

1. INTRODUCTION

1.1 What is the name of your organisation?

DGARNE (Belgium) - DG for Agriculture, Natural Resources and Environment

1.2 What stakeholder group does your organisation belong to?

Competent Authority (CA) involved in S&PM certification and control; Breeder 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 is a very specific area. When you plant a forest, you begin a process of often more than fifty years sometimes more than one hundred years. so if you make a mistake on the quality of the plants it is not possible to modified your choice the next season as it the case in agriculture. In general, you plant populations and not specific varieties which are nearly impossible to identify with classical procedure as it is in agriculture. Control of the flow is then of a major importance. Even a private forest has an ecological importance for the general interest

2.3 Are certain problems underestimated or overly emphasized?

Underestimated

2.3.1 Please indicate the problems that have not been estimated rightly

The high difficulty to identify a forest seed lot needs to have a very strict check of the flow to give the guarantee to end users to get the proper material.

2.4 Other suggestions or remarks

The OECD system for forest reproductive material is very similar to the directive 1999/105/CE. There is no objective reason to change a system which is recognized at the international level.

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)

Increase productivity is only a small part of the objectives in forestry compared with agriculture. As a plantation is established for a long period, adaptation to the station through time an large genetic diversity are two main aspects to take into account.

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)

Forest reproductive material should be kept separated from the agricultural material directive

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?

Yes

5.2.1 Please state which one(s)

The correct use of MFR is a major tool to ensure the stability and the development of the forests for the future. The forest has a multifunctional role which implies, in the context of climate change, a specific attention to MFR.

5.3 Are certain impacts underestimated or overly emphasized?

Underestimated

5.3.1 Please provide evidence or data to support your assessment:

The adaptability of the forests goes through the good choice of the provenance et the genetic diversity which is practically impossible to check in the the present conditions. The only practical solution is to check the flow.

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 control of official bodies at the different steps of the production and marketing of the MFR is of a major importance if we want to give a guarantee to the end user. Otherwise it is impossible to the end user to evaluate the nature and the quality of the material before many years.

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

Official control at all steps of the production and marketing Keep the 1999/105/CE directive + Harmonisation of the supplier's document + general equivalence with OCED system

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:

