

Federal Ministry of Food and Agriculture Germany

Germany would like to make the following comments regarding the Inception Impact Assessment presented by the European Commission on 30 of June 2021:

Title of the Initiative: Revision of the plant and forest reproductive material legislation

Subject: Feedback of Germany regarding Inception Impact Assessment

A new legislative should consider forest reproductive material (FRM) which is essential for following purposes:

- Sustainable forestry management
 - Agroforestry
 - Biomass production (short rotation cycles of up to 20 years for energetic and material use)
 - Biodiversity
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- A new FRM legislation, including control mechanisms should be treated separately from PRM legislation, because of its specific characteristics.
 - Control mechanisms should be kept in the hands of the forestry sector to avoid risks of neglect and to assure professionalism.
 - It is considered convenient to harmonise terms and definitions. But it is not clear how a harmonisation will be achieved: Directive or Regulation. Regional differences and characteristics of MS should be taken into account. Germany favours a directive, leaving enough scope for the implementation by MS.
 - Germany stresses a clear separation between production/marketing and use of FRM.
 - Option 0: The high German standard ensures the production, marketing and control of FRM even without further measures.

- Option 1/ Option 2: Currently no evaluation / statement possible on the basis of the proposal.
 - Option 3: Unsuitable due to limitations in the field of control mechanisms.
- Future EU impact assessments and proposals should separate FRM and PRM clearly e.g. in different chapters.