

The Basic Obligations for Suppliers under the Forest Reproductive Material Regulations

This short guide has been produced in particular for the smaller supplier who is likely to be producing a range of controlled and uncontrolled native species, predominantly from source-identified seed sources or occasional selected stands. It does not deal with material produced from seed orchards or using specific parents of families in breeding programmes. More detail is available in the Guidelines on implementation of the Regulations (see full title at end).

The 4 things suppliers must do:

1. **Notify the FC** of details of the sites at which they intend to collect material and their proposed times of collection (use form FRM7).
2. When a collection is complete, **apply to the FC for a Master Certificate** which records that the collection originated with them (use forms FRM4a-c)
3. When they pass on material to a customer (who may be another supplier) complete and pass on a **Supplier's Document** giving a set of standard details of the material they are supplying.
4. Notify the Forestry Commission if you export seeds or plants – you can do this by sending a copy of your suppliers document to frm@forestry.gsi.gov.uk
5. **Maintain copies** of all the above (originals for Master Certificates) for at least 5 years and be able to produce these, logically presented, for inspection.

Some more specific issues

General considerations for seed collectors

If you are collecting seed and you plan to market it on your own account, you must certify it (apply for a Master Certificate). If you sell seed you are required by the Regulations to provide the result of a seed test (for purity, germination etc.) for each lot marketed. Currently only a small number of suppliers have been approved by the FC to undertake such tests. If you are unable to provide a seed test, you may only collect seed as a contractor to another supplier who will sow all the seed or is able to test and market it. If acting as such a contractor, you should ensure that the supplier for whom you are collecting notifies the FC of their intention to collect and applies for a Master Certificate to cover the collection. You can collect seed for more than one supplier at the same site on this basis, but each supplier must separately notify the FC of the collection and certify the seed you collect.

Forestry purposes

Forestry purposes are defined more specifically in the Guidelines but essentially, all material being planted under grant-aided forestry is covered by this designation. You may collect material, grow plants and trade in planting stock which will not be used for forestry purposes without complying with the Regulations, for example, stock grown for hedging. If you do so, however, this stock will be precluded from marketing for forestry purposes and to sell it in this way would contravene the

Regulations. In order to take advantage of any such opportunistic sales, suppliers should note the advantage of certification for each collection they make, particularly if the final use is not clear.

If you hold stock which is not certified and therefore will not be used for forestry purposes, the Regulations require that such stock is identified with the designation 'Not for Forestry Purposes'. This means that the designation should appear on labels, nursery layout plans/maps or IT systems indicating the location of such material. The designation should also appear on documentation provided to customers (invoices, delivery notes etc.) which apply to such material.

Permission from landowners to collect

The Regulations require suppliers to provide written permission from landowners to collect seed or vegetative material and to make this available to inspectors. The FC encourages suppliers to fulfil this obligation by keeping a list of all their collection sites, the species collected at each and the name and contact details of the landowners concerned.

Notifying the FC of proposed collections

Form FRM7

Form FRM7 must be used by suppliers to identify all sites at which collection is proposed. The FC needs this information because they are obliged under the Regulations to implement a control system which involves the inspection of some collections. Actual inspections may be at random or may target specific issues, geographical areas, species or suppliers. Some points to bear in mind in using this form are:

- A National Grid Reference is essential. The FC will use this to identify collection sites but will respect the commercially confidential nature of this information to suppliers.
- It is accepted that suppliers are likely to identify all the sites from which they intend to collect in one season, although actual collections, due to varying sizes of seed crops, available resources etc. may only be made at a smaller number of the original sites proposed.
- It is acceptable to identify proposed times of collection on a reasonably broad basis. The local FC Woodland Officers who carry out inspections at the selected sites will always liaise directly with suppliers over the actual times of inspections.
- Suppliers must retain copies of Form FRM7 for at least 5 years and must make them available to nursery inspectors.

Applying for Master Certificates

Forms FRM4a-c

- FRM4a is most commonly used by suppliers collecting seed in general *seed sources* or specific registered *stands*.
- FRM4b is used by a small number of suppliers who own or have access to *seed orchards* or who compound specific reproductive material, usually from sources within tree-breeding programmes (*parents of families*).
- FRM4c is used by suppliers who collect cuttings or carry out other forms of vegetative propagation of registered *clones* or *clonal mixtures*.

Some points to bear in mind when completing these forms are:

The time limits following collection as laid out in the Guidelines must be adhered to. Application must be made within 9 months of collection or before marketing, whichever is the sooner.

- There are procedures in the Guidelines covering species with highly perishable seed such as oak or the taking of cuttings over a long period. These enable the supplier to be given a Master Certificate number which they can use on Supplier's Documents, enabling them to market material before the Master Certificate is issued.
- If collecting in a registered *stand* (either *source-identified* or *selected*) the stand identity in the National Register of Basic Material (available on FC web-site) must be entered in box 3 on the form.
- If collecting a general *seed source* the entry in box 3 will take the form
species 3-letter code 'RP' region of provenance or native seed zone 'SI'

qpeRP303SI

these identities are examples

bpeRP20SI

bpeRP20hSI

'h' denotes a collection from >300m in altitude

- Suppliers must retain copies of FRM4a-c for at least 5 years and must make them available to nursery inspectors

Master Certificates

The FC will issue a Master Certificate to cover each collection applied for on a separate FRM4 (provided that the collection and details provided are acceptable). The Master Certificate belongs to the originator of the collection and should be retained by them. It is not transferable, nor should it be copied to any other supplier. Master Certificates must be retained for at least 5 years and made available for nursery inspectors.

Issuing Supplier's Documents to Customers

Supplier's Documents

Supplier's Documents must be issued for controlled species marketed for forestry purposes, whether asked for by the customer or not. Many suppliers know or suspect that sight of Supplier's Documents may sometimes not be demanded for grant aid to be paid. Nevertheless it is a requirement of the Regulations that Supplier's Documents are sent out in all such cases and copies must be retained for at least 5 years and made available for inspection.

It is particularly essential that Supplier's Documents are issued when material passes between two suppliers i.e. from one nursery to another. If the receiving nursery does not have a Supplier's Document, they cannot transcribe the Master Certificate number onto any Supplier's Documents they may subsequently issue and the audit trail from collector to final recipient is incomplete

For voluntary species, there is no such requirement but if certified stock is being marketed it is sensible to include it on Suppliers Documents.

Where material is being supplied outside the forestry sector (i.e. to private individuals, small plantations of farms without grant aid, the amenity sector etc.), a Supplier's Document is not essential. In these situations, many suppliers issue them only when asked for by the customer.

Specimens of supplier's documents can be downloaded from the FC web-site but suppliers need not be bound by this format provided all the detail on these specimens is given. Some points which may aid the correct completion of Supplier's Documents are:

- Botanical names in Latin should be used for species. These can be found in the Guidelines
- It is imperative that the Master Certificate number appears in full. An example would be:

UK20120319

where the first 4 digits are the year issued and the last 4 the serial number. Material originating on other EU countries will have a different country prefix.
- Types of basic material are described in detail in the Guidelines. Most suppliers marketing material raised from seed will market plants derived from a *seed source*; if a registered individual stand is concerned the type will be *stand* and if cuttings are being produced *clone* or more rarely *clonal mixture*.
- Categories, also detailed in the Guidelines, are most likely to be *source-identified* or, where specific registered stands of higher quality are concerned, *selected*.
- If clonal material of *Populus* species is being produced, the category will be *tested for commercial hybrid poplar clones* or *qualified for aspen and black poplar clones*.
- The National Register Basic Material Identity is shown on the Master Certificate, or if the material has been obtained from another supplier, their Supplier's Document.
- The origin of the material can only be *Indigenous* if it derives from an individual registered stand which has been given that designation. If known to be non-indigenous, information on its known origin should be given (particularly important for commercial conifers). Where no information is available, *Unknown* should appear.
- Age and type of plants may be given in years or the general notation 2+1, 1u1 (for example) may be used.
- The nature of the material will be *seed* if seed is being supplied, *parts of plants* if cuttings or similar material is involved or otherwise *planting stock*.

Contact for further information:

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email: frm@forestry.gsi.gov.uk

Guidelines on implementation of the Regulations (Forestry Commission (2007)).:
Forest Reproductive Material: Regulations controlling seed, cuttings and planting stock for forestry in Great Britain. Forestry Commission, Edinburgh. i-iv + 1-32 pp