

## **1. INTRODUCTION**

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

Southern Swedish Forest Owners Association

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

Breeder of S&PM; Supplier of S&PM; User of S&PM; Professional user of raw material produced by agriculture, horticulture or forestry; International company

#### **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)**

A serious shortcoming with the option and analysis paper is that different types of seed and plant material are not recognized in the impact assessment. Given the unique properties of forest reproductive material (FRM), no information is provided on how a modified legislation may affect the special conditions and needs in the forestry sector.

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

Underestimated

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

The problems for the forest sector

#### **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 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**

#### **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)**

Scenarios 2-5 are by no means adequate for forest reproductive material

**4.3 Are certain scenarios unrealistic?**

Yes

**4.3.1 Please state which one(s) and why**

Yes, scenario 2-5 concerning forest reproductive material

**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**

#### **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)**

Problems for the forest sector in scenario 2-5

**5.3 Are certain impacts underestimated or overly emphasized?**

Underestimated

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

Problems for the forest sector in scenario 2-5

**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**

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:**

Scenarios 2-5 are by no means adequate for FRM. The main reasons are that official seed certification, VCU, DUS and registration of varieties are not performed for FRM (forest reproductive material). Official seed certification, VCU, DUS and registration of varieties for FRM, with the possible exception of Populus, would most likely lead e.g. to: a decreased supply of FRM especially for minor species, smaller suppliers of FRM may be driven out of competition, marketing of FRM between the member states will be noticeably more complicated and the trade within the OECD-scheme will be disturbed. Moreover, a large negative impact for the forest sector as a whole can be foreseen due to the increased costs and administrative burden as will be the result if scenarios 2-5 are applied on FRM. The above mentioned impacts are obviously all in sharp contrast with the general policy objectives with the review of the seed and plant material legislation.

**6. ASSESSMENT OF SCENARIOS**

**6.1 Which scenario or combination of scenarios would best meet the objectives of the review of the legislation?**

Scenario 1

**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

**6.2.1 Please explain:**

The consequences for the forest sector are not considered in a proper way

**7. OTHER COMMENTS**

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

souther Swedish Forest Owners Association considers it of great importance that the content in directive 1999/105/EC on the whole remains unmodified, even in the case of a common regulation with other seed and plant material as well as with other legislations. Consequently, for all issues in all articles and annexes etc. in the common regulation, the specific conditions which apply to forest reproductive material must be made completely clear.

**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:**

