

From: UNION FLEURS - Sylvie Mamias
Sent: Tue, 25 Apr 2023 00:08:07 +0200
To: <COMP-GREFFE-ANTITRUST@ec.europa.eu>
Cc:
Subject: HT.6134 - reply from an organisation
Attachments:

Dear Sir/Madam,

The derogation introduced in the new Article 210a by Regulation (EU) 2021/2117 is welcome and opens valuable opportunities for the ornamental horticultural sector to further contribute to sustainability in line with the EU ambitions laid down in the Green Deal, Farm to Fork Strategy and the European biodiversity strategy. The development of guidelines by the EU Commission, covering the interpretation of this derogation and the conditions for applying it in practice, is also very welcomed to help the sector make use of this new derogation and we thank you for the opportunity to contribute with comments.

We have noted that 'plant health' (in the sense of the phytosanitary rules covered under the EU Plant Health Law as per Regulation 2016/2031) is not listed in the scope of the derogation, whereas 'animal health' is. As already mentioned in the initial consultation in 2022, we would insist that guidelines on Article 210a clarify that sustainability agreements may in practice also include agreements to improve plant health and prevent the introduction and spread of pest of plants regulated by the EU Plant Health law as such agreements will help protect biodiversity and ecosystems and mitigate the use of plant protection products . Similarly, we would also recommend that the guidelines also clarify that sustainability agreements aimed at preventing the introduction and spread of invasive alien species will be considered compliant with Article 210a as they help contribute to the protection of biodiversity and ecosystems.

We thank the European Commission for taking our comments into account and integrate them in the final version of the guidelines.

Kind regards,

Sylvie Mamias

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Union Fleurs is the international umbrella organization representing and promoting the worldwide interests of national associations and companies active in the floricultural trade (cut flowers, foliage and pot plants). It is based in Brussels and has nowadays members in 20 countries

worldwide (in Europe, Africa, Middle-East, South and North America, and Asia). Within its membership, Union Fleurs gathers over 3.000 companies active in the trade of cut flowers and pot plants worldwide, of which more than 1,500 floricultural traders and wholesalers in the EU. Members account for more than 80% of the total value of the worldwide trade of cut flowers and pot plants.

More information on Union Fleurs is available at: www.unionfleurs.org

EU Register of Interest Representatives (ETI): 14864192565-82

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