

For a Balanced Definition of "FRM" in the European Regulation Project on Forest Reproductive Material

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CONTEXT

The draft regulation adopted by the European Parliament¹ plans to extend the scope of Forest Reproductive Material (FRM) usage by adding, in addition to its silvicultural purpose, tree plantations and direct seeding for the following purposes :

- a) Production of **wood and biomaterials**,
- b) Conservation of forest genetic resources and **the preservation and improvement of biodiversity**,
- c) Restoration of forest ecosystems and other wooded areas, and support for their functioning,
- c.*bis*) Establishment or restoration of **agroforestry systems**,
- d) Adaptation to climate change,
- e) Mitigation of climate change,
- f) Conservation and sustainable use of forest genetic resources.

By expanding, particularly in paragraph c bis), the scope of FRM destinations, the proposed regulation risks limiting agroforestry practices encouraged by the European Nature Restoration Regulation (2024/1991) as well as other policies developed at the Member State level, such as France's National Biodiversity Strategy 2030, Germany's Federal Nature Conservation Act (BnatSchG), and Norway's Nature Diversity Act (Naturmangfoldloven).

This draft regulation could negatively impact labels and initiatives specifically designed for the restoration of natural and semi-natural habitats, such as hedgerows and groves. When these habitats are created or restored using plants adapted to the local soil and climate conditions and managed sustainably, they become essential resilience elements for rural agricultural areas: they contribute to the local economy while significantly enhancing biodiversity capacity.

This document presents arguments in favor of revising the definition of "FRM" in the European regulation project on Forest Reproductive Material. It also provides alternative wording proposals to ensure that tree plantations outside forests can continue to include plants bearing different labels that guarantee their native origin.

¹ European Commission Proposal: 2023/0228(COD)
Amendments Adopted by the European Parliament: TA-9-2024-0342

ARGUMENTS

1. The European Nature Restoration Regulation (2024/1991) provides for the planting of three billion additional trees in the European Union by 2030 (Article 13).

Member States, in contributing to this objective, must fully respect ecological principles, including ensuring **species diversity** and age structure diversity while **prioritizing native tree species**.

2. The European Nature Restoration Regulation (2024/1991) provides for the implementation of restoration measures to strengthen biodiversity in agricultural ecosystems by 2030 (Article 11).

Hedgerows are permanent vegetation elements that provide ecosystem services and support biodiversity in agricultural contexts. **Agroforestry** is explicitly mentioned under "topographical features" favorable to biodiversity.

3. The draft European regulation on FRM pursues the same objectives as the draft European regulation on plant reproductive material (2023/0227).

The draft regulation on plant reproductive material within the EU recognizes the role of **plants intended for the restoration of the natural environment**. They are explicitly covered under the "preservation mixtures" defined in Article 22 and the "PRM of heterogeneous material" (Article 27). Since hedgerows are recognized as essential spaces for biodiversity and the ecological functionality of rural areas, all plants intended for them, including those of FRM species, should meet specific production requirements, particularly ensuring the **conservation of the local and wild characteristics of the region of origin** where they are to be planted.

4. In agroforestry, the conservation and enhancement of the genetic diversity of plant material are essential to preserving its capacity for evolution and adaptation.

The recommended sampling principles for collecting seeds suitable for recreating ecologically functional **natural and semi-natural habitats (including hedgerows)** originate from the specialized field of Ex Situ conservation of plant species. The European Native Seed Conservation Network (ENSCONET) has notably produced summary documentation on this subject, which has largely inspired some **traceability approaches guaranteeing, at different scales, the indigeneship of the produced plants**.

5. In Europe, initiatives exist to ensure the origin and genetic diversity of seeds and plants for use outside forests

Various national initiatives across Europe ensure the wild and local origin of woody species :

- The Végétal Local label in France ;
- The Végétal d'ici initiative in Wallonia, Belgium ;
- The VWW-Regiosaaten® certification in Germany;
- In Norway (Nature Diversity Act - Naturmangfoldloven) and Germany (Federal Nature Conservation Act - BnatSchG), the use of native plants (excluding agricultural production) has been legally mandated for any landscaping outside the urban context.w

The absence of certification or labelling initiatives in most European countries does not mean the issue is overlooked :

- The European Native Seed Producers Association (ENSPA) brings together 22 seed producers from 14 European countries, including Luxembourg, Austria, France, Germany, the Netherlands, Denmark, Sweden, Italy, Ireland, and Spain.
- The *Society for Ecological Restoration - Europe* has emphasized the need to support the production of seeds of local and wild origin in its declaration published during the 2024 European Conference on Ecological Restoration.

6. The objectives of agroforestry and hedgerows differ from the predominantly silvicultural goals of the FRM regulation

The specifications proposed in the European draft regulation on Forest Reproductive Material (FRM) primarily pursue silvicultural objectives and promote a form of phenotypic selection based on criteria related to timber exploitation (see Annex III-7 on the selection criteria for selected stands). **The wild and local character of plant materials is not at the core of the regulation, and the technical requirements regarding seed collection and plant production are insufficient for hedgerow needs,** regardless of the FRM categories considered. Since maintaining the wild and local character is the primary objective for young hedgerow plants, the current draft regulation is inadequate, **as it does not ensure comprehensive genetic representativity of source populations in collected seed lots,** particularly for species classified under the "identified" category.

7. The FRM regulation and initiatives like Végétal Local have complementary goals in agroforestry

In France, for example (and similarly in other EU Member States with existing initiatives), FRM plants and Végétal Local-certified plants have been used complementarily for several years in agroforestry system establishment or restoration projects. Across Europe, where initiatives exist to guarantee the origin and wild character of seeds and plants, abandoning the possibility of planting young wild and locally sourced plants in hedgerows in favor of Forest Reproductive Material (FRM) would halt the development of specialized sectors, reduce the restoration potential of key ecosystem services in rural areas, and **deprive rural areas and agriculture of a diverse genetic resource pool, which is essential for adaptation and long-term resilience.**



Végétal local

Owned by the French Office for Biodiversity, Végétal Local is a label created in 2015 to guarantee the native origin and non-selected nature of plants. Widely endorsed for the production of trees and shrubs intended for agroforestry, this label is referenced in France's current national biodiversity strategy.

www.vegetal-local.fr



PROPOSALS

It is therefore proposed that legislators adopt a balanced definition of FRM in the European regulation project

Proposal 1 :

Revise the first articles of the draft regulation (2 and 3) to refocus the text on the silvicultural objectives associated with FRM while presenting other uses (including agroforestry) as complementary pathways that FRM can contribute to alongside plant materials from other traceability systems ensuring an equivalent level of genetic origin and diversity.

Proposal 2 :

Remove all points from Article 3, Paragraph 1, that directly or indirectly relate to agroforestry :

- " a. Production of wood and biomaterials "
- " b. Conservation of forest genetic resources and the preservation and improvement of biodiversity "
- " c bis. Establishment or restoration of agroforestry systems "

Proposal 3 :

Revise Article 3, Paragraph 1, entirely. Our proposed wording is as follows :

" 1) 'Forest Reproductive Material' (FRM) refers to seeds, plant parts, and plants belonging to forest species and their hybrids listed in Annex I of this regulation and used for afforestation, reforestation, and other tree plantations for the following purposes :

- a) production de bois et de biomatériaux,
- b) Conservation of forest genetic resources and the preservation and improvement of biodiversity,
- c) Restoration of forest ecosystems and other wooded areas, and support for their functioning,
- ebis) Establishment or restoration of agroforestry systems**
- d) Adaptation to climate change,
- e) Mitigation of climate change,
- f) Conservation and sustainable use of forest genetic resources.

For other tree plantations, particularly for the establishment or restoration of agroforestry systems, FRM can be used alongside plants produced under other traceability initiatives or labels ensuring an equivalent level of genetic origin and diversity."