

1. INTRODUCTION

1.1 What is the name of your organisation?

DESSAIN Hubert

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 to the nature of the forest reproductive material and the necessity to maintain and 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 climatic changes. Important and absolute need for an official control by public institution

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 compared to the agricultural directives' purpose significantly different

2.4 Other suggestions or remarks

nul

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 separated from the agricultural

4.3 Are certain scenarios unrealistic?

Yes

4.3.1 Please state which one(s) and why

Quite all scenarios for forest productive material

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

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 forest (1999 - 105 - E.C.) was revised according to the principles of sustainable forest management. After more than 10 years, these principles are still valid.

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. RFM especially when the genetic diversity is high to maintain adaptability capacity, are quite now impossible to be identified by molecular tools, so it needs a control on the material's flux through.

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:

Big increasing of the risk to have commercialisation to the end user (forest owner) of a non adapted material for the genetic provenance, due to a lack of official control at all the steps of production and commercialisation of the FRM

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- It is a necessity to keep the specificity of the FRM apart from the agricultural that is often not adapted to the objectives of the forestry.

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:

