



EUROPEAN COMMISSION
HEALTH AND CONSUMERS DIRECTORATE-GENERAL

Safety of the Food Chain
Director

Brussels,
SANCO E2/RV/ap (2012) 64019

TO WHOM IT MAY CONCERN

Subject: Impact study: Quantification of the economic, environmental and social impacts of introducing mandatory treatment requirements for wood packaging material circulating inside the European Union

The European Commission is reviewing Commission Decision 2006/133/EC¹ and considers replacing it by measures addressed to all Member States, reflecting the changed status of pine wood nematode (PWN) as EU quarantine organism present in part of its territory. The changed reality necessitates reconsidering whether it is appropriate to maintain the current ISPM No.15² requirements only for imports into the Union and for movements out of PWN outbreak areas. An alternative would be to introduce a legal provision under Directive 2000/29/EC³ requiring that also movements of WPM produced inside the Union shall be prohibited unless that WPM have been subjected to the measures of ISPM No.15.

Such EU-wide implementation of ISPM No. 15 would not only help combat PWN, but also step up prevention against other dangerous quarantine pests carried with WPM (e.g. Asian longhorn beetle (*Anoplophora glabripennis*), various bark beetles (e.g. *Ips duplicatus*, *Dendroctonus micans*) etc.).

At the Council meeting in December 2009, the Chief Plant Health Officers of the Member States stressed the need for implementation of ISPM No. 15 requirements on WPM for the intra-EU trade and asked the Commission to initiate the process by performing an impact study.

In support to the policy decision making process, an impact study on quantification of the economic, environmental and social impacts of introducing mandatory ISPM No.15 treatment requirements for WPM circulating inside the European Union will be carried

¹ Commission Decision 2006/133/EC of 13 February 2006 requiring Member States temporarily to take additional measures against the dissemination of *Bursaphelenchus xylophilus* (Steiner *et* Buhrer) Nickle *et al.* (the pine wood nematode) as regards areas in Portugal, other than those in which it is known not to occur, OJ L 52, 23.2.2006, p. 34.

² International Standard for Phytosanitary Measures No.15: *Regulation of wood packaging material in international trade* (2009), FAO, 2011


³ Council Directive 2000/29/EC of 8 May 2000 on protective measures against the introduction into the Community of organisms harmful to plants or plant products and against their spread within the Community, OJ No L169, 10.7.2000, p.1.

out by the Food Chain Evaluation Consortium (FCEC⁴), led by Mr. Conrad Caspari and Dr. Maria Christodoulou (Agra CEAS Consulting). The FCEC will consult public bodies and relevant stakeholders at EU and national level. It is obvious that, for the study to be successful, the quality of the information submitted to the investigators is of paramount importance.

With this letter I would like to request your full cooperation in the above-mentioned study, which will play a crucial role in the assessment of the impact of potential policy options for the intra-EU provisions for WPM. Contact point for further enquiry is Mr Roman Vágner (tel. +32 2 29 59 664; Roman.VAGNER@ec.europa.eu).

I thank you in advance for your kind help in this matter.

Yours faithfully,


Eric Poudelet

⁴ FCEC team members: Agra CEAS Consulting, Van Dijk Management Consultants and Arcadia International.