

## **1. INTRODUCTION**

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

Federation of Swedish Family Forest Owners

### **1.2 What stakeholder group does your organisation belong to?**

Other

#### **1.2.1 Please specify**

national organisation

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

Lennart Ackzell Dr. Senior Advisor International Affairs Fed. of Swedish Family Forest Owners  
Lantbrukarnas Riksförbund SE-105 33 Stockholm, SWEDEN lennart.ackzell@lrf.se Phone: +46 8  
787 58 94 Fax: +46 8 787 59 08

## **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?**

No opinion

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

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

No opinion

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

### **2.4 Other suggestions or remarks**

The defined problems can very well be true for the agricultural sector; however the directive on forest reproductive material (1999/105/EC) [FRM] is not viewed upon from the forestry sector as problematic.

## **3. OBJECTIVES OF THE REVIEW**

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

No opinion

### **3.2 Have certain objectives been overlooked?**

No opinion

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

### **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**

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

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

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

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

**3.6 Other suggestions and remarks**

The objectives are certainly appropriate when it comes to any dysfunctional legislation, but in the case of the directive on FRM there is currently no need for a change.

**4. OPTIONS FOR CHANGE**

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

No opinion

**4.2 Have certain scenarios been overlooked?**

No opinion

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

**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 opinion

**4.5 Other suggestions and remarks**

We believe that no-change is favorable for the directive on FRM. We have no opinion to whether a change should be made to the other directives and if the scenarios are correct/unrealistic in these cases.

**5. ASSESSMENT OF OPTIONS**

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

No opinion

**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?**

No opinion

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

**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:**

We have not assessed the impacts of a revision of all listed directives. However the current directive on FRM was revised 1999 according to the guidelines of the Forest Strategy from 1998 which still are valid and the directive is believed to be effective. Scenario 1, with unchanged regulations is clearly preferable regarding the directive on FRM. This directive works well and facilitates the introduction of forest reproductive material in Europe. In addition, the FRM directive is synchronised with the OECD's trade scheme, which is central to trade with third countries. Confidence among forest stakeholders reduces the need for regulated official testing, such as VCU. VCU-testing must be voluntary, it could otherwise be a barrier for species with marginal forest cultivation and for small traders. Wishes for a simplified or otherwise modified legislation is lacking, and needs to formulate a new scenario for forest reproductive material.

**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:**

The connection between the directive on FRM and the OECD Scheme for the Certification of Forest Reproductive Material Moving in International Trade is strong and must be taken into account in any review of the FRM directive. Changes in objectives, terms and rules of the Directive on FRM could significantly hamper international trade of FRM if changes are not made in harmony with OECD Forest Scheme also in the future. Changes or renewal of the Directive on FRM should not be done just because there is a need for reforms in the agricultural sector.

**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:**

In the Evaluation of the Community acquis on the marketing of seed and plant propagating material (S&PM) (10.10.2008) it was said that according to the questionnaire 48% of respondents consider that the EU S&PM legislation has been fully effective in facilitating the free marketing of S&PM in the EU. Such proportion increased to 73% when focusing on the respondents from the forestry area. This, for example, shows that Directive on FRM is still working well and largely accepted.

