



**Internationaler Rebveredlerverband  
Comité international  
des pépiniéristes viticoles**

Vienna, 29 November 2017

European Commission  
Directorate-General for Health and Food Safety  
European Commission  
1049 Bruxelles/Brussel  
Belgium

Ref.: Standing Committee on Plants, Animals, Food and Feed  
Section "Plant Health" - Code: C20410  
Feedback to Draft implementing regulation Ares(2017)4762532

Ladies and Gentleman,

The International Association of Grapevine Nurseries regrets to forward this opinion after expiry of the period for feedback within the EDP-System. However, we hope that it still can be considered.

Representing the professional sector of grapevine nurseries of the 9 leading producers countries in Europe (see presentation on our website [www.irv-cip.org](http://www.irv-cip.org)) we want to comment on the

Draft implementing regulation Ares(2017)4762532, Article 4 Date of application:

“This Regulation shall apply from 14 December 2019. Plant passports issued before 14 December 2019 in accordance with Commission Directive 92/105/EEC shall remain valid until 14 December 2021.”

The appointed date 14 December 2019 cannot be held in practice as the vines are taken out from the nurseries not until November and after that still have to be handled and sorted.

Thus it should be possible to sell the production of the year 2019 yet using the old plant passports, remaining valid until the year 2022 in the case of cold storage. The regulation should then apply from December 2020.

Thank you for consideration.

Kind regards

Christian Jaborek  
General Secretary of the IRV-CIP