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CONTRIBUTION

From:	General Secretariat of the Council
To:	Working Party on Genetic Resources and Innovation in Agriculture (Seeds, Propagating and Planting Materials)
N° prev. doc.:	16273/24
N° Cion doc.:	11503/23 + ADD 1
Subject:	Regulation on forest reproductive material - Request for contributions on the incoming Polish Presidency alternative proposal for the provisions on official controls and other articles - comments from IE

Delegations will find in Annex comments on Recitals, Articles 2, 4, 5b, 8, 9a, 9b, 9c, 10, 16, 17, 26, 28, Annexes I-IV of the revised Presidency text (as in document 16273/24) submitted by the Irish delegation.

Regulation on forest reproductive material - Request for contributions on the incoming Polish Presidency alternative proposal for the provisions on official controls and other articles - 16304/2024

Comments from Ireland

1. General comments on document entitled “Use of provisions from OCR regulation in FRM regulation without linking these legal acts”

IE supports the approach of including FRM under the scope of the Official Controls Regulation (OCR) while introducing targeted derogations, as has previously been proposed under the BE and HU presidencies.

IE would like to engage positively in finding a solution and would like to thank the PL Presidency for the text and its efforts to identify a way forward on this issue. However, our initial view of the alternative proposal is that it is unclear what the advantages of it are over the previously proposed approach. For example, while the new approach proposed integrates into the FRM regulation elements of the OCR considered most relevant to the FRM sector. Elements not included would largely appear to be those for which a derogation has already been provided for under the previous approach. Therefore, it is not clear to us the extent to which the administrative burden has been lessened in this scenario. While such an approach would also likely negate some of the advantages of applying the OCR regime such as harmonisation or utilisation of existing IT systems.

2. Comments on Hungarian Presidency text (ST 16273/24)

Art. 2 (4) (c)

IE does not support the inclusion of exports into the scope of the regulation.

Art. 2 (4) (d)

Requirement to “register” with Competent authority is overly onerous. View is that this should be removed.

Arts. 10, 10a, 10b, 10c

OK

Art. 16

OK

Annexes II, III, IV, V – regarding FGR conservation

OK

END