



**FINNISH FOOD
AUTHORITY**
Ruokavirasto • Livsmedelsverket

Public Hearing on
*“Planting the Future - a new legal
framework for seeds”*

Leinonen Kari

Chief Specialist, Finnish Food Authority

Doctor of Science, Docent in Silviculture

**27 November 2023, 15.00 - 17.15,
Brussels, Room: SPAAK 1A2**



Scope of the regulation

- The regulation aims to clarify and enhance the consistency in legislation regarding the **production and marketing** of forest reproductive material (FRM) and to enable the introduction of new scientific and technical developments.
- **We support the main principles of the proposal.**
- It is important to provide foresters and forest owners with precise and detailed information on origin and genetic characters of marketed FRM. These stakeholders are responsible for selecting suitable FRM for **reforestation and afforestation**, aiming to establish healthy, diverse, and resilient forest for future decades.
- The term "**other tree planting**" in the definition of FRM is unclear. It must be understood as actions conducted on **land classified as forest**, parallel to the practices of reforestation and afforestation. It is important that the regulation shall not apply to FRM used for non-forestry purposes.
- Local foresters, scientists and forest owners have best knowledge of the local environmental and site conditions. Therefore, it is essential this legislation does not regulate the **use of FRM**, as such matters falls within the jurisdiction of the Member States.

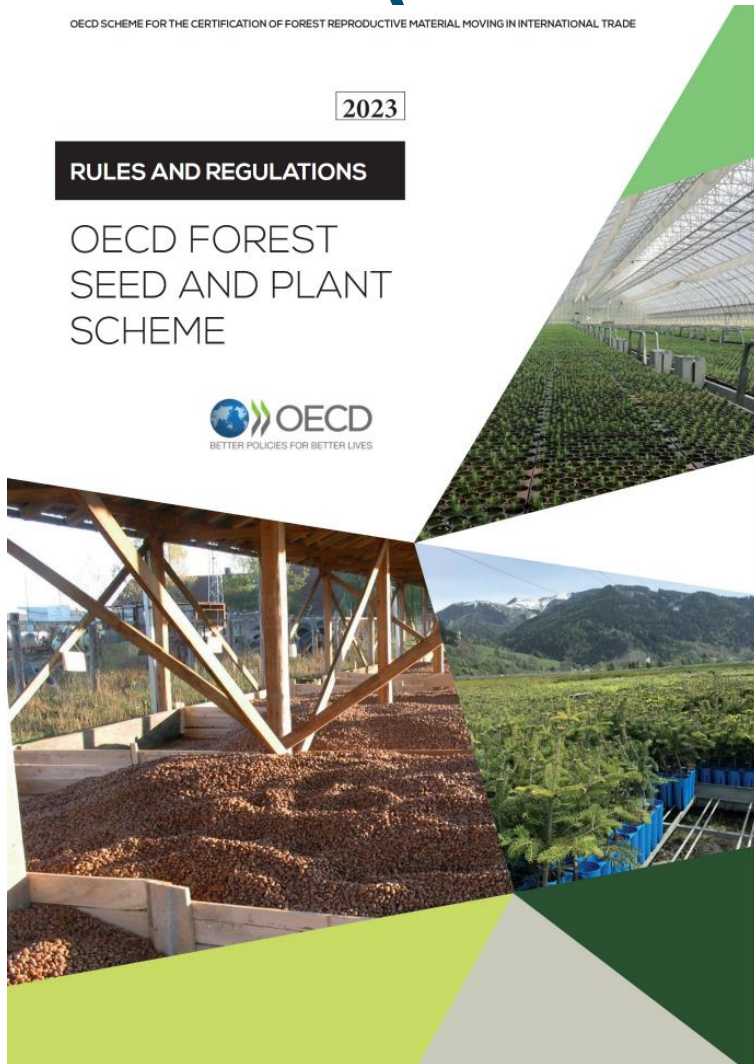


We welcome the following facts:

We welcome the following facts:

1. The regulation regarding forestry reproductive material (FRM) have been kept separate from the legislation on plant propagation material.
2. The special terminology of FRM has been preserved.
3. The classification of basic material and the requirements for its approval remain almost unchanged and they are in line with the current practice.
4. The Regulation does not apply to the propagating material of ornamental plants, FRM used for scientific purposes, and selection work.
5. The Regulation enables the digitalization, including the introduction of common EU-level databases, electronic master certificates, and labels.
6. Regarding imports, a common information management system (IMSOC) will be implemented. The system is already in use in plant health sector.

Equivalence with OECD Forest Seed and Plant Scheme ([OECD Forest Scheme](#))



- The OECD Forest Scheme is a global certification system that facilitates the international trade of forest seed and plants.
- OECD Forest Scheme has a long-shared history with current Directive (105/1999 EC).
- As a result, classification and the requirements for FRM are aligned with the OECD Forest Scheme.
- Currently, 29 participating countries implement the Scheme. It is particularly important to retain a common language and ensure equivalence of standards with our trading partners (UK, US, CA, NO etc.).




Official label

- Finland proposes that the official label shall be issued by authorized operator **under the supervision of the competent authority**, in the same way as the plant passport shall be issued by authorized operator according to the article 84 of the Plant Health Regulation ((EU) 2016/2031).
- We believe that the official certification process for issuing the official label is excessively laborious. Certification under official supervision aligns more closely with current practices, where lots must be accompanied by the supplier's label. We do not wish to tighten the current procedure.
- It is practically impossible for the competent authority to issue all official labels for every package of FRM lots of each operator. In Finland, this means approximately 1,7 million packages for 170 million seedlings.



Combined plant passport and official label

	Kasvipassi / Plant passport		
A <i>Pinus sylvestris</i>	B FI-44444	C M0601	D FI
SUPPLIER'S LABEL			
Taimituottaja Ky			
Petäjäpolku 2, 0X000 Honkala. Puh. 020 001 0003			
Master certificate reference	EY/FIN/ RV3-18-0012		
Traceability code of plant lot	M0601		
Tree species	Scots pine <i>Pinus sylvestris</i>		
Age and type of plants	1 year, containers, (PL121F)		
Quantity in package	200 pcs		
Category of forest reproductive material	Tested		
Basic material			
- type	Seed orchard		
- register reference	Sv411 <u>Koljo</u>		
- region of provenance	-		
- location	63°32,589'N, 27°1,509'E		
- origin	-		
Purpose	Multifunctional forestry		
Deployment area			
	https://www.ruokavirasto.fi/en/deployment-area		
Mean / minimum height	14 / 9 cm		
Growing density	816 pcs / m ²		
Packing date	19 May 2019		
Frozen storage ended	-		
Date of shipment	20 May 2019		
Genetic modification has not been used in the production of basic material			

- The Finnish Food Authority has been conducting joint inspections of combined plant passports and "supplier labels" for several years.
- This practice has proven to be operationally functional and administratively efficient. Controlling both regulations during the same inspection visit is cost-effective.
- We hope that this established and effective practice, based on the Official Controls Regulation, can continue.
- Furthermore, it is practically unfeasible to combine a plant passport issued by a professional operator with an official label issued by the competent authority.

Authorisation of professional operators to approve source-identified basic material (derogation in article 19)



- The majority of forest tree seeds used in Finland are high-quality, genetically improved seeds produced in seed orchards that fall within qualified and tested categories.
- In Lapland, the northernmost part of Finland, the production of improved seeds is challenging due to infrequent occurrence of seed crops, primarily because of the short growing season and harsh cold weather conditions.
 - The demand for Scots pine seeds, especially for direct seeding purposes, is high in the northern regions. It is essential to collect seeds from stands falling within the lowest category source-identified.
- **We support the derogation that allows Member States to authorize professional operators to approve source-identified basic material in areas subjected to extreme weather conditions, where abundance of snow makes seed harvesting exceptionally challenging.**
 - Harvesting must be conducted during the wintertime from felled trees after cuttings. Consequently, the approval of the basic material must be done case-by-case among the stands planned to be cut.
 - **To ensure the security and quality of (FRM), a notification should be deemed sufficient instead of requiring approval by the Commission.**



Contingency plan

- In Finland, the seed production of forest trees for forestry purposes is already highly organized.
 - We have a Seed Orchard Establishment Program for genetically improved seeds extending until the year 2060.
 - A long-term security storage of forest tree seeds in Lapland.
- We support the new obligation to prepare contingency plans for sudden and unexpected additional needs of FRM.
- Climate change will probably amplify various types of forest hazards in Finland. It is crucial that the forests are promptly regenerated with the highest quality materials to ensure the growth, vitality and carbon sequestration.
- **Nevertheless, we deem it important that Member States be granted the autonomy to determine the appropriate level of preparedness for themselves.**



Official Control

- The official control to verify compliance with rules is suggested to be regulated by the Official Control Regulation (2017/625/EU), along with the delegated and implementing acts issued based on it.
- We hope for a flexible regulation that considers the diverse conditions and practices of Member States.
- Control measures must be planned on a risk basis, and the frequency of inspections should be maintained at a reasonable level in terms of the resources of the authorities.
- The inspections should be targeted to the appropriate professional operators as cost-effectively as possible, utilizing self-evaluation plans and conducting remote inspections using technology and communication tools when feasible.



Administrative burden

- We express concern about the increasing administrative burden, primarily attributed to the requirement of developing contingency plans for important tree species, associated reporting, and the organization of training and exercises for professional operators.
- Additionally, the burden is heightened by regular reporting of seed and plant production and import volumes to the Commission, coupled with various communication and cooperation obligations with the Commission and other Member States.
- The maintenance and data transfer of electronic master certificates and official labels, along with related common EU-level databases, can increase the administrative burden for both operators and authorities. The exact amount of this burden is difficult to estimate at this stage.



FINNISH FOOD
AUTHORITY
Ruokavirasto • Livsmedelsverket

Thank you

Kari Leinonen