

1. INTRODUCTION

1.1 What is the name of your organisation?

Confederation of Forest Industries – Nursery Producers Group

1.2 What stakeholder group does your organisation belong to?

Other

1.2.1 Please specify

trade association

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)

FRM is not really concerned with food security. We are concerned about stimulating improved seed. Cost burden considerations are misbalanced for forestry – some benefit may be realised on the nursery due to increased germination, but most benefit is realised by the harvester in 15-50+ years time.

2.3 Are certain problems underestimated or overly emphasized?

Underestimated

2.3.1 Please indicate the problems that have not been estimated rightly

Alignment of FRM health standards from Forestry to other activities such as horticulture – they are often the same product, albeit to a different market. Ability of the private sector to take on a policing role will also be different

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)

Improve forester's choice - especially important for conifers. Allow for national improvement or provenance rules – very important in forestry, especially native planting. There should be recognition that forestry still aims to plant native trees

3.3 Are certain objectives inappropriate?

Yes

3.3.1 Please state which one(s)

Single Marketing is just not appropriate between forestry and agriculture due to the different

timespans of realisation of benefit.

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?

Yes

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

3

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

2

Empower users by informing them about seed and propagating material

5

Contribute to improve biodiversity, sustainability and favour innovation

4

Promote plant health and support agriculture, horticulture and forestry

1

3.6 Other suggestions and remarks

4. OPTIONS FOR CHANGE

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

Yes

4.2 Have certain scenarios been overlooked?

Yes

4.2.1 Please state which one(s)

Decouple Forestry from Agriculture

4.3 Are certain scenarios unrealistic?

Yes

4.3.1 Please state which one(s) and why

1 – define 'stakeholders'. In forestry, the main stakeholders here are the sawmills and end user for better timber quality. 2. Ornamentals- what is the definition? What is an ornamental becomes used for biomass eg Eucalyptus? 3. V unrealistic. Foresters do not realise most benefits of improved seed until harvest time – they need a central certification scheme to give them the confidence to pay any premium. 5 – Just too unwieldy and difficult, especially with provenance considerations

4.4 Do you agree with the reasoning leading to the discard of the "no-changes" and the "abolishment" scenarios?

Yes

4.5 Other suggestions and remarks

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)

Are the stats true for FRM?

5.3 Are certain impacts underestimated or overly emphasized?

Underestimated

5.3.1 Please provide evidence or data to support your assessment:

Scenario 3 impacts incorrect – without independent verification of improved seed, this will negatively impact on FRM marketing to the extent that it becomes untenable. Note that there is only really one seed supplier in the UK and though BHIP have tried to develop improved hardwood seed, the marketing has not yet proved possible due to a lack of trust in the product. Scenario 5 impacts are all poorly considered for forestry as, though agri seed is often cross-traded, in UK forestry, it is very often UK seed that is required.

5.4 How do you rate the proportionality of a generalised traceability/labelling and fit-for-purpose requirement (as set out in scenario 4)?

3 = proportional

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

Rather negative

Scenario 2

Fairly beneficial

Scenario 3

Very negative

Scenario 4

Fairly beneficial

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:

no answer

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

Decouple forestry from Agriculture with national inspections sympathetic to forestry objectives – habitat restoration, timber production, biomass production. Mirror plant health regulations with

associated industries (agri and horticulture), but implemented at a central level. EU involvement for forestry grants are already having a negative impact and significantly decreasing profitability – further involvement is undesirable unless specifically tailored to our needs.

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:

UK Forestry has so many different considerations of detail that the analysis fails on most lines of consideration

7. OTHER COMMENTS

7.1 Further written comments on the seeds and propagating material review:

The requirements of forestry have not been properly considered from the start. There is little of our business that concerns food security, but much that concerns plant, soil and water health, restoration of native habitats, harvesting on 50-year cycles and stimulating supply for an increasingly hungry biomass market. It does not seem to make sense to have the same framework for forestry: 1. Very long term. 2. Many native species specific to area of country 3. Sustainability and ecological concerns a high priority 4. Small industry 5. Totally different employment levels in relation to investment 6. Large overlap with horticulture 7. Low use of fertilisers and 'crop' husbandry. 8. Plant health a very present threat to the viability of the industry. To agriculture: The opposite

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:

