price of the plants for planting that require a PP as of 14 December 2019**

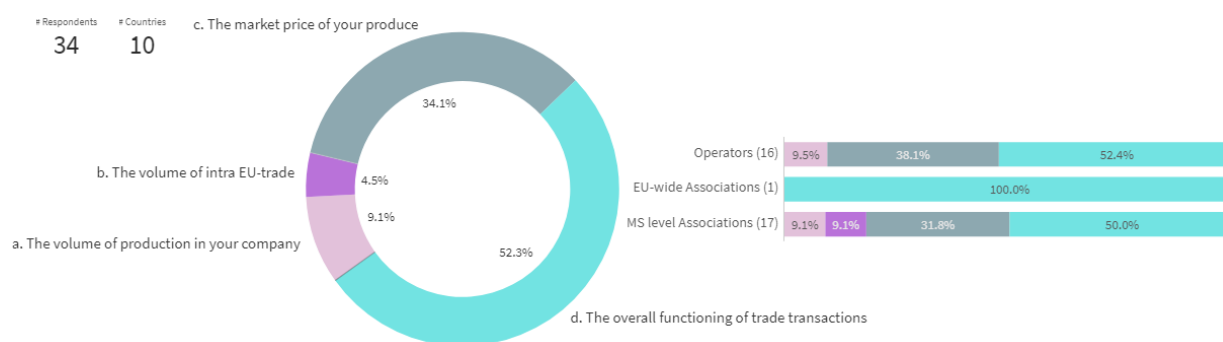


## 2.6.3 Changes in trade due to the requirement to attach the plant passport to the trade unit

*Do you think that the new requirements for attaching the plant passport to the trade unit have affected any of the following elements...? (Q57)*

36% of respondents (34) – including operators and associations – considered that there were changes in trade due to the requirement of attaching PP to the trade unit. These changes were mostly referred by the respondents for the overall functioning of trade transactions and in the market price. Changes in the volume of production and in the volume of intra-EU trade were considered to a lesser extent.

**Figure 59. Changes in trade due to the requirement of attaching PP to the trade unit**



## 2.6.4 Additional costs for producing/selling regulated plant materials

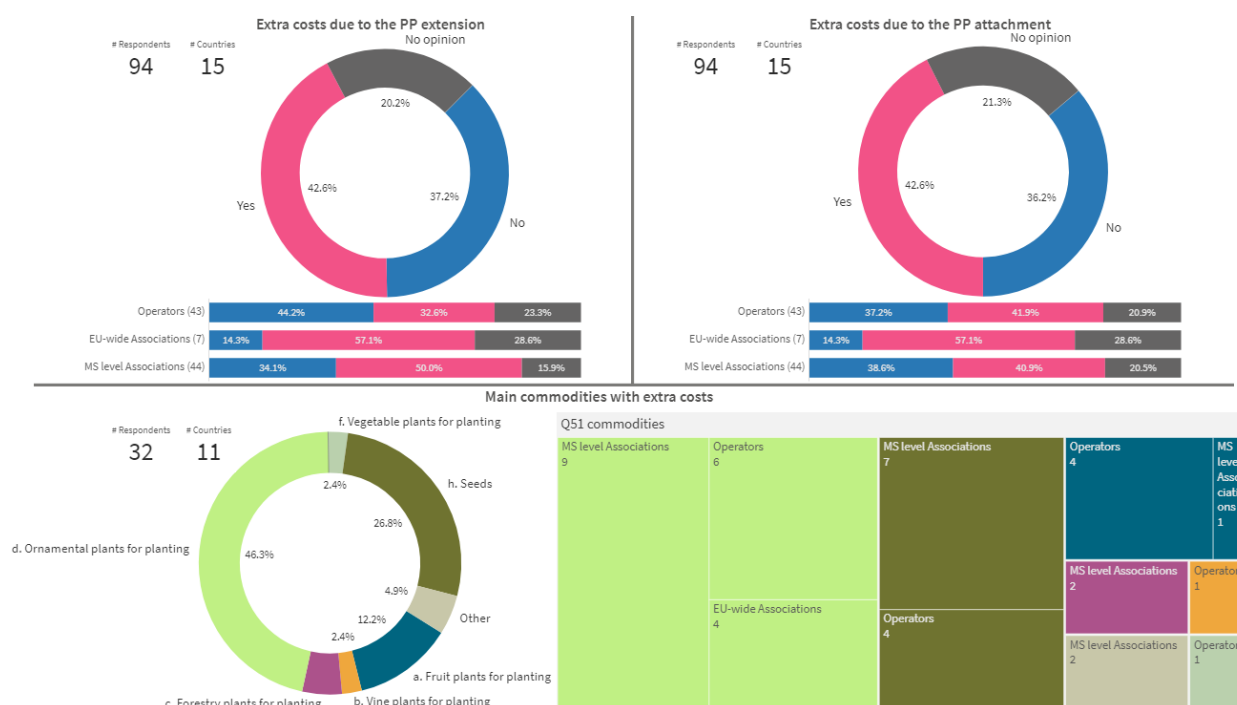
*Do you have incurred in any extra costs for producing/selling regulated plant materials – due to the extension of the requirement of a plant passport to all plants for planting,?/ – due to the requirement of attaching plant passport to the trade unit? (Q51)*

42.6% of respondents – including operators and associations - (40) incurred extra costs for producing or selling regulated plant materials due to the extension of the PP requirement to all plants for planting. Same number of respondents confirmed extra costs for the requirement of attaching PP to the trade unit.

On the other hand, 37.2% (35) and 36.2% (34) of respondents expressed not to have had extra costs due to the PP extension and the attachment of the PP requirements respectively. Approximately 20% of respondents expressed no opinion.

The group of plants more mentioned to have extra incurred costs were ornamental plants and seeds. The extra incurred costs provided by the stakeholders, related mostly to new tests (e.g., EUR 12 per PP), labelling and new systems to print the PP (ca. EUR 1 per PP) or logistics and administrative cost (ca. EUR 20 per PP). Attaching the PP to each single unit was considered a significant cost in terms of administrative burden.

**Figure 60. Additional costs for producing/selling regulated plant materials**



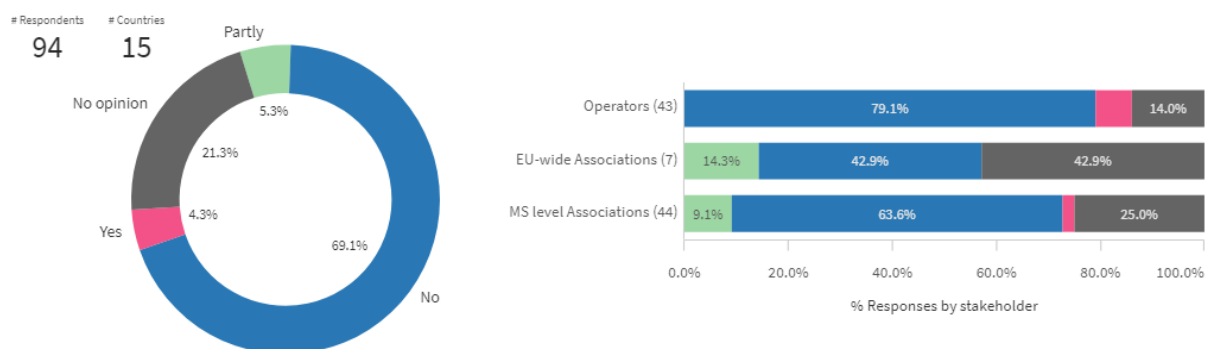
## 2.6.5 Changes in the business model

*Have you decided, as a consequence of the extension of plant passports to all plants for planting, to change your business model by targeting only final users where no plant passport is needed? (Q52)*

69.1% of respondents – including operators and associations – (65) expressed not to have changed the business model by targeting only final users since the PP extension to all plants for planting. Only one MS-level association and three operators confirmed that they have changed the business model.

A total of five respondents from associations expressed to have changed partially the business model. As reported by those stakeholders, some species with limited trade are no longer distributed and there has been a shift to more professional traders. This might have an impact on traditional varieties that should be monitored.

**Figure 61. Changes in the business model since the PP extension to all plants for planting**



### **Conclusions regarding the trade changes due to the extension of the plant passport requirement to all plants for planting and the attachment of the PP to the trade unit**

According to the questionnaire results, it seems that a majority of respondents agreed that the three most relevant groups of plants that have been somewhat affected by the extension of the PP requirement to all plants for planting were ornamental plants for planting, seeds and fruit plants for planting. In terms of the number of responses they were higher rated to have the most technical difficulties.

There were no significant changes in the volume of production nor in the volume of intra EU-trade of the plants for planting that since 14 December 2019 require a PP. Slightly higher changes were considered in the market price of these plants, but there is no consensus among stakeholders on the direction of the market price changes (increases or decreases).

Similar to the extension of the PP requirement to all plants for planting, there were not significant changes in trade related to the attachment of the PP to the trade unit. The received replies also suggest that the changes in the overall functioning of trade transactions and in the market price were higher than the changes in the volume of production and in the volume of intra-EU trade.

Less than half of respondents – including operators and associations (EU-wide and MS-level) – incurred extra costs for producing or selling regulated plant materials due to the PP extension requirement to all plants for planting and the attachment of the PP to the trade unit. The group of plants considered to have more extra incurred costs were ornamental plants and seeds. The extra incurred costs provided by the stakeholders relates mostly to new tests, labelling and new systems to print the PP or logistics and administrative costs. Attaching the PP to each single unit was considered a significant cost in terms of the administrative burden.

Overall, the extension of the PP requirements to all plants for planting has not led to a significant change in the business model.

## **2.7 Changes in trade transactions due to the extension of the plant passport requirement to all plants for planting and the attachment of the plant passport to the trade unit**

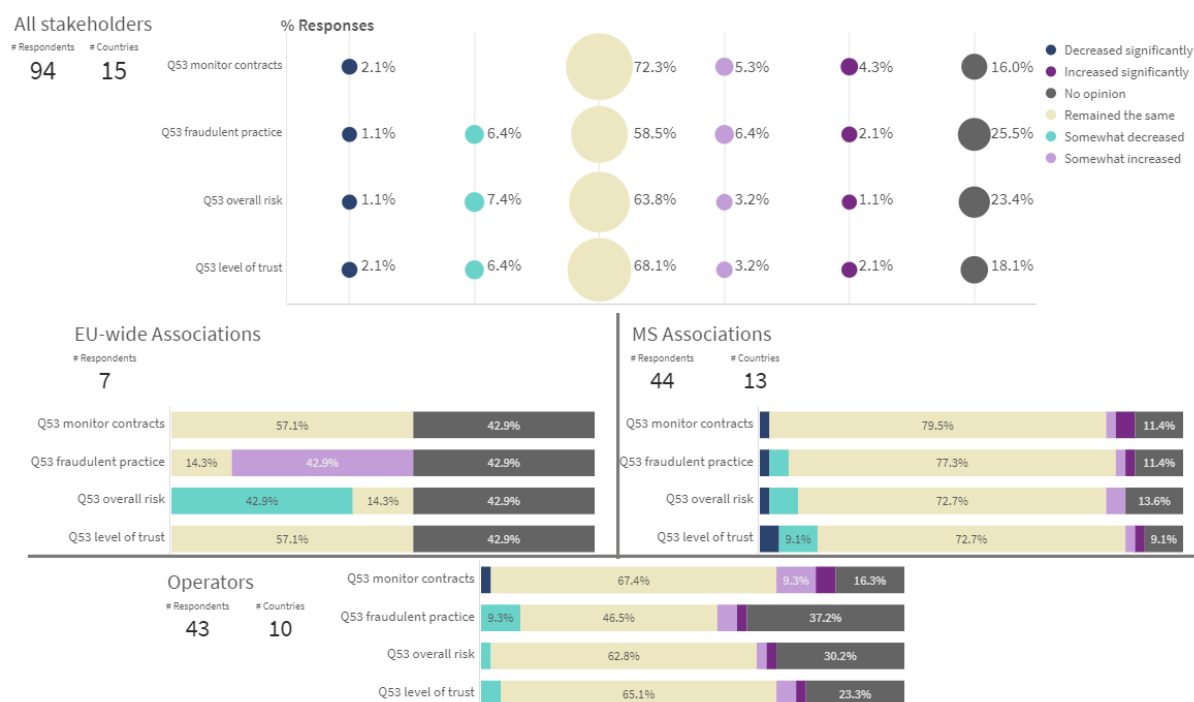
### **2.7.1 Overall functioning of trade transactions (selling/buying) in the plants for planting that have newly required a plant passport since the extension of the plant passport requirement**

*How would you rate the impact on the overall functioning of trade transactions (selling/buying) of the plants for planting that now newly require a plant passport concerning the following aspects? (Q53)*

A vast majority of respondents –operators and associations (EU-wide and MS-level) – considered that the overall functioning of trade transactions (selling/buying) of the plants for planting that now newly require a PP has remained the same. Almost a third of respondents expressed no opinion.

According to the comments provided by some of the respondents, the extension of the PP requirement to all plants for planting improves the functioning of the markets. Although the implementation of the changes might have brought some administrative burden on operators, they are aware of the positive impact this has had on the overall plant security.

**Figure 62. Changes in the overall functioning of trade transactions (selling/buying) of the plants for planting that newly require a PP**



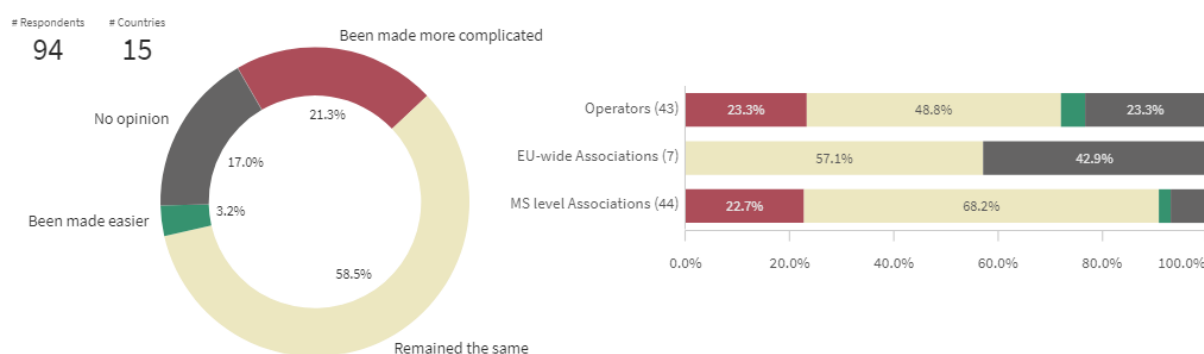
## 2.7.2 Capacity to make long-term investment or strategic decisions affecting the production of or trade in the plants for planting that newly require a plant passport

*Regarding the capacity of companies to make long-term investment or strategic decisions affecting the production or trade of the plants for planting that now require a plant passport, do you consider it has? (Q54)*

The capacity to make long-term investment or strategic decisions affecting the production or trade of the plants for planting that newly require a PP have remained the same according to more than half of respondents - operators and associations (EU-wide and MS-level).

To a lesser extent, 21.3% of respondents (20), including only operators and MS-level associations, stated that this capacity has been made more complicated. In particular, some of these MS-level associations mentioned reasons for more complications such as the increased market competition for budwood, or the need for investments for small and medium enterprises (SMEs) being too big.

**Figure 63. Changes in the capacity to make long-term investment or strategic decisions affecting the production or trade of the plants for planting that newly require a PP**





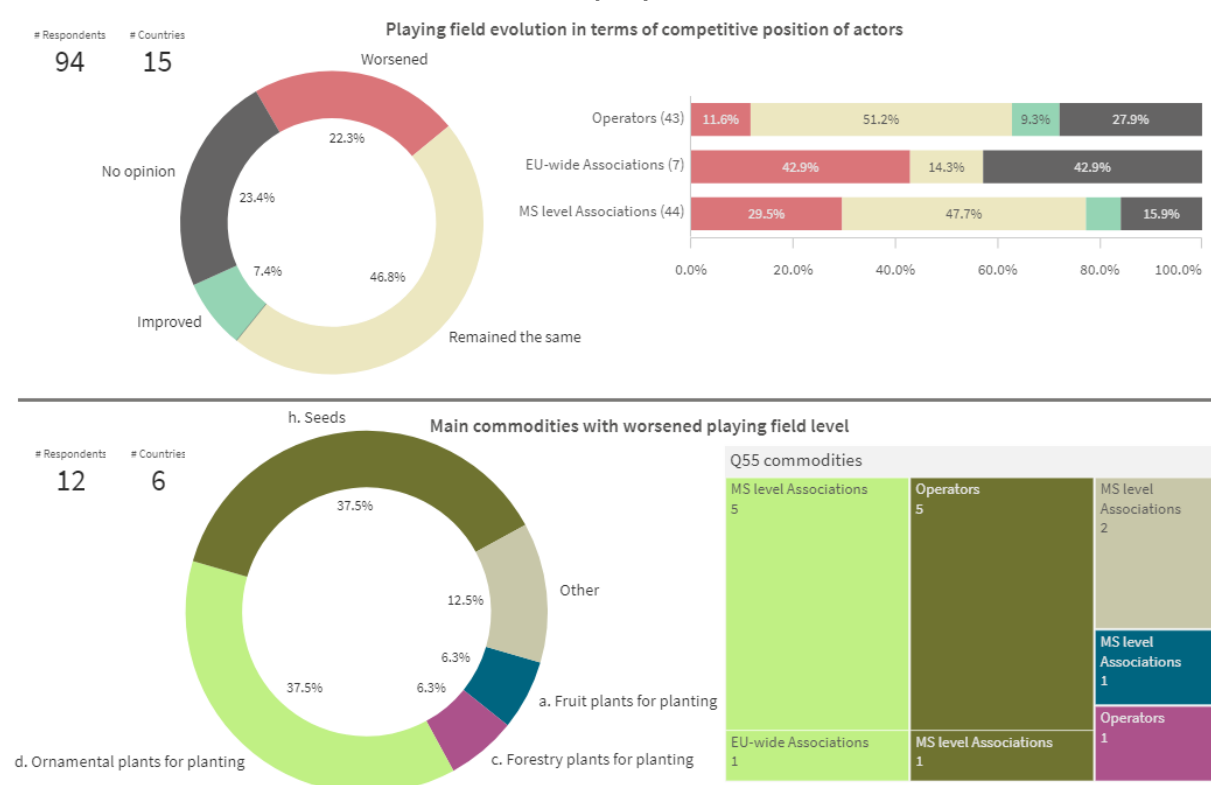
### 2.7.3 Playing field evolution in terms of competitive position of actors related to the plants for planting that newly require a plant passport

*Following the extension of the plant passport to all plants for planting, how would you consider that the playing field in terms of competitive position of actors has evolved in the sector of plants for planting for which a plant passport is now required? (Q55)*

Over half of operators and almost half MS-level associations, responding to this question, agreed that the playing field level for all the actors involved has remained the same, related to the plants for planting that newly require a PP. To a lesser extent, 7.4% of respondents (seven), considered this to have improved.

11.6% of operators (five), 29.5% of MS-level associations (13), and three EU-wide associations out of seven, considered that the playing field level has worsened. In particular, they considered ornamental plants for planting and seeds as those commodities for which the playing field level has worsened the most.

**Figure 64. Playing field evolution in terms of competitive position of actors related to the plants for planting that newly require a PP**



The reasons provided by some of the respondents when they considered 'worsened' the playing field level are summarised in Box.11.

**Box 11.** Reasons for justifying the **worsened playing field** evolution in terms of competitive position of actors related to the plants for planting that newly require a PP

- Costs might have increased differently for small growers or producers than for large operators due to the new PP requirements, resulting in no level playing field.
- Small producers (direct sales) do not have the capacity to invest or recruit additional staff while larger companies more automated have not had any drastic changes in their practices. This may affect the competitive position of smaller businesses.

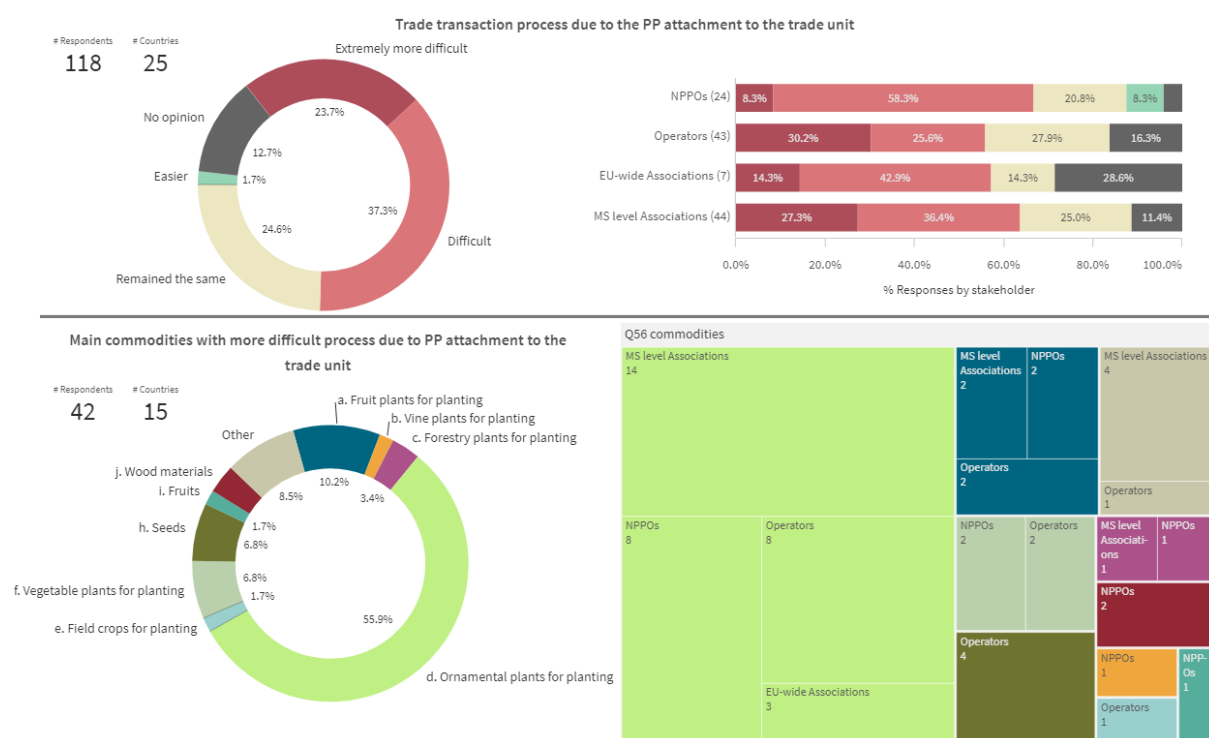
## 2.7.4 Changes in the trade transaction process due to attachment of the plant passport to the trade unit

*Do you think that the requirements of attaching the plant passport to the trade unit have made this process (i.e. ensuring that the plants are accompanied by a plant passport)? (Q56)*

Over 60% of respondents (72) considered the requirement of attaching the PP to the trade unit to have made more difficult the trade transaction process. Another third of respondents (29) considered trade transaction to have remained the same in spite of the attachment of the PP to the trade unit, and to a lesser extent, two NPPOs stated that this requirement has made the process easier.

The ornamental plants for planting were considered the commodities for which the requirement of PP attaching to the trade unit has been the most difficult to carry out trade transactions (33 responses).

**Figure 65. Changes in the trade transaction process due to attachment of the PP to the trade unit**



The reasons provided by some of the respondents when they considered 'more difficult' or 'extremely more difficult' the trade transaction process due to PP attaching to the trade unit are summarised in Box.12.

### Box 12. Reasons for justifying the **difficult trade transaction** process due to PP attaching to the trade unit PP

- Most difficult for plants that require manual labelling or for small organisations that are not automated.
- More work time needed to attach the plant passport to each trade unit. Additional administrative tasks, logistics and cost.
- In the speed of the logistical processes. Especially with day-trade it takes a lot of effort to apply the plant passport to the shipment instead of simply have it accompany the shipment.
- As frequently a trade unit is just one or few plants, many PPs have to be printed for one delivery.
- Because of the nature of plants (humidity) the PP cannot be printed on normal paper and so a lot of plastic waste is produced.
- When receiving plants where the PP is affixed directly to the pot/packaging and not to the enclosed documents (delivery note/bill) requires additional handling to keep the information and guaranteeing traceability. Invoices and delivery notes are easier to keep.
- Affixing the plant passport to each individual plant is more difficult, however it also has merits in case of splitting or merging consignments.
- Consignments may include units with small numbers of different plant species that may be split up or merged with others before delivery to the final user.
- Traceability can be guaranteed through other means than the plant passport itself.

## PROPOSALS PROVIDED BY RESPONDENTS

- For small seed packages (according to the definition of the EU seeds marketing acquis), it should be possible to attach the plant passport on the delivery note or the invoice without having to attach the delivery note/invoice to the respective trade item.
- Accompanying documents seem to be sufficient tool (*to replace a PP attached to the trade unit*).
- Invoices and delivery notes are easier to keep.

## Conclusions regarding the changes in trade transactions due to the extension of the plant passport requirement to all plants for planting and the plant passport attachment to the trade unit

No great changes related to the additional plants for planting that now require a PP were perceived by respondents on the overall functioning of trade transactions, the capacity to make long-term investment or strategic decisions, and on the playing field level for all the actors involved.

The attachment of the PP to the trade unit was considered the new requirement to make more difficult the trade transactions by most respondents, mainly for manual labelling or for small organisations that are not automated. This resulting in no level playing field.

The ornamental plants for planting were considered the commodities for which the new PP requirements, particularly attachment of the PP to the trade unit, has made more difficult to carry out trade transactions.

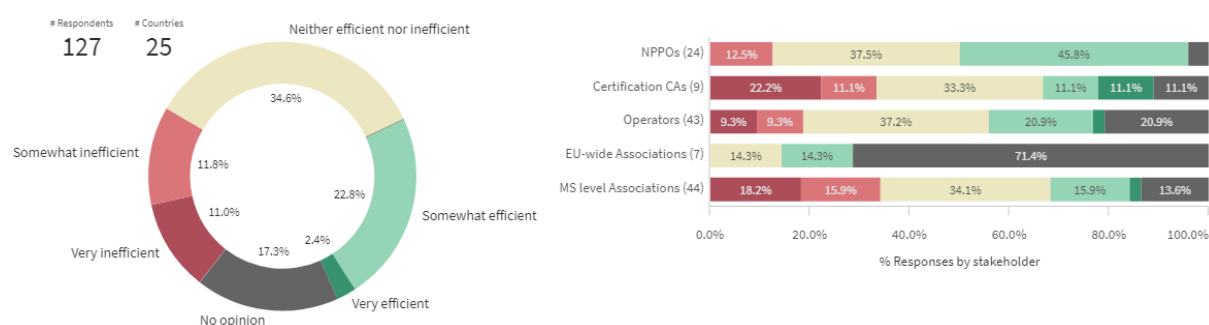
## 2.8 Changes related to Regulated Non-Quarantine Pests (RNQPs) and the new plant passport requirements

### 2.8.1 The implementation of the rules regarding RNQPs within the newly extended plant passport system

*How do you rate the implementation, within the newly extended plant passport system, of the rules regarding RNQPs? (Q58)*

The implementation of the rules regarding RNQPs within the newly extended PP system was rated as neither efficient nor inefficient by 34.6% of respondents (44). Another share of 48% of respondents (61) evenly rated the implementation as efficient (25.2%) or inefficient (22.8%), and the remaining share of respondents (17.3% (22)) expressed no opinion.

**Figure 66. The implementation of the rules regarding RNQPs within the newly extended PP system**



The reasons provided by some of the respondents whether they considered 'somewhat inefficient' or 'very inefficient' the implementation of the rules regarding RNQPs within the newly extended PP system are summarised in Box.13.

### Box 13. Reasons for justifying the inefficient implementation of the rules regarding RNQPs within the newly extended PP system

- Limited implementation due to lack of training for professional operators and other organisations (e.g., conservation organisations) for phytosanitary inspection of every RNQP.
- Overlapping of the Marketing Directives and the Phytosanitary Regulation with distinct definitions and scopes is a considerable challenge for authorities and operators.

- Seed certification, including the RNQPs, had already ensured the control of 100% of seed lots as part of the Seed Marketing Directives. The RNQPs introduction in the PHR has led to double regulation and therefore more administrative workload with no extra value.
- The EU official certification label is sufficient for traceability of plants with no adjustment to PP document.
- The requirements for RNQPs are already checked on plants for planting in the EU certification schemes of the marketing Directives. The EU official certification label guarantees traceability of plants for planting. Hence there is no need to adapt the plant passport.
- The absence of plant pests has always been a requirement for seed certification. Seed certification has ensured the control of 100% of seed lots. The introduction of RNQPs within the plant health legislation has caused a double regulation. As plant health falls under the scope of the Official Controls Regulation, seed certification is faced by an additional bureaucratic workload with no added value. The new rules did not increase the assurance of seed health for certified seed.
- The same rules for RNQPs have been added to the EU marketing Directives. Directives have to be transposed into national law. This means that the Commission has produced rules for RNQPs under two legal frameworks (plant health legislation and marketing legislation) and regulated at two different levels (EU and national level).
- The implementation of the new rules is limited because the professional operators of fruit plant nurseries have not yet been trained to carry out inspections for RNQPs.

## 2.8.2 Official controls related to plant passports for RNQPs and quarantine pests (QPs)

*Since the entry into force of the New Plant Health Regulation (Regulation 2016/2031), are the official controls for plant passports for RNQPs and QPs (quarantine pests) carried out simultaneously?*

*If the answer is “Yes, we started doing so since the entry into force of the New Plant Health Regulation”: How would you rate the evolution of the cost for your organisation as a consequence of carrying out plant passport official controls for RNQPs and QPs simultaneously for the different sectors below? (Q59)*

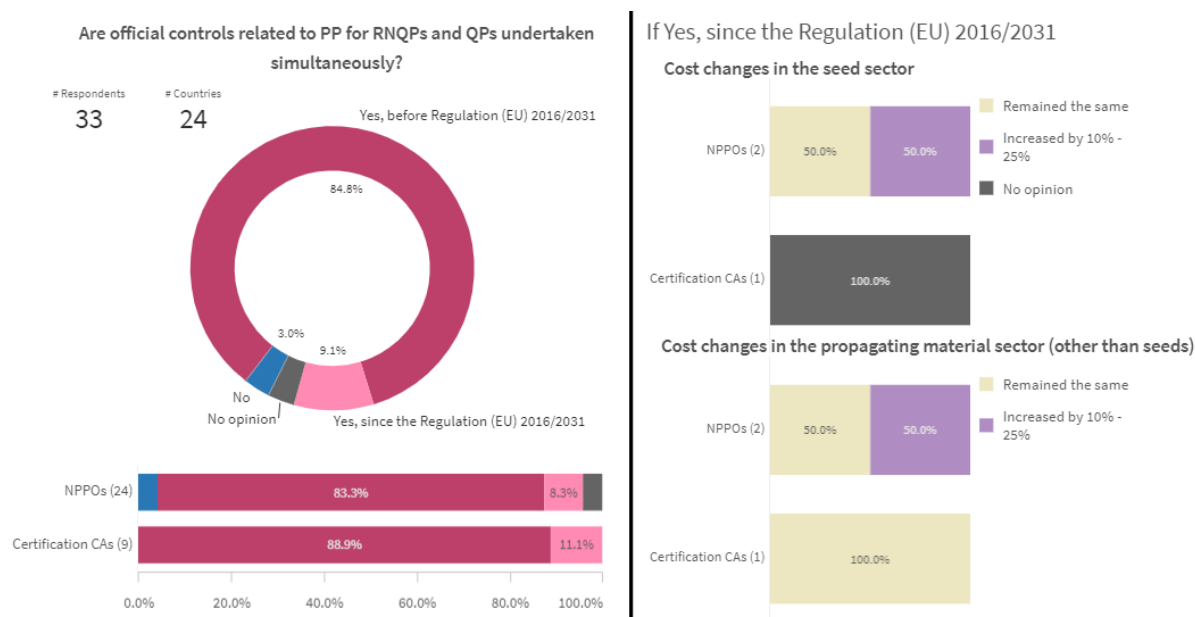
*Are the plant passport official controls for RNQPs and QPs carried out by the same inspector? (Q60)*

*Where have plant passport official controls for RNQPs been implemented in your country? (Q61)*

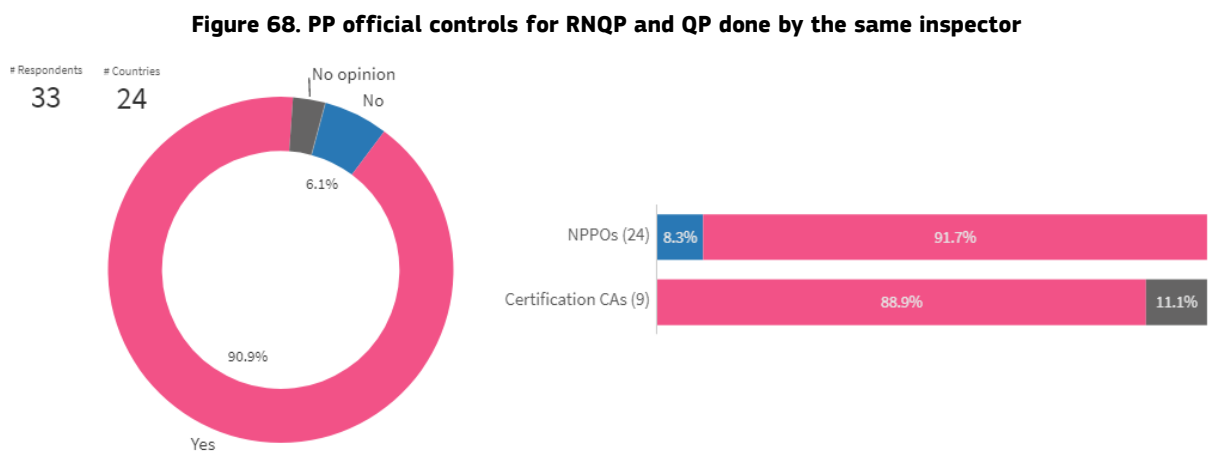
Before the entry into force of the Regulation (EU) 2016/2031, most NPPOs and certification CAs responding to this questionnaire were already undertaking simultaneously the official controls related to PP for RNQPs and QPs.

Only two NPPOs and one certification CAs started to carry out the official control simultaneously since the entry into force of the Regulation (EU) 2016/2031. Of them, only one NPPO considered the cost to have increased between 10% and 25% and stated that the reason is that now they have to apply two legal frameworks - the PHR and the Marketing directives.

**Figure 67. Official controls related to PP carried out simultaneously for RNQPs and QPs**



An overwhelming majority of respondents (90.9%) stated that official controls for quarantine pests and RNQPs are carried out by the same inspector. A minority of stakeholders (6.1%) responded that official controls were not carried out by the same inspector while 3% of respondents did not have an opinion. 8.3% of NPPOs (two) responded that the controls are not done by the same inspector in the case of seeds.

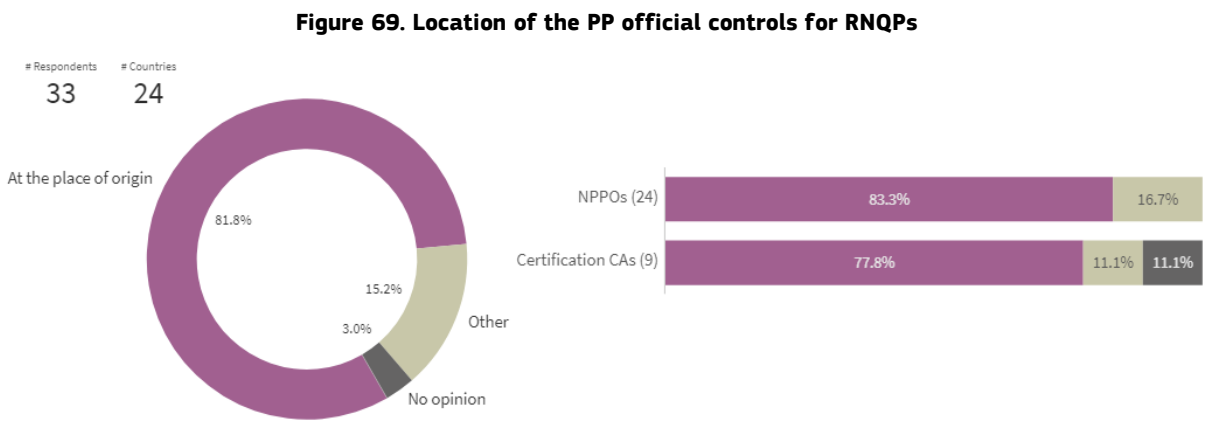


The reasons provided by some of the respondents when they responded 'No' are summarised in Box.14.

**Box 14** Reasons for justifying the **PP official controls for RNQP and QP** which are not done by the same inspector

- In the certification procedure of the seeds the control of RNQPs are partly carried out by the authority who is responsible for the certification system.
- It depends on the type of multiplication material. For example for seeds controls were carried out by the institution for seed certification

A vast majority (81.8%) of stakeholders responded that plant passport official controls are carried out at the place of origin, whereas 15.2% of respondents declared that official controls were carried out at another place. A minority of stakeholders (3%) did not express an opinion



The reasons provided by some of the respondents when they responded 'other places' are summarised in Box.15.

**Box 15.** Reasons for justifying the **location of the PP official controls** for RNQPs when they are not carried out at the place of origin

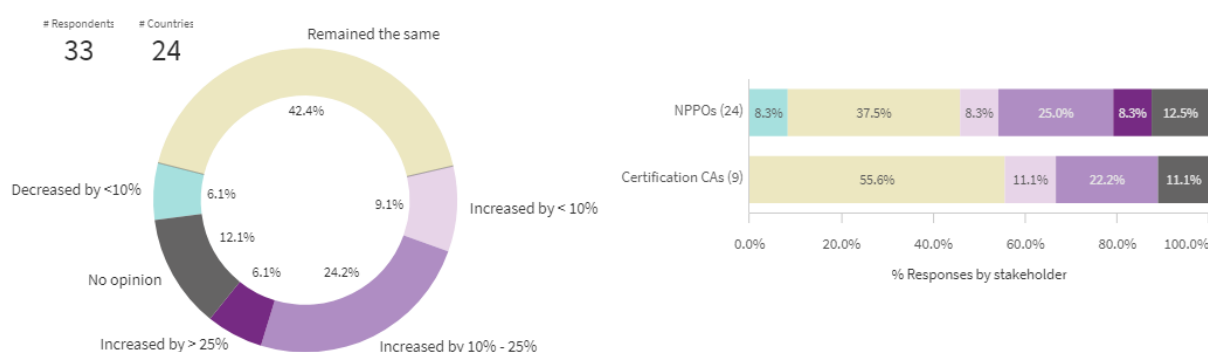
- At the place of origin but the place depends on who issues the plant passport.
- At the place of origin and other relevant places for operators
- In the case of seed, the plant passport is issued in laboratories
- At the premises of producers and resellers who issue the plant passport

### 2.8.3 Changes in the number of official controls related to plant passports for RNQPs

*How has the number of plant passport official controls for RNQPs changed since the entry into force of the new Plant Health Regulation (Regulation 2016/2031)? (Q62)*

Most NPPOs and certification CAs respondents considered that the number of official controls related to PP for RNQPs has either remained the same (42.4% (14)) or increased (39.4% (13)). Only two NPPOs considered that the number of controls has decreased and a remaining share of 12.1% of respondents (14) expressed no opinion.

**Figure 70. Changes in the number of official controls related to PP for RNQPs**



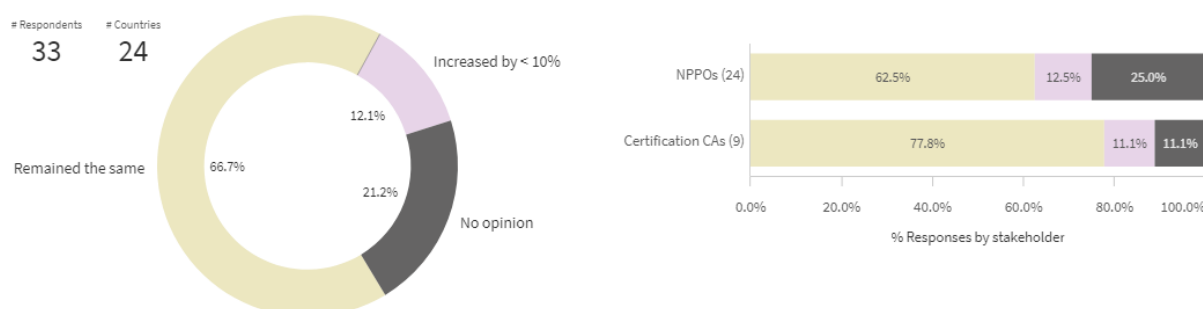
### 2.8.4 Changes in the number of instances of non-compliance related only to plant passport official controls for RNQPs and actions taken

*How has the number of non-compliances related only to RNQPs plant passport official controls changed since the entry into force of the new Plant Health Regulation (Regulation 2016/2031)? (Q63)*

*Which action do you take when a consignment from a Member State does not meet the RNQP requirements? (Q64)*

66.7% of NPPOs and certification CAs (22), responding to the questionnaire, agreed that the number of non-compliances related only to PP official controls for RNQPs have remained the same. Only three NPPOs and one certification CA considered that the number of non-compliances has increased by less than 10%. The remaining share of 21.2% of respondents (seven) expressed no opinion.

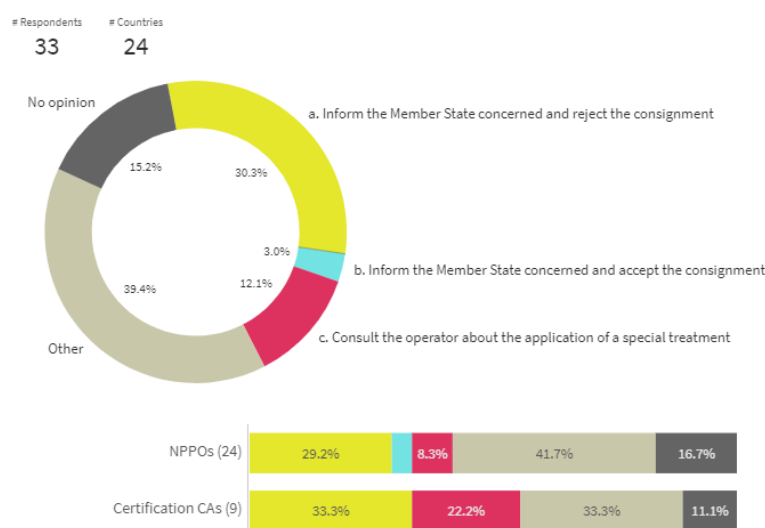
**Figure 71. Changes in the number of non-compliances related only to PP official controls for RNQPs**



About one third of responding NPPOs and certification CAs (30.3%) stated that they inform the Member State concerned and reject the consignment in case they find a consignment that does not meet the RNQP requirements. Only 3% of respondents informed the Member State concerned and accepted the consignment.

12.1% of respondents declared that they consult the operator about the application of a special treatment in case a consignment from another Member State does not meet the RNQP requirements. Over one third (39.4%) of respondents stated that they take other actions while 15.2% of respondents had no opinion.

**Figure 72. Actions taken when a consignment from MS does not meet the RNQP requirements**



The reasons comments provided by some of the respondents are summarised in Box.16.

**Box 16** Reasons for justifying the other **actions taken** in case a consignment from a Member State does not meet the RNQP requirements

- Not applicable, did not yet encounter a consignment not meeting the RNQP requirements (5 respondents). If such a consignment were to be found:
  - Would inform the Member State concerned and reject the consignment (1 respondent)
  - Placing on the market of the lot/consignment would be prohibited and the information about this event would be published on our website. The operator would be consulted about the application of a special treatment. (1 respondent)
  - The actions to be taken are not clear. EU guidelines are needed. (1 respondent)
  - A decision would be taken on a case by case basis, from possible rejection to appropriate treatment. (1 respondent)
  - Does not expect the situation to occur but would remove infested flower bulbs and inform the Member State concerned or reject the consignment if the infestation rate is too high (1 respondent)
- Five respondents stated that the actions to be taken depend on the case, of which 4 respondents specified the following:
  - Depending on the severity of the attack: inform the Member State concerned, accept the consignment if a special treatment is possible or reject the consignment if special treatment is not possible. (1 respondent)
  - The Member State would also be informed (1 respondent)
  - Did not yet discuss about standardised procedures because so far there has not been any need for it. (1 respondent)
  - Sometimes treatment, sometimes downgrading or rejection. In special cases the Member State of origin is consulted. (1 respondent)
- Inform the Member State concerned and consult the operator about the actions to be taken (2 respondents)
- In the case of agricultural seed crops all RNQPs are covered by purity analysis. When a consignment does not meet the standards it will be re-cleaned. Treatment will be carried out where possible. (1 respondent)
- There is no procedure in place to check whether a consignment meets the RNQP requirements because there are no official controls on plants for planting moved between Member States, (1 respondent)

**Conclusions regarding the changes related to Regulated Non-Quarantine Pests (RNQPs) and the new plant passport requirements**

Several stakeholders were of the opinion that the extension of the plant passport to include RNQPs was not necessary. Checks of the RNQP requirements are already included in the certification schemes of the marketing Directives. The EU official certification label guarantees the traceability of plants. In the case of certified seed of agricultural species all seed lots of certified seed have been field inspected and tested in the laboratory. As the requirements for plant passports have been checked at the place of origin and all seed lots have been

tested, it is very rare, that consignments from other Member States do not fulfil the plant passport requirements. The extension of the plant passport to include RNQPs has increased the administrative burden.

Overall, there was no consensus on whether the implementation of the rules regarding RNQPs within the newly extended PP system was efficient or not. The respondents that considered the implementation inefficient justified this by the fact that now there might be overlapping or certain lack of coherence between the Marketing Directives and the Plant Health Regulation.

No significant costs were incurred to carry out simultaneously the official controls related to PP for RNQPs and QPs, since the entry into force of the Regulation (EU) 2016/2031, as most respondents were already undertaking them simultaneously from before.

Most NPPOs and certification CAs respondents considered that the number of official controls related to PP for RNQPs has either remained the same or increased and the number of non-compliances related only to PP official controls for RNQPs has remained the same.

## 2.9 Other aspects

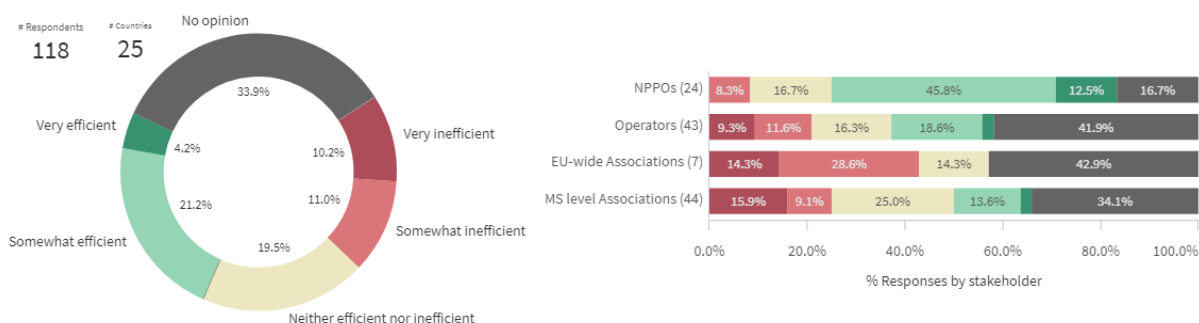
### 2.9.1 The implementation of the new rules on pre-export certificates (Art. 102)

*How do you rate the implementation of the new rules on pre-export certificates (Art. 102; Regulation 2016/2031)? (Q65)*

The implementation of the new rules on pre-export certificates (Art. 102) was rated as neither efficient nor inefficient by 19.5% of respondents (23). Another share of 46.6% of respondents (55) evenly rated the implementation as efficient (25.4%) or inefficient (21.2%), and the remaining share of respondents (33.9% (40)) expressed no opinion.

In particular, more than half of NPPOs considered the implementation rather efficient and three out of seven EU-wide associations considered rather inefficient.

**Figure 73. The implementation of the new rules on pre-export certificates (Art. 102)**



The reasons and proposals provided by some of the respondents when they responded 'somewhat inefficient' or 'very inefficient' are summarised in Box.17.

#### **Box 17. Reasons for justifying the inefficient implementation of the new rules on pre-export certificates**

- Different implementation timing across the Member State.
- Lack of harmonisation as not all Member States issue pre-export certificates.
- While the implementation needs to be improved, the pre-export certificates have nevertheless proven indispensable, in particular in relation to Brexit.

#### **PROPOSALS PROVIDED BY RESPONDENTS**

- Simplified format and procedures, harmonised and carried out electronically, in order to reduce costs and administrative burden for operators and for facilitating smooth logistics in trade.
- An official EU-wide database on the status of regulated pests in Member States in relation to non-EU country requirements.

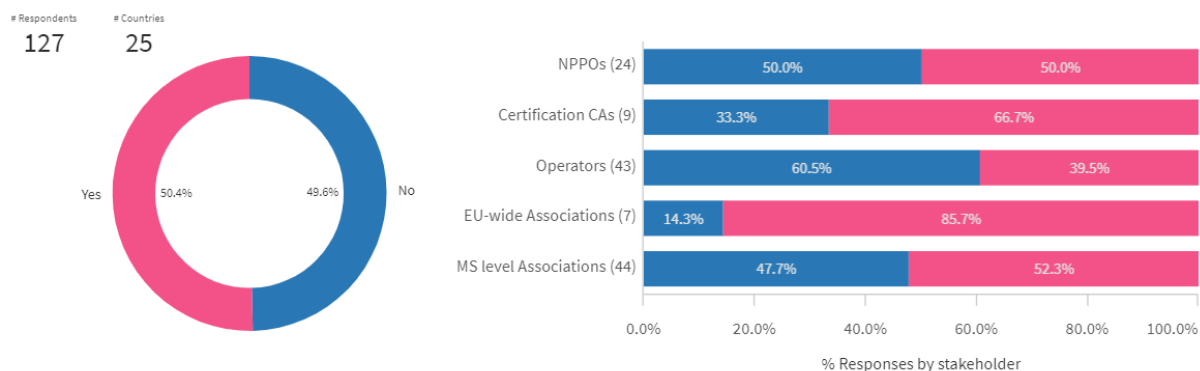


## 2.9.2 Other aspects raised by stakeholders under the section ‘additional comments’

*Do you have any additional comments or feedback you would like to provide? (Q67)*

50.4% of respondents provided additional comments to this questionnaire.

**Figure 74. Additional comments**



Only comments that are not already included under the analysis of specific questions will be mentioned below in Box 18.

### Box 18. Additional comments provided by stakeholders

#### Certification CAs

- Professional operators need some time (years) to adapt to the changes introduced by the new regulation and in the meantime the competent authorities will continue issuing PP for certified fruit plants.
- There is some concern that the increased controls of seeds will result in additional costs for seed producers, followed by higher costs for farmers. Only certified seed of agricultural species may be marketed (with few exceptions).
- Need for clarity to avoid unnecessary administrative burden regarding the need or not of PP for the movement of plants for planting between operator premises and service providers (e.g. washing or hot water treatment of plants or flower bulbs).

#### EU-wide Associations

- Difficulties replying to some questions when representing associations/organisations from different countries, as the situation differs from country to country.
- Additional guidance material should be developed by the EC to specifically assist operators working in smaller organisations. This is also to remedy the sometimes ineffective communication between gene bank managers and the national plant health authority.
- The new EU rules had a significant impact on the ornamental plants supply chain, with increased costs and administrative burden, combined with the effects of COVID. Need to have regular assessment of the implementation of the new rules after Dec 2021. As urgent adjustments, the following would be welcomed: 1) the possibility to ask for specific derogation or exemptions under Art. 88 to address complexities on a case-by-case basis and 2) non-binding guidelines developed by EU COM to facilitate uniform interpretation of the requirements by NPPOs across the EU and limit discrepancies between MSs at national and regional level.
- While the new system increased costs, phytosanitary protection has also gone up significantly. Overall, the changes have been beneficial, even though some operators still see them as increased costs and burden. Major improvements are still possible as regards movement to a digital plant passport and pre-export certificate. An official EU-wide database on the status of regulated pests in Member States in relation to non-EU country requirements is highly desirable, in order to reduce the need for pre-export certificates in cases where field data concerning nurseries are not necessary. Brexit has shown that upgrading pest status data and pest information and communication between MS is urgently needed. The evaluation has come too early.

#### MS-level Associations

- The current plant passport requirements hinder the conservation work and are not proportionate to the risks entailed by the local or regional activities. The increased obligations with regards to traceability push for the centralisation of production in the hands of the association itself, instead of conserving plant material in different

agro-ecological and climatic conditions. Furthermore, the Regulation creates further barriers for participatory plant breeding. For the aim of conserving plant genetic resources the national authorities should, upon request, after the submission of an action plan, issue an exemption from the plant passport requirement. Regionally organised sales for non-commercial use should be exempt from the plant passport requirement, even at a distance, e.g. through the introduction of the concept of the regional original or primary producers. Primary producers regionally sell small quantities of seeds from their own propagation for non-commercial use.

- The new plant passport system is manageable for producers with a few numbers of different varieties and which trade between EU Member States. For small producers, with a large number of different plants, which trade in a small radius it is very difficult and burdensome. The requirement to put the plant passports on plants, which are supplied directly to an end user through distance contracts (eCommerce) has positive and negative effects. Because of COVID-19 many producers, which sell the plants only direct to end users, started to offer distance contracts via phone and online shopping with delivery within a radius of more or less 50 km. For the spreading of pests there is no difference between online shopping and shopping in the garden centre/direct at the producer. There has to be a difference between the deliveries in the nearby region e.g. province and a long distance delivery.
- The new PP system is impractical for R&D materials, which are not placed on the market, to be sent with a plant passport, particularly in cases in which there are no regulated pests. The new format of the plant passport is not entirely harmonised; there are differences in interpretation between Member States on format and information provided. It can be very difficult to obtain an additional declaration on a pre-export certificate for re-export purposes.
- The new phytosanitary rules do not bring any advantage for intra EU-trade. The entire intra EU-trade is now more complicated. It does not have any positive impact on the trade between EU countries. Plant passport = unnecessary new rules copying current controls (double certification and evidence), chaotic legislation with 2-3 levels of identical processes.
- We are not in favour of the changes in plant production checks. Operators check plants at every growing operation, but also have an interest in selling plants, so a control check once a year to avoid the risk of spreading new or the most dangerous (quarantine) pest by official inspectorate should be maintained.
- The new labelling constraints are not at all suitable for the millions of small sachets of vegetable and floral seeds (of a few grams or even less than 1 g) intended for the amateur market. According to a panel of our members, the cost of the adaptations required to be able to affix the Phytosanitary Passports (re-labelling, new packaging, new printers, etc.) varying between EUR 10 000 and EUR 55000, equivalent between 0.5% and 5% of their turnover. Plant materials, which are not placed on the market, but used for research, selection, and for destructive analyses should be exempt from a plant passport.
- Difficulties arise above all for horticultural companies that are legally separated but that belong to the same natural person, since a plant passport is also required when trading between the two companies owned by this person.
- The new developments have not improved traceability to protect against new harmful pathogens. The new regulation is perceived as an impractical system, the image of the EU as the cause of bureaucracy is growing, which only creates work and does not perceive the producers with their high administrative workload.
- The following should be excluded from the plant passport obligations: a) Primary producers: i.e. those who produce seeds themselves and give them in small quantities directly to the users of seeds. b) Varieties conservationists and their associations and organisations. When diseases affect an accession, it can cause not only economic damage, but also lead to the irretrievable loss of a variety. Phytosanitary regulations must not curtail the right to seeds as formulated in UNDROP.
- We think that the legislation is well done, so the problems originate from the interpretation and application by the local authorities. We need guidelines, important also for the "Pest management plans" as Art. 91 requires.
- While this increased costs, phytosanitary protection has also gone up significantly. Overall, the changes have been beneficial, even though quite a few operators still see them as increased costs and burden.
- The pre export certificate is very necessary. So Brexit has proven. It should not be obligated that the document accompanies the shipment. It should be sufficient for it to be presented during the export inspection. The format and procedures however need to be simplified, harmonised and carried electronically. We would urgently welcome the EU making this a fully electronic process. A simple first step would be to allow the certificate to be transferred B2B electronically (as a pdf) and to generate a database where the competent authorities in the EU can verify the original certificate.
- We need:
  - tailor-made information on what symptoms to look for in all different crops;
  - scientifically based safety distances and other control measures for serious diseases;
  - a system of compensation for crops lost to serious diseases so growers lack incentive to hide disease symptoms by fungicides;

- a system for quarantine and seed disinfection for valuable breeding and propagation material from non-EU countries.

#### NPPOs

- We would appreciate it if each MS could decide whether the examination for plant passports should be carried out by authorised operators or by the NPPO; to harmonise a need for plant passports for consignments with direct sale to end consumers regardless of the way of transfer (direct vs. distant sale).
- We would support implementation of electronic plant passports using barcodes on plant packaging which would significantly simplify the entire process of issuing plant passports.
- On the whole we find the new rules regarding Plant Passports to be more robust as they have made traceability of plants for planting easier, thereby offering enhanced and rapid traceability of plants in the event of an outbreak. This offers the EU greater protection against EU Quarantine Pests establishing in its territory. If any changes were to be made to the plant passport system, we would suggest (1) extending the plant passport requirements for plants for planting to the end user and (2) the use of modern timber tracking systems for enhanced traceability and security purposes to provide viable solutions to overcome the difficulty of attaching a Plant Passport to the trade unit for coniferous logs.
- Most companies complain about the administrative burden and the plant passport is considered a useless piece of paper, especially in case of products ready for sale to end consumers. But also in case of movement of plants for research or breeding activities. There is a need to follow the marketing directives in this respect. If planting material is not yet marketed according to the definition of the marketing directives, the plant passport should also not be required.
- A need was recognised for developing a delegated act for exempting certain categories from registration (Art. 65.4). Especially contract growers, whereby the breeder company continues to be the owner of the start and end product, but a grower is hired to do the work. The products of these growers should also be exempted from the plant passport requirements, as stipulated in Art. 79.
- It is not possible to determine which RNQP control option has been complied with in case of several options.
- Based on which document can a plant passport for imported consignment not accompanied by a phytosanitary certificate be issued? For example, there is no requirement for a phytosanitary certificate for the imported consignment of wood of *Juglans* from countries where *G. morbida* is not present but on the other hand there is a requirement for movement of wood of *Juglans* within the EU.
- We request the Commission to make use of the empowerment in Art. 81.1 in PHR.

#### Operators

- The provision of the 0% threshold and the allowed occurrence within a very low limit give rise to different interpretations by the inspectors. To harmonise the rules in Annex IV C of Reg. (EU) 2016/2031 the 0% threshold should be replaced by the term "practically exempt" for all RNQPs because they are not Quarantine Pests.
- Fear of disengagement of the state in the future, with the risk that sanitary controls will only be carried out by producers. The cost of monitoring falls solely on the producers. Need to control the entire sector, not just the producers. Carry out more checks at points of sale, e.g. garden centres.
- There were different interpretations of the implementing regulations and thus many ambiguities and a different approach at both the state and federal level as well as correspondingly different demands/claims.
- In my opinion the plant passport requirements should end at the part of the supply chain that still has the skills to assess plant health. Selling to florists or other retail businesses should be equivalent to selling to an end user.
- I cannot identify a reliable tracking system in the plant passports I have received over the past 12 months. Many of my colleagues simply copy the botanical genus into Field A and the number of the delivery paper into Field C. How can you ensure traceability when there is no batch number? But how much more bureaucracy is needed to ensure correct batch numbers on every delivered plant/unit? We are not working with machinery that puts a "Best Before Date" on each product plus a batch/lot number... I suggest making plant passports applicable in nurseries with an output larger than 1(?) million plants per season.
- The plant passport should differ for very small and "normal"/large producers e.g. there could be fewer and easier to implement regulations for small producers and stricter regulations for large companies producing a large number of plants for sale.
- Plant passport has significantly increased the burden for the small package trade. The other points have improved.

— Also, we wanted to note that it would be advisable to conduct these kinds of questionnaires in different languages, so that small producers/gardeners etc also have access. Many do not speak English.

## 2.10 Citizens' awareness of the plant passport

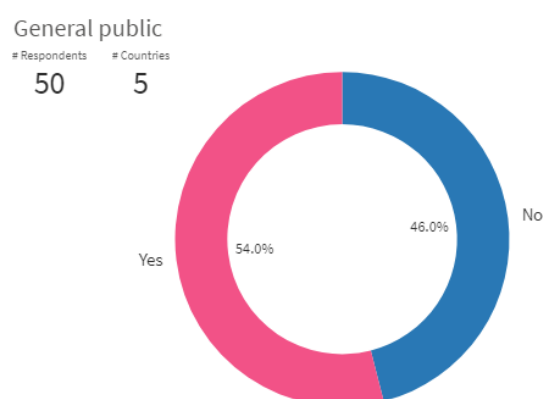
### 2.10.1 General awareness of plant passports

*EU rules on plant health contribute to sustainable agricultural and horticultural production as well as the protection of public and private green spaces, forests and the natural landscape. They also aim to ensure safe trade, as well as to mitigate the impacts of climate change on the health of our crops and forests. To do so, EU Member States, the European Parliament and the Commission, all came to an agreement that all plants for planting (e.g. fruits trees, ornamental plants, indoor pot plants, vegetable seedlings etc.) and certain plant products (e.g. wood) and other objects should be accompanied by so called 'plant passport'. Plant passport is an official label that attests to the compliance of the respective plant material with the applicable EU plant health requirement. Plant passport is required at the business-to-business level, when plant material is traded or otherwise moved between professional operators. It is also required to accompany plant material sold online (e.g. through different e-shops) or destined to so called Protected Zones in the Union (Art. 81 of Regulation (EU) 2019/2072).*

*As a citizen, did you know that a plant passport is required to accompany all plants for planting when traded between the producers and other professional operators in the EU? (Q68)*

More than half of the general public respondents (54% representing 27 individuals) were aware that PP is required for the movement of plants for planting at the business level, while 46% of respondents were not aware of this requirement.

**Figure 75. Citizens' knowledge about the PP requirement at business level**



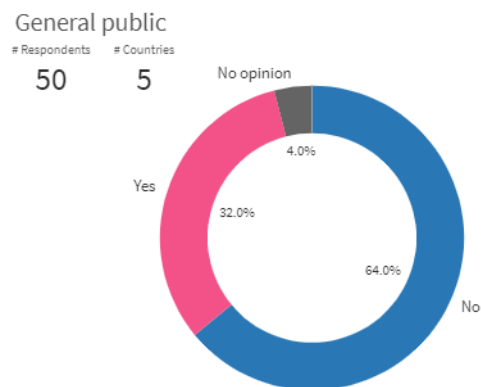
### 2.10.2 Awareness of plant passports to accompany plants sold online to an end user

*Did you know that, if you buy plants on-line, you should receive them accompanied by a plant passport? (Q69)*

*How do you rate the requirement, i.e. that plants sold on-line should be accompanied by a plant passport, in terms of contributing to an increased protection of the EU territory against the spread of plant quarantine pests? (Q70)*

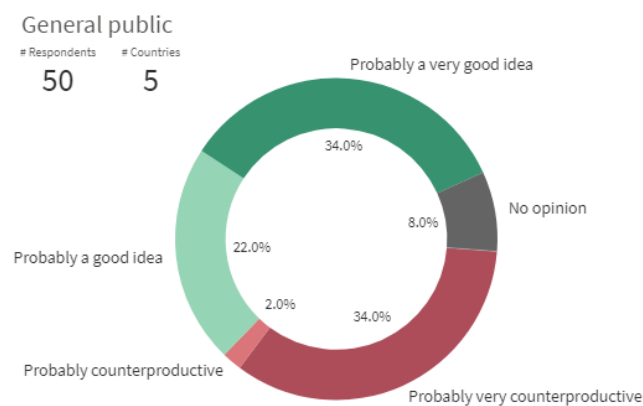
More than half general public respondents (28) rated the PP requirement for plants sold on-line, in terms of contributing to an increased EU protection against QPs, as probably a very good idea (34%) or as probably a good idea (22%). Another share of 34% of the general public respondents (17) rated this requirement as probably very counterproductive.

**Figure 76. Citizens' knowledge about the PP requirement for plants bought online**



More than half of respondents (56%) considered that the requirement that the plants sold online have to be accompanied by a PP increased the protection of the EU territory against the spread of plant quarantine pest, while 36% of respondents considered this requirement to be counterproductive or very counterproductive.

**Figure 77. The PP requirement for plants sold on-line in terms of contributing to an increased protection of the EU territory against the spread of plant quarantine pests**



### Conclusions regarding citizens' awareness of the plant passport

More than half general public respondents were not aware (64%) of the requirement that when buying plants on-line, they should receive them accompanied by a plant passport, and rated (56%) the PP requirement for plants sold on-line, in terms of contributing to an increased EU protection against QPs, as probably a good or a very good idea.

### **3 Conclusions**

#### ***The new plant passport requirements***

The transition to the new PP rules (i.e. their practical application) has been challenging and required a big effort for all stakeholders. It was more demanding for small operators. In particular, the attachment of the PP to the trade unit (Art. 88) and the extension of the PP to all plants for planting (Art. 79), in the sector of ornamental plants in particular, were the two requirements considered more burdensome.

Similarly to transition, the implementation of the new PP rules was considered challenging mainly due to the attachment of the PP requirement issues - e.g., unclear definition of trade unit or difficulties in attaching the PP to the trade units (Art. 88), the extension of the PP to all plants for planting (Art. 79) and the examination requirements for PP (Art. 87). Increased risks to lower safety were associated with assigning inspection/examination obligation to operators. Administrative burden and a need for intensive communication to inform operators were also considered to be increased for all stakeholders due to the transition and implementation of the new PP rules.

The overall complexity of the process of issuing or replacing a PP was, likewise the PP transition and implementation, considered more difficult by more than half of respondents. Especially complicated, were considered again, the attachment of the PP to the trade unit (Art. 88) and the extension of the PP to all plants for planting (Art. 79).

Issuing or replacing a PP faces a series of difficulties that can be grouped into three categories. First, some specific types of plants or plant material do not facilitate the physical attachment of a PP (e.g. stand-alone logs, turf in rolls, consignments with multiple small lots, lots with multiple species or multiple species in a single pot). Second, some type of operators carry out activities which by their nature combine multiple plants or plants that need and do not need a PP (e.g. research activities, gene banks, distance sales and material early in the chain not ready for final users). Last, some requirements seem not adequate/proportionate (e.g. use of multiple botanical names on a single PP, problems with a colour of a combined label/PP, etc.). Concerns were expressed by some respondents regarding the proportionality and justification of the PP requirement which doesn't distinguish the level of risk associated with specific types of plants.

In terms of usefulness and protection against plant pests, NPPOs and EU-wide associations perceived the requirement to attach the PP more favourably and operators and MS-level associations perceived it more negatively. The requirement of PP harmonised format (Art. 83), on the other hand, was more positively perceived by all stakeholders (especially NPPOs and operators), in terms of transition, implementation or issuing/replacing a PP as easier and simplified.

In order to overcome these difficulties enhanced outreach, training, awareness activities and longer transitional periods would be most welcome. These activities should take into account specificities of small producers (e.g. those with advanced age). Also the content of these activities should focus on a set of issues which are mentioned as unclear in the feedback received from stakeholders. These include coherence between PP requirement and marketing directives, conditions for self-checking by operators and information of RNQP which are new to operators.

In particular, stakeholders are quite explicit regarding the need to consider the electronic PP as a facilitating tool and the possibility to attach the PP not physically to the plant itself but as part of the commercial documents. The possibility to exempt or adapt the PP for some goods that by their nature are not suited for physical attachment of the PP should also be considered.

Overall, the most positive impacts, perceived by stakeholders, due to the changes to plant passports under Art. 79, 83, 87, 88 and 93 were increased visibility/awareness or knowledge of the plant health system and the guarantees on plant health status. The most negative impacts were an increased administrative burden (e.g., software, printers, more labels) and increased workload/costs (traceability demands, strict labelling of each trade unit).

#### ***Extension of the plant passport requirement to all plants for planting***

The extension of the PP requirement to all plants for planting (Art. 79) was not rated very positively in terms of transition, implementation or issuing/replacing a PP. However, it seems to have a very positive impact in terms of traceability, protection effectiveness and preparedness against new plant pest for the EU, as well as essential to improve the understanding and awareness of relevant stakeholders on the plant health importance.

### ***Issuance of the plant passport***

The authorised operators were reported responsible to issue the PP in most EU Member States (12). To a lesser extent the PPs are being issued by the CAs (six), by either (three) or depending on the commodity (three). In general, there is more than 70% of respondents that considered that it is not necessary that the CA issue PP for certain commodities.

The introduction of an electronic PP was considered feasible and applicable by more than half of respondents. In particular, 61.5% of respondents responded that an electronic PP would be feasible and 72.8% of respondents responded that an electronic PP would be useful.

Limited information was provided by respondents on the fees related to PP. For the registration of professional operators, 34% (40) of respondents agreed that the fee usually is paid one-time, and to a lesser extent annually (13.6% of respondents). For the authorisation of professional operators, fee seems to be charged either one-time or annually (15.3% and 13.6% of respondents respectively).

For the fee to carry out the official controls at the operator's premises on the PP compliance (Art. 92), there was not consensus across NPPOs on the same basis for calculating this fee (e.g., per area, per time, annually, per number of plants or type of sector, etc.). However most NPPOs agreed that the level of the fee does not depend on the number of PPs, neither takes into account whether the operator has a pest risk management plan.

Seven NPPOs (out of 24 responding) declared to charge fees for the authorisation of operators to issue the PP, and from them, four declared to fully cover the costs incurred in providing the service with the fees. To carry out the official controls at the operator's premises subject to the PP compliance, 13 NPPOs confirmed to charge fees, from them six declared to fully cover the costs incurred in providing the service with the fees.

Values provided for the fees to authorise operators, in EUR per operator authorised, were very different across EU Member States, from EUR 25 to EUR 300.

Large differences were also found on the cost of fees to carry out the official controls at the operator's premises across the different NPPOs, from EUR 15 to 250 per inspection or from EUR 17.5 to 300 per hour.

Overall, large discrepancy was found across all fee values provided by stakeholder, even for the same single country. Fees depends on many factors, such as i) time, area/turnover, ii) MS or even region, iii) the size of operator; iv) the labour, driving distance of an inspector or working tools; and v) the type and quantity of plant material.

Of the 23 NPPOs that responded to the question whether all the professional operators in their country were registered following the provisions of Article 65 of Regulation (EU) 2016/2031, more than half (56.5%) (13) of NPPOs responded in the affirmative. Those NPPOs that responded that not all their operators are registered have explained that the process is still ongoing, due to different reasons.

According to data provided by 16 NPPOs, since 2019 the total number of registered operators have increased by 17.1%. The seed sector and the sector of forestry plants for planting had a very significant increase from 2019 to 2020 in the number of registered operators, comparing with other sectors.

In addition, the total number of professional operators authorised to issue the PP have more than doubled between 2019 and 2020. In this case, most sectors have significantly increased the number of authorised operators. In particular, the seed sector and the plants for planting sectors of fruit and field crops had the highest percentage increases in the number of authorised operators.

According to operators responding to the questionnaire, more than half (25) were already issuing PP before 14 December 2019 - when the new requirements of Regulation (EU) 2016/2031 were implemented. In fact, 63% (27) of operators declared to have been issuing PP since more than five years.

Large differences across EU Member States were also reported, by EU-wide and MS-level associations, on the percentage of their members that were operators issuing the PP before 14 December 2019.

The requirement that a PP has to accompany plants and plant products until the final user when they are received by means of sales through distance contracts was considered as appropriate by 49.4% of respondents, burdensome by 29.7% and unnecessary by 12.5%. The requirement that a PP has to accompany plants until the final user when a PP for protected zones is required was considered appropriate by 57.1% of respondents, burdensome by 20.9% and unnecessary by 10.7%.

The enforcement of the provisions of PP to final users receiving plants, plant products or other objects by means of sales through distance contracts was considered by the respondents almost equally appropriate (29.9%) and inappropriate (29.1%). In their reply to the question on the clarity of the provisions of PP to final users receiving plants, plant products or other objects by means of sales through distance contracts, half (12) of the responding NPPOs considered the clarity insufficient, while 37.5% (9) of NPPOs considered the clarity of this requirement to be sufficient.

The opinion on the need for a more harmonised approach for the use of plant passports in relation to sales through distance contracts to final users was evenly distributed between necessary (39%) and unnecessary (34.8%).

### ***Compliance and administrative costs related to the new plant passport requirements***

According to the questionnaire results, compliance and administrative costs related to the new PP requirements have raised as a result of certain increases in the staff involved with administrative procedures, and especially from an increased administrative workload for most respondents.

Higher impact on compliance and administrative costs, in terms of staff and workload, was highlighted for the extension of the PP to all plants for planting (Art. 79), the PP requirements on registered and authorised operators (Art. 66, 69, 87, 89 and 90) and the attachment of the PP to the trade unit (Art. 88).

Low or no impact on compliance and administrative costs, in terms of staff and workload, was associated to the exception for direct supply to final users (Art. 81(1)(a)) and the PP harmonised format (Art. 83).

Overall, impacts on the staff involved with administrative procedures and on the administrative workload were lower for NPPOs and operators than for EU-wide and MS-level associations.

The access to technical guidance to professional operators on the examinations for PP issuance, as required in Regulation 2016/2031 (Art. 89) and Regulation 2019/827, has already been provided by 10 NPPOs mostly on their official website. Most work to provide technical guidelines is still under development and being further improved. NPPOs that have not yet provided access to technical guidance pledge to provide it in a maximum period of 12 months. In general, professional operators and associations (EU-wide and MS-level) with the access to the technical guidance mostly rated the quality of this guidance as good or average, and to a lesser extent as very good.

Other compliance and administrative costs are those associated with the trainings for obtaining new skills and acquiring knowledge on the new PP requirements. Either having organised, or participated in, trainings were acknowledged by a large share of respondents (67.8%). The majority of NPPOs and MS-level associations and over half of the operators confirmed that they have organised or participated in trainings related to the new PP requirements. In average, training costs were reported to be about EUR 65 per hour, and the spent time from minimum 4 hours to maximum 500 hours.

Costs associated with the changes or improvements of the operational processes for administrative procedures (e.g. IT systems, labelling, packaging, etc.) related to the new PP were reported by more than half of the operators and associations and by less than 30% of NPPOs.

Cost estimates provided by the NPPOs reflected that they had higher costs than other stakeholders and very diverse across countries, and that in general IT systems related costs were higher than those for other operational processes. Costs of changes or improvements of IT systems were provided from EUR 15 to EUR 1.5 million, and for other operational processes from EUR 3.5 to EUR 60 000.

Costs estimates of IT systems changes or improvements provided by professional operators and MS-level associations were very similar. In average costs for IT systems were around EUR 3 300 and costs for other operational processes, in average, from EUR 6 000 to EUR 13 000.

### ***Changes of phytosanitary control measures related to the extension of plant passport requirement to all plants for planting***

Most associations and operators agreed that the staff involved in the examinations at the operators' premises have either increased or remained the same since the PP extension to all plants for planting. Likewise, most NPPOs considered that their staff involved in the official controls, to verify that the professional operators comply with the PP criteria, has either increased or remained the same. Besides, approximately half of



respondents declared an increased number of the official controls and the number of examinations, related to the new PP requirements.

Certain increases of the staff involved in the official controls and the examinations at the operators' premises related to the new PP requirements have probably resulted in higher costs for all stakeholders. However, a clear benefit, highlighted by almost half of the NPPOs, was the increased possibility to identify plant quarantine pests at the premises of operators. The majority of operators (48.8%) use their internal/own expertise to ensure the detection of plant quarantine pests in their premises.

More than a half of the NPPOs and MS-level associations and a third of operators confirmed that they have organised or participated in training for obtaining new skills and acquiring knowledge on the applicable rules relevant to the examinations/official controls, since the PP extension to all plants for planting. The average estimate of this training cost, as provided by several respondents, was about EUR 49 per hour. Trainings relevant to the examinations/official controls rules required time from minimum 4 hours to maximum 500 hours.

Overall, only few respondents confirmed changes or improvements of the facilities/infrastructures to perform the official controls related to the new PP requirements. Less than half associations (EU-wide and MS-level), four NPPOs and seven operators, responding to this questionnaire, confirmed changes.

Changes of facilities/infrastructures to perform the official controls as listed by the four NPPOs included: IT system improvements or changes to check systems of operators; ii) buildings for staff, laptops, smartphones, vehicles; and iii) complete reorganisation of national legislation.

Main improvements that needed to be undertaken by operators and associations included (in decreasing order of frequency of mentions by stakeholders): IT systems, labelling equipment (printers for the PP) and some changes in the physical infrastructure of the companies (e.g. more automation or change in the logistics).

Cost estimates of changes related to facilities/infrastructures to perform the official controls due to new PP requirements provided by operators averaged about EUR 2 400 excluding one extreme value of EUR 35 000. Cost estimates provided by MS associations were very diverse, varying from EUR 1 000 to EUR 2 million.

### ***Trade changes due to the extension of the plant passport requirement to all plants for planting and the attachment of the PP to the trade unit***

According to the questionnaire results, it seems that a majority of respondents agreed that the three most relevant groups of plants that have been somewhat affected by the extension of the PP requirement to all plants for planting were ornamental plants for planting, seeds and fruit plants for planting. In terms of the number of responses they were higher rated to have the most technical difficulties.

There were no significant changes in the volume of production nor in the volume of intra EU-trade of the plants for planting that since 14 December 2019 require a PP. Slightly higher changes were considered in the market price of these plants, but there is no consensus among stakeholders on the direction of the market price changes (increases or decreases).

Similar to the extension of the PP requirement to all plants for planting, there were not significant changes in trade related to the attachment of the PP to the trade unit. The received replies also suggest that the changes in the overall functioning of trade transactions and in the market price were higher than the changes in the volume of production and in the volume of intra-EU trade.

Less than half of respondents – including operators and associations (EU-wide and MS-level) – incurred extra costs for producing or selling regulated plant materials due to the PP extension requirement to all plants for planting and the attachment of the PP to the trade unit. The group of plants considered to have more extra incurred costs were ornamental plants and seeds. The extra incurred costs provided by the stakeholders relates mostly to new tests, labelling and new systems to print the PP or logistics and administrative costs. Attaching the PP to each single unit was considered a significant cost in terms of the administrative burden.

Overall, the extension of the PP requirements to all plants for planting has not led to a significant change in the business model.

### ***Changes in trade transactions due to the extension of the plant passport requirement to all plants for planting and the attachment of the PP to the trade unit***

No great changes related to the additional plants for planting that now require a PP were perceived by respondents on the overall functioning of trade transactions, the capacity to make long-term investment or strategic decisions, and on the playing field level for all the actors involved.

The attachment of the PP to the trade unit was considered the new requirement to make more difficult the trade transactions by most respondents, mainly for manual labelling or for small organisations that are not automated. This resulting in no level playing field.

The ornamental plants for planting were considered the commodities for which the new PP requirements, particularly attachment of the PP to the trade unit, has made more difficult to carry out trade transactions.

### ***Changes related to Regulated Non-Quarantine Pests (RNQPs) and the new plant passport requirements***

Several stakeholders were of the opinion that the extension of the plant passport to include RNQPs was not necessary. Checks of the RNQP requirements are already included in the certification schemes of the marketing Directives. The EU official certification label guarantees the traceability of plants. In the case of certified seed of agricultural species all seed lots of certified seed have been field inspected and tested in the laboratory. As the requirements for plant passports have been checked at the place of origin and all seed lots have been tested, it is very rare, that consignments from other Member States do not fulfil the plant passport requirements. The extension of the plant passport to include RNQPs has increased the administrative burden.

Overall, there was no consensus on whether the implementation of the rules regarding RNQPs within the newly extended PP system was efficient or not. The respondents that considered the implementation inefficient justified this by the fact that now there might be overlapping or certain lack of coherence between the Marketing Directives and the Plant Health Regulation.

No significant costs were incurred to carry out simultaneously the official controls related to PP for RNQPs and QPs, since the entry into force of the Regulation (EU) 2016/2031, as most respondents were already undertaking them simultaneously from before.

Most NPPOs and certifications CAs respondents considered that the number of official controls related to PP for RNQPs has either remained the same or increased and the number of non-compliances related only to PP official controls for RNQPs has remained the same.

### ***Other aspects***

Overall, there was not a consensus on whether the implementation of the new rules on pre-export certificates (Art. 102) was efficient or not. The respondents that considered the implementation inefficient justified this by the fact that there is a lack of harmonisation as not all Member States issue pre-export certificates or they do not implemented the new rules at the same time.

### ***Citizens' awareness of plant passports***

More than half general public respondents were not aware (64%) of the requirement that when buying plants on-line, they should receive them accompanied by a plant passport, and rated (56%) the PP requirement for plants sold on-line, in terms of contributing to an increased EU protection against QPs, as probably a good or a very good idea.

## References

Commission Delegated Regulation (EU) 2019/827 of 13 March 2019 on criteria to be fulfilled by the professional operators in order to comply with the conditions set out in Article 89(1) point (a) of Regulation (EU) 2016/2031 of the European Parliament and of the Council and procedures to ensure that those criteria are met.

Commission Implementing Regulation (EU) 2019/2072 of 28 November 2019 establishing uniform conditions for the implementation of Regulation (EU) 2016/2031 of the European Parliament and the Council, as regards protective measures against pests of plants, and repealing Commission Regulation (EC) No 690/2008 and amending Commission Implementing Regulation (EU) 2018/2019.

Regulation (EU) 2016/2031 of the European Parliament of the Council of 26 October 2016 on protective measures against pests of plants, amending Regulations (EU) No 228/2013, (EU) No 652/2014 and (EU) No 1143/2014 of the European Parliament and of the Council and repealing Council Directives 69/464/EEC, 74/647/EEC, 93/85/EEC, 98/57/EC, 2000/29/EC, 2006/91/EC and 2007/33/EC.

Commission Implementing Regulation (EU) 2020/466 of 30 March 2020 on temporary measures to contain risks to human, animal and plant health and animal welfare during certain serious disruptions of Member States' control systems due to coronavirus disease (COVID-19).

## **List of abbreviations and definitions**

B2B	Businesses to businesses
BCP	Border control point
CA	Competent Authority
DG SANTE	Directorate General for Health and Food Safety of the European Commission
EU	European Union
JRC	Joint Research Centre
MS	Member State
NPPO	National Plant Protection Organization
OCR	Official Controls Regulation
PHR	Plant Health Regulation
PP(s)	Plant passport(s)
QPs	Quarantine Pests
RNQPs	Regulated Non-Quarantine Pests
SMEs	Small and medium enterprises
TRACES	Trade Control and Expert System

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## Annexes

### Annex 1. Plant Passport (PP) questionnaire template

	Question					Target group					
	Plant passport requirements and extension										
1.	How do you rate <b>the transition to the new rules</b> (i.e. their practical application; <a href="#">Regulation 2016/2031</a> ) with regards to : <table><tr><td><i>The extension of use of plant passports for intra-EU movement to all plant for planting (Art 79)</i><ul style="list-style-type: none"><li>• Effortless</li><li>• Easy</li><li>• Manageable</li><li>• Somewhat burdensome</li><li>• Very burdensome</li><li>• No opinion</li></ul></td><td><i>The harmonised format of plant passports (Art 83)</i><ul style="list-style-type: none"><li>• Effortless</li><li>• Easy</li><li>• Manageable</li><li>• Somewhat burdensome</li><li>• Very burdensome</li><li>• No opinion</li></ul></td><td><i>The requirements to attach the plant passports to the trade unit (Art 88)</i><ul style="list-style-type: none"><li>• Effortless</li><li>• Easy</li><li>• Manageable</li><li>• Somewhat burdensome</li><li>• Very burdensome</li><li>• No opinion</li></ul></td><td><i>The requirements for ensuring traceability (Art 69)</i><ul style="list-style-type: none"><li>• Effortless</li><li>• Easy</li><li>• Manageable</li><li>• Somewhat burdensome</li><li>• Very burdensome</li><li>• No opinion</li></ul></td><td><i>The requirements for the examination for plant passports (Art 87)</i><ul style="list-style-type: none"><li>• Effortless</li><li>• Easy</li><li>• Manageable</li><li>• Somewhat burdensome</li><li>• Very burdensome</li><li>• No opinion</li></ul></td></tr></table> <i>If the response is 'Very burdensome' or 'somewhat burdensome', please explain why, and also provide any proposals for modification [FREE TEXT]</i>					<i>The extension of use of plant passports for intra-EU movement to all plant for planting (Art 79)</i> <ul style="list-style-type: none"><li>• Effortless</li><li>• Easy</li><li>• Manageable</li><li>• Somewhat burdensome</li><li>• Very burdensome</li><li>• No opinion</li></ul>	<i>The harmonised format of plant passports (Art 83)</i> <ul style="list-style-type: none"><li>• Effortless</li><li>• Easy</li><li>• Manageable</li><li>• Somewhat burdensome</li><li>• Very burdensome</li><li>• No opinion</li></ul>	<i>The requirements to attach the plant passports to the trade unit (Art 88)</i> <ul style="list-style-type: none"><li>• Effortless</li><li>• Easy</li><li>• Manageable</li><li>• Somewhat burdensome</li><li>• Very burdensome</li><li>• No opinion</li></ul>	<i>The requirements for ensuring traceability (Art 69)</i> <ul style="list-style-type: none"><li>• Effortless</li><li>• Easy</li><li>• Manageable</li><li>• Somewhat burdensome</li><li>• Very burdensome</li><li>• No opinion</li></ul>	<i>The requirements for the examination for plant passports (Art 87)</i> <ul style="list-style-type: none"><li>• Effortless</li><li>• Easy</li><li>• Manageable</li><li>• Somewhat burdensome</li><li>• Very burdensome</li><li>• No opinion</li></ul>	<ul style="list-style-type: none"><li>▪ EU NPPOs</li><li>▪ EU Operators</li><li>▪ EU Professional associations</li><li>▪ MS Professional associations</li></ul>
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2.	How do you rate <b>the implementation of the new rules</b> (i.e. their official enforcement; <a href="#">Regulation 2016/2031</a> ) on: <table><tr><td><i>The extension of use of plant passports for intra-EU movement to all plant for planting (Art 79)</i><ul style="list-style-type: none"><li>• Much more complicated</li><li>• Somewhat more complicated</li><li>• Not changes</li><li>• Somewhat simplified</li><li>• Very simplified</li><li>• No opinion</li></ul></td><td><i>The harmonised format of plant passports (Art 83)</i><ul style="list-style-type: none"><li>• Much more complicated</li><li>• Somewhat more complicated</li><li>• Not changes</li><li>• Somewhat simplified</li><li>• Very simplified</li><li>• No opinion</li></ul></td><td><i>The requirements to attach the plant passports to the trade unit (Art 88)</i><ul style="list-style-type: none"><li>• Much more complicated</li><li>• Somewhat more complicated</li><li>• Not changes</li><li>• Somewhat simplified</li><li>• Very simplified</li><li>• No opinion</li></ul></td><td><i>The requirements for ensuring traceability (Art 69)</i><ul style="list-style-type: none"><li>• Much more complicated</li><li>• Somewhat more complicated</li><li>• Not changes</li><li>• Somewhat simplified</li><li>• Very simplified</li><li>• No opinion</li></ul></td><td><i>The requirements for the examination for plant passports (Art 87)</i><ul style="list-style-type: none"><li>• Much more complicated</li><li>• Somewhat more complicated</li><li>• Not changes</li><li>• Somewhat simplified</li><li>• Very simplified</li><li>• No opinion</li></ul></td></tr></table> <i>If the response is 'much more complicated' or 'somewhat more complicated', please explain why [FREE TEXT]</i>					<i>The extension of use of plant passports for intra-EU movement to all plant for planting (Art 79)</i> <ul style="list-style-type: none"><li>• Much more complicated</li><li>• Somewhat more complicated</li><li>• Not changes</li><li>• Somewhat simplified</li><li>• Very simplified</li><li>• No opinion</li></ul>	<i>The harmonised format of plant passports (Art 83)</i> <ul style="list-style-type: none"><li>• Much more complicated</li><li>• Somewhat more complicated</li><li>• Not changes</li><li>• Somewhat simplified</li><li>• Very simplified</li><li>• No opinion</li></ul>	<i>The requirements to attach the plant passports to the trade unit (Art 88)</i> <ul style="list-style-type: none"><li>• Much more complicated</li><li>• Somewhat more complicated</li><li>• Not changes</li><li>• Somewhat simplified</li><li>• Very simplified</li><li>• No opinion</li></ul>	<i>The requirements for ensuring traceability (Art 69)</i> <ul style="list-style-type: none"><li>• Much more complicated</li><li>• Somewhat more complicated</li><li>• Not changes</li><li>• Somewhat simplified</li><li>• Very simplified</li><li>• No opinion</li></ul>	<i>The requirements for the examination for plant passports (Art 87)</i> <ul style="list-style-type: none"><li>• Much more complicated</li><li>• Somewhat more complicated</li><li>• Not changes</li><li>• Somewhat simplified</li><li>• Very simplified</li><li>• No opinion</li></ul>	<ul style="list-style-type: none"><li>▪ EU NPPOs</li><li>▪ EU Operators</li><li>▪ EU Professional associations</li><li>▪ MS Professional associations</li></ul>
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3.	<p>The plant passports, according to Art 88 (<a href="#">Regulation 2016/2031</a>), are required <b>to be attached to the trade unit of plants, plant products or other objects</b>. In your view –</p> <ul style="list-style-type: none"> <li>- has this requirement proven to be useful? <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> <li>• No opinion</li> </ul> </li> </ul> <p><i>If not, please explain why and suggest an alternative solution: [FREE TEXT]</i></p> <ul style="list-style-type: none"> <li>- does this requirement contribute to an increased prevention of spreading plant quarantine pests? <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> <li>• No opinion</li> </ul> </li> </ul> <p><i>If not, please explain why: [FREE TEXT]</i></p>	<ul style="list-style-type: none"> <li>▪ EU NPPOs</li> <li>▪ EU Operators</li> <li>▪ EU Professional associations</li> <li>▪ MS Professional associations</li> </ul>
4.	<p>Please choose from the [dropdown] list below the <b>2 aspects</b> in which you have experienced <b>the most significant positive impact due to the changes on the plant passports under articles Art 79, 83, 87 , 88 &amp; 93</b> (<a href="#">Regulation 2016/2031</a>):</p> <ul style="list-style-type: none"> <li>• Area #1 [choose from dropdown list]</li> <li>• Area #2 [choose from dropdown list]</li> </ul> <p><i>List of aspects [to be included as dropdown list]</i></p> <ul style="list-style-type: none"> <li>— Increased traceability of the commodities</li> <li>— Increased effectiveness of the plant health protection against pests</li> <li>— Increased preparedness for the identification of new plant pests</li> <li>— Increased protection of the EU territory against pests</li> <li>— Increased visibility/awareness of the plant health system and of the guarantees on the plant health status of plants for planting</li> <li>— Increased training about plant health with support from national plant health competent authorities</li> <li>— Increased knowledge about plant health</li> <li>— Others</li> </ul> <p><i>If others, please specify which ones [FREE TEXT]</i></p>	<ul style="list-style-type: none"> <li>▪ EU NPPOs</li> <li>▪ EU Operators</li> <li>▪ EU Professional associations</li> <li>▪ MS Professional associations</li> </ul>
5.	<p>Please choose from the [dropdown] list below the <b>2 aspects</b> in which you have experienced <b>the most significant negative impact due to the changes on the plant passports under articles Art 79, 83, 87 , 88 &amp; 93</b> (<a href="#">Regulation 2016/2031</a>):</p> <ul style="list-style-type: none"> <li>• Area #1 [choose from dropdown list]</li> <li>• Area #2 [choose from dropdown list]</li> </ul> <p><i>List of aspects [to be included as dropdown list]</i></p> <ul style="list-style-type: none"> <li>— Increased administrative burden</li> <li>— Increased workload</li> </ul>	<ul style="list-style-type: none"> <li>▪ EU NPPOs</li> <li>▪ EU Operators</li> <li>▪ EU Professional associations</li> <li>▪ MS Professional associations</li> </ul>

	<ul style="list-style-type: none"> <li>— Increased costs</li> <li>— Increased needs for training of the staff</li> <li>— Shift of business model to sell to final users to avoid the plant passport requirements</li> <li>— Others</li> </ul> <p><i>If others, please specify which ones [FREE TEXT]</i></p>	
6.	<p>Regarding the <b>traceability of the plants</b> that now newly require a plant passport under the extended plant passport regime, do you consider it has:</p> <ul style="list-style-type: none"> <li>• Increased significantly</li> <li>• Somewhat increased</li> <li>• Remained the same</li> <li>• Somewhat decreased</li> <li>• Decreased significantly</li> <li>• No opinion</li> </ul> <p><i>If 'somewhat decreased' or 'decreased significantly', please explain why [FREE TEXT]</i></p>	<ul style="list-style-type: none"> <li>▪ EU NPPOs</li> <li>▪ EU Operators</li> <li>▪ EU Professional associations</li> <li>▪ MS Professional associations</li> </ul>
7.	<p>How do you rate the change in <b>effectiveness of the plant health security in terms of protection against plant quarantine pests</b> since the plant passport has been extended to all plants for planting?</p> <ul style="list-style-type: none"> <li>• Increased significantly</li> <li>• Somewhat increased</li> <li>• Remained the same</li> <li>• Somewhat decreased</li> <li>• Decreased significantly</li> <li>• No opinion</li> </ul> <p><i>If 'somewhat decreased' or 'decreased significantly', please explain why [FREE TEXT]</i></p>	<ul style="list-style-type: none"> <li>▪ EU NPPOs</li> <li>▪ EU Operators</li> <li>▪ EU Professional associations</li> <li>▪ MS Professional associations</li> </ul>
8.	<p>Regarding the <b>preparedness for the identification of new plant pests</b> of concern for the Union territory, since the plant passport has been extended to all plants for planting, do you consider it has:</p> <ul style="list-style-type: none"> <li>• Improved significantly</li> <li>• Somewhat improved</li> <li>• Remained the same</li> <li>• Somewhat worsened</li> <li>• Worsened significantly</li> <li>• No opinion</li> </ul> <p><i>If 'somewhat worsened' or 'worsened significantly', please explain why [FREE TEXT]</i></p>	<ul style="list-style-type: none"> <li>▪ EU NPPOs</li> <li>▪ EU Operators</li> <li>▪ EU Professional associations</li> <li>▪ MS Professional associations</li> </ul>
9.	<p>Regarding the <b>understanding and awareness of relevant stakeholders on the importance of plant health</b>, since the plant passport has been extended to all plants for planting, do you consider it has:</p>	<ul style="list-style-type: none"> <li>▪ EU NPPOs</li> <li>▪ EU Operators</li> </ul>

	<ul style="list-style-type: none"><li>• Improved significantly</li><li>• Somewhat improved</li><li>• Remained the same</li><li>• Somewhat worsened</li><li>• Worsened significantly</li><li>• No opinion</li></ul> <p><i>If 'somewhat worsened' or 'worsened significantly', please explain why [FREE TEXT]</i></p>	<ul style="list-style-type: none"><li>▪ EU Professional associations</li><li>▪ MS Professional associations</li><li>▪ General public</li></ul>		
10.	<p>How do you rate <b>the provision of Article 81 (<a href="#">Regulation 2016/2031</a>) whereby a plant passport is required for plants supplied directly to a final user</b> :-</p> <table><tr><td><p><i>- receiving those plants and plant products by means of sales through distance contracts (eCommerce)</i></p><ul style="list-style-type: none"><li>• Very appropriate</li><li>• Somewhat appropriate</li><li>• Unnecessary</li><li>• Somewhat burdensome</li><li>• Very burdensome</li><li>• No opinion</li></ul></td><td><p><i>- of plants and plant products for which a plant passport for protected zones is required</i></p><ul style="list-style-type: none"><li>• Very appropriate</li><li>• Somewhat appropriate</li><li>• Unnecessary</li><li>• Somewhat burdensome</li><li>• Very burdensome</li><li>• No opinion</li></ul></td></tr></table> <p><i>If 'somewhat burdensome' or 'very burdensome', please explain why [FREE TEXT]</i></p>	<p><i>- receiving those plants and plant products by means of sales through distance contracts (eCommerce)</i></p> <ul style="list-style-type: none"><li>• Very appropriate</li><li>• Somewhat appropriate</li><li>• Unnecessary</li><li>• Somewhat burdensome</li><li>• Very burdensome</li><li>• No opinion</li></ul>	<p><i>- of plants and plant products for which a plant passport for protected zones is required</i></p> <ul style="list-style-type: none"><li>• Very appropriate</li><li>• Somewhat appropriate</li><li>• Unnecessary</li><li>• Somewhat burdensome</li><li>• Very burdensome</li><li>• No opinion</li></ul>	<ul style="list-style-type: none"><li>▪ EU NPPOs</li><li>▪ EU Operators</li><li>▪ EU Professional associations</li><li>▪ MS Professional associations</li><li>▪ General public</li></ul>
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11.	<p>In your view, the way in which <b>the provisions of Art 81(1)(a) (<a href="#">Regulation 2016/2031</a>), in respect of 'means of sales through distance contracts', are enforced</b>, is:</p> <ul style="list-style-type: none"><li>• Appropriate</li><li>• Somewhat appropriate</li><li>• Somewhat inappropriate</li><li>• Inappropriate</li><li>• No opinion</li></ul> <p><i>If 'inappropriate' or 'Somewhat inappropriate', please clarify why: [FREE TEXT]</i></p>	<ul style="list-style-type: none"><li>▪ EU Operators</li><li>▪ EU Professional associations</li><li>▪ MS Professional associations</li><li>▪ General public</li></ul>		
12.	<p>In your view, <b>the clarity of the provisions of Art 81(1)(a) (<a href="#">Regulation 2016/2031</a>), in respect of 'means of sales through distance contracts'</b>, for the purpose of its official enforcement, is:</p> <ul style="list-style-type: none"><li>• Sufficient</li><li>• Insufficient</li><li>• No opinion</li></ul> <p><i>If 'insufficient', please clarify why: [FREE TEXT]</i></p>	<ul style="list-style-type: none"><li>▪ EU NPPOs</li></ul>		
13.	<p>How would you rate the need for a more <b>harmonised approach for the use of plant passports in relation to sales through distance contracts to private citizens (final users)?</b></p>	<ul style="list-style-type: none"><li>▪ EU NPPOs</li><li>▪ EU Operators</li></ul>		

	<ul style="list-style-type: none"> <li>• Absolutely necessary</li> <li>• Somewhat necessary</li> <li>• Somewhat unnecessary</li> <li>• Absolutely unnecessary</li> <li>• No opinion</li> </ul> <p><i>If necessary, please explain why: [FREE TEXT]</i></p>	<ul style="list-style-type: none"> <li>▪ EU Professional associations</li> <li>▪ MS Professional associations</li> </ul>										
14.	<p>How would you rate <b>a possible introduction of an electronic plant passport</b> (replacing the current paper form) for the movement of plants at business-to-business level:</p> <table border="1"> <thead> <tr> <th><i>In terms of feasibility</i></th><th><i>In terms of applicability</i></th></tr> </thead> <tbody> <tr> <td> <ul style="list-style-type: none"> <li>• Very feasible</li> <li>• Somewhat feasible</li> <li>• Not feasible</li> <li>• No opinion</li> </ul> </td><td> <ul style="list-style-type: none"> <li>• Very useful</li> <li>• Somewhat useful</li> <li>• Not useful</li> <li>• No opinion</li> </ul> </td></tr> </tbody> </table> <p><i>Explain, please, your choice: [FREE TEXT]</i> (No free text)</p>	<i>In terms of feasibility</i>	<i>In terms of applicability</i>	<ul style="list-style-type: none"> <li>• Very feasible</li> <li>• Somewhat feasible</li> <li>• Not feasible</li> <li>• No opinion</li> </ul>	<ul style="list-style-type: none"> <li>• Very useful</li> <li>• Somewhat useful</li> <li>• Not useful</li> <li>• No opinion</li> </ul>	<ul style="list-style-type: none"> <li>▪ EU NPPOs</li> <li>▪ EU Operators</li> <li>▪ EU Professional associations</li> <li>▪ MS Professional associations</li> </ul>						
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<b>Issuance of the plant passports</b>												
15.	<p>Following the changes introduced in the Plant Health Regulation (<a href="#">Regulation 2016/2031</a>), how do you consider that the <b>overall complexity of the process of issuing or replacing a plant passport</b> has become due to the following aspects:</p> <table border="1"> <thead> <tr> <th><i>The extension of use of plant passports for intra-EU movement to all plant for planting (Art 79)</i></th><th><i>The harmonised format of plant passports (Art 83)</i></th><th><i>The requirements for authorisation to issue plant passports (Art 89)</i></th><th><i>The requirements to attach the plant passports to the trade unit (Art 88)</i></th><th><i>The requirements for the examination for plant passports (Art 87)</i></th></tr> </thead> <tbody> <tr> <td> <ul style="list-style-type: none"> <li>• Extremely more difficult</li> <li>• More difficult, but manageable</li> <li>• Remained the same</li> <li>• More easy</li> <li>• Extremely easier</li> <li>• No opinion</li> </ul> </td><td> <ul style="list-style-type: none"> <li>• Extremely more difficult</li> <li>• More difficult, but manageable</li> <li>• Remained the same</li> <li>• More easy</li> <li>• Extremely easier</li> <li>• No opinion</li> </ul> </td><td> <ul style="list-style-type: none"> <li>• Extremely more difficult</li> <li>• More difficult, but manageable</li> <li>• Remained the same</li> <li>• More easy</li> <li>• Extremely easier</li> <li>• No opinion</li> </ul> </td><td> <ul style="list-style-type: none"> <li>• Extremely more difficult</li> <li>• More difficult, but manageable</li> <li>• Remained the same</li> <li>• More easy</li> <li>• Extremely easier</li> <li>• No opinion</li> </ul> </td><td> <ul style="list-style-type: none"> <li>• Extremely more difficult</li> <li>• More difficult, but manageable</li> <li>• Remained the same</li> <li>• More easy</li> <li>• Extremely easier</li> <li>• No opinion</li> </ul> </td></tr> </tbody> </table> <p><i>If difficult, could you, please,</i></p> <ul style="list-style-type: none"> <li>- Please specify for which commodities (up to 3) the most difficult from the dropdown list [*] and the plant Latin species name</li> <li>- Please explain why do you found these commodities the most difficult: [FREE TEXT]</li> <li>- For those aspects which you have selected more difficult, please propose changes (especially in relation to Art 83 and 88): [FREE TEXT]</li> </ul> <p><i>*The dropdown list commodities are listed in the Annex I at the end of this document.</i></p>	<i>The extension of use of plant passports for intra-EU movement to all plant for planting (Art 79)</i>	<i>The harmonised format of plant passports (Art 83)</i>	<i>The requirements for authorisation to issue plant passports (Art 89)</i>	<i>The requirements to attach the plant passports to the trade unit (Art 88)</i>	<i>The requirements for the examination for plant passports (Art 87)</i>	<ul style="list-style-type: none"> <li>• Extremely more difficult</li> <li>• More difficult, but manageable</li> <li>• Remained the same</li> <li>• More easy</li> <li>• Extremely easier</li> <li>• No opinion</li> </ul>	<ul style="list-style-type: none"> <li>• Extremely more difficult</li> <li>• More difficult, but manageable</li> <li>• Remained the same</li> <li>• More easy</li> <li>• Extremely easier</li> <li>• No opinion</li> </ul>	<ul style="list-style-type: none"> <li>• Extremely more difficult</li> <li>• More difficult, but manageable</li> <li>• Remained the same</li> <li>• More easy</li> <li>• Extremely easier</li> <li>• No opinion</li> </ul>	<ul style="list-style-type: none"> <li>• Extremely more difficult</li> <li>• More difficult, but manageable</li> <li>• Remained the same</li> <li>• More easy</li> <li>• Extremely easier</li> <li>• No opinion</li> </ul>	<ul style="list-style-type: none"> <li>• Extremely more difficult</li> <li>• More difficult, but manageable</li> <li>• Remained the same</li> <li>• More easy</li> <li>• Extremely easier</li> <li>• No opinion</li> </ul>	<ul style="list-style-type: none"> <li>▪ EU NPPOs</li> <li>▪ EU Operators</li> <li>▪ EU Professional associations</li> <li>▪ MS Professional associations</li> </ul>
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16.	<p>In your country, <b>plant passports are mostly issued</b> by:</p> <ul style="list-style-type: none"> <li>• Competent authorities</li> <li>• Authorised operators</li> <li>• Both [please specify the proportion of plant passports issued by authorised operators]</li> <li>• Depending on the commodity [please specify commodity and the responsible to issue the plant passports]</li> <li>• No opinion</li> </ul>	<ul style="list-style-type: none"> <li>▪ EU NPPOs</li> </ul>
17.	<p>Do you consider that for some type of plants, plant products or other objects, <b>only the Competent Authorities instead of an operator should issue plant passports?</b></p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul> <p><i>If yes, can you please specify for which commodities (up to 3) from the dropdown list [*]and the plant Latin species name</i>  <i>*The dropdown list commodities are listed in the Annex I at the end of this document.</i></p>	<ul style="list-style-type: none"> <li>▪ EU NPPOs</li> <li>▪ EU Operators</li> <li>▪ EU Professional associations</li> <li>▪ MS Professional associations</li> </ul>
18.	<p>The <b>fees charged by the competent authorities</b> in your country for the following procedures are (if applicable):</p> <ul style="list-style-type: none"> <li>• Registration fee of each operator handling regulated plant materials subjected to plant passports [VALUE in EUR/operator] <ul style="list-style-type: none"> <li>○ One-time</li> <li>○ Annual</li> <li>○ Other</li> <li>○ Not applicable</li> </ul> </li> <li>• Authorization fee to issue plant passports [VALUE in EUR/operator] <ul style="list-style-type: none"> <li>○ One-time</li> <li>○ Annual</li> <li>○ Other</li> <li>○ Not applicable</li> </ul> </li> <li>• Fee for issuance of the plant passports by the competent authority [VALUE in EUR/operator] <ul style="list-style-type: none"> <li>○ One-time</li> <li>○ Annual</li> <li>○ Other</li> <li>○ Not applicable</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ EU NPPOs</li> <li>▪ EU Operators</li> <li>▪ EU Professional associations</li> <li>▪ MS Professional associations</li> </ul>
19.	<p>Are you <b>registered as Professional Operator and authorised to issue plant passports?</b></p> <ul style="list-style-type: none"> <li>• Registered professional operator</li> <li>• Authorised to issue plant passports</li> </ul>	<ul style="list-style-type: none"> <li>▪ EU Operators</li> </ul>

20.	Did you <b>issue plant passports before 14 December 2019</b> ? <ul style="list-style-type: none"><li>• Yes</li><li>• Only on part of my production</li><li>• No</li><li>• No opinion</li></ul>	▪ EU Operators					
21.	How long have you <b>been issuing plant passports</b> ? <ul style="list-style-type: none"><li>• Less than 1 year</li><li>• Between 1 and 2 years</li><li>• Between 2 and 5 years</li><li>• More than 5 years</li><li>• Not applicable</li></ul>	▪ EU Operators					
22.	What percentage of the members of your association who are <b>professional operators under the new Plant Health Regulation (Regulation 2016/2031)</b> were <b>issuing plant passports before 14 December 2019</b> ? <ul style="list-style-type: none"><li>• Less than 29%</li><li>• 30-60%</li><li>• 61-90%</li><li>• More than 91%</li><li>• No opinion</li></ul>	▪ EU Professional associations ▪ MS Professional associations					
Administrative procedures							
23.	How has <b>the staff involved with administrative procedures related to plant passports</b> changed in your organization due to the modifications specified below, introduced in 2019 with the new Plant Health Regulation ( <a href="#">Regulation 2016/2031</a> ): <table><tr><td><i>The extension of use of plant passports for intra-EU movement to all plant for planting (Art 79)</i><ul style="list-style-type: none"><li>• Increased by more than 10%</li><li>• Increased by 5% - 10%</li><li>• Increased by less than 5%</li><li>• Remained the same</li><li>• Decreased by less 5%</li></ul></td><td><i>The exception for direct supply to final users (Art 81(1)(a))</i><ul style="list-style-type: none"><li>• Increased by more than 10%</li><li>• Increased by 5% - 10%</li><li>• Increased by less than 5%</li><li>• Remained the same</li><li>• Decreased by less 5%</li></ul></td><td><i>The harmonised format of plant passports (Art 83)</i><ul style="list-style-type: none"><li>• Increased by more than 10%</li><li>• Increased by 5% - 10%</li><li>• Increased by less than 5%</li><li>• Remained the same</li><li>• Decreased by less 5%</li></ul></td><td><i>The requirements to attach the plant passports to the trade unit (Art 88)</i><ul style="list-style-type: none"><li>• Increased by more than 10%</li><li>• Increased by 5% - 10%</li><li>• Increased by less than 5%</li><li>• Remained the same</li><li>• Decreased by less 5%</li></ul></td><td><i>The requirements on authorised operators (Art 69,87,89 and 90)</i><ul style="list-style-type: none"><li>• Increased by more than 10%</li><li>• Increased by 5% - 10%</li><li>• Increased by less than 5%</li><li>• Remained the same</li><li>• Decreased by less 5%</li></ul></td></tr></table>	<i>The extension of use of plant passports for intra-EU movement to all plant for planting (Art 79)</i> <ul style="list-style-type: none"><li>• Increased by more than 10%</li><li>• Increased by 5% - 10%</li><li>• Increased by less than 5%</li><li>• Remained the same</li><li>• Decreased by less 5%</li></ul>	<i>The exception for direct supply to final users (Art 81(1)(a))</i> <ul style="list-style-type: none"><li>• Increased by more than 10%</li><li>• Increased by 5% - 10%</li><li>• Increased by less than 5%</li><li>• Remained the same</li><li>• Decreased by less 5%</li></ul>	<i>The harmonised format of plant passports (Art 83)</i> <ul style="list-style-type: none"><li>• Increased by more than 10%</li><li>• Increased by 5% - 10%</li><li>• Increased by less than 5%</li><li>• Remained the same</li><li>• Decreased by less 5%</li></ul>	<i>The requirements to attach the plant passports to the trade unit (Art 88)</i> <ul style="list-style-type: none"><li>• Increased by more than 10%</li><li>• Increased by 5% - 10%</li><li>• Increased by less than 5%</li><li>• Remained the same</li><li>• Decreased by less 5%</li></ul>	<i>The requirements on authorised operators (Art 69,87,89 and 90)</i> <ul style="list-style-type: none"><li>• Increased by more than 10%</li><li>• Increased by 5% - 10%</li><li>• Increased by less than 5%</li><li>• Remained the same</li><li>• Decreased by less 5%</li></ul>	▪ EU NPPOs ▪ EU Operators ▪ EU Professional associations ▪ MS Professional associations
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24.	<p>How has the <b>administrative workload (plant passport issuance, operator approval, issuance validation functions, knowledge transfer to operators, technical guidelines preparation, training of the staff, etc.)</b> changed in your organization due to the modifications specified below, introduced in 2019 with the new Plant Health Regulation (<a href="#">Regulation 2016/2031</a>):</p> <table><tr><td><i>The extension of use of plant passports for intra-EU movement to all plant for planting (Art 79)</i></td><td><i>The exception for direct supply to final users (Art 81(1)(a))</i></td><td><i>The harmonised format of plant passports (Art 83)</i></td><td><i>The requirements to attach the plant passports to the trade unit (Art 88)</i></td><td><i>Registration and authorisation of professional operators (Art 66 and 89)</i></td></tr><tr><td><ul style="list-style-type: none"><li>• Increased by more than 10%</li><li>• Increased by 5% - 10%</li><li>• Increased by less than 5%</li><li>• Remained the same</li><li>• Decreased by less 5%</li><li>• Decreased by 5% - 10%</li><li>• Decreased by more than 10%</li><li>• No opinion</li></ul></td><td><ul style="list-style-type: none"><li>• Increased by more than 10%</li><li>• Increased by 5% - 10%</li><li>• Increased by less than 5%</li><li>• Remained the same</li><li>• Decreased by less 5%</li><li>• Decreased by 5% - 10%</li><li>• Decreased by more than 10%</li><li>• No opinion</li></ul></td><td><ul style="list-style-type: none"><li>• Increased by more than 10%</li><li>• Increased by 5% - 10%</li><li>• Increased by less than 5%</li><li>• Remained the same</li><li>• Decreased by less 5%</li><li>• Decreased by 5% - 10%</li><li>• Decreased by more than 10%</li><li>• No opinion</li></ul></td><td><ul style="list-style-type: none"><li>• Increased by more than 10%</li><li>• Increased by 5% - 10%</li><li>• Increased by less than 5%</li><li>• Remained the same</li><li>• Decreased by less 5%</li><li>• Decreased by 5% - 10%</li><li>• Decreased by more than 10%</li><li>• No opinion</li></ul></td><td><ul style="list-style-type: none"><li>• Increased by more than 10%</li><li>• Increased by 5% - 10%</li><li>• Increased by less than 5%</li><li>• Remained the same</li><li>• Decreased by less 5%</li><li>• Decreased by 5% - 10%</li><li>• Decreased by more than 10%</li><li>• No opinion</li></ul></td></tr></table>					<i>The extension of use of plant passports for intra-EU movement to all plant for planting (Art 79)</i>	<i>The exception for direct supply to final users (Art 81(1)(a))</i>	<i>The harmonised format of plant passports (Art 83)</i>	<i>The requirements to attach the plant passports to the trade unit (Art 88)</i>	<i>Registration and authorisation of professional operators (Art 66 and 89)</i>	<ul style="list-style-type: none"><li>• Increased by more than 10%</li><li>• Increased by 5% - 10%</li><li>• Increased by less than 5%</li><li>• Remained the same</li><li>• Decreased by less 5%</li><li>• Decreased by 5% - 10%</li><li>• Decreased by more than 10%</li><li>• No opinion</li></ul>	<ul style="list-style-type: none"><li>• Increased by more than 10%</li><li>• Increased by 5% - 10%</li><li>• Increased by less than 5%</li><li>• Remained the same</li><li>• Decreased by less 5%</li><li>• Decreased by 5% - 10%</li><li>• Decreased by more than 10%</li><li>• No opinion</li></ul>	<ul style="list-style-type: none"><li>• Increased by more than 10%</li><li>• Increased by 5% - 10%</li><li>• Increased by less than 5%</li><li>• Remained the same</li><li>• Decreased by less 5%</li><li>• Decreased by 5% - 10%</li><li>• Decreased by more than 10%</li><li>• No opinion</li></ul>	<ul style="list-style-type: none"><li>• Increased by more than 10%</li><li>• Increased by 5% - 10%</li><li>• Increased by less than 5%</li><li>• Remained the same</li><li>• Decreased by less 5%</li><li>• Decreased by 5% - 10%</li><li>• Decreased by more than 10%</li><li>• No opinion</li></ul>	<ul style="list-style-type: none"><li>• Increased by more than 10%</li><li>• Increased by 5% - 10%</li><li>• Increased by less than 5%</li><li>• Remained the same</li><li>• Decreased by less 5%</li><li>• Decreased by 5% - 10%</li><li>• Decreased by more than 10%</li><li>• No opinion</li></ul>	<ul style="list-style-type: none"><li>▪ EU NPPOs</li></ul>
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25.	<p>Article 89 of the <a href="#">Plant Health Regulation</a> and <a href="#">Regulation 2019/827</a> require the <b>Competent Authorities to ensure that professional operators have access to a technical guidance</b> on the criteria to be fulfilled in the examinations to the issuance of plant passports. Have you ensured that access?</p> <ul style="list-style-type: none"><li>• Yes</li><li>• Not yet</li><li>• No opinion</li></ul> <p><i>If 'yes', can you please specify how [FREE TEXT ]and please specify the total cost to prepare the technical guidelines and grant access to operators (estimation in euros per year): [VALUE]</i></p> <p><i>If 'not yet', can you please specify why and how do you plan to ensure such access and by when: [FREE TEXT]</i></p>					<ul style="list-style-type: none"><li>▪ EU NPPOs</li></ul>										



26.	<p>How has the <b>administrative workload (plant passport issuance, traceability procedures, validation functions, examination before issuing plant passports, reporting to competent authorities)</b> changed in your organization due to the modifications specified below, introduced in 2019 with the new Plant Health Regulation (<a href="#">Regulation 2016/2031</a>):</p> <table><tr><td><i>The extension of use of plant passports for intra-EU movement to all plant for planting (Art 79)</i><ul style="list-style-type: none"><li>Increased by more than 10%</li><li>Increased by 5% - 10%</li><li>Increased by less than 5%</li><li>Remained the same</li><li>Decreased by less 5%</li><li>Decreased by 5% - 10%</li><li>Decreased by more than 10%</li><li>No opinion</li></ul></td><td><i>The harmonised format of plant passports (Art 83)</i><ul style="list-style-type: none"><li>Increased by more than 10%</li><li>Increased by 5% - 10%</li><li>Increased by less than 5%</li><li>Remained the same</li><li>Decreased by less 5%</li><li>Decreased by 5% - 10%</li><li>Decreased by more than 10%</li><li>No opinion</li></ul></td><td><i>The requirements to attach the plant passports to the trade unit (Art 88)</i><ul style="list-style-type: none"><li>Increased by more than 10%</li><li>Increased by 5% - 10%</li><li>Increased by less than 5%</li><li>Remained the same</li><li>Decreased by less 5%</li><li>Decreased by 5% - 10%</li><li>Decreased by more than 10%</li><li>No opinion</li></ul></td><td><i>The requirements for the examination for plant passports (Art 87)</i><ul style="list-style-type: none"><li>Increased by more than 10%</li><li>Increased by 5% - 10%</li><li>Increased by less than 5%</li><li>Remained the same</li><li>Decreased by less 5%</li><li>Decreased by 5% - 10%</li><li>Decreased by more than 10%</li><li>No opinion</li></ul></td><td><i>The requirements on authorised operators (Art 69,87,89 and 90)</i><ul style="list-style-type: none"><li>Increased by more than 10%</li><li>Increased by 5% - 10%</li><li>Increased by less than 5%</li><li>Remained the same</li><li>Decreased by less 5%</li><li>Decreased by 5% - 10%</li><li>Decreased by more than 10%</li><li>No opinion</li></ul></td></tr></table>	<i>The extension of use of plant passports for intra-EU movement to all plant for planting (Art 79)</i> <ul style="list-style-type: none"><li>Increased by more than 10%</li><li>Increased by 5% - 10%</li><li>Increased by less than 5%</li><li>Remained the same</li><li>Decreased by less 5%</li><li>Decreased by 5% - 10%</li><li>Decreased by more than 10%</li><li>No opinion</li></ul>	<i>The harmonised format of plant passports (Art 83)</i> <ul style="list-style-type: none"><li>Increased by more than 10%</li><li>Increased by 5% - 10%</li><li>Increased by less than 5%</li><li>Remained the same</li><li>Decreased by less 5%</li><li>Decreased by 5% - 10%</li><li>Decreased by more than 10%</li><li>No opinion</li></ul>	<i>The requirements to attach the plant passports to the trade unit (Art 88)</i> <ul style="list-style-type: none"><li>Increased by more than 10%</li><li>Increased by 5% - 10%</li><li>Increased by less than 5%</li><li>Remained the same</li><li>Decreased by less 5%</li><li>Decreased by 5% - 10%</li><li>Decreased by more than 10%</li><li>No opinion</li></ul>	<i>The requirements for the examination for plant passports (Art 87)</i> <ul style="list-style-type: none"><li>Increased by more than 10%</li><li>Increased by 5% - 10%</li><li>Increased by less than 5%</li><li>Remained the same</li><li>Decreased by less 5%</li><li>Decreased by 5% - 10%</li><li>Decreased by more than 10%</li><li>No opinion</li></ul>	<i>The requirements on authorised operators (Art 69,87,89 and 90)</i> <ul style="list-style-type: none"><li>Increased by more than 10%</li><li>Increased by 5% - 10%</li><li>Increased by less than 5%</li><li>Remained the same</li><li>Decreased by less 5%</li><li>Decreased by 5% - 10%</li><li>Decreased by more than 10%</li><li>No opinion</li></ul>	<ul style="list-style-type: none"><li>▪ EU Operators</li><li>▪ EU Professional associations</li><li>▪ MS Professional associations</li></ul>
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27.	<p>Did you have to <b>organize and/or to participate in any kind of training for obtaining new skills and acquiring knowledge</b> on the changes to the requirements related to the plant passports?</p> <ul style="list-style-type: none"><li>• Yes<ul style="list-style-type: none"><li>○ Organise</li><li>○ Participate</li><li>○ Both</li></ul></li><li>• No</li><li>• No opinion</li></ul> <p><i>If yes, please provide an estimation of:</i></p> <ul style="list-style-type: none"><li>- the total time spent in trainings by all staff members (related to the plant passport requirements)</li><li>- the total costs for the training (related to the plant passport requirements)</li></ul>	<ul style="list-style-type: none"><li>▪ EU NPPOs</li><li>▪ EU Operators</li><li>▪ EU Professional associations</li><li>▪ MS Professional associations</li></ul>					
28.	<p>Did you have to <b>change or improve your operational processes for administrative procedures</b> (e.g. IT systems, labelling, packaging etc.) subjected to the new plant passport requirements (<a href="#">Regulation 2016/2031</a>)?</p>	<ul style="list-style-type: none"><li>▪ EU NPPOs</li><li>▪ EU Operators</li><li>▪ EU Professional associations</li></ul>					

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29.	<p>Are all professional operators in your country falling under <b>the provisions of Art 65 registered (<a href="#">Regulation 2016/2031</a>)?</b></p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> <li>• No opinion</li> </ul> <p><i>if 'no', can you please specify why: [FREE TEXT]</i></p>				<ul style="list-style-type: none"> <li>▪ EU NPPOs</li> </ul>																																																												
30.	<p>Can you provide <b>the number of registered operators subjected to the plant passport</b> for the following years in total and approximately by sector?</p> <table border="1"> <thead> <tr> <th></th><th>2018</th><th>2019</th><th>2020</th></tr> </thead> <tbody> <tr> <td><b>TOTAL of registered professional operators</b></td><td></td><td></td><td></td></tr> <tr> <td><b>Sector<sup>3</sup></b></td><td></td><td></td><td></td></tr> <tr> <td>Plants for planting/propagating material (other than seeds) of:</td><td></td><td></td><td></td></tr> <tr> <td>- fruit plants</td><td></td><td></td><td></td></tr> <tr> <td>- vine plants</td><td></td><td></td><td></td></tr> <tr> <td>- forestry plants</td><td></td><td></td><td></td></tr> <tr> <td>- ornamental plants</td><td></td><td></td><td></td></tr> <tr> <td>- field crops (other than potatoes)</td><td></td><td></td><td></td></tr> <tr> <td>- vegetable plants</td><td></td><td></td><td></td></tr> <tr> <td>- seed potatoes</td><td></td><td></td><td></td></tr> <tr> <td>Seeds</td><td></td><td></td><td></td></tr> <tr> <td>Fruits</td><td></td><td></td><td></td></tr> <tr> <td>Wood materials</td><td></td><td></td><td></td></tr> <tr> <td>Other* / *If other please specify</td><td></td><td></td><td></td></tr> </tbody> </table>		2018	2019	2020	<b>TOTAL of registered professional operators</b>				<b>Sector<sup>3</sup></b>				Plants for planting/propagating material (other than seeds) of:				- fruit plants				- vine plants				- forestry plants				- ornamental plants				- field crops (other than potatoes)				- vegetable plants				- seed potatoes				Seeds				Fruits				Wood materials				Other* / *If other please specify							<ul style="list-style-type: none"> <li>▪ EU NPPOs</li> </ul>
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31.	<p>Can you provide <b>the total number of operators issuing plant passports (for the years 2018 and 2019) and authorised to issue plant passports (for the year 2020)</b> and approximately by sector?</p> <table border="1"> <thead> <tr> <th></th> <th>2018</th> <th>2019</th> <th>2020</th> </tr> </thead> <tbody> <tr> <td><b>TOTAL of authorised professional operators</b></td> <td></td> <td></td> <td></td> </tr> <tr> <td><b>Sector<sup>1</sup></b></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Plants for planting/propagating material (other than seeds) of :</td> <td></td> <td></td> <td></td> </tr> <tr> <td>- fruit plants</td> <td></td> <td></td> <td></td> </tr> <tr> <td>- vine plants</td> <td></td> <td></td> <td></td> </tr> <tr> <td>- forestry plants</td> <td></td> <td></td> <td></td> </tr> <tr> <td>- ornamental plants</td> <td></td> <td></td> <td></td> </tr> <tr> <td>- field crops (other than potatoes)</td> <td></td> <td></td> <td></td> </tr> <tr> <td>- vegetable plants</td> <td></td> <td></td> <td></td> </tr> <tr> <td>- seed potatoes</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Seeds</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Fruits</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Wood materials</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Other* / *If other please specify</td> <td></td> <td></td> <td></td> </tr> </tbody> </table>		2018	2019	2020	<b>TOTAL of authorised professional operators</b>				<b>Sector<sup>1</sup></b>				Plants for planting/propagating material (other than seeds) of :				- fruit plants				- vine plants				- forestry plants				- ornamental plants				- field crops (other than potatoes)				- vegetable plants				- seed potatoes				Seeds				Fruits				Wood materials				Other* / *If other please specify				<p>▪ EU NPPOs</p>
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32.	<p>Do you <b>charge fees</b> for the authorization of operators to issue the plant passports?</p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> <li>• No opinion</li> </ul> <p><i>If yes, by how much cost each approximately: [VALUE in EUR/Operator authorised]</i></p> <p><i>If yes, do you fully cover the costs incurred in providing the service with the charged fees?</i></p> <p><i>If the fees cost has changed in comparison with 2019, please specify the percentage of change from 2019 to present:</i></p> <ul style="list-style-type: none"> <li>• Increased by more than 10%</li> <li>• Increased by 5% - 10%</li> <li>• Increased by less than 5%</li> <li>• Remained the same</li> <li>• Decreased by less 5%</li> <li>• Decreased by 5% - 10%</li> <li>• Decreased by more than 10%</li> </ul>	<p>▪ EU NPPOs</p>																																																												

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	<b>Phytosanitary control measures at the Operator premises<sup>4</sup></b>	
33.	<p>How has the <b>staff / number of person-hours involved in the examinations at the premises (under competent authorities' supervision) and for assisting the controls carried out by the competent authorities for the issuance of the plant passports</b> changed since the plant passport has been extended to all plants for planting?</p> <ul style="list-style-type: none"> <li>Increased by more than 10%</li> <li>Increased by 5% - 10%</li> <li>Increased by less than 5%</li> <li>Remained the same</li> <li>Decreased by less 5%</li> <li>Decreased by 5% - 10%</li> <li>Decreased by more than 10%</li> <li>No opinion</li> </ul>	<ul style="list-style-type: none"> <li>EU Operators</li> <li>EU Professional associations</li> <li>MS Professional associations</li> </ul>
34.	<p>How has the <b>number of examinations by the authorised operator at the operator' premises</b> to prevent the presence and spread of the plant quarantine pests changed, since examinations have to be carried out by authorized operators (Art 87; <a href="#">Regulation 2016/2031</a>) and plant passports have been extended to all plants for planting?</p> <ul style="list-style-type: none"> <li>Increased by more than 10%</li> <li>Increased by 5% - 10%</li> <li>Increased by less than 5%</li> <li>Remained the same</li> <li>Decreased by less 5%</li> <li>Decreased by 5% - 10%</li> <li>Decreased by more than 10%</li> <li>No opinion</li> </ul>	<ul style="list-style-type: none"> <li>EU Operators</li> <li>EU Professional associations</li> <li>MS Professional associations</li> </ul>
35.	<p>How has the <b>staff / number of person-hours involved in the official controls, to verify that the professional operators comply with the plant passport criteria</b>, changed since the plant passport has been extended to all plants for planting?</p> <ul style="list-style-type: none"> <li>Increased by more than 10%</li> <li>Increased by 5% - 10%</li> <li>Increased by less than 5%</li> <li>Remained the same</li> <li>Decreased by less 5%</li> </ul>	<ul style="list-style-type: none"> <li>EU NPPOs</li> </ul>

<sup>4</sup> Operator premises refers to all the premises, collective warehouses and dispatching centres which are under the operator responsibility and declared by them pursuant to point (d) of Article 66(2) or, where Article 94(1) applies, in another location if so authorised by the competent authority.

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36.	<p>Do you <b>charge fees for the official controls (according to Art 92; <a href="#">Regulation 2016/2031</a>)</b> at the operator's premises subjected to the plant passport compliance?</p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> <li>• No opinion</li> </ul> <p><i>If yes -</i>  <i>What is the basis for calculating the fee (e.g., time, area, number of passports)? [FREE TEXT]</i>  <i>How much cost each approximately in EUR/hour; EUR/ha; EUR/plant passport; EUR/inspection [FREE TEXT]</i>  <i>Do you fully cover the costs incurred in providing the service with the charged fees:</i></p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> <li>• No opinion</li> </ul> <p><i>Does the level of the fee depends on the number of plant passports?</i></p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> <li>• No opinion</li> </ul> <p><i>Does the level of the fee takes into account whether the operator has a pest risk management plan?</i></p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> <li>• No opinion</li> </ul>	<ul style="list-style-type: none"> <li>▪ EU NPPOs</li> </ul>														
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38.	<p>How has the <b>number of regular official controls at the operator's premises related to the plant passport issuance</b> changed, since the plant passport system/requirement has been extended to all plants for planting?</p> <ul style="list-style-type: none"> <li>• Increased by more than 10%</li> <li>• Increased by 5% - 10%</li> <li>• Increased by less than 5%</li> <li>• Remained the same</li> <li>• Decreased by less 5%</li> <li>• Decreased by 5% - 10%</li> <li>• Decreased by more than 10%</li> <li>• No opinion</li> </ul>		<ul style="list-style-type: none"> <li>▪ EU NPPOs</li> </ul>
39.	<p>How has the <b>number of examinations by the Competent Authority on the plants for planting at the premises of operators</b> to prevent the presence and spread of the plant quarantine pests changed, since the operators are authorized to issue plant passports?</p> <ul style="list-style-type: none"> <li>• Increased by more than 10%</li> <li>• Increased by 5% - 10%</li> <li>• Increased by less than 5%</li> <li>• Remained the same</li> <li>• Decreased by less 5%</li> <li>• Decreased by 5% - 10%</li> <li>• Decreased by more than 10%</li> <li>• No opinion</li> </ul>		<ul style="list-style-type: none"> <li>▪ EU NPPOs</li> </ul>
40.	<p>Did you have to <b>organize or to participate in any kind of training for obtaining new skills and acquiring knowledge</b> on the applicable rules relevant to the examinations/official controls at the premises for the issuance of the plant passports, since the plant passport has been extended to all plants for planting?</p> <ul style="list-style-type: none"> <li>• Yes <ul style="list-style-type: none"> <li>○ Organise</li> <li>○ Participate</li> </ul> </li> </ul>		<ul style="list-style-type: none"> <li>▪ EU NPPOs</li> <li>▪ EU Operators</li> <li>▪ EU Professional associations</li> <li>▪ MS Professional associations</li> </ul>

	<ul style="list-style-type: none"><li>○ Both</li><li>• No</li><li>• No opinion</li></ul> <p><i>If yes, please provide an estimation of:</i></p> <ul style="list-style-type: none"><li>- the total time spent in trainings by all staff members (related to the plant passport requirements)</li><li>- the total costs for the training (related to the plant passport requirements)</li></ul>			
41.	<p>Did you have to <b>change or improve your facilities/infrastructures to perform the official controls</b> related to the plant passport issuance - due to its extension to all plants for planting?</p> <ul style="list-style-type: none"><li>• Yes</li><li>• No</li><li>• No opinion</li></ul> <p>- due to the requirement of attaching plant passport to the trade unit</p> <ul style="list-style-type: none"><li>• Yes</li><li>• No</li><li>• No opinion</li></ul> <p><i>If yes – Could you please specify what type of facilities/infrastructure [FREE TEXT]</i></p> <p><i>If yes – Please provide an estimation of the total cost of the facilities/infrastructure changes or improvements</i></p>	<ul style="list-style-type: none"><li>▪ EU NPPOs</li></ul>		
42.	<table><tr><td><p>How do you rate the <b>possibility to identify plant quarantine pests at the premises of operators</b>, since operators are given responsibilities under Art 87 regarding examinations for issuing plant passports?</p><ul style="list-style-type: none"><li>• Increased significantly</li><li>• Somewhat increased</li><li>• Remained the same</li><li>• Somewhat decreased</li><li>• Decreased significantly</li><li>• No opinion</li></ul><p><i>If decreased, please explain why: [FREE TEXT]</i></p></td><td><p><i>the plant passport has been extended to all plants for planting?</i></p><ul style="list-style-type: none"><li>• Increased significantly</li><li>• Somewhat increased</li><li>• Remained the same</li><li>• Somewhat decreased</li><li>• Decreased significantly</li><li>• No opinion</li></ul></td></tr></table>	<p>How do you rate the <b>possibility to identify plant quarantine pests at the premises of operators</b>, since operators are given responsibilities under Art 87 regarding examinations for issuing plant passports?</p> <ul style="list-style-type: none"><li>• Increased significantly</li><li>• Somewhat increased</li><li>• Remained the same</li><li>• Somewhat decreased</li><li>• Decreased significantly</li><li>• No opinion</li></ul> <p><i>If decreased, please explain why: [FREE TEXT]</i></p>	<p><i>the plant passport has been extended to all plants for planting?</i></p> <ul style="list-style-type: none"><li>• Increased significantly</li><li>• Somewhat increased</li><li>• Remained the same</li><li>• Somewhat decreased</li><li>• Decreased significantly</li><li>• No opinion</li></ul>	<ul style="list-style-type: none"><li>▪ EU NPPOs</li></ul>
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43.	<p>Do you consider that <b>in addition to the changes related to the plant passport mentioned above</b>, there has been any other change in the additional control requirements you need to implement at the operator premises?</p> <ul style="list-style-type: none"><li>• Yes</li><li>• No</li><li>• No opinion</li></ul> <p><i>If yes: please specify what (free text)</i></p>	<ul style="list-style-type: none"><li>▪ EU NPPOs</li></ul>		

44.	<p>Did you have to <b>change or improve your facilities/infrastructures to perform the required examinations</b> for the issuance of the plant passports</p> <ul style="list-style-type: none"> <li>- due to its extension to all plants for planting? <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> <li>• No opinion</li> </ul> </li> <li>- due to the requirement of attaching plant passport to the trade unit <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> <li>• No opinion</li> </ul> </li> </ul> <p><i>If yes – Could you please specify what type of facilities/infrastructure [FREE TEXT]</i></p> <p><i>If yes – Please provide an estimation of the total cost of the facilities/infrastructure changes or improvements</i></p>	<ul style="list-style-type: none"> <li>▪ EU Operators</li> <li>▪ EU Professional associations</li> <li>▪ MS Professional associations</li> </ul>
45.	<p>Please specify how you <b>ensure the detection of plant quarantine pests</b> on your premises:</p> <ul style="list-style-type: none"> <li>• Internal / own expertise</li> <li>• Outsourced expertise - <ul style="list-style-type: none"> <li>○ from the NPPO</li> <li>○ Other (please specify [FREE TEXT])</li> </ul> </li> <li>• No opinion</li> </ul>	<ul style="list-style-type: none"> <li>▪ EU Operators</li> </ul>
<b>Production and trade (within a MS and intra EU)</b>		
46.	<p>Please could you list the <b>main plants or groups of plants (up to 3)</b> for which you have <b>experienced the most technical difficulties when having to issue the plant passport</b>, since the plant passport has been extended to all plants for planting:</p> <ul style="list-style-type: none"> <li>• Plants or groups of plants #1 [DROPDOWN LIST* and Plant Latin species name]</li> <li>• Plants or groups of plants #2 [DROPDOWN LIST* and Plant Latin species name]</li> <li>• Plants or groups of plants #3 [DROPDOWN LIST* and Plant Latin species name]</li> </ul> <p><i>*The dropdown list commodities are listed in the Annex I at the end of this document.</i></p>	<ul style="list-style-type: none"> <li>▪ EU NPPOs</li> <li>▪ EU Operators</li> <li>▪ EU Professional associations</li> <li>▪ MS Professional associations</li> </ul>
47.	<p>Please could you list <b>main plants or groups of plants (up to 3)</b> for which you have <b>experienced greater technical ease when having to issue plant passports</b>, since the plant passport has been extended to all plants for planting:</p> <ul style="list-style-type: none"> <li>• Plants or groups of plants #1 [DROPDOWN LIST* and Plant Latin species name]</li> <li>• Plants or groups of plants #2 [DROPDOWN LIST* and Plant Latin species name]</li> <li>• Plants or groups of plants #3 [DROPDOWN LIST* and Plant Latin species name]</li> </ul> <p><i>*The dropdown list commodities are listed in the Annex I at the end of this document.</i></p>	<ul style="list-style-type: none"> <li>▪ EU NPPOs</li> <li>▪ EU Operators</li> <li>▪ EU Professional associations</li> <li>▪ MS Professional associations</li> </ul>
48.	<p>Following the extension of the requirement of a plant passport to all plants for planting, would you consider that <b>the volume of production</b> of these products has changed (at your respective level, i.e. <b>in your company if your reply as an operator, or in your country if you reply as a national association, or in the EU if you reply as an EU association</b>)?</p>	<ul style="list-style-type: none"> <li>▪ EU Operators</li> <li>▪ EU Professional associations</li> </ul>



	<ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> <li>• No opinion</li> </ul> <p><i>If change, please select the percentage of change of the volume of production from 2019 to present for the following products:</i></p> <table border="1"> <thead> <tr> <th>Sector</th><th>Increased &gt;10%</th><th>Increased &lt;10%</th><th>Remained the same</th><th>Decreased &lt;10%</th><th>Decreased &gt;10%</th></tr> </thead> <tbody> <tr> <td>Plants for planting/propagating material (other than seeds) of:</td><td></td><td></td><td></td><td></td><td></td></tr> <tr> <td>- fruit plants</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td></tr> <tr> <td>- forestry plants</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td></tr> <tr> <td>- ornamental plants</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td></tr> <tr> <td>Seeds</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td></tr> <tr> <td>Other* / *If other please specify [FREE TEXT]</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td></tr> </tbody> </table>	Sector	Increased >10%	Increased <10%	Remained the same	Decreased <10%	Decreased >10%	Plants for planting/propagating material (other than seeds) of:						- fruit plants	0	0	0	0	0	- forestry plants	0	0	0	0	0	- ornamental plants	0	0	0	0	0	Seeds	0	0	0	0	0	Other* / *If other please specify [FREE TEXT]	0	0	0	0	0	<ul style="list-style-type: none"> <li>▪ MS Professional associations</li> </ul>
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49.	<p>Following the extension of the requirement of a plant passport to all plants for planting, would you consider that <b>the volume of intra EU-trade for those products has changed?</b></p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> <li>• No opinion</li> </ul> <p><i>If change, please select the percentage of change of the volume of intra EU-trade from 2019 to present for the following products:</i></p> <table border="1"> <thead> <tr> <th>Sector</th><th>Increased &gt;10%</th><th>Increased &lt;10%</th><th>Remained the same</th><th>Decreased &lt;10%</th><th>Decreased &gt;10%</th></tr> </thead> <tbody> <tr> <td>Plants for planting/propagating material (other than seeds) of:</td><td></td><td></td><td></td><td></td><td></td></tr> <tr> <td>- fruit plants</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td></tr> <tr> <td>- forestry plants</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td></tr> <tr> <td>- ornamental plants</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td></tr> <tr> <td>Seeds</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td></tr> <tr> <td>Other* / *If other please specify [FREE TEXT]</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td></tr> </tbody> </table>	Sector	Increased >10%	Increased <10%	Remained the same	Decreased <10%	Decreased >10%	Plants for planting/propagating material (other than seeds) of:						- fruit plants	0	0	0	0	0	- forestry plants	0	0	0	0	0	- ornamental plants	0	0	0	0	0	Seeds	0	0	0	0	0	Other* / *If other please specify [FREE TEXT]	0	0	0	0	0	<ul style="list-style-type: none"> <li>▪ EU Operators</li> <li>▪ EU Professional associations</li> <li>▪ MS Professional associations</li> </ul>
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Other* / *If other please specify [FREE TEXT]	0	0	0	0	0																																							
50.	<p>Do you think that <b>the market price</b> of plants for planting for which the requirement to have plant passport has been extended has changed?</p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> <li>• No opinion</li> </ul> <p><i>If change, please select the percentage of change of the market price from 2019 to present for the following products:</i></p>	<ul style="list-style-type: none"> <li>▪ EU Operators</li> <li>▪ EU Professional associations</li> <li>▪ MS Professional associations</li> </ul>																																										

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	- ornamental plants	0	0	0	0	0	
	Seeds	0	0	0	0	0	
	Other* / *If other please specify [FREE TEXT]	0	0	0	0	0	
51.	<p>Do you have incurred in any <b>extra costs for producing/selling regulated plant materials</b> –</p> <p>- due to the extension of the requirement of a plant passport to all plants for planting,?</p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> <li>• No opinion</li> </ul> <p>- due to the requirement of attaching plant passport to the trade unit</p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> <li>• No opinion</li> </ul> <p>If yes, please specify the <b>main plants or plant products (up to 3) for which extra costs have been incurred costs and specify the nature of those costs:</b></p> <ul style="list-style-type: none"> <li>• Plants or groups of plants #1 [DROPDOWN LIST*] – Please specify which costs [FREE TEXT] and the estimation of total extra cost [VALUE in EUR per plant passport]</li> <li>• Plants or groups of plants #2 [DROPDOWN LIST*] – Please specify which costs [FREE TEXT] and the estimation of total extra cost [VALUE in EUR per plant passport]</li> <li>• Plants or groups of plants #3 [DROPDOWN LIST*] – Please specify which costs [FREE TEXT] and the estimation of total extra cost [VALUE in EUR per plant passport]</li> </ul>						<ul style="list-style-type: none"> <li>▪ EU Operators</li> <li>▪ EU Professional associations</li> <li>▪ MS Professional associations</li> </ul>
52.	<p>Have you decided, as a consequence of the extension of plant passports to all plants for planting, to <b>change your business model by targeting only final users</b> where no plant passport<sup>5</sup> is needed?</p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• Partly, please specify [FREE TEXT]</li> <li>• No</li> <li>• No opinion</li> </ul>						<ul style="list-style-type: none"> <li>▪ EU Operators</li> <li>▪ EU Professional associations</li> <li>▪ MS Professional associations</li> </ul>

<sup>5</sup> Except sale to final users through distance sales

53.	<p>How would you rate the <b>impact on the overall functioning of trade transactions (selling/buying)</b> of the additional plants for planting that now require a plant passport concerning the following aspects?</p> <table><tr><td><i>Reinforcement of the capacity to monitor and enforce contracts (e.g. better quality guarantees)</i></td><td><i>Frequency of fraudulent practice/conduct</i></td><td><i>Overall risk and uncertainty in the market</i></td><td><i>Level of trust among administrative / economic actors</i></td></tr><tr><td><ul style="list-style-type: none"><li>Increased significantly</li><li>Somewhat increased</li><li>Remained the same</li><li>Somewhat decreased</li><li>Decreased significantly</li><li>No opinion</li></ul></td><td><ul style="list-style-type: none"><li>Increased significantly</li><li>Somewhat increased</li><li>Remained the same</li><li>Somewhat decreased</li><li>Decreased significantly</li><li>No opinion</li></ul></td><td><ul style="list-style-type: none"><li>Increased significantly</li><li>Somewhat increased</li><li>Remained the same</li><li>Somewhat decreased</li><li>Decreased significantly</li><li>No opinion</li></ul></td><td><ul style="list-style-type: none"><li>Increased significantly</li><li>Somewhat increased</li><li>Remained the same</li><li>Somewhat decreased</li><li>Decreased significantly</li><li>No opinion</li></ul></td></tr></table> <p><i>If 'somewhat decreased' or 'decreased significantly', please explain why: [FREE TEXT]</i></p>	<i>Reinforcement of the capacity to monitor and enforce contracts (e.g. better quality guarantees)</i>	<i>Frequency of fraudulent practice/conduct</i>	<i>Overall risk and uncertainty in the market</i>	<i>Level of trust among administrative / economic actors</i>	<ul style="list-style-type: none"><li>Increased significantly</li><li>Somewhat increased</li><li>Remained the same</li><li>Somewhat decreased</li><li>Decreased significantly</li><li>No opinion</li></ul>	<ul style="list-style-type: none"><li>Increased significantly</li><li>Somewhat increased</li><li>Remained the same</li><li>Somewhat decreased</li><li>Decreased significantly</li><li>No opinion</li></ul>	<ul style="list-style-type: none"><li>Increased significantly</li><li>Somewhat increased</li><li>Remained the same</li><li>Somewhat decreased</li><li>Decreased significantly</li><li>No opinion</li></ul>	<ul style="list-style-type: none"><li>Increased significantly</li><li>Somewhat increased</li><li>Remained the same</li><li>Somewhat decreased</li><li>Decreased significantly</li><li>No opinion</li></ul>	<ul style="list-style-type: none"><li>▪ EU Operators</li><li>▪ EU Professional associations</li><li>▪ MS Professional associations</li></ul>
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54.	<p>Regarding the capacity of companies to <b>make long-term investment or strategic decisions</b> affecting the production or trade of the plants for planting that now require a plant passport, do you consider it has:</p> <ul style="list-style-type: none"><li>• Been made easier</li><li>• Remained the same</li><li>• Been made more complicated</li><li>• No opinion</li></ul> <p><i>If 'more complicated', please explain why: [FREE TEXT]</i></p>	<ul style="list-style-type: none"><li>▪ EU Operators</li><li>▪ EU Professional associations</li><li>▪ MS Professional associations</li></ul>								
55.	<p>Following the extension of the plant passport to all plants for planting, how would you consider that the <b>playing field in terms of competitive position of actors has evolved</b> in the sector of plants for planting for which a plant passport is now required?</p> <ul style="list-style-type: none"><li>• Improved (we all face now the same regulations)</li><li>• Remained the same</li><li>• Worsened (some people have more advantages than before)</li><li>• No opinion</li></ul> <p><i>If 'worsened', could you please specify for which specific commodities the most from the dropdown list [*] and the plant Latin species name</i></p> <p><i>If 'worsened', please explain why [FREE TEXT]</i></p> <p><i>*The dropdown list commodities are listed in the Annex I at the end of this document</i></p>	<ul style="list-style-type: none"><li>▪ EU Operators</li><li>▪ EU Professional associations</li><li>▪ MS Professional associations</li></ul>								
56.	<p>Do you think that the <b>requirements of attaching the plant passport to the trade unit</b> have made this process (i.e. ensuring that the plants are accompanied by a plant passport):</p> <ul style="list-style-type: none"><li>• Extremely more difficult</li><li>• More difficult, but manageable</li></ul>	<ul style="list-style-type: none"><li>▪ EU NPPOs</li><li>▪ EU Operators</li><li>▪ EU Professional associations</li></ul>								

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57.	<p>Do you think that the <b>new requirements for attaching the plant passport to the trade unit</b> have affected any of the following elements?</p> <ul style="list-style-type: none"> <li>• The volume of production in your company (EU / country for associations)</li> <li>• The volume of intra EU-trade</li> <li>• The market price of your produce</li> <li>• The overall functioning of trade transactions (selling/buying)</li> </ul>	<ul style="list-style-type: none"> <li>▪ EU Operators</li> <li>▪ EU Professional associations</li> <li>▪ MS Professional associations</li> </ul>
<b>Regulated Non-Quarantine Pests (RNQPs)</b>		
58.	<p>How do you rate the <b>implementation, within the newly extended plant passport system, of the rules regarding RNQPs?</b></p> <ul style="list-style-type: none"> <li>• Very efficient</li> <li>• Somewhat efficient</li> <li>• Neither efficient nor inefficient</li> <li>• Somewhat inefficient</li> <li>• Very inefficient</li> <li>• No opinion</li> </ul> <p><i>If the response is 'somewhat inefficient' or 'very inefficient', please explain why, and also provide any proposals for modification [FREE TEXT]</i></p>	<ul style="list-style-type: none"> <li>▪ EU NPPOs</li> <li>▪ EU certification CAs</li> <li>▪ EU Professional Associations</li> <li>▪ MS Professional Associations</li> <li>▪ EU operators</li> </ul>
59.	<p>Since the entry into force of the New Plant Health Regulation (<a href="#">Regulation 2016/2031</a>), <b>are the official controls for plant passports for RNQPs and QPs (quarantine pests) carried out simultaneously?</b></p> <ul style="list-style-type: none"> <li>• No (explain the reasons)</li> <li>• Yes, this was the case already before the entry into force of the New Plant Health Regulation</li> <li>• Yes, we started doing so since the entry into force of the New Plant Health Regulation</li> <li>• No opinion</li> </ul> <p>If the answer is "Yes, we started doing so since the entry into force of the New Plant Health Regulation": How would you rate the <b>evolution of the cost for your organization as a consequence of carrying out plant passport official controls for RNQPs and QPs simultaneously</b> for the different sectors below?</p> <p><i>Seed sector</i>   <i>Propagating material sector, other than seed</i>   <i>Other sectors (please, specify)</i></p>	<ul style="list-style-type: none"> <li>▪ EU NPPOs</li> <li>▪ EU certification CAs</li> </ul>

	<ul style="list-style-type: none"> <li>Increased by more than 25%</li> <li>Increased by 10%-25%</li> <li>Increased by less than 10%</li> <li>Remained the same</li> <li>Decreased by less 10%</li> <li>Decreased by 10%-25%</li> <li>Decreased by more than 25%</li> <li>No opinion</li> </ul>	<ul style="list-style-type: none"> <li>Increased by more than 25%</li> <li>Increased by 10%-25%</li> <li>Increased by less than 10%</li> <li>Remained the same</li> <li>Decreased by less 10%</li> <li>Decreased by 10%-25%</li> <li>Decreased by more than 25%</li> <li>No opinion</li> </ul>	<ul style="list-style-type: none"> <li>Increased by more than 25%</li> <li>Increased by 10%-25%</li> <li>Increased by less than 10%</li> <li>Remained the same</li> <li>Decreased by less 10%</li> <li>Decreased by 10%-25%</li> <li>Decreased by more than 25%</li> <li>No opinion</li> </ul>	
	<p>Please, in case of "increased", "increased significantly", "decreased" or "decreased significantly", explain the reasons and provide an estimate of the increase/decrease of costs (EUR) per control</p>			
60.	<p>Are the plant passport <b>official controls for RNQPs and QPs carried out by the same inspector?</b></p> <ul style="list-style-type: none"> <li>Yes</li> <li>No, explain the reasons</li> <li>No opinion</li> </ul>			<ul style="list-style-type: none"> <li>EU NPPOs</li> <li>EU certification CAs</li> </ul>
61.	<p>Where have <b>plant passport official controls for RNQPs been implemented in your country?</b></p> <ul style="list-style-type: none"> <li>At the place of origin</li> <li>Other places (please specify): <i>[FREE TEXT]</i></li> <li>No opinion</li> </ul>			<ul style="list-style-type: none"> <li>EU NPPOs</li> <li>EU certification CAs</li> </ul>
62.	<p>How has the <b>number of plant passport official controls for RNQPs changed since the entry into force of the new Plant Health Regulation (<a href="#">Regulation 2016/2031</a>)?</b></p> <ul style="list-style-type: none"> <li>Increased by more than 25%</li> <li>Increased by 10%-25%</li> <li>Increased by less than 10%</li> <li>Remained the same</li> <li>Decreased by less 10%</li> <li>Decreased by 10%-25%</li> <li>Decreased by more than 25%</li> <li>No opinion</li> </ul>			<ul style="list-style-type: none"> <li>EU NPPOs</li> <li>EU certification CAs</li> </ul>
63.	<p>How has the <b>number of non-compliances related only to RNQPs plant passport official controls changed since the entry into force the new Plant Health Regulation (<a href="#">Regulation 2016/2031</a>)?</b></p> <ul style="list-style-type: none"> <li>Increased by more than 25%</li> <li>Increased by 10%-25%</li> <li>Increased by less than 10%</li> </ul>			<ul style="list-style-type: none"> <li>EU NPPOs</li> <li>EU certification CAs</li> </ul>

	<ul style="list-style-type: none"> <li>• Remained the same</li> <li>• Decreased by less 10%</li> <li>• Decreased by 10%-25%</li> <li>• Decreased by more than 25%</li> <li>• No opinion</li> </ul>	
64.	<p>Which <b>action do you take when a consignment from a Member State does not meet the RNQP requirements?</b></p> <ul style="list-style-type: none"> <li>• Inform the Member State concerned and reject the consignment</li> <li>• Inform the Member State concerned and accept the consignment</li> <li>• Consult the operator about the application of a special treatment</li> <li>• None of the above/Other</li> <li>• No opinion</li> </ul> <p><i>Please describe the action taken and provide the rationale for your action [FREE TEXT]</i></p>	<ul style="list-style-type: none"> <li>▪ EU NPPOs</li> <li>▪ EU certification CAs</li> </ul>
<b>Other aspects</b>		
65.	<p>How do you rate <b>the implementation of the new rules</b> on pre-export certificates (Art 102; <a href="#">Regulation 2016/2031</a>):</p> <ul style="list-style-type: none"> <li>• Very efficient</li> <li>• Somewhat efficient</li> <li>• Neither efficient nor inefficient</li> <li>• Somewhat inefficient</li> <li>• Very inefficient</li> <li>• No opinion</li> </ul> <p><i>If the response is 'somewhat inefficient' or 'very inefficient', please explain why, and also provide any proposals for modification. [FREE TEXT]</i></p>	<ul style="list-style-type: none"> <li>▪ EU NPPOs</li> <li>▪ EU Operators</li> <li>▪ EU Professional associations</li> <li>▪ MS Professional associations</li> </ul>
66.	<p>Article 89 of the Plant Health Regulation (<a href="#">Regulation 2016/2031</a>) and <a href="#">Regulation 2019/827</a> require the Competent Authorities to ensure that professional operators have access to a technical guidance on the criteria to be fulfilled in the examinations to the issuance of plant passports. Has that technical guidance been provided in your <b>country</b>?</p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul> <p>If yes: how would you rate <b>the quality of the technical guidance provided</b> in your country?</p> <ul style="list-style-type: none"> <li>• Very good</li> <li>• good</li> <li>• average</li> <li>• Somewhat insufficient</li> <li>• insufficient</li> </ul> <p><i>If 'somewhat inappropriate' or 'not sufficient', can you please explain: [FREE TEXT]</i></p>	<ul style="list-style-type: none"> <li>▪ EU operators</li> <li>▪ EU Professional associations</li> <li>▪ MS Professional associations</li> </ul>

	Additional comments or Feedback	
67.	<p>Do you have any additional comments or feedback you would like to provide?</p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul> <p><i>If yes, Please provide your comments or feedback: [FREE TEXT]</i></p>	<ul style="list-style-type: none"> <li>▪ EU NPPO</li> <li>▪ EU Certification CAs</li> <li>▪ EU Professional associations</li> <li>▪ MS Professional associations</li> <li>▪ EU Operators</li> </ul>
	Citizens' awareness on the plant passport	
68.	<p>EU rules on plant health contribute to sustainable agricultural and horticultural production as well as the protection of public and private green spaces, forests and the natural landscape. They also aim to ensure safe trade, as well as to mitigate the impacts of climate change on the health of our crops and forests. To do so, EU Member States, the European Parliament and the Commission, all came to an agreement that all plants for planting (e.g. fruits trees, ornamental plants, indoor pot plants, vegetable seedlings etc.) and certain plant products (e.g. wood) and other objects should be accompanied by so called 'plant passport'. Plant passport is an official label that attests to the compliance of the respective plant material with the applicable EU plant health requirement. Plant passport is required at the business-to-business level, when plant material is traded or otherwise moved between professional operators. It is also required to accompany plant material sold on-line (e.g. through different e-shops) or destined to so called Protected Zones in the Union (Art 81 of <a href="#">Regulation (EU) 2019/2072</a>).</p> <p>As a citizen, did <b>you know that a plant passport is required to accompany all plants for planting</b> when traded between the producers and other professional operators in the EU?</p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> <li>• No opinion</li> </ul>	<ul style="list-style-type: none"> <li>▪ General public</li> </ul>
69.	<p>Did you <b>know that, if you buy plants on-line, you should receive them accompanied by a plant passport?</b></p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> <li>• No opinion</li> </ul>	<ul style="list-style-type: none"> <li>▪ General public</li> </ul>
70.	<p>How do you rate the requirement, <b>i.e. that plants sold on-line should be accompanied by a plant passport, in terms of contributing to an increased protection</b> of the EU territory against the spread of plant quarantine pests?</p> <ul style="list-style-type: none"> <li>• Probably very counterproductive</li> <li>• Probably counterproductive</li> <li>• Probably a good idea</li> <li>• Probably a very good idea</li> <li>• No opinion</li> </ul>	<ul style="list-style-type: none"> <li>▪ General public</li> </ul>

**ANNEX I -List of the commodities that will be included as a dropdown list (\*) for some of the questions.**

- Fruit plants for planting/propagating material (other than seeds)
- Vine plants for planting/propagating material (other than seeds)
- Forestry plants for planting/propagating material (other than seeds)
- Ornamental plants for planting/propagating material (other than seeds)
- Field crops (other than potatoes) for planting/propagating material
- Vegetable plants for planting/propagating material (other than seeds)
- Seed potatoes for planting/propagating material
- Seeds
- Fruits
- Wood materials



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