

## **1. INTRODUCTION**

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

Central Union of Agricultural Producers and Forest Owners (MTK), Forestry Group, Registration number: 56039441735-48

### **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?**

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 problems identified are not suitable for marketing of forest reproductive material (FRM). Marketing of FRM is under the Directive on FRM (1999/105/EC) and the objectives and legislative bases of the Directive are still valid and working well. The Directive is largely accepted by forest owners, suppliers of FRM and authorities. From the forest owners' point of view the administrative burden seems to be quite low at the moment and could come more complicated after revision.

#### **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)**

From the point of view of marketing of FRM objectives of the revision are not relevant. The

objectives and the legislative framework of the Directive on FRM are still valid and, therefore, they should not be automatically changed due to the problems observed in other sectors. It seems quite impossible to include trade of FRM in a single horizontal framework for marketing of seed and propagation material. The objectives of the Directive on FRM marketing have not been recognized at all in the objectives of the revision. The objective of the Directive on FRM marketing is to guarantee that FRM is suitable for the place it is sowed or planted and the marketing is based on origins. In addition to production, stability and diversity of the whole forest ecosystem is taking into account in the legislative bases of the Directive on FRM. This is very important because the life span of forest trees is much longer than those of agricultural crops and horticultural plants. The objectives of the marketing of FRM are in line with the OECD Forest Scheme and they have been developed hand in hand.

**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**

The prioritization differs between agriculture and forestry. Biodiversity and sustainability questions are highlighted in forestry and forest ecosystems because of the long life span and important ecological role of forests.

**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)**

From the forest owners' point of view the scenarios are not suitable for marketing of FRM. It is surprising that the situation in which the legislation would not be changed is out of question. It would be important to keep the Directive of FRM marketing as such.

**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**

The situation "no-changes" would be the most suitable for the marketing of FRM.

**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 FRM have not been taken into account. The whole terminology and practices may change significantly which may result in confusion and misunderstanding. The relationship between OECD Forest Scheme process has not been recognized either.

**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:**

It is impossible to think about the possible impacts of revision because the revision does not take into account marketing of FRM. Most probably it would make legislation of FRM more complicated and the whole idea and bases of the Directive would change significantly.

**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 FRM should not be included in the revision of the Directives on marketing of seed and propagation material. If the Directive 1999/105/EC on marketing of FRM needs modification it should be done as an independent project.

**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:**

