

Natuur en Recht

Van: ENV-IAS@ec.europa.eu
Verzonden: dinsdag 22 december 2015 15:23
Aan: info@natuurenrecht.nl; ENV-IAS@ec.europa.eu
Onderwerp: RE: IAS list

Dear Mrs Philippi-Gho,

Thank you for your mails from 25 November and 15 December 2015.

Please note that the first list of IAS of Union concern has been developed scrupulously following the provisions in Regulation 1143/2014, based on scientific risk assessments including all elements required through Article 5.1. The species with such risk assessment have been carefully screened through three subsequent meetings of the Committee with the Member States for their compliance with the criteria for listing in Article 4(3) with due consideration to the elements of Article 4(6). The process was advised by the Scientific Forum, with scientists appointed by all Member States.

This is the first list, and it will be further developed during the coming years, as more scientific risk assessments become available.

Please also note that this is an EU approach for species for which inclusion on the Union list will effectively prevent, minimise or mitigate their adverse impact (Article 4(3)(e)). Tailoring the measures to species and stakeholders is not an option, as this would undermine the consistency of the system. There are no internal border controls to prevent species to be transported from one Member State to the other. Determining invasive alien species per country would bring us back to the approach before the entry into force of the Regulation 1143/2014, a system that has not proven effective. You consider that species like the Asian hornet and the House crow should not be listed because the restrictions foreseen in the Regulation will not will effectively prevent, minimize or mitigate their adverse impact as required under article 4(3)(e). We would like to bring to your attention that besides the restrictions under Article 7, the species will be subject inter alia to the provisions under Articles 13, 16 and 17.

Compensating businesses has not been provided for in the Regulation. This is not provided for when other items are banned from trade either (e.g. chemicals). The EU expects European companies to be sufficiently forward-looking, and to avoid investing in commodities having serious negative impacts on the environment. And in the case of invasive alien species, many alternative species are available, including native species. In this context, two years for exhausting the stock can be considered very reasonable.

On the inclusion of insects detrimental to agriculture, please note that this belongs to the scope of the EU Plant Health regime. Species addressed through this regime are excluded from the scope of the Regulation (Article 2(2)(d)).

We hope that you will understand that the approach followed is exactly the one provided for by the Regulation. We are confident that the first list is an important step in the right direction and that it will further develop during the coming years. This is very essential for achieving the 2020 Biodiversity target.

Best wishes,

The IAS-team

From: Natuur en Recht [<mailto:info@natuurenrecht.nl>]
Sent: Tuesday, December 15, 2015 8:41 AM
To: ENV IAS
Subject: IAS list

Dear Sir, Madam,

Herewith I would like to ask for your attention for a commend of the Collective of IAS stakeholders on the Unionlist of invasive alien species. It would be highly appreciated by many stakeholders in the entire EU if you would take due notice of this commend.

Sincerely,
On behalf of the Collective of IAS stakeholders,
Mrs. E. Philippi-Gho



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