

Public Hearing on “Plant and Forest reproductive materials - the stakeholders perspective”

IMPLICATIONS FOR THE CONSERVATION OF FOREST GENETIC RESOURCES, PERSPECTIVES FROM THE EUFORGEN PROGRAMME

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27 November 2023, Brussels



EUROPEAN FOREST GENETIC
RESOURCES PROGRAMME



What is EUFORGEN?



EUFORGEN

EUROPEAN FOREST GENETIC
RESOURCES PROGRAMME

**International cooperation
programme funded by its
member countries**

**Implementation mechanism of
the Forest Europe Process**

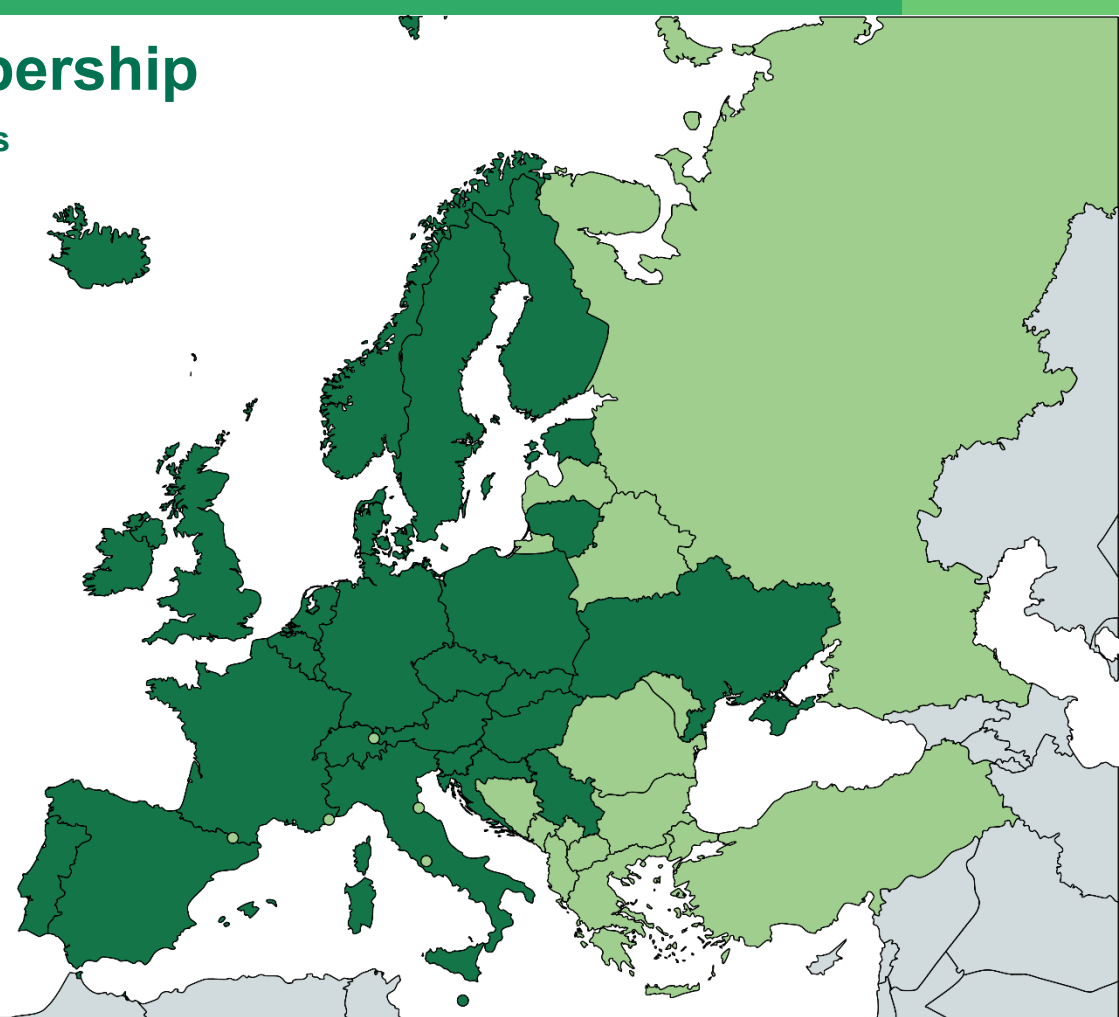


**Forest
Europe** growing life

EUFORGEN's Membership

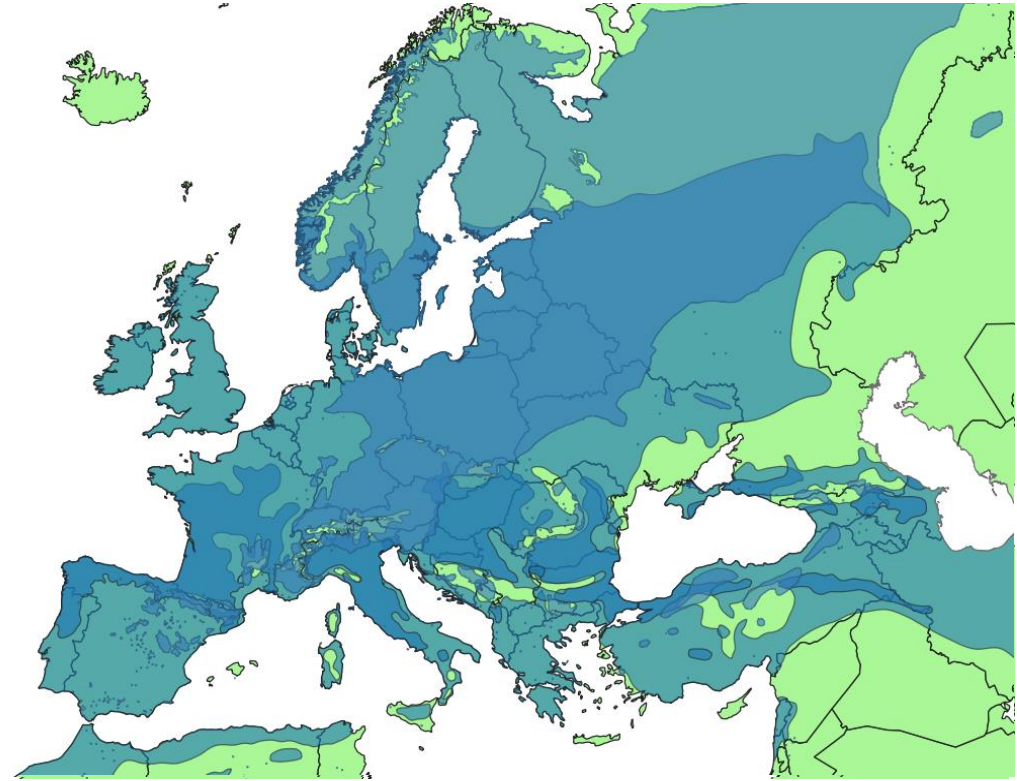
Phase VI (2020-2024) – 28 countries

-  EUFORGEN Member countries during current phase 2020-2024
-  Countries that signed Forest Europe resolutions



EUFORGEN's Objectives

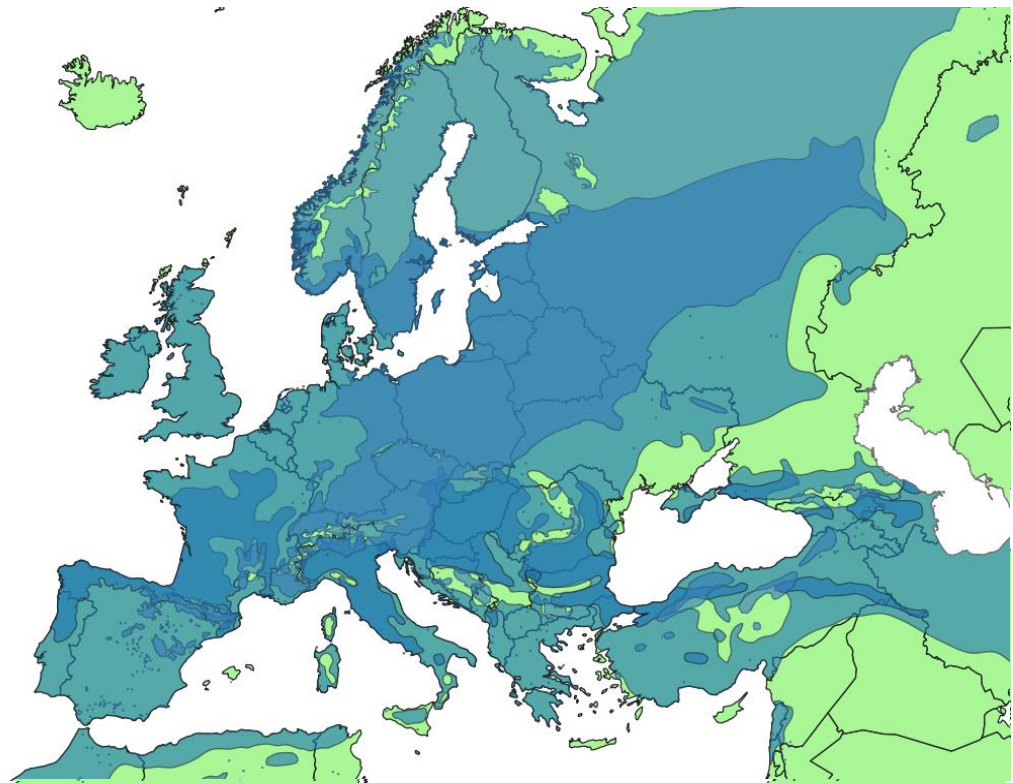
1. Facilitate **knowledge sharing** and **communicate** with key stakeholders on forest genetic resources in Europe.
2. **Coordinate and monitor the conservation** of forest genetic resources in Europe.
3. **Promote the appropriate use of forest genetic resources** by preparing science-based guidelines and recommendations to improve genetic conservation in forest management.



Distribution range of Pinus sylvestris, Quercus robur, Fraxinus angustifolia

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Conservation of FGR at the core of EUFORGEN activities

EUROPEAN FOREST GENETIC RESOURCES PROGRAMME



Pan-European strategy for genetic conservation of forest trees


and establishment of a core network of dynamic conservation units

Sven M.G. de Vries, Muriel Aign, Michele Bozzano, Václav Búrňánek, Eric Colin, Joan Cottrell, Mladen Ivančević, Colin T. Kellomäki, Jarkko Koskela, Peter Redak, Lorenzo Vietto and Leena Träsel

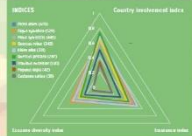



EUROPEAN FOREST GENETIC RESOURCES PROGRAMME





Dynamic conservation and utilization of forest tree genetic resources

Indicators for *in situ* and *ex situ* genetic conservation and forest reproductive material





François Lefèvre, Ricardo Alías, Ryszard Bokroszew, Fjellstad, Lars Graudal, Silvio Daniele Dagnoni, Mari Rusanen, Giovanni Giuseppe Votdramin, Michele Bozzano

EUFORGEN | EUROPEAN FOREST GENETIC RESOURCES PROGRAMME

FOREST GENETIC RESOURCES STRATEGY FOR EUROPE




EUFORGEN's outputs related to FRM

EUROPEAN FOREST GENETIC RESOURCES PROGRAMME



Genetic aspects linked to production and use of forest reproductive material (FRM)

Collecting scientific evidence for developing guidelines and decision support tools for effective FRM management




Dušan Gómory, Katri Himanen, Mari Mette Claes Uggla, Hjoika Kraigher, Sándor Bördi Paraskévi Alkizoti, Stuart A'Hara, Aline Frai Gunnar Friis Proschowicz, Josef Frydl, Thérèse Monique Guilbert, Miladěn Ivanković, Ana Stuaert Kennedy, Jan Kowalczyk, Heike Lie Tiit Maaten, Andrej Pilipović, Roberta Pro Volker Schneck, Alain Servais, Brynjar Skj Christoph Spersen, Frank Wolter, Terife Y and Michele Bozzano.



www.euforgen.org/FRM-Publication



FOREST REPRODUCTIVE MATERIAL IS VITAL TO SECURE EUROPE'S FORESTS




POLICY BRIEF OCTOBER 2023

What is at stake?

Forests cover more than a third of Europe's land surface and provide a multitude of ecosystem services and socioeconomic functions. They are vital for meeting climate targets, for human wellbeing, and for the transition to a sustainable, circular bioeconomy. However, climate change itself presents an acute threat to European forests, bringing with it a host of potentially devastating impacts, as well as uncertainties.

The role of forest reproductive material

Rapid climate change is outstripping the ability of tree populations to adapt solely by natural evolutionary processes. Forest management must therefore be oriented towards building resilience by increasing genetic diversity and accelerating genetic adaptation. In addition to promoting natural regeneration, this can require the introduction of forest reproductive material (FRM) — some of which may need to be transferred from other localities.

Use of inappropriate FRM can be catastrophic

FRM must be genetically suitable for the site it is planted, as well as of good quality. How unintentional use of inappropriate planting commences. Over time, this leads to a reduction in forest cover, and major loss of goods and services. Large plantations with genetic diversity between trees are at particular risk.

Provenance trials demonstrate the suitability of material for specific site conditions. Maintaining existing trials and establishing new ones is to support practitioners' decision-making on appropriate FRM under climate change scenarios.




Scan the QR code if you want to learn more about the genetic aspects linked to production and use of forest reproductive materials.

¹ Seeds, seedlings or cuttings of trees and shrubs important for forestry, as well as for non-forestry purposes.



www.euforgen.org/FRM-Policy

Views on articles 6 and 18 related to Conservation of FGR included in the Proposal for the EU Regulation on the production and marketing of forest reproductive material

Different views in the **inclusion vs exclusion** of conservation:

- **Exclusion** because the regulation would be too restrictive
- **Inclusion** because could support the cross-border conservation initiatives.

Asking to meet **all points** could significantly limit the use of FRM for genetic conservation purposes.

Article 6 Requirements for FRM derived from basic material intended for the purpose of conserving forest genetic resources

In order for FRM derived from basic material subject to the derogation of Article 18 to be marketed, all the following conditions shall be fulfilled:

- (a) FRM of the species listed in Annex I may **only** be marketed, if it is of the **'source- identified' category**;
- (b) FRM shall be of origin which is **naturally adapted** to the local and regional conditions; and
- (c) FRM shall be **collected from all individuals** of the notified basic material.

Article 6 Requirements for FRM derived from basic material intended for the purpose of conserving forest genetic resources

(a) FRM of the species listed in Annex I may only be marketed, if it is of the **'source- identified' category**;

Too restrictive:

This excludes material that can be very valuable for conservation (eg in some countries DCUs are of **selected** category, or in case of black poplar,

FRM could even be of **tested** category, now this is excluded) ---

Article 6 Requirements for FRM derived from basic material intended for the purpose of conserving forest genetic resources

~~(b) FRM shall be of origin which is naturally adapted to the local and regional conditions; and;~~

Too restrictive:

Populations **not well adapted** to the local and regional conditions, because of climate change, new pest and diseases, etc., **could be relevant** for conservation for the future!

The EUFORGEN community is actively working on the conceptualisation of **assisted migration** of valuable genetic resources

Article 6 Requirements for FRM derived from basic material intended for the purpose of conserving forest genetic resources

(c) FRM shall be collected from **all individuals** of the notified basic material.

Too restrictive:

- in stand forming trees thousands of them are to be collected;
- in marginal populations – could be detrimental for their sustainability

Can be re-phrased:

[(c) FRM shall be collected from an [optimum]/[maximum number]/[sufficient number] of individuals of the notified-basic material-, taking into account the biology of the species, natural conditions and organizational or financial capacities.]

Article 6 Requirements for FRM derived from basic material intended for the purpose of conserving forest genetic resources

Possible addition:

[(d) FRM **for species where vegetative propagation** is usually used for the purpose of conservation of forest genetic resources, such as *Populus*, **mixture of sufficient number of clones**, in order to maintain genetic diversity, can/shall be considered]

Article 18 Derogation from the obligation to be approved for basic material intended for the purpose of conserving forest genetic resources

Overall comment:

The derogation(s) would lead to **loss of traceability and transparency**, and would support frauds from (regular) professional operators.

Article 18 Derogation from the obligation to be approved for basic material intended for the purpose of conserving forest genetic resources

1. By way of derogation from Article 4(1) and (2), the registration of basic material intended for the purpose of conserving forest genetic resources in the national register **shall not be subject to approval by the competent authorities.**
2. **Any professional operator** registering basic material for the purpose of conserving forest genetic resources used in forestry, shall notify that basic material to the competent authority of the Member State concerned.

Article 18 Derogation from the obligation to be approved for basic material intended for the purpose of conserving forest genetic resources

Points 1 and 2

- The derogations may/would lead to **loss of traceability and transparency, and would support frauds** from (regular) professional operators.
- with this derogation, it will be possible to **spread inappropriate material under the pretext of FGR conservation** with no other limit than specific conditions and requirements defined in paragraph 4 - this can result in large scale uniformity of deployed FGR, rather than diversity
- **If this whole article is not deleted**, then at least the derogation should be **subject to national decision whether to apply it or not** (even though this would still lead to doubts regarding its implementation in different MS).

Article 18 Derogation from the obligation to be approved for basic material intended for the purpose of conserving forest genetic resources

Points 1 and 2

There is no support in indicating that "any professional operator" can act in this regard, furthermore multiple actors can be added in the chain - if the derogation is maintained, then a point should be added before it:

1 bis : [**Professional operators devoted to conservation of forest genetic resources shall be registered for this purpose**, according to specific conditions established by competent authorities."]

Article 18 Derogation from the obligation to be approved for basic material intended for the purpose of conserving forest genetic resources

3. Basic material referred to in paragraph 1 **shall be notified** to the competent authorities in accordance with the format of FOREMATIS.

The notification of the basic material shall be carried out with reference to the unit of notification.

Each unit of notification shall be identified by a unique register reference in a national register.

That notification shall contain the following information:

Comment: the EU Horizon project **FORGENIUS** currently contributing to the climatic and environmental data for FOREMATIS to help end users choice of FRM

Article 18 Derogation from the obligation to be approved for basic material intended for the purpose of conserving forest genetic resources

4. **The Commission may**, by means of implementing acts, **establish the specific conditions** as regards the requirements and content of that **notification**. Those implementing acts shall take account of the **development of applicable international standards** and shall be adopted in accordance with the examination procedure referred to in Article 27(2)

Article 18 Derogation from the obligation to be approved for basic material intended for the purpose of conserving forest genetic resources

Point 4 – for notification and for registration of PO

- *The Commission* would need to **establish the minimum conditions for a professional operator** that can be registered with the purpose of conservation of FGR, instead of competent authorities, however, **the EC would not have competence in this, compared to the MS**
- to ensure the diversity of FGR conserved and used, **the conditions and requirements have to be locally specific** in order (i) to determine the locally appropriate FGR for use, and (ii) to define and implement the FGR conservation strategy;
- **only the competent authorities of the Member States can provide local expertise**

General comments on Article 18

General concern with this article is highlighted, because it does not guarantee to serve the general objective of FGR conservation and sustainable use:

- **FGR conservation and sustainable use depends on the diversity, not uniformity,** of locally appropriate FGR effectively used in European forests;
- **FGR conservation and sustainable use requires control by competent authorities of the Member States** who have the expertise to determine the diversity of FGR that is appropriate for local use and to implement national FGR conservation strategies as the fundamentals of FGR conservation and sustainable use.
- **The derogation(s) would lead to loss of traceability and transparency,** and would support possible frauds from (regular) professional operators.

Conclusions

The EUFORGEN Programme is willing to further support the dialogue and the discussions aimed to define the most appropriate modalities and technicalities for the conservation of FGR