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SCIENTIFIC OPINION

Commodity risk assessment of *Robinia pseudoacacia* plants from the United Kingdom

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The declarations of interest of all scientific experts active in EFSA's work are available at https://open.efsa.europa.eu/experts.

Abstract

The European Commission requested the EFSA Panel on Plant Health (PLH) to prepare and deliver risk assessments for commodities listed in Commission Implementing Regulation (EU) 2018/2019 as 'High risk plants, plant products and other objects'. This Scientific Opinion covers plant health risks posed by rooted plants in pots of *Robinia pseudoacacia* 'Frisia' imported from the United Kingdom (UK). The assessment was performed considering the available scientific information, including the technical information provided by the UK. All pests potentially associated with the commodity were evaluated against specific criteria. Two EU-regulated pests (*Bemisia tabaci* and *Phytophthora ramorum* non-EU isolates), present in the UK and potentially associated with the commodity, were considered as relevant for this Opinion. No non-regulated pests in the European Union were identified to be selected for further evaluation.

KEYWORDS

EU-regulated pests, European Union, locust tree, non-regulated pests, pathway risk assessment, plant health, plant pest, *Robinia pseudoacacia*

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1 | INTRODUCTION

1.1 | Background and Terms of Reference as provided by European Commission

1.1.1 | Background

The new Plant Health Regulation (EU) 2016/2031,[1] on the protective measures against pests of plants, has been applied from 14 December 2019. Provisions within the above Regulation are in place for the listing of 'high risk plants, plant products and other objects' (Article 42) on the basis of a preliminary assessment, and to be followed by a commodity risk assessment. A list of 'high risk plants, plant products and other objects' has been published in Regulation (EU) 2018/2019.[2] Scientific Opinions are, therefore, needed to support the European Commission and the Member States (MSs) in the work connected to Article 42 of Regulation (EU) 2016/2031, as stipulated in the Terms of Reference (ToR).

1.1.2 | Terms of Reference

In view of the above and in accordance with Article 29 of Regulation (EC) No 178/2002,[3] the Commission asks EFSA to provide Scientific Opinions in the field of plant health. In particular, EFSA is expected to prepare and deliver risk assessments for commodities listed in the relevant Implementing Act as "High risk plants, plant products and other objects". Article 42, paragraphs 4 and 5, establishes that a risk assessment is needed as a follow-up to evaluate whether the commodities will remain prohibited, removed from the list and additional measures will be applied or removed from the list without any additional measures. This task is expected to be on-going, with a regular flow of dossiers being sent by the applicant required for the risk assessment.

Therefore, to facilitate the correct handling of the dossiers and the acquisition of the required data for the commodity risk assessment, a format for the submission of the required data for each dossier is needed.

Furthermore, a standard methodology for the performance of 'commodity risk assessment' based on the work already done by MSs and other international organizations needs to be set.

In view of the above and in accordance with Article 29 of Regulation (EC) No. 178/2002, the Commission asks EFSA to provide a Scientific Opinion in the field of plant health for *Robinia pseudoacacia* L. from the United Kingdom (UK) taking into account the available scientific information, including the technical dossier provided by the UK.

1.2 | Interpretation of the Terms of Reference

The EFSA Panel on Plant Health (hereafter referred to as 'the Panel') was requested to conduct a commodity risk assessment of *R. pseudoacacia* L. from the UK following the Guidance on commodity risk assessment for the evaluation of high-risk plant dossiers (EFSA PLH Panel, 2019), taking into account the available scientific information, including the technical information provided by the UK.

In accordance with the Agreement on the withdrawal of the UK of Great Britain and Northern Ireland from the European Union and the European Atomic Energy Community, and in particular Article 5(4) of the Windsor Framework in conjunction with Annex 2 to that Framework, for the purposes of this Opinion, references to the UK do not include Northern Ireland.

The EU quarantine pests that are regulated as a group in the Commission Implementing Regulation (EU) 2019/2072[4] were considered and evaluated separately at species level.

Annex II of Implementing Regulation (EU) 2019/2072 lists certain pests as non-European populations or isolates or species. These pests are considered regulated quarantine pests. Consequently, the respective European populations, or isolates, or species are non-regulated pests.

Annex VII of the same Regulation, in certain cases (e.g. point 32), makes reference to the following countries that are excluded from the obligation to comply with specific import requirements for those non-European populations, or isolates, or species referred to Annex II of Implementing Regulation (EU) 2019/2072: Albania, Andorra, Armenia, Azerbaijan, Belarus, Bosnia and Herzegovina, Canary Islands, Faeroe Islands, Georgia, Iceland, Liechtenstein, Moldova, Monaco, Montenegro, North Macedonia, Norway, Russia (only the following parts: Central Federal District (Tsentralny federalny okrug), Northwestern Federal District (SeveroZapadny federalny okrug), Southern Federal District (Yuzhny federalny

[1]Regulation (EU) 2016/2031 of the European Parliament of the Council of 26 October 2016 on protective measures against pests of plants, amending Regulations (EU) 228/2013, (EU) 652/2014 and (EU) 1143/2014 of the European Parliament and of the Council and repealing Council Directives 69/464/EEC, 74/647/EEC, 93/85/EEC, 98/57/EC, 2000/29/EC, 2006/91/EC and 2007/33/EC. OJ L 317, 23.11.2016, pp. 4–104.

[2]Commission Implementing Regulation (EU) 2018/2019 of 18 December 2018 establishing a provisional list of high risk plants, plant products or other objects, within the meaning of Article 42 of Regulation (EU) 2016/2031 and a list of plants for which phytosanitary certificates are not required for introduction into the Union, within the meaning of Article 73 of that Regulation C/2018/8877. OJ L 323, 19.12.2018, pp. 10–15.

[3]Regulation (EC) No 178/2002 of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety. OJ L 31, 1.2.2002, pp. 1–24.

[4]Commission Implementing Regulation (EU) 2019/2072 of 28 November 2019 establishing uniform conditions for the implementation of Regulation (EU) 2016/2031 of the European Parliament and the Council, as regards protective measures against pests of plants, and repealing Commission Regulation (EC) No 690/2008 and amending Commission Implementing Regulation (EU) 2018/2019, OJ L 319, 10.12.2019, p. 1–279.

okrug), North Caucasian Federal District (Severo-Kavkazsky federalny okrug) and Volga Federal District (Privolzhsky federalny okrug), San Marino, Serbia, Switzerland, Türkiye, Ukraine and the United Kingdom (except Northern Ireland[5])). Those countries are historically linked to the reference to 'non-European countries' existing in the previous legal framework, Directive 2000/29/EC.

Consequently, for those countries,

(i) any pests identified, which are listed as non-European species in Annex II of Implementing Regulation (EU) 2019/2072 should be investigated;
(ii) any pest found in a European country that belongs to the same denomination as the pests listed as non-European populations or isolates in Annex II of Implementing Regulation (EU) 2019/2072 should be considered as European populations or isolates and should not be considered in the assessment of those countries.

Pests listed as 'Regulated Non-Quarantine Pest' (RNQP) in Annex IV of the Commission Implementing Regulation (EU) 2019/2072 and deregulated pests (i.e. pest which were listed as quarantine pests in the Council Directive 2000/29/EC and were deregulated by Commission Implementing Regulation (EU) 2019/2072) were not considered for further evaluation.

Any pests regulated both as RNQP and as a protected zone quarantine pest (Annex III) or regulated as protected zone quarantine pest will be treated as EU quarantine pest in this Opinion.

In its evaluation, the Panel:

(i) checked whether the information in the technical dossier (hereafter referred to as 'the Dossier') provided by the UK was sufficient to conduct a commodity risk assessment. When necessary, additional information was requested from the applicant;
(ii) selected the relevant EU-regulated pests (excluding RNQP, and including pests regulated under Article 30 of Regulation (EU) 2016/2031) and other relevant non-regulated pests in EU present in the UK and potentially associated with the commodity;
(iii) assessed the effectiveness of measures for pests non-regulated pest in the EU;
(iv) did not assess the effectiveness of measures for the following EU-regulated pests: (1) Union quarantine pests, (2) protected zone quarantine pests, (3) emergency measures pests listed in (EU) 2022/1941.

Risk management decisions are not within EFSA's remit. Therefore, the Panel provided a rating based on expert judgement regarding the likelihood of pest freedom for each relevant pest given the risk mitigation measures implemented by the applicant (see Section 2.3).

The Plant Health Commodity Risk Assessment Opinions are prepared following the EFSA Standard Protocol for Commodity Risk Assessment (Gardi et al., 2025).

2 | DATA AND METHODOLOGIES

2.1 | Data provided by DEFRA

The Panel considered all the data and information provided by the Department for Environment, Food and Rural Affairs (DEFRA) of the UK in June 2025, including the additional information provided on 19 December 2025, after EFSA's request. The Dossier is managed by EFSA.

The structure and overview of the Dossier is shown in Table 1. The number of the relevant section is indicated in the Opinion when referring to a specific part of the Dossier.

TABLE 1 Structure and overview of the Dossier.

Dossier section	Overview of contents	Filename
1	Technical dossiers	Robinia pseudoacacia commodity information final.pdf
2	Pest list	Robinia pseudoacacia pest list – Final.xlsx
3	List of plants produced in *Robinia* nurseries	Robinia producers sample product list.xlsx
4	Additional information: answers on dossier information and pest status	Robinia pseudoacacia additional information.pdf

The data and supporting information provided by the UK formed the basis of the commodity risk assessment.

[5]In accordance with the Agreement on the withdrawal of the United Kingdom of Great Britain and Northern Ireland from the European Union and the European Atomic Energy Community, and in particular Article 5(4) of the Windsor Framework in conjunction with Annex 2 to that Framework, for the purposes of this Opinion, references to the United Kingdom do not include Northern Ireland.

Table 2 shows the main data sources used by the UK to compile the Dossier (details on literature searches can be found in the Dossier Section 1).

TABLE 2 Database sources used in the literature searches by the UK.

Database	Platform/link
Aphids on World Plants	https://www.aphidsonworldsplants.info/
Beetles of Britain and Ireland	https://www.coleoptera.org.uk/
Biological Records Centre	https://www.brc.ac.uk/
British Bugs	https://www.britishbugs.org.uk/gallery.html
Butterflies and Moths of North America	https://www.butterfliesandmoths.org/
CABI Crop Protection Compendium	https://www.cabi.org/cpc/
CABI Plantwise Knowledge Bank	https://www.plantwise.org/knowledgebank/
CABI Publishing	https://www.cabi.org/what-we-do/publishing/
Checklist of Aphids of Britain	https://influentialpoints.com/aphid/Checklist_of_aphids_in_Britain.htm
Encyclopedia of Life	https://eol.org/
EPPO Global Database	https://gd.eppo.int/
Fauna Europaea	https://www.gbif.org/dataset/90d9e8a6-0ce1-472d-b682-3451095dbc5a
Forest research	https://www.forestresearch.gov.uk/
Fungi of Great Britain and Ireland	https://fungi.myspecies.info/
Global Biodiversity Information Facility	https://www.gbif.org/
Global Taxonomic Database of Gracillariidae (Lepidoptera)	https://www.gbif.org/dataset/98fb9418-8215-4575-abfb-07a30b81acfc
National Collection of Plant Pathogenic Bacteria (NCPPB)	https://ncppb.fera.co.uk/ncppbresult.cfm
Nature Spot	https://www.naturespot.org.uk/
Natural History Museum (NHM)	https://data.nhm.ac.uk/dataset/hosts
NBN Atlas	https://species.nbnatlas.org/
NEMAPLEX	https://nemaplex.ucdavis.edu/
Plant Parasites of Europe – leafminers, galls and fungi	https://bladmineerders.nl/
Pyrenomycetes from southwestern France	https://pyrenomycetes.free.fr/
ScaleNet	https://scalenet.info/
Spider Mites Web	https://www1.montpellier.inra.fr/CBGP/spmweb/
The Sawflies (Symphyta) of Britain and Ireland	https://www.sawflies.org.uk/
Thrips-iD	https://www.thrips-id.com/en/
UK Beetles	https://www.ukbeetles.co.uk/
UK Moths	https://ukmoths.org.uk/
UK Plant Health Information Portal	https://planthealthportal.defra.gov.uk/

2.2 | Literature searches performed by EFSA

Literature searches in different databases were undertaken by EFSA to complete a list of pests potentially associated with *R. pseudoacacia*. The following searches were combined: (i) a general search to identify pests reported on *R. pseudoacacia* in the databases, (ii) a search to identify any EU quarantine pest reported on *Robinia* as a genus and subsequently (iii) a tailored search to identify whether the above pests are present or not in the UK. The databases used for each of the above searches are specified in Table 3. The searches were run on 19 November 2025. No language, date or document type restrictions were applied in the search strategy.

The search strategy and search syntax were adapted to each of the databases listed in Table 3, according to the options and functionalities of the different databases and the CABI keyword thesaurus.

As for Web of Science, the literature search was performed using a specific, ad hoc established search string (Supporting information: Annex A). The string was run in 'All Databases' with no range limits for time or language filters. The methodology is further explained in Section 2.3.2.

TABLE 3 Databases used by EFSA for the compilation of the pest list associated with *Robinia pseudoacacia*.

Database	Platform/link	Database use
Aphids on World Plants	https://www.aphidsonworldsplants.info/C_HOSTS_AAIntro.htm	Host plant records
BIOTA of New Zealand		Host plant records
CABI Crop Protection Compendium		Pest distribution and host plant records
Database of Insects and their Food Plants		Host plant records
Database of the World's Lepidopteran Hostplants		Host plant records
EPPO Global Database		Regulated status, pest status, pest distribution and host plant records
EUROPHYT		Pest interceptions and outbreak reports
Gallformers		Host plant records
Leaf-miners		Host plant records
GBIF		Arthropods distribution in EU ('human observation' category) only for validated records
MyCoPortal	https://www.mycoportal.org/portal/collections/harvestparams.php	Pest distribution
Nemaplex		Pest distribution
PESI portal	https://www.eu-nomen.eu/portal/	Pest distribution
Plant Parasites of Europe		Host plant records
Plant Pest Information Network		Host plant records
ScaleNet		Pest distribution and host plant records
Scoly-Hub Scolytinae hosts and distribution database	https://www.scolytinaehostsdatabase.eu/site/it/home/	Host plant records and pest distribution
Spider Mites Web		Host plant records
USDA ARS Fungal Database		Pest distribution and host plant records
Web of Science: All Databases (Web of Science Core Collection, CABI: CAB Abstracts, BIOSIS Citation Index, Chinese Science Citation Database, Current Contents Connect, Data Citation Index, FSTA, KCI-Korean Journal Database, Russian Science Citation Index, MEDLINE, SciELO Citation Index, Zoological Record)	Web of Science	Host plant records and evidence of impact (for actionable pests)
World Agroforestry	https://www.worldagroforestry.org/treedb2/speciesprofile.php?Spid=1749	Host plant records

Additional documents were retrieved when developing the Opinion. The available scientific information, including previous EFSA opinions on the relevant pests and diseases and the relevant literature and legislation (e.g. Regulation (EU) 2016/2031; Commission Implementing Regulations (EU) 2018/2019; (EU) 2018/2018 and (EU) 2019/2072) were taken into account.

2.3 | Methodology

When developing the Opinion, the Panel followed the EFSA Guidance on commodity risk assessment for the evaluation of high-risk plant dossiers (EFSA PLH Panel, 2019) and the EFSA Standard Protocol for Commodity Risk Assessment (Gardi et al., 2025).

Pests potentially associated with the commodity in the country of origin and fulfilling the selection criteria (see Section 2.3.2) are identified as relevant pests.

For non-regulated pests in the EU, all relevant risk information is summarised in a pest data sheet and a conclusion on the likelihood of the commodity being free from each of the relevant pests is determined and uncertainties are identified using expert knowledge elicitation (EKE).

Relevant pests with a quarantine status in the EU are prohibited from being introduced to the EU according to Article 5(1) of Regulation (EU) 2016/2031 and therefore should not be present on imported plant commodities. Consequently, no specific measures are defined in the Annex to Implementing Regulation (EU) 2020/1213. For these pests, no expert knowledge elicitation of likelihood of pest freedom on the exported commodity is performed, unless the Panel considers it appropriate to conduct such an evaluation or if it is specifically requested by the European Commission.

2.3.1 | Commodity information

Based on the information provided by DEFRA from the UK, the characteristics of the commodity were summarised in Section 3 of this Opinion.

2.3.2 | Identification of pests potentially associated with the commodity

To evaluate the pest risk associated with the importation of *R. pseudoacacia* from the UK, a pest list was compiled. The pest list is a compilation of all identified plant pests associated with plants of the genus *Robinia* based on information provided in the Dossier Section 2 and on further literature searches performed by the Panel.

The scientific names of the host plants (i.e. *R. pseudoacacia*) were used when searching in the EPPO Global database, CABI Crop Protection Compendium and other databases (Table 3), with the exception of EUROPHYT/TRACES-NT and Web of Science for which the search procedure is described below in the text. EUROPHYT (2025) was consulted by searching for the interceptions associated with commodities imported from the UK, at species and genus level, from 1995 to May 2020 and TRACES-NT (2025) for interceptions from May 2020 to present. For the pests selected for further evaluation, a search in the EUROPHYT and/or TRACES-NT was performed for the interceptions from the whole world at species level.

The search strategy used for Web of Science Databases was designed combining common names for pests and diseases, terms describing symptoms of plant diseases and the scientific and common names of the commodity. All of the pests already retrieved using the other databases were removed from the search terms in order to be able to reduce the number of records to be screened. The established search string is detailed in Supporting information (Annex A) and was run on 19 November 2025.

The titles and abstracts of the scientific papers retrieved were screened and the pests associated with the *R. pseudoacacia* were included in the pest list. The pest list was eventually further compiled with other relevant information (e.g. EPPO code per pest, taxonomic information, categorisation, distribution) useful for the selection of the pests relevant for the purposes of this Opinion.

The compiled pest list (Supporting information: Annex B) includes all pests and other entities reported as associated with the genus of *Robinia*.

The evaluation of the compiled pest list was done in two steps: first, the relevance of the EU-regulated pests was evaluated (Section 4.1); second, the relevance of any other plant pests was evaluated (Section 4.2).

The relevance of an EU-regulated pest for this Opinion was based on evidence that:

(i) The *R. pseudoacacia* is a host of the pest.
(ii) The pest is present in the UK.
(iii) One or more life stages of the pest can be associated with the specified commodity.

Pests that fulfilled all criteria were selected as relevant.

To identify non-regulated pest in the EU and associated with the commodity, the same criteria used for EU-regulated pests were applied. In addition, further criteria were considered: if the pest is (i) absent or (ii) has a limited distribution in

the EU and if the pest (iii) might have an impact in the EU. Pests that fulfilled all criteria were selected for further evaluation. Pests for which limited information was available on one or more criteria used to identify them as relevant for this Opinion, e.g. on potential impact, are listed in Section 4.3 and Table 6.

2.3.3 | Listing and evaluation of risk mitigation measures

All implemented risk mitigation measures were listed. When evaluating the likelihood of pest freedom at origin, the following types of potential pathways by which the pest may be introduced to the *R. pseudoacacia* plants in nurseries were considered (Figure 1):

- pest entry from surrounding areas,
- pest entry with new plants/seeds,
- pest spread within the nursery.

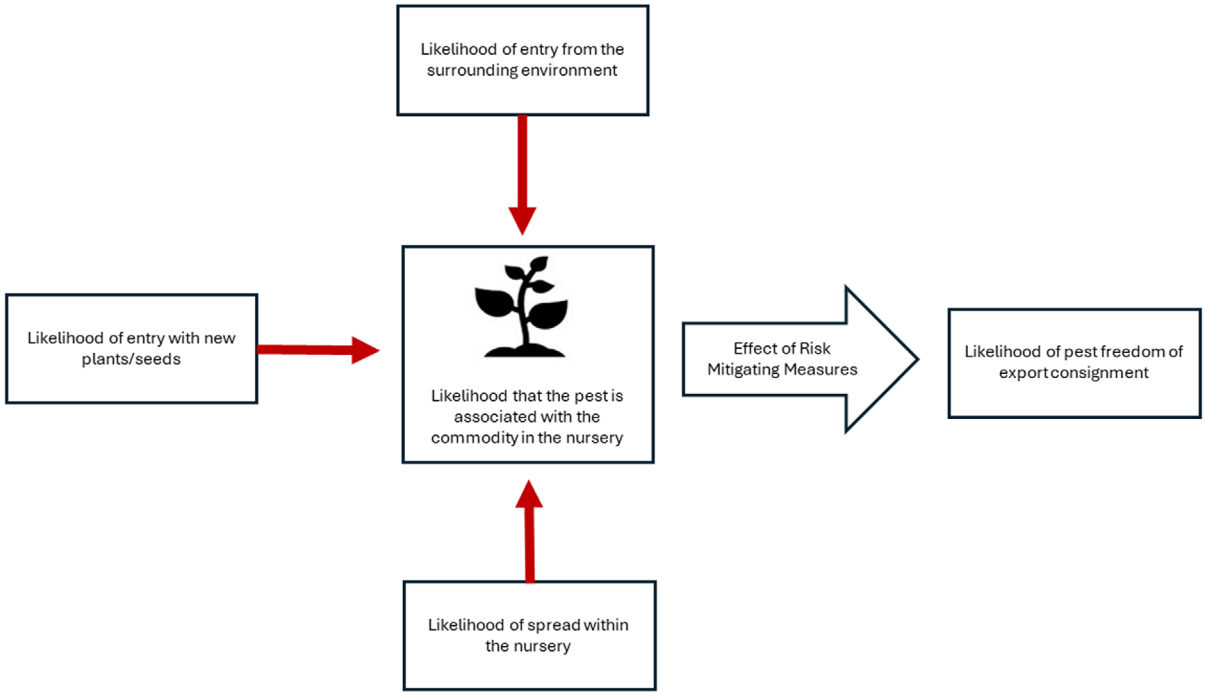

FIGURE 1 Conceptual framework to assess likelihood that plants are exported free from relevant pests (Source: EFSA PLH Panel, 2019).

The risk mitigation measures adopted in the plant nurseries (as communicated by DEFRA from the UK) were described in Section 5.2 for each relevant pest.

2.3.4 | Expert knowledge elicitation

As only EU-regulated pests were selected as relevant for this Opinion (see Section 4), according to Section 2.3, no EKE was performed.

3 | COMMODITY INFORMATION

All the information presented in this section has been retrieved from the Dossier submitted by the UK. The Panel assumes that the information retrieved from the Dossier submitted by the UK is applicable to all nurseries seeking authorisation to export the commodity to the EU in the future.

3.1 | Description of the commodity

The commodity to be imported is *Robinia pseudoacacia* L. (EPPO code: ROBPS; common name: Locust tree, robinia, false acacia, black locust; family: Fabaceae; variety: 'Frisia') in the form of rooted plants in pots. According to ISPM 36 (FAO, 2019),

the commodity can be classified as 'rooted plants in pots'. Plants may be exported with leaves, depending on the timing of the export and the life cycle of the species.

Details on plant commodities characteristics (age and size) are presented in Table 4.

TABLE 4 Type of *Robinia pseudoacacia* 'Frisia' to be exported to the EU (Dossier Section 1).

Type of plant	Age	Min–max diameter	Min–max height/length
Rooted plants in pots	3–10 years	2–12 cm	150–800 cm

According to the Dossier, a total of 1500 rooted plants in pots per year are planned to be exported to the EU. Rooted plants in pots can be moved at any point in the year to fulfil customer demand, but more usually with a seasonal timing from September to May.

3.2 | Description of the production areas

All nurseries/producers are registered as professional operators with the UK NPPO, either by the Animal and Plant Health Agency (APHA) in England and Wales or by the Scottish Government, and are authorised to issue UK plant passports.

The exporting nurseries grow a range of other plant species (see Dossier section 3). The nursery also sells plants within the UK to final users as ornamental plants, e.g. to the local authorities/landscape architects.

Hedges surrounding the nursery are made up of a range of species including hazel (*Corylus avellana*), yew (*Taxus baccata*), holly (*Ilex* spp.), ivy (*Hedera* spp.), alder (*Alnus glutinosa*), laurel (*Prunus laurocerasus*), hawthorn (*Crataegus* spp.), blackthorn (*Prunus spinosa*) and leylandii (*Cupressus x leylandii*).

The minimum distance between greenhouses and outdoor areas where plants may be stored is 30 m. The minimum distance to the nearest greenhouses in the surrounding environment (i.e. not on the grower's premises) is 500 m.

Exporting nurseries are predominantly situated in rural areas. The surrounding land tends to be arable farmland with some pasture for animals and small areas of woodland. Hedges are often used to define field boundaries and grown along roadsides.

Arable crops are rotated in line with good farming practice and could include oilseed rape (*Brassica napus*), wheat (*Triticum* spp.), barley (*Hordeum vulgare*), turnips *(Brassica rapa* subsp. *rapa*), potatoes (*Solanum tuberosum*) and maize (*Zea mays*).

Pasture is predominantly ryegrass (*Lolium*).

Woodlands tend to be a standard UK mixed woodland, with a range of UK native trees such as oak (*Quercus robur*), pine (*Pinus* spp.), poplar (*Populus* spp.), ash (*Fraxinus* spp.), sycamore (*Acer pseudoplatanus*), holly (*Ilex* spp.), Norway maple (*Acer platanoides*) and field maple (*Acer campestre*).

Hedges in the surrounding environment are made up of a range of species, including hazel (*Corylus avellana*), yew (*Taxus baccata*), holly, ivy (*Hedera* spp.), alder (*Alnus glutinosa*), laurel (*Prunus laurocerasus)*, hawthorn (*Crataegus* spp.), blackthorn (*Prunus spinosa*) and leylandii (*Cupressus x leylandii*).

The plant species that are growing within the gardens of private dwellings are not known.

3.3 | Production and handling processes

3.3.1 | Growing conditions

Only potted plants of *R. pseudoacacia* are grown in the nursery. All these plants are imported from the EU and stored outdoors, in trays on top of protective plastic membranes to prevent contact with soil, on site for only short periods (not more than 3 months) before being exported.

3.3.2 | Source of planting material

Robinia pseudoacacia potted plants are sourced from EU suppliers (usually the Netherlands, Belgium or Germany). All plants are certified with phytosanitary certificates.

3.3.3 | Production cycle

Potted plants of *R. pseudoacacia* are imported to fulfil specific commercial orders, stored for as short a period as possible and then dispatched (re-exported to the EU). The imported plants are not re-potted. The plants could be imported at any time of year and therefore in any phenological stage. The plants could be in the nursery for as little as 1 week. The maximum time they would be on site is 3 months.

3.3.4 | Pest monitoring during production

The crops are inspected visually on a regular basis by competent nursery staff as part of the growing process. All plants are also carefully inspected by nurseries on arrival and dispatch for any plant health issues.

3.3.5 | Pest management during production

All plants within UK nurseries are grown under the same phytosanitary measures, meeting the requirements of the UK Plant Passporting regime (Dossier section 1).

All nurseries and producers are registered as professional operators with the UK NPPO either by the Animal and Plant Health Agency (APHA) in England and Wales or with SASA by the Scottish Government, and are authorised to issue UK plant passports and phytosanitary certificates for export, verifying they meet the required national sanitary standards (Dossier Section 1).

3.3.6 | Post-harvest processes and export procedure

For export procedures, the UK NPPO carries out inspections and testing (where required by the country of destination's plant health legislation) to ensure all requirements are fulfilled and a valid phytosanitary certificate with the correct additional declarations is issued (Dossier Section 1).

The preparation of the commodities for export is carried out inside the nurseries in a closed environment, e.g. a packing shed (Dossier Section 1).

Rooted plants in pots are transported on Danish trolleys for smaller containers, or ISPM 15 certified pallets, or individually in pots for larger containers.

Plants are transported by lorry (size dependent on load quantity). Sensitive plants will occasionally be transported by temperature-controlled lorry if weather conditions during transit are likely to be very cold (Dossier Section 1).

4 | IDENTIFICATION OF PESTS POTENTIALLY ASSOCIATED WITH THE COMMODITY

A total of 1297 potential pests associated with the *R. pseudoacacia* were identified following a structured search (as described in Section 2.3.2) (for search string and pest list, see Supporting information: Annexes A and B).

4.1 | EU-regulated pests potentially associated with the commodity

Twenty-six EU-regulated species (excluding RNQPs' pests) are reported to use *Robinia* spp. as a host plant. *Bemisia tabaci* and *Phytophthora ramorum* (non-EU isolates) were listed as relevant since they are present in the UK and can be associated with the commodity (Table 5).

TABLE 5 Overview of the evaluation of the 26 EU-regulated pest species (excluding RNQP pests) known to use *Robinia* spp. as a host plant for their relevance for this Opinion.

No.	Pest name according to EU Legislation[a]	EPPO code	Group[b]	Pest present in UK	*Robinia genus* confirmed as a host (reference)	Pest can be associated with the commodity	Regulatory status	Pest relevance for the Opinion	Selected for the EKE
1	*Anoplophora chinensis*	*ANOLCN*	*INSECT*	*NO*	Yes (EPPO, online)	*Yes*	*EU-regulated pest*	NO	NO
2	*Anoplophora glabripennis*	*ANOLGL*	*INSECT*	*NO*	Yes (Medzihorský et al., 2023)	*Yes*	*EU-regulated pest*	NO	NO
3	*Apriona germari*	*APRIGE*	*INSECT*	*NO*	Yes (EPPO, online)	*Yes*	*EU-regulated pest*	NO	NO
4	*Apriona rugicollis*	*APRIJA*	*INSECT*	*NO*	Yes (EPPO, online)	*Yes*	*EU-regulated pest*	NO	NO
5	*Bemisia tabaci*	*BEMITA*	*INSECT*	*YES*	No (EPPO, online; Plant parasites of Europe, online)	*Yes*	*EU-regulated pest*	YES	NO
6	*Bothrogonia ferruginea*	*TETTFE*	*INSECT*	*NO*	Yes (Medzihorský et al., 2023)	*Yes*	*EU-regulated pest*	NO	NO
7	*Cnesinus dividuus*		*INSECT*	*NO*	Yes (Marchioro et al., 2025)	*Yes*	*EU-regulated pest*	NO	NO
8	*Diabrotica undecimpunctata howardi*	*DIABUH*	*INSECT*	*NO*	Yes (EPPO, online)	*Yes*	*EU-regulated pest*	NO	NO
9	*Euwallacea fornicatus* sensu lato	*XYLBFO*	*INSECT*	*NO*	Yes (EPPO, online)	*Yes*	*EU-regulated pest*	NO	NO
10	*Euwallacea fornicatus* sensu *strictu*	*EUWAWH*	*INSECT*	*NO*	Yes (EPPO, online)	*Yes*	*EU-regulated pest*	NO	NO
11	*Fusarium euwallaceae*	*FUSAEW*	*FUNGI*	*NO*	Yes (EFSA PLH Panel, 2020)	*Yes*	*EU-regulated pest*	NO	NO
12	*Hypothenemus crudiae*	*HYOTHI*	*INSECT*	*NO*	Yes (Marchioro et al., 2025)	*Yes*	*EU-regulated pest*	NO	NO
13	*Hypothenemus dissimilis*		*INSECT*	*NO*	Yes (Marchioro et al., 2025)	*Yes*	*EU-regulated pest*	NO	NO
14	*Hypothenemus obscurus*	*HYOTOB*	*INSECT*	*NO*	Yes (Marchioro et al., 2025)	*Yes*	*EU-regulated pest*	NO	NO
15	*Lepyronia quadrangularis*	*LEPOQU*	*INSECT*	*NO*	Yes (EPPO, online)	*Yes*	*EU-regulated pest*	NO	NO
16	*Lopholeucaspis japonica*	*LOPLJA*	*INSECT*	*NO*	Yes (EPPO, online; ScaleNet, online)	*Yes*	*EU-regulated pest*	NO	NO
17	*Lycorma delicatula*	*LYCMDE*	*INSECT*	*NO*	Yes (EPPO, online)	*Yes*	*EU-regulated pest*	NO	NO
18	*Margarodes vitis*	*MARGVI*	*INSECT*	*NO*	No (EPPO, online)	*Yes*	*EU-regulated pest*	NO	NO
19	*Phytophthora ramorum*	*PHYTRA*	*OOMYCETES*	*YES*	Yes (Tooley & Browning, 2009)	*Yes*	*EU-regulated pest*	YES	NO
20	*Poophilus costalis*	*POOPCO*	*INSECT*	*NO*	Yes (Saini et al., 2011)	*Yes*	*EU-regulated pest*	NO	NO
21	*Popillia japonica*	*POPIJA*	*INSECT*	*NO*	Yes (EPPO, online)	*Yes*	*EU-regulated pest*	NO	NO
22	*Thaumetopoea processionea*	*THAUPR*	*INSECT*	*YES*	No (CABI, online)	*No*	*EU-regulated pest*	NO	NO
23	*Trirachys sartus*	*AELSSA*	*INSECT*	*NO*	Yes (EPPO, online; CABI, online)	*Yes*	*EU-regulated pest*	NO	NO
24	*Xylella fastidiosa*	*XYLEFA*	*Bacteria*	*NO*	Yes (EPPO, online)	*Yes*	*EU-regulated pest*	NO	NO
25	*Xylella fastidiosa subsp. Multiplex*	*XYLEFM*	*Bacteria*	*NO*	Yes (EPPO, online)	*Yes*	*EU-regulated pest*	NO	NO
26	*Zeugodacus cucurbitae*	*DACUCU*	*INSECT*	*NO*	No (EPPO, online)	*Yes*	*EU-regulated pest*	NO	NO

[a]Commission Implementing Regulation (EU) 2019/2072.

[b]Group names correspond to common names used in Commission Implementing Regulation (EU) 2019/2072.

4.2 | Other relevant pests potentially associated with the commodity

None of the 1271 pests that are not regulated in the EU were selected for further evaluation, as none of them met all the relevant criteria.

4.3 | List of potential pests not further assessed

Of the pests for which there was uncertainty in at least one of the selection criteria, the Panel identified *Erysphe diffusa* as potentially concerning for the purposes of this Opinion. A specific justification for its selection is provided in Table 6. This pest will be proposed for inclusion for the Horizon scanning workflow (Horizon scanning plant pests|EFSA).

TABLE 6 List of pests of potential concern for which there is uncertainty at least in one of the selection criteria and were, therefore, not further assessed and proposed for inclusion in Horizon Scanning workflow.

No.	Current scientific name	EPPO code	Group[a]	Pest present in the UK	Present in the EU	*Robinia* genus confirmed as a host (reference)	Pest can be associated with the commodity	Impact	Justification for inclusion in this list
1	*Eysiphe diffusa*	*MCRSDI*	Fungi	Yes	Limited	Anonymous (1964)	Uncertain	Uncertain	Fungus unlikely to be present in the exported commodity; important leaf pathogen (powdery mildew), mainly for soya bean (*Glycine max*); present in Romania and Spain, no reports of official control or impact in the EU.

[a]Group names correspond to common names used in Commission Implementing Regulation (EU) 2019/2072.

4.4 | Summary of pests selected for further evaluation

The two pests satisfying all the relevant criteria listed above in Section 4.1 are included in Table 7. Both pests have a quarantine status in the EU; therefore, according to the interpretation of the ToR, the Panel did not assess the effectiveness of the measures for these pests with expert knowledge elicitation.

TABLE 7 List of pests selected as relevant for this Opinion.

No.	Current scientific name	EPPO code	Name used in the EU legislation	Taxonomic information	Group[a]	Regulatory status
1	*Bemisia tabaci*	BEMITA	*Bemisia tabaci* Genn.	Hemiptera; Aleyrodidae	Insects	EU Quarantine Pest according to Commission Implementing Regulation (EU) 2019/2072
2	*Phytophthora ramorum*	PHYTRA	*Phytophthora ramorum* (non-EU isolates) Werres, De Cock & Man in 't Veld [PHYTRA]	Order: Peronosporales Family: Peronosporaceae	Oomycetes	EU Quarantine Pest according to Commission Implementing Regulation (EU) 2019/2072

[a]Group names correspond to common names used in Commission Implementing Regulation (EU) 2019/2072.

5 | RISK MITIGATION MEASURES

For each selected pest (Table 7), the Panel assessed the possibility that it could be present in *R. pseudoacacia* nurseries by evaluating the possibility that the commodity in the export nurseries is infested either by:

- introduction of the pest from the environment surrounding the nursery;
- introduction of the pest with new plants/seeds;
- spread of the pest within the nursery.

5.1 | Risk mitigation measures applied in the UK

With the information provided by the UK (Dossier sections 1, 2, 3 and 4), the Panel summarised the risk mitigation measures (Table 8) that are implemented in the production nurseries.

TABLE 8 Overview of implemented risk mitigation measures for *Robinia pseudoacacia* plants designated for export to the EU from the UK.

Risk mitigation measure	Implementation in the UK
Registration of production sites	All nurseries are registered as professional operator with the UK NPPO, by the APHA for England and Wales, or with SASA for Scotland, and is authorised to issue UK plant passports (Dossier Section 1).
Physical separation from the soil	Potted plants are grown in trays on top of protective plastic membranes to prevent contact with soil. Membranes are regularly changed when needed. Alternatively, plants may be grown on raised galvanised steel benches stood on gravel as a barrier between the soil and bench feet and/or concreted surfaces.
Certification of plant material	All plants are sourced from EU suppliers (usually Netherlands, Belgium or Germany) in EU-compliant growing medium. All plants sourced from EU countries are certified with phytosanitary certificates.
Origin and treatment of growing media	Potted plants are imported from the EU in EU-compliant growing media. The plants are not re-potted.
Surveillance, monitoring and sampling	During production, inspection is carried out at least once a year as part of the Quarantine Surveillance programme (Great Britain uses the same framework for its surveillance programme as the EU). Surveillance is based on visual inspection with samples taken from symptomatic material, and where appropriate, samples are also taken from asymptomatic material (e.g. plants, soil, watercourses) (Dossier Section 1). For *P. ramorum*, official specific inspections and containment measures are in place. As the plants spend a very short period of time in the UK, it is unlikely that they would be present on a nursery when the UK Competent Authority conducts their annual inspection (Dossier Section 1).
Hygiene measures	According to the Dossier Section 1, all the nurseries have plant hygiene and housekeeping rules and practices in place, which are communicated to all relevant employees. These practices cover growing media, weed management, water usage, cleaning and sterilisation, waste treatment and disposal and the management of visitors.
Irrigation water quality and/or treatments	Growers are required to assess water sources, irrigation and drainage systems used in the plant production for the potential to harbour and transmit plant pests. Rainwater that is collected is sand filtrated. Water is routinely sampled and sent for analysis. No quarantine pests have been found (Dossier Section 1).
Application of pest control products	Crop protection is achieved using a combination of measures including approved plant protection products, biological control or physical measures. Plant protection products are only used when necessary and records of all plant protection treatments are kept (Dossier Section 1).
Inspections and management of plants before export	Pre-export inspections are undertaken as part of the process of issuing a phytosanitary certificate. There inspections are generally undertaken as near to the time of export as possible, usually within 1–2 days, and not more than 2 weeks before export. Separate to any official inspection, plant material is checked by growers for plant health issues before dispatch.

5.2 | Overview of the selected pests

For EU-regulated pests, the relevant risk mitigation measures acting on the selected pests were identified. No quantitative expert judgement has been performed for those pests. An overview of the evaluation of the selected pests (*B. tabaci* and *P. ramorum*) is summarised in the sections below (Sections 5.2.1 and 5.2.2).

5.2.1 | Reasoning for the relevance of *Bemisia tabaci* for this commodity

Bemisia tabaci (Order: Hemiptera; Family: Aleyrodidae; EPPO code: BEMITA) is regulated in the EU as a protected zone quarantine pest. *Bemisia tabaci* is a polyphagous pest with a wide host range, comprising more than 1000 different plant species (Abd-Rabou & Simmons, 2010; CABI, online), including Lonicera species (CABI, online). All life stages of *B. tabaci* (eggs, larvae and adults) are present on the leaves of the plants and could therefore be associated with the commodity (rooted plants in pots). *Bemisia tabaci* was already considered as a relevant pest for *Ligustrum* spp., *Acer* spp., *Prunus* spp., *Populus* spp., *Berberis thunbergii* and *Lonicera* spp. plants originating in the UK (EFSA PLH Panel, 2022, 2023a, 2023b, 2023c, 2024a, 2024b, 2024c, 2025a, 2025b, 2026).

Bemisia tabaci has a quarantine status in the UK and outbreaks of *B. tabaci* have been restricted to greenhouses and subjected to eradication procedures. There are no records of *B. tabaci* establishing outdoors in the UK (Bradshaw et al., 2019; Cuthbertson & Vänninen, 2015).

5.2.2 | Reasoning for the relevance of *Phytophthora ramorum* for this commodity

The Oomycete *Phytophthora ramorum* (non-EU isolates) (Order: Peronosporales; Family: Peronosporaceae; EPPO code: PHYTRA) is listed in Annex IIA of Commission Implementing Regulation (EU) 2019/2072. *Phytophthora ramorum* has a broad host range, including *Robinia pseudoacacia* (Tooley & Browning, 2009). *Phytophthora ramorum* is present in most regions of the UK, but it is more often reported in wetter, western regions. *Phytophthora ramorum* was considered as a relevant pest for *Acer* spp., *Alnus* spp., *Berberis thunbergii, Betula* spp., *Cornus* spp., *Corylus* spp., *Fagus* spp., *Lonicera* spp. *Quercus* spp., *Salix* spp., *Sorbus* spp. and *Taxus* spp. plants originating in the UK (EFSA PLH Panel, 2023a, 2023b, 2023c, 2023d, 2023e, 2024a, 2024d, 2024e, 2024f, 2025b, 2025c, 2025d, 2025e, 2025f, 2025g, 2026).

The potential entry of propagules of *P. ramorum* from the surrounding environment may occur via wind, water and soil carried on shoes or feet of animals entering the nursery (if any). Additionally, the pathogen can enter the nursery with other plant species used for plant production. For potted plants of *R. pseudoacia*, where the pots are physically separated from the soil, *P. ramorum* is not expected to be present on their roots, but can be present on the leaves of the exported commodity.

6 | CONCLUSIONS

Two EU-regulated pests, *Bemisia tabaci* and *Phytophthora ramorum*, were identified to be present in the UK and considered to be potentially associated with potted plants of *Robinia pseudoacacia* imported from the UK and relevant to the EU. No non-regulated pests were selected as relevant for this Opinion.

GLOSSARY

Control (of a pest)	Suppression, containment or eradication of a pest population (FAO, 2024a, 2024b).
Entry (of a pest)	Movement of a pest into an area where it is not yet present, or present but not widely distributed and being officially controlled (FAO, 2024b).
Establishment (of a pest)	Perpetuation, for the foreseeable future, of a pest within an area after entry (FAO, 2024b).
Impact (of a pest)	The impact of the pest on the crop output and quality and on the environment in the occupied spatial units.
Introduction (of a pest)	The entry of a pest resulting in its establishment (FAO, 2024b).
Measures	Control (of a pest) is defined in ISPM 5 (FAO, 2024b) as 'Suppression, containment or eradication of a pest population' (FAO, 2024a). Control measures are measures that have a direct effect on pest abundance. Supporting measures are organisational measures or procedures supporting the choice of appropriate risk mitigation measures that do not directly affect pest abundance
Non-regulated pest	Pest that is not regulated in the EU Legislation Implementing Regulation (EU) 2019/2072.
Pathway	Any means that allows the entry or spread of a pest (FAO, 2024b).
Phytosanitary measures	Any legislation, regulation or official procedure having the purpose to prevent the introduction or spread of quarantine pests, or to limit the economic impact of regulated non-quarantine pests (FAO, 2024b).

Protected zone	A Protected zone is an area recognised at EU level to be free from a harmful organism, which is established in one or more other parts of the Union.
Quarantine pest	A pest of potential economic importance to the area endangered thereby and not yet present there, or present but not widely distributed and being officially controlled (FAO, 2024b).
Regulated non-quarantine pest	A non-quarantine pest whose presence in plants for planting affects the intended use of those plants with an economically unacceptable impact and which is therefore regulated within the territory of the importing contracting party (FAO, 2024b).
Risk mitigation measure	A measure acting on pest introduction and/or pest spread and/or the magnitude of the biological impact of the pest should the pest be present. A risk mitigation measure may become a phytosanitary measure, action or procedure according to the decision of the risk manager.
Spread (of a pest)	Expansion of the geographical distribution of a pest within an area (FAO, 2024b).

ABBREVIATIONS

CABI	Centre for Agriculture and Bioscience International
EKE	Expert Knowledge Elicitation
EPPO	European and Mediterranean Plant Protection Organization
FAO	Food and Agriculture Organization
ISPM	International Standards for Phytosanitary Measures
NPPO	National Plant Protection Organisation
PLH	Plant Health
PRA	Pest Risk Assessment
RNQPs	Regulated Non-Quarantine Pests
ToR	Terms of Reference

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SUPPORTING INFORMATION

Additional supporting information can be found online in the Supporting Information section at the end of this article.

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ANNEX A

Web of Science All Databases Search String

Web of Science All Databases Search String can be found in the online version of this output in the 'supporting information section'.

ANNEX B

Pest list of *Robinia pseudoacacia*

Pest list of commodity species can be found in the online version of this output in the 'supporting information section'.