1. INTRODUCTION

1.1 What is the name of your organisation?
Foreningen Sveriges Skogsplantproducenter (Swedish Forest Nurserie Association) with 18 members, amongst others: Svenska Skogsplantor, Holmen Skog, Sodra Odlarna, Ramlosa, Bergvik Skog, SCA Norrplant, Sundins Skogsplantor, Next Forest, Sydplantor, Nordic Pant Center

1.2 What stakeholder group does your organisation belong to?
Other

1.2.1 Please specify
Organisation operating on national level

1.3 Please write down the address (postal, e-mail, telephone, fax and web page if available) of your organisation
Foreningen Sveriges Skogsplantproducenter c/o Lena Sammeli Johansson, Vibytorp, 694 36 Hallsberg, Sweden

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)
Directive 1999/105/EC is not mentioned. Some parts are not applicable to FRM.

2.3 Are certain problems underestimated or overly emphasized?
Overestimated

2.3.1 Please indicate the problems that have not been estimated rightly
The administrative burden is not so high for FRM

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?
Yes

3.2 Have certain objectives been overlooked?
No

3.2.1 Please state which one(s)

3.3 Are certain objectives inappropriate?
No

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
All objectives mentioned are already met in the FRM directive 1999/105/EC

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?
No opinion

4.2.1 Please state which one(s)

4.3 Are certain scenarios unrealistic?
Yes

4.3.1 Please state which one(s) and why
Scenarios 2-5 are not realistic for FRM. No certification, VCU, DUS or registration of varieties are performed for FRM. Registration of varieties would be valid for plants derived from somatic embryogenesis.

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
Only scenarion 1 is realistic for FRM, but a "no-change" scenario would be more appropriate to 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?
Yes

5.2.1 Please state which one(s)

No impacts have been described for FRM concerning VCU and DUS, i.e. the long testing time for long rotation species. Certification of FRM would not lead to better products, only raising the costs and actually increase the administrative burden for the authorities (which in fact is the opposite to the aim with this revision)

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)?
5 = not proportional at all

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
Fairly beneficial

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:
Scenario 2-5 would lead to higher costs for consumers and suppliers, more administration and no improvement at all for the products. FRM must be handled considering the long rotation-characteristcs and not compared to other plant and seed material with other properties. Smaller suppliers of FRM may be driven out of competition with an increased and irrelevant burden.

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
No change at all would be the best and most appropriate alternative for FRM

6.2 Do you agree with the comparison of the scenarios in the light of the potential to achieve the objectives?
No

6.2.1 Please explain:

No scenario is of advantage for FRM. Todays directive is well adapted to the trade of FRM within the EU and as well outside the EU through the harmonized rules with OECD, and a change now would destroy many years of negotiating betwwen EU and OECD and other involved parties.

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: