British Potato Trade Association

12 Buckstone Hill, Edinburgh, EH10 6TH
Tel: 0131 623 0183 Fax: 0131 623 5295
Email: charlie.greenslade@bpta.org.uk
Website: www.bpta.org.uk

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Mr Walter De Backer
Policy Officer
Directorate-General for Health & Consumers
European Commission
B-1049 Brussels
BELGIUM

Dear Mr De Backer

Annexes I and II to Directive 2002/56/EC

Thank you for taking time to attend the Europatat Seed Potato Commission meeting on 27th January 2011 and for your presentation on the marketing of seed and plant propagating material. Of great interest to the seed potato industry at present is the discussions on possible amendments to Annexes I and II to the Seed Potato Directive 2002/56/EC. Unfortunately in the discussion that ensued after you left the meeting there was no unanimity amongst the Seed Potato Commission on the position that Europatat should take on the matter. As a result national trade bodies were invited to make representations direct to you. This letter encapsulates the view of the British Potato Trade Association (BPTA) which represents potato trading companies across the UK, many of which have their own seed potato production capability.

The BPTA fully endorses the concept of harmonisation of seed potato classes across Europe. In that respect it welcomed the paper prepared by the European Seed Association. However that paper contained a fundamental error in ascribing to the UK the existence of only 3 generations of Basic seed potatoes when in fact we currently have 6 possible entry generations at Basic Grade. As a result ESA's proposals for only 3 generations of Basic seed are based upon a false premise and represent a contraction in the classification system in the UK that is unjustified and difficult to bear. As such it is unacceptable to the BPTA and to the potato industry in the UK as a whole. We consider the Experts Group paper, which is a significant evolution of the ESA paper, to be a more credible foundation for taking this matter forward.

The UK, and in particular the high grade seed potato areas in this country, enjoy exceptional conditions for the production of quality seed potatoes. This enables the maintenance of high quality seed potatoes for multiple generations of the same stock. While it is accepted that there is a correlation between the number of field generations and the quality of the seed potatoes it is also true to say that "More generations do not necessarily lead to a lower quality nor do fewer generations automatically result in higher quality seed. Under suitable conditions and proper health management, seed stocks can be propagated for more than 7 years and provide a final seed crop suitable for end use production." This very statement is taken from the Experts Group paper.

We see no justifiable reason why perfectly acceptable seed potatoes which continue to meet the standard for say "S" grade should be downgraded automatically and removed from Basic Grade after 3 years. We simply cannot accept a classification scheme which negates the natural environmental advantages which we are fortunate to enjoy and which cannot be justified other than by the creation of harmony with other areas of Europe. As with the ability to adopt discretionary stricter national standards there needs to be scope within the harmonised scheme for member states to optimise their certification arrangements to the local conditions and their potential to make an industry - which faces challenging circumstances, including a

location at the margins of Europe with the attendant higher transportation costs - as profitable as possible. Some may argue that this may require the mandatory inclusion of field generation information. The BPTA's position is that field generation information should be optional and at the discretion of the seller. At present a number of member states obviously haven't the facility to operate field generation markers and it would be wrong to impose this unilaterally. However, we believe over time that the market may insist that field generations be provided.

We feel that showing the generation number on the label solves all of the technical requirement demanded by those requesting automatic downgrading. We therefore feel that it is fundamentally wrong for automatic downgrading to be introduced to solve the commercial problem of those wishing to disguise the generation number from their customers. Overly restrictive automatic downgrading would have huge economic impact of the UK seed industry with no technical justification. The Expert Group paper allows flexibility to encourage competitive seed production systems in the diverse climate conditions of the EU. The UK requires this flexibility to operate a competitive production system and still produce high quality seed from a region that, while benefiting from the climate to produce healthy seed, suffers from geographical isolation and higher transport costs.

Moreover, we want to encourage and incentivise our growers to keep stock at a high grade. We feel that compulsory downgrading would disguise the work done by growers to keep standards high. This constant striving to produce to a high standard keeps downgrading to a minimum in our industry and is good for our customers whether they want to grow seed or ware.

Turning to individual tolerances, the BPTA, while accepting the desirability of having tighter tolerances for wet/soft rots, recognises in particularly wet seasons that this might result in considerable unnecessary wastage and resultant cost. It would also have a significant unwarranted and unnecessarily restrictive impact on growers of organic seed and growers of older heritage varieties. We accept that certain markets demand and comply with a tolerance of 0.2% wet rots. However, we are unaware of the technical justification for restricting the viability of seed production in these and other speciality markets. We suggest that there should be no specific tolerance at Elite grade and below for wet/soft rot and that the total for all rots should simply be stated as 0.5%. This would permit the sale as Elite seed any Basic Grade seed that failed to meet the 0.2% tolerance for wet/soft rot provided that the overall tolerance for all rots was within 0.5%. Indeed we would suggest that consideration be given to creating a fall grade where a relaxation in the surface area affected by powdery scab and a less strict tolerance for Blackleg to allow downgrading of stocks in difficult seasons, possibly to Class B.

Also before we can accept the concept of a tolerance with regard to 'shrivelled tubers' being incorporated into the scheme we need to know the extent of dehydration that will be deemed unacceptable or is this decision to be left to the discretion of: a) member states or b) local inspectors? Our concerns are twofold:

1) in seasons in which there is no rain at tuber bulking the tubers can often have a loss of turgidity at harvest; and

2) the Ethylene treatment of seed increases respiration and therefore again leads to some dehydration. We wouldn't want otherwise healthy seed being unable to be certified due to the technicality of failing to meet the tolerance for shrivelled tubers. Perhaps derogations could be used in exceptionally dry seasons or when ethylene is used as a seed conditioner. In our experience other than in extreme dehydration due to silver scurf (100% surface area coverage) tubers will rehydrate once planted.

Yours sincerely

Charles W Greenslade
Secretary