

1. INTRODUCTION

1.1 What is the name of your organisation?

Hubert BASTIN, timber producer, forest owner

1.2 What stakeholder group does your organisation belong to?

Professional user of raw material produced by agriculture, horticulture or forestry

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 (min 50 years) and the necessity to increase the genetic diversity. It is important for the end user to have the warranty of well suited material adapted to the site conditions, also in the future. Absolute need for an official control by public institutions.

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 FRM compared to the agricultural directives' purposes is very different. The objectives, terms and rules of the directive on FRM should not be changed. The best way to ensure this is to keep the directive separated from the agricultural and horticultural directives.

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?

Yes

3.2.1 Please state which one(s)

Forestry differs significantly from agriculture 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

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

1

Empower users by informing them about seed and propagating material

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

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?

Yes

4.2.1 Please state which one(s)

To keep the directive separated from the agricultural and horticultural directives

4.3 Are certain scenarios unrealistic?

Yes

4.3.1 Please state which one(s) and why

Much scenarios for FRM

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

Evaluations show that Directive on FRM is still working well and good 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 FRM (1999/105/EC) was revised according to the principles of sustainable forest management. After 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 of the warranty of the quality of the genetic FRM due to lack of control by official bodies. FRM are quite now impossible to be indentified by molecular tools, so it needs a control on the material's flux through EU.

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

Rather 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 forest owner of a non adapted material due to a lack of official control of all steps of production and commercialisation of the FRMrave dammmages (wood quality, pest resistance, form,...) for the forest are only visble some decades later.

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. It is necessary to keep the specificity of the FRM aprt from the agricultural and horticol rules that are often not adapted to the long term objectives of the forestry (increase genetic diversity, way to face the climatic change f.e.)

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:

