

1. INTRODUCTION

1.1 What is the name of your organisation?

Central Agricultural Office, Hungary

1.2 What stakeholder group does your organisation belong to?

Competent Authority (CA) involved in S&PM certification and control; Competent Authority (CA) involved in S&PM variety and material registration

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

H-1024 Budapest, Keleti K. u. 24. Tel: +36-1-336-9300 Fax: +36-1-336-9094 www.mgszh.gov.hu

2. PROBLEM IDENTIFICATION

2.1 Are the problems defined correctly in the context of S&PM marketing?

Yes

2.2 Have certain problems been overlooked?

Yes

2.2.1 Please state which one(s)

The forestry sector does not really need any relevant changes in legislation, especially the endusers (forest owners) of reproductive materials.

2.3 Are certain problems underestimated or overly emphasized?

Underestimated

2.3.1 Please indicate the problems that have not been estimated rightly

In the forestry sector varieties have been used just very limitedly. There has not been any registered variety for forestry purposes yet in CPVO and no real changes are expected in the next future in that. All the detailed scenarios were based on a wrong presumption: Basically, forestry sector does not need varieties in the future but much more genetic diversity on each sites, especially regarding the predicted climate change effects. The present legislation can absolutely fulfil these requirements, based on 'non-variety' materials.

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)

3.2.2 According to the predicted climate changes, foresters (farmers) does not need higher diversity of monoclonal varieties but much more need high genetic diversity of each FRM lot used on the forest sites. Traceability of FRM lots has been correctly regulated by the present legislation and therefore the genetic value can be documented as well.

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

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

4.2 Have certain scenarios been overlooked?

No opinion

4.2.1 Please state which one(s)

4.3 Are certain scenarios unrealistic?

No opinion

4.3.1 Please state which one(s) and why

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

Basically, in the forestry sector there is no real need to change or modify the present legislation. In that aspect "no-changes" means a better adaptability to the changing environmental conditions.

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?

No opinion

5.2.1 Please state which one(s)

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)?

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

Very 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:

Arguments have already been clarified in my previous answers.

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

Eventually, the present FRM legislation can fulfil all the all the requirements of the multifunctional forestry. However, there is an increasing demand on woody biomass or industrial wood which can be effectively produced in wood plantations. Scenario 2 or 3 would be suitable for a new legislative system incl. variety registration and certification for industrial wood production sector if traditional (multifunctional) forestry material excluded.

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:

EUFORGEN documents and studies made on forest genetic resources, especially considering climate changes in Europe. www.euforgen.org

