

CC(17)663:1 – VO/al

Mr Daniel Calleja Crespo
Director-General
DG Environment
European Commission
Avenue de Beaulieu, 5
BE-1160 Brussels

Brussels, 7th February 2017

Re: Implementation of EU Regulation No 1143/2014 on Invasive Alien Species

Dear Sir,

We, the European farmers and agri-cooperatives, forest owners, landowners, horticulturists and the fur industry, would like to express our deepest concerns about the ongoing and future implementation of EU Regulation No 1143/2014 on Invasive Alien Species.

We wish to make it clear to the European Commission and to the Member States that the objectives of this regulation are not being respected. Many stakeholders supported the regulation given that it will primarily focus on species not yet present or at an early stage of invasion which also have the most significant adverse impact on biodiversity. However, the focus until now has been on species that are either already widely spread or were introduced among Europe's fauna and flora several decades ago, without having had a significant adverse impact.

Furthermore, we are concerned by the fact that the Commission started to list species before the method of listing (i.e. the delegated act) was written and approved. Now that the work on the delegated act has finally begun, we would like to take the opportunity to propose several amendments to the draft that has been circulated to the Member States. Please find them enclosed to this letter.

We are especially worried by the fact that the Scientific Forum does not reflect the spirit of Article 5 (1) h of the Regulation, where socio-economic benefits deriving from these species have to be evaluated alongside environmental aspects equally. The Scientific Forum has proven to have little capacities on properly assessing socio-economic benefits. We therefore urge the Commission to appoint economic experts in addition to the environmental ones to be part of the Scientific Forum in order to develop solid risk assessments in line with Art 5 (1) h).

In addition, we consider that the scientists performing the risk assessments as well as the peer reviewers of the risk assessments must be chosen based on their scientific expertise, not on their nationality.

We also urge the Commission to make a distinction between Invasive Alien Species and their sterile varieties. Ornamental plant breeders have used a number of methods to develop sterile (with low or no effective reproductive and dispersal mechanisms) varieties that can therefore not become invasive as defined under Art 3 (2). So far, this distinction has not been made by the regulation. We therefore demand that sterile varieties of species that are undergoing risk assessments are excluded from the Regulations 'scope.

The undersigned organisations especially appreciate our good cooperation with the Commission's Directorates and wish to thank you for taking into account the concerns we have hereby expressed.

Yours faithfully,

Emma Berglund
Secretary General of
CEPF

Pekka Pesonen
Secretary General of
Copa and Cogeca

Thierry de l'Escaille
Secretary General of
ELO

Josep M. Pagès
Secretary General of
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Mette Lykke Nielsen
CEO FurEurope

Eveline Herben
Director of VBN

Bertram Fleischer
Secretary General of
ZVG

Enc: [EN(17)751]: Proposals For Amendments On The Draft Delegated Act Foreseen Under Art.5(3) Of Reg. 1143/2014