

30. Agroforestry & the draft regulation on Forest Reproductive Material

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EURAF is an NGO, based in Montpellier and Brussels (Transparency Register ID of [913270437706-82](https://www.transparencyregister.eu/913270437706-82)). It aims "to promote the adoption of agroforestry practices across Europe by supporting efforts to develop awareness, education, research, policy making and investments which foster the use of trees on farms". It has a network of 31 affiliated entities in 23 countries.

Summary

Policy Briefing #30-v3 updates our previous recommendations on the wording of the draft EU Forest Reproductive Material (FRM) Regulation. It discusses the agreed opinion of Parliament and Council before the start of Trialogue discussions this autumn with the Commission. Parliament's amendments clarify that the FRM should apply agroforestry (as the previous Directive did in many countries). EURAF suggested this in our previous submission. Four types of certification of planting material are described in the FRM in increasing "quality" order: i) source identified, ii) selected, iii) qualified; iv) tested.

This briefing stresses that the highest possible quality of planting material should be used for "in-field" agroforestry where there is less scope for self-thinning or improvement- thinning than in conventional forestry. However, we observe that there are existing quality labels for local tree seeds, such as Végétal local and similar initiatives in Europe, which are largely used in hedgerow plantations. As their primary objective is biodiversity and ecosystem services, they are not compatible with the 'source-identified' FRM category or, more broadly, with the FRM regulation. Rather, they are used alongside FRM, in a complementary way, in the context of hedge plantings.

Figure 1: Example of a plus tree ([Future Trees Trust](#)). Trees used in agroforestry should have strong apical dominance and an ability to grow straight when planted at wide-spacing with little inter-tree self-thinning or opportunity for improvement-thinning.



EURAF welcomes Amendment 18 (definitions) in Parliament's consolidated text [P9_TA\(2024\)0342](#) which adds "setting up or restoring agroforestry systems" to the scope of the Regulation, but we request that a bracket "(excluding hedgerows)" should be added after "agroforestry" in the final text to reflect the difference between hedgerow planting for biodiversity and other types of agroforestry which have a greater focus on the production of quality timber. [Version 2](#) of this Briefing (22/12/23) had a section on the draft New Genomics Techniques regulation. This has been removed and may be included in a separate Briefing.

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1 Introduction

The "Sustainable Use of Soil and Plant Natural Resources" package ([link](#)) was published by the Commission on 5.7.23. It contained five draft laws; a) the Soil Monitoring and Resilience Directive, b) revision of the Waste Framework Directive, c) the Plant Reproductive Material (PRM) Regulation ([COM/2023/414](#)), **d) the Forest Reproductive Material (FRM) Regulation ([COM/2023/415](#))** and e) the New Genomic Techniques (NGTs) Regulation ([COM/2023/411](#)). Version 3 of this briefing **focuses only on the FRM Regulation**. The NGT Regulation is covered in EURAF Policy Briefing #71.

2 Commission draft of the Forest Reproductive Materials Regulation

The [draft Regulation](#) was published on 5.7.23 alongside an [impact assessment](#). It builds on an older Directive ([1999/105/EC](#)) which was subject to wide differences of interpretation in Member States. One difference was whether trees planted outside official "forest land" were covered by the Directive. The original wording referred only to planting for "*forestry purposes*", but it also mentioned new planting to meet the needs of the Dec 1998 Forestry Strategy (COM 1998/649) - which in turn had several mentions of "agroforestry". Other Regulations at the time (e.g. [2016/2031](#) and [2017/625](#)) more clearly related to tree-planting in towns, parks and landscapes, and not just in forests.

The new draft regulation clarifies that it refers to: "*seeds, parts of plants and plants and is used for the creation of new forests ('afforestation'), the replanting of areas with trees ('reforestation') and other types of tree planting for different purposes: (i) wood and biomaterials production, (ii) biodiversity conservation, (iii) restoration of forest ecosystems, (iv) climate adaptation, (v) climate mitigation and (vi) conservation and sustainable use of forest genetic resources*". It also stresses that "*Member States must be allowed to decide on the selection criteria that will be applied to the basic material in view of the intended purpose of that FRM*".

The new Regulation is designed to ensure the quality, identity, and traceability of seeds, cuttings, and plants used for forestry purposes. The core objective is to guarantee that the material used for afforestation and reforestation is genetically suitable and of high quality to ensure healthy and sustainable forests. The draft Regulation establishes a system for the approval and registration of "*basic material*" which are the parent trees or stands from which FRM is harvested. This basic material is categorized based on the level of genetic information and quality: a) "**source Identified**" - material with a known geographical origin but no pre-selection for genetic qualities, b) "**selected**" - material from stands chosen for superior phenotypic traits like vigor and form, c) "**qualified**" - material from seed orchards or other artificially established sources with a guaranteed genetic quality, d) "**tested**" - the highest category, where the genetic superiority of the material is demonstrated through comparative trials.

The regulation proposes that all FRM marketed within the EU is officially certified and accompanied by a "*Master Certificate of Provenance*," guaranteeing its origin and quality. This system, which also aligns with the OECD's international certification scheme (OECD 2024), facilitates the free movement of high-quality FRM across member states while preventing the sale of unsuitable material. In light of new challenges like climate change, pest attacks and windthrow, the proposed changes aim to improve traceability and provide more information on the suitability of FRM for future conditions. Member States are also required to have contingency plans for rapid reforestation following natural disasters like pest attack or major storms.

3 Parliament's negotiating position

The Parliamentary [legislative train](#) for the FRM Regulation started on 5.7.23, with the Committee Agriculture and Rural Development (COMAGRI) as the lead committee and Herbert Dorfmann MEP as the lead rapporteur. The Economic and Social Committee (EESC) provided an [opinion](#) on 13.12.23. The Committee on Environment, Public Health and Food Safety (COMENVI) gave their opinion on [12.3.24](#). The draft report from COMAGRI was published on 21.3.24 ([A9-0142/2024](#)), and all amendments were voted upon in a plenary "first-reading" session on 24.4.24 in Strasbourg amendments. The consolidated text ([P9_TA\(2024\)0342](#)) contains two mentions of agroforestry in Article 3

(definitions), where "setting up or restoring agroforestry systems" is included as one of the purposes to which "forest reproductive material" applies, and "agroforestry" is defined as "the integration of trees on agricultural land without changing the classification of that land".

4 Council's negotiating position

Since then, the Committee of MS Permanent Representatives (COREPER) has been discussing a combined view of Member States, and on 10.6.25 it approved the "**Council Negotiating Mandate**" ([9694/1/25](#)). This welcomes the overall goals of the FRM proposal, but introduces a number of changes:

- Simplification of the marketing rules by including a more flexible system for the approval and use of FRM, which reduces administrative burdens while still ensuring quality. This simplification includes keeping the FRM sector outside the scope of the EU Official Controls Regulation. Member States will be required to designate competent authorities in charge of controls, equip them with adequate financial resources and staff and legal powers to perform inspections.
- Flexibility for the production of FRM from the "source-identified" category in the case of extreme climatic conditions.²
- Adding an emphasis on genetic diversity and adaptation to climate change by allowing FRM to be categorized by its adaptability to a wider range of future climatic conditions, rather than being restricted to a specific geographic area.
- Support for small-scale producers - by specifically recognizing their important role in the forestry sector and allowing less stringent requirements for low-volume production, which will help keep these producers in business.
- National contingency plans would be voluntary with simplified requirements;
- The list of tree species that the regulation covers would be simplified. Member states would be able to apply more stringent or less stringent measures to the tree species that are not listed in the annex.

The Council document does not mention agroforestry, but does add the "*production of wood, biomaterials, biomass and other forest products*".

EURAF Position

The **European Agroforestry Federation (EURAF)** has long campaigned for the highest quality planting stock (e.g. Figure 1) to be used for in-field agroforestry plantations. This is because trees planted at wide-spacing (e.g. 50-400 stems/ha) have less competition with their neighbours, and therefore less "self-thinning" than trees planted at conventional spacings (1000-2500 stems/ha). The final number of "crop trees" in agroforestry will be around 40-80 stems hectare, so "improvement thinning" to select the highest-quality individuals is much less intense than in conventional forestry. For this reason EURAF has pressed that "in-field" agroforestry systems should be planted with "selected", "qualified" or "tested" planting stock. One key selection characteristic is "apical dominance": i.e. the stem grows with an erect form (orthotropic), rather than producing many horizontal branches (plagiotropic), even if the terminal bud is damaged, for example by frost or insect attack. This greater certainty of high-quality stem growth can be conferred by low-tech clonal propagation methods (Leakey & Longman 1986; Libby & Rauter 1984; Hemery et al. 2008), conventional micro-propagation methods (Tollefsrud et al. 2025) or even low-tech micro-propagation (Castro-Camba et al. 2023). For all techniques in clonal agroforestry it is necessary to use a "sufficient" number of clones in the planting mixture material to manage risks (Bishir & Roberds 1999). The FAO recommends that no more than 10% of a single superior clone should be planted in a given area in a single year (Longman 1993). Clonal seed orchards are another possibility in the "selected" category to improve tree quality while maintaining diversity (Liesebach et al. 2021; Torres-Dini et al. 2024).

² Recital 17 says "However, in order to ensure a more flexible approach with regard to the FRM of source-identified category, competent authorities should have the possibility, upon the approval of the Commission, to authorise professional operators to approve, for certain species, "basic material" intended for the production of the FRM of that category, in the case of extreme climatic conditions".

EURAF welcomes the emphasis in the FRM on recording whether the stands are autochthonous/indigenous or not, and that this label can help organisations meet any obligations imposed in the Nature Restoration Regulation on the percentage of native species to be used. We note the definition of "source identified" in Recital 23, and Annex II³ but stress that the "FRM source identified" is not interchangeable with "Vegetal local" and its national equivalents. The two approaches are complementary for planting FRM-regulated species for hedges.

EURAF welcomes the welcome the amendments proposed by Council (Recital 31, Articles 5, 10, 14, 19) to give more flexibility to smaller professional operators in meeting subsequent marketing rules. We recommend that the criteria for "source-identified" certification, are further defined in the FRM Implementing Regulation to be as broad as possible, and to meet the code of conduct by the European Native Seeds Conservation Network manual (ENSCONET 2009). ENSPA is an association that brings together producers from across Europe who are committed to producing reproductive materials for ecological restoration projects—reproductive materials that are genetically similar to the natural populations of their territory. At the Member State level, measures have been implemented to ensure that the plants used in ecological restoration projects (including ecological focus areas under the CAP, such as hedges) are suitable. This has led to requirements to use native plants in development projects in natural areas (Norway, Germany), as well as support for the creation of labels that guarantee the wild and local nature of the plants produced: [Végétal local](#) (France), [Végétal d'ici](#) (Belgium), and [VW-Regiosaaten](#).

EURAF has also considered the position of "Réseau Haies France" (RH), which is France's national network of associations dedicated to the development and preservation of trees and hedges. There are around 450 local affiliated organizations to Réseau Haies promoting the hedges as a multifunctional resource - for biodiversity preservation, agricultural enhancement, landscape structuration, water quality, biomass provision, carbon stock. RH has expressed concern that the application of the proposed FRM quality standards to hedge planting could negatively impact labels and initiatives which are specifically designed for the restoration of natural and semi-natural habitats such as hedges (Gourlin 2025).

EURAF has also considered the differences pointed out by Réseau Haies (2024) between the "Végétal Local" collective mark (owned by the French Office for Biodiversity) and the "source-identified" label of the FRM. Réseau Haies stress the emphasis in *Végétal Local* on "preservation of wild and local genetic diversity to strengthen resistance against hazards and to increase the functional biodiversity of landscapes.

EURAF recognises that the nature of Forest Reproductive Material to be used in "in-field" agroforestry, is different to that which are usually used in hedge planting. In the latter, where the primary aim is the creation of natural habitats, FRM should be used in a complementary way, with materials chosen primarily for biodiversity objectives, particularly when traceability initiatives or labels can guarantee it. For "in-field" agroforestry, aiming at the production of timber, trees planted at wide-spacing, farmers and managers should seek the higher certification levels of FRM (selected, qualified or tested).



We therefore welcome Amendment 18 (definitions) in Parliament's consolidated text ([P9_TA\(2024\)0342](#)) which adds "*setting up or restoring agroforestry systems*" to the scope of the Regulation, **but request that a bracket "(excluding hedgerows)" should be added** to reflect the very different nature of hedgerow planting for biodiversity from other types of agroforestry which have a greater focus on the production of quality timber.

Considering these new elements, we acknowledge that source-identified FRM has different objectives from reproductive materials bearing the Végétal local label (and its equivalents in Europe), and that they are in fact complementary in the context of hedges, which are agroforestry plantings not primarily intended for timber production.

³ Annex II defines "**source-identified**" as meeting the following conditions i) **type of basic material** - shall be a "seed source or stand located within a single region or provenance", and that the seed source or stand shall consist of one or more groups of trees (stands) or an individual stand; ii) **effective size of the population** - trees shall be well distributed and sufficiently numerous to maintain genetic diversity and ensure adequate cross-pollination between iii) **origins and region of provenance** - should give the provenance latitude, longitude and altitude range of the place(s) where the FRM is collected, and that the operator should show whether the origin of the basic material is autochthonous, non-autochthonous, indigenous, non-indigenous or unknown; iv) **sustainability characteristics** - The trees shall be well-adapted to the climatic and ecological conditions including the biotic and abiotic factors prevailing in the region of provenance and also marginal populations demonstrating local adaptation to more extreme biotic and abiotic factors, additionally they should be "practically free" from quality pests and their symptoms.

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