

1. INTRODUCTION

1.1 What is the name of your organisation?

EGEFIM - Timber producer

1.2 What stakeholder group does your organisation belong to?

User of S&PM

1.2.1 Please specify

1.3 Please write down the address (postal, e-mail, telephone, fax and web page if available) of your organisation

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2. PROBLEM IDENTIFICATION

2.1 Are the problems defined correctly in the context of S&PM marketing?

No

2.2 Have certain problems been overlooked?

Yes

2.2.1 Please state which one(s)

Forestry needs a long term approach due the nature of the FOREST REPRODUCTIVE MATERIAL and the necessity to maintain/increase the genetic diversity. It is important for the end user to have the warranty of a well suited material adapted to the site conditions and that can face to climatic changes. Importance and absolute need for an official control by public institutions

2.3 Are certain problems underestimated or overly emphasized?

Underestimated

2.3.1 Please indicate the problems that have not been estimated rightly

The purpose of the Directive on the marketing of forest reproductive material (FRM) compared to the agricultural directives' purposes is significantly different. The objectives, terms and rules of the Directive on FRM should not be changed. The best way to ensure this is to keep the directive separated from the agricultural and horticultural directives. There is a risk of increasing the use of non-adapted provenances to site conditions and the damages may be seen only after decades with heavy losses for the owners and for the forest ecosystem.

2.4 Other suggestions or remarks

3. OBJECTIVES OF THE REVIEW

3.1 Are the objectives defined correctly in the context of S&PM marketing?

No

3.2 Have certain objectives been overlooked?

Yes

3.2.1 Please state which one(s)

Forestry differs significantly from both agricultural crop production and horticulture !

3.3 Are certain objectives inappropriate?

No opinion

3.3.1 Please state which one(s)

3.4 Is it possible to have a regime whereby a variety is considered as being automatically registered in an EU catalogue as soon as a variety protection title is granted by CPVO?

No opinion

3.5 If there is a need to prioritise the objectives, which should be the most important ones? (Please rank 1 to 5, 1 being first priority)

Ensure availability of healthy high quality seed and propagating material

2

Secure the functioning of the internal market for seed and propagating material

1

Empower users by informing them about seed and propagating material

4

Contribute to improve biodiversity, sustainability and favour innovation

3

Promote plant health and support agriculture, horticulture and forestry

5

3.6 Other suggestions and remarks

4. OPTIONS FOR CHANGE

4.1 Are the scenarios defined correctly in the context of S&PM marketing?

No

4.2 Have certain scenarios been overlooked?

Yes

4.2.1 Please state which one(s)

To keep the directive for forestry separated from the agricultural and horticultural directives.

4.3 Are certain scenarios unrealistic?

Yes

4.3.1 Please state which one(s) and why

Almost all scenarios for Forest Reproductive Material. This needs to be re-studied with forestry experts and users.

4.4 Do you agree with the reasoning leading to the discard of the "no-changes" and the "abolishment" scenarios?

No

4.5 Other suggestions and remarks

Evaluation in 2008 shows that Directive on Forest Reproductive Material is still working well and largely accepted. Therefore, the possible revision of the Directive should be done from its own baselines and without abolishing or changing its main objectives, principles and rules.

5. ASSESSMENT OF OPTIONS

5.1 Are the impacts correctly analysed in the context of S&PM marketing?

No

5.2 Have certain impacts been overlooked?

Yes

5.2.1 Please state which one(s)

Directive on FRM (1999/105/EC) was revised according to the principles of sustainable forest management. After more than 10 years, these principles are still valid. The changes or renewal of the Directive on FRM can not be justified by the agricultural sector's needs for reform.

5.3 Are certain impacts underestimated or overly emphasized?

Underestimated

5.3.1 Please provide evidence or data to support your assessment:

Impact on the warranty of the quality of the genetic FRM due to lack of control by official bodies. FRM, especially when the genetic diversity is high to maintain adaptability capacity, are now impossible to be identified by molecular tools, so it needs a control on the material's flux through EU.

5.4 How do you rate the proportionality of a generalised traceability/labelling and fit-for-purpose requirement (as set out in scenario 4)?

No opinion

5.5 How do you assess the possible impact of the various scenarios on your organisation or on the stakeholders that your organisation represents?

Scenario 1

Don't know

Scenario 2

Very negative

Scenario 3

Very negative

Scenario 4

Very negative

Scenario 5

Very negative

5.5.1 Please state your reasons for your answers above, where possible providing evidence or data to support your assessment:

The risk of commercialisation to the end user (forest owner) of un-adapted material (genetic provenance) due to a lack of official control at all the steps of production and commercialisation of the FRM is severely increased. On top of that, damages to multipurpose objectives (wood quality, pest resistance, form,...) for forest are only visible many years (actually decades) after commercialisation. This requires official public controls.

6. ASSESSMENT OF SCENARIOS

6.1 Which scenario or combination of scenarios would best meet the objectives of the review of the legislation?

Scenario with new features

6.1.1 What are your views with regards to combining elements from the various scenarios into a new scenario?

6.1.1 Please explain the new scenario in terms of key features

Taking into account a scenario 1 with no change for FRM (1999/105/CE). It is a necessity to keep the specificity of the Forest Reproductive Material apart from the agricultural and horticultural rules that are often not adapted to the objectives of the forestry (long term sustainable management for sometimes more than 100 years, multipurposes objectives and obligation to maintain or to increase the genetic diversity: an important way to address, from a long term point of view, the climatic changes).

6.2 Do you agree with the comparison of the scenarios in the light of the potential to achieve the objectives?

No opinion

6.2.1 Please explain:

7. OTHER COMMENTS

7.1 Further written comments on the seeds and propagating material review:

7.2 Please make reference here to any available data/documents that support your answer, or indicate sources where such data/documents can be found:

