

## **1. INTRODUCTION**

### **1.1 What is the name of your organisation?**

Bureau of Nordic Family Forestry

### **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**

Rue de Treves 61, 1040 Brussels, Belgium. satu.lantiainen@nordicforestry.org +32476212176  
www.nordicforestry.org

## **2. PROBLEM IDENTIFICATION**

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

Yes

### **2.2 Have certain problems been overlooked?**

No

#### **2.2.1 Please state which one(s)**

### **2.3 Are certain problems underestimated or overly emphasized?**

Overestimated

#### **2.3.1 Please indicate the problems that have not been estimated rightly**

The defined problems do not correspond to the marketing of forest reproductive material. The legislative basis for forest reproductive materials is on the Directive on FRM (1999/105/EC) which is widely accepted by different stakeholders, forest owners among others.

#### **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?**

No opinion

#### **3.2.1 Please state which one(s)**

### **3.3 Are certain objectives inappropriate?**

Yes

#### **3.3.1 Please state which one(s)**

As the Directive on forest reproductive materials is valid, the objectives should not be changed only because of the problems faced in other sectors. The objectives of the Directive on forest reproductive materials' marketing are not recognized in the objectives of the revision. The objective of this Directive is to guarantee that FRM is suitable for the place it is sowed or planted and the marketing is based on origins.

**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**

1

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

5

**Empower users by informing them about seed and propagating material**

4

**Contribute to improve biodiversity, sustainability and favour innovation**

2

**Promote plant health and support agriculture, horticulture and forestry**

3

**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)**

The option of keeping the Directive of forest reproductive materials' marketing as such would be the best option.

**4.3 Are certain scenarios unrealistic?**

No opinion

**4.3.1 Please state which one(s) and why**

**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**

#### **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?**

No opinion

**5.2.1 Please state which one(s)**

**5.3 Are certain impacts underestimated or overly emphasized?**

Underestimated

**5.3.1 Please provide evidence or data to support your assessment:**

The impacts on the marketing of forest reproductive materials are not defined. The link to the existing OECD Forest Scheme is not recognized.

**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**

Don't know

**Scenario 3**

Don't know

**Scenario 4**

Don't know

**Scenario 5**

Don't know

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

As the revision does not take into account marketing of forest reproductive materials, it is hard to make any estimations.

**6. ASSESSMENT OF SCENARIOS**

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

No opinion

**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**

**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:**

Marketing of forest reproductive materials should not be included in the revision of the Directives on marketing of seed and propagation material. In case an update is needed to the Directive 1999/105/EC on marketing of forest reproductive materials, it should be done separately.

**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:**

