

1. INTRODUCTION

1.1 What is the name of your organisation?

Finnish Forest Research Institute

1.2 What stakeholder group does your organisation belong to?

Other

1.2.1 Please specify

role in this case: institute being responsible for the national gene conservation programme for forest trees

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?

No opinion

2.2.1 Please state which one(s)

2.3 Are certain problems underestimated or overly emphasized?

Overestimated

2.3.1 Please indicate the problems that have not been estimated rightly

The overall problem identification does not fit the forestry sector

2.4 Other suggestions or remarks

It is very confusing that terminology is copied for the agricultural sector and then used for forest reproductive material. This may have dangerous and unpredictable consequences.

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)

For forest reproductive material the most important objective should be ensuring good adaptation to the climate and other environmental conditions.

3.3 Are certain objectives inappropriate?

Yes

3.3.1 Please state which one(s)

These should be sector specific. Not possible to combine everything.

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

2

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

5

Empower users by informing them about seed and propagating material

3

Contribute to improve biodiversity, sustainability and favour innovation

1

Promote plant health and support agriculture, horticulture and forestry

4

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?

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 opinion

4.5 Other suggestions and remarks

The strong link between OECD Scheme on forest seed and the Directive on the marketing of the FRM should be taken into account in the considerations.

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)

Adaptation to climate as the first priority

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

Neutral

Scenario 2

Rather 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:

It will not be beneficial to handle all the sectors under one system

6. ASSESSMENT OF SCENARIOS

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

No opinion

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 opinion

6.2.1 Please explain:

7. OTHER COMMENTS

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

It is most welcome that the aspects of genetic conservation will be included in the system, e.g. providing option for reproductive material for conservation purposes.

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:

