

# Department for Environment, Food and Rural Affairs

## 27 March 2009

### PCN Directive – Implications for Growers: Q&A

1. Seed potatoes, and farm saved seed – see section 1
2. Ware potatoes, and farm saved seed – see section 2
3. Plants – see section 3

#### **1. Seed potatoes, and farm saved seed**

##### **I grow classified seed – what are the implications?**

You will see very little difference. You will make your SPCS application in the usual way and a pre-planting PCN soil test will be required. This will be arranged by the PHSI, who will sample your field at the intensified rate specified in the Directive. A negative result will allow you to enter your crop for classification. A positive result will mean that official restrictions will be placed on the field, which happens under the current arrangements. As an intensified soil sampling rate will be used, which means that any input seed you purchase will come with a greater degree of assurance about PCN freedom and equally any customers buying your harvested crop will have this assurance.

##### **I grow farm saved seed – what are the implications?**

The Directive makes provision for farm saved seed to be exempt from the requirements for an official pre-planting soil test, provided it is used 'within the same place of production situated in a defined area'. Defra's consultation proposes that this exemption should cover holdings under the same ownership or operational management. If agreed this will mean that the vast majority of farm saved seed produced in England and Wales will not require a pre-planting soil test. Defra's view is that there would be very limited benefits from introducing widespread official testing for farm saved seed production. Views are sought in the consultation on whether this proposal is supported.

##### **What are the cost implications from intensified soil sampling for seed potato growers?**

At present the PCN testing element of the SPCS is paid for by Defra. It is not proposed to change this approach, although a wider review of plant health charges is likely to take place in 2010.

### **What about exports?**

Where a third country requires confirmation of PCN freedom, official sampling and testing are necessary. These are chargeable activities at present and this will not change. The consultation proposes that sampling and testing of fields related to third country exports should be aligned with the protocol in the new Directive, to provide an equivalent degree of assurance about the results (i.e. sampling rate of 400 ml/ha for the first 4 hectares and 200 ml/ha for each additional hectare). No change to the hourly charging rate is proposed at present, but intensified sampling would take longer to complete. A wider review of plant health charges will be carried out in 2010.

### **What part of my land needs to be tested?**

The Directive requires that the field of production must be tested. It is proposed to retain the existing definition of field, which is the plot of land in which the crop is planted defined by recognisable boundaries. Views are sought on this definition in the consultation.

### **Will I be eligible for reduced rate sampling?**

Your field will be eligible for the reduced rate of sampling (400 ml/ha) if no potatoes (or tomatoes, aubergines or peppers) have been grown in it for 6 years or more, or if the most recent official tests have not detected PCN. A further reduction (to 200 ml/ha) will be applied in the case of larger fields (>4ha).

### **How can I prove that potatoes have not been grown for 6 years, to qualify for the reduced rate?**

It is proposed to make use of any existing records, such as SPCS records and grower planting records, to provide the necessary evidence. Where there is any doubt, the onus will be on growers to satisfy their PHSI that the requirement has been met.

### **Are there any requirements on potato volunteers?**

To be eligible for the reduced rate of sampling on the basis of 6 years freedom from potatoes and other hosts. It is therefore important for potato volunteers to have been controlled during this period.

### **Can I still use advisory tests?**

Yes, but these will not count towards the official assessment that a field is eligible to produce seed potatoes. Furthermore a positive finding will not result in any official confirmation of infestation or any requirement to follow an official control programme.

### **What requirements will apply to laboratories carrying out advisory tests?**

The Directive does not apply to such laboratories, so growers are free to use any laboratory they choose. No authorisation or accreditation is specified for laboratories carrying out advisory tests, but growers will wish to satisfy themselves about the quality of the testing and therefore the results they receive. For instance, they may wish to check that such laboratories are externally assessed (e.g. according to ISO 9001 and/or GLP) and follow the testing procedure outlined by the Directive (published by EPPO).

### **Can I still 'bank' my test results?**

The Directive provides that test results can be banked and it is proposed to retain the existing approach, that results can be banked for up to 4 years. Views are sought on this aspect in the consultation.

## **2. Ware potatoes**

### **I grow ware potatoes – what are the implications?**

Most ware potato production will be unaffected by the Directive. The only implications will be for those fields which are already under official control (scheduled) because of the past confirmation of the presence of PCN and for those fields officially recorded as having PCN present in future (e.g. as a result of testing for the SPCS or during the survey of ware potato land). An 'official control programme' will be required on such fields, which essentially will be an agreement to follow good agricultural practice in suppressing PCN, while still permitting ware potatoes to be grown. This will be an agreement between the grower and the PHSI and is likely to reflect the activities carried out during usual commercial practice. Guidance will be provided on the type of action which could be followed as part of the control programme. For fields which are already scheduled, the official control programme will be a relaxation of existing requirements, where the planting of ware potatoes is restricted and growing of plants for planting is prohibited.

### **I grow farm saved seed – what are the implications?**

The Directive makes provision for farm saved seed to be exempt from the requirements for an official pre-planting soil test, provided it is used 'within the same place of production situated in a defined area'. Defra's consultation proposes that this exemption should cover holdings under the same ownership or operational management. If agreed this will mean that the vast majority of farm saved seed produced in England and Wales will not require a pre-planting soil test. Defra's view is that there would be very limited benefits from introducing widespread official testing for farm saved seed production. Views are sought in the consultation on whether this proposal is supported.

### **Will a PCN test be needed before I can plant ware potatoes?**

No.

### **Can I still use advisory tests?**

Yes. Any positive finding will not result in an official confirmation of infestation or any requirement to follow an official control programme.

### **What requirements will apply to laboratories carrying out advisory tests?**

The Directive does not apply to such laboratories, so growers are free to use any laboratory they choose. No authorisation or accreditation is specified for laboratories carrying out advisory tests, but growers will wish to satisfy themselves about the quality of the testing and therefore the results they receive. For instance, they may wish to check that such laboratories are externally assessed (e.g. according to ISO 9001 and/or GLP) and follow the testing procedure outlined by the Directive (published by EPPO).

### **Will I need to meet any requirements on rotation, or use of resistant varieties?**

There is no requirement for ware potato growers to follow such practices generally, although adopting a sensible rotation represents good practice and is likely to be an important element of any official control programme on fields officially recorded as having PCN present. Whilst resistant varieties exist for *Globodera rostochiensis* there are none for *G.pallida*.

### **Will I be included in the survey of ware potato land?**

The Directive requires that 0.5% of ware potato land is included in an annual survey. This is approximately 500ha in England and Wales. It is likely that tests carried out for other reasons (e.g. potato exports) will contribute to the survey, with any additional sampling necessary carried out on a random basis. Ware fields for the survey will be selected at random to make the imposition of this requirement equitable for all growers of ware potatoes.

### **Will advisory test results contribute to the survey?**

Defra will not generally have access to such results. Additionally, the survey must be carried out 'officially' using the testing procedure specified in the Directive.

### **If I am included in the survey will I have access to the results?**

Yes. If the result is positive then it will be necessary to agree a control programme for the field in question. Identification of the species of PCN present will be helpful in this respect. If negative, then this will be helpful information to assist with future planting plans etc.

### **What if I am included in the survey and the result is positive?**

It will be necessary to agree a control programme with your PHSI, but this is likely to reflect good commercial practice in suppressing PCN.

### **Who will pay for the survey?**

Defra will pay all sampling and testing costs.

### **Can I still grow ware potatoes on a field where PCN has been officially recorded?**

Yes. Even for fields subject to an official control programme this is permitted, although the aim should be to pursue a regime which suppresses PCN level, through rotation and use of resistant varieties for example.

### **Can I still grow seed potatoes of farm saved seed on a field where PCN has been officially recorded?**

It will not be possible to grow seed potatoes (including farm saved seed) on fields subject to an official control programme.

### **Will I be subject to an official control programme?**

The main routes by which fields will be officially recorded as having PCN, and therefore will become subject to an official control programme, will be through a positive result in an official test associated with the SPCS, third country exports or in the annual survey of ware potato land.

### **What are the requirements of an official control programme?**

These will be agreed on a case by case basis between the grower and PHSI. Guidance will be provided on the type of practices to follow, based on the species of PCN present, to suppress levels and therefore achieve the objective of the control programme, which is to suppress PCN but not necessarily eradicate it.

### **Will I have to meet any waste disposal requirements?**

Potatoes grown on a field subject to an official control programme and sent for industrial processing or industrial grading, must go to a premises with appropriate waste disposal facilities. There are a number of such premises already approved and details will be provided by your PHSI. There are no waste disposal requirements applicable to other means of distribution and use of potatoes from such fields, but it is good practice to follow the Plant Health Code of Practice on the Disposal of Agricultural and Horticultural Waste. The following specific points should be noted:

- As much soil as possible should be left in the field. If material from the infested field is handled separately, it may also be returned to the same field. This is not appropriate if material from more than one field is handled together.

- Soil and waste from grading and processing must not be deposited on any other agricultural land.
- All vehicles and machinery must be cleaned and disinfected after handling the contaminated material, and the washing water disposed of in a suitable way.

### **How can I get official restrictions on my field lifted?**

An official control programme will remain in place until it can be confirmed that PCN is no longer present in the field. This will generally be after a minimum period of 6 years from the confirmation of PCN or growing of the most recent potato crop. Official sampling and testing will be required to confirm the absence of PCN. This sampling will be undertaken at the higher rate (1500 ml/ha for fields up to 8 ha in size and 400 ml/ha for each subsequent hectare).

### **If a field is rented, what responsibilities lie with the tenant?**

As a positive result in an official test will affect future use of a field, co-operation between the owner and occupier will be important if such a test is envisaged. Fields under an official control programme will remain subject to that programme until such time that the absence of PCN can be confirmed. It will be for the 'occupier' of the field (which will be the tenant, for rented fields) to ensure compliance with the programme during the period of any rental agreement, but owners will also have a responsibility to ensure that new tenants are aware of the requirements in place.

### **If a non-potato growing farmer lets land for potato growing on a season by season basis, what are his responsibilities?**

If the field is not under an official control programme, then it will be for the grower renting the field to comply with any relevant requirements. To grow seed potatoes for marketing, an official soil test will be necessary as part of the Seed Potato Classification Scheme application procedure. There are no PCN pre-planting requirements in relation to ware potato production. For fields under an official control programme, the requirements of that programme will apply to the owner of the field in addition to anyone using the field for potato production.

### **What are the cost implications for ware potato growers?**

There are no testing costs for ware potato growers. Compliance with an official control programme will have some resource implications, although these are likely to reflect existing commercial practice, to suppress PCN level in the field.

### **What about exports?**

Where a third country requires confirmation of PCN freedom, official sampling and testing are necessary. These are chargeable activities at present and this will not change. The consultation proposes that sampling and testing of fields related to third country exports should be aligned with the protocol in the new Directive, to

provide an equivalent degree of assurance about the results (i.e. sampling rate of 400 ml/ha for the first 4 ha and 200 ml/ha for each additional hectare). No changes to the hourly charging rate is proposed at present, but intensified sampling would take longer to complete. A wider review of plant health charges will be carried out in 2010.

### **3. Plants**

#### **What plants are covered?**

The Directive applies to certain PCN host plants (tomato, pepper, aubergine) and specified non-host plants, which are commonly grown in rotation with potatoes across the EU. The non-host plants are leek, beetroot, brassicas, strawberry and asparagus. Certain bulbs are also covered, which are garlic, onion, dahlia, gladiolus, hyacinth, iris, lily, daffodil and tulip.

#### **What are the requirements for PCN host plants?**

The requirements for the specified host plants (tomato, pepper and aubergine) only apply to plants with roots which are to be grown in a field, to produce further plants for planting. This method of production is not common in the UK, but the requirements would be similar to those for seed potatoes, with an official pre-planting test of the field required. An exemption from the official test is available to grow plants intended for replanting on the same holding.

#### **What are the requirements for non-host plants?**

For the specified non-host plants (leek, beetroot, brassicas, strawberry and asparagus) an official assessment is required in cases where plants with roots are to be planted in a field to produce further plants for planting. To satisfy the assessment, it will be sufficient to provide evidence that the field has remained free of PCN for a 12 year period, based on negative results of soil testing. Alternatively a known cropping history during the last 12 years that is free of potatoes and other host plants would negate the need for an official soil test. Exemptions from the assessment are available, to grow plants intended for replanting on the same holding, or if the plants are to be washed/brushed free of soil or disinfested, after harvesting. Only if it is not possible to comply with any of these requirements will an official pre-planting soil test be required.

#### **What about bulbs?**

The requirements for specified bulbs (garlic, onion, dahlia, gladiolus, hyacinth, iris, lily, daffodil and tulip) are similar to those for other specified non-host plants, except that they are only covered by the Directive when intended to produce further bulbs for planting by a commercial grower and when they have not been washed/brushed free of soil or disinfested.

### **What about plants not listed in the Directive?**

There are no specific requirements for such plants in terms of pre-planting tests or planting restrictions, but it should be remembered that PCN is a 'quarantine' pest, so it is important not to knowingly spread contaminated soil in the roots of plants or on machinery etc.

### **Can I plant on PCN infested land?**

It is possible to plant the listed non-host plants and bulbs on fields subject to an official control programme, provided they are washed/brushed free of soil or disinfested, after harvesting. It is not possible to plant host plants (other than ware potato production) on such fields.

### **What about plants infested with PCN?**

For non-host plants and bulbs from fields subject to an official control programme, these may be washed/brushed free of soil or disinfested after harvesting and then planted without restrictions. It is not possible to decontaminate host plants in this way.

### **What are the cost implications for growers of plants?**

There are unlikely to be PCN testing costs for plant growers, except where it is not possible to comply with one of the alternative options described. Some plant species are subject to chargeable plant passporting authorisations and this will not change under the new regime.

### **What about exports?**

Where a third country requires confirmation of PCN freedom, official sampling and testing are necessary. These are chargeable activities at present and this will not change. The consultation proposes that sampling and testing of fields related to third country exports should be aligned with the protocol in the new Directive, to provide an equivalent degree of assurance about the results. No changes to the hourly charging rate is proposed at present, but intensified sampling would take longer to complete. A wider review of plant health charges will be carried out in 2010.