

Country	Comments
Austria	Austria has no objections to the proposed amendments of the International Poplar Convention.
Canada	<p>The Poplar and Willow Council of Canada (PWCC) board members (Barb Thomas, John Doornbos and Jim Richardson) were actively involved in various capacities since the inception of the IPC reforms in 2012 in Dehradun, India. The position taken by Canada is to have accepted these amendments as written and Canada voted YES in Berlin 2016 IPC meeting. Based on the three documents provided from your end, a consensus was reached among PWCC board members to vote in favour of the changes. We have no substantive comments on the documents and are in favour of their adoption.</p>
Finland	Finland has no Comments to the Proposed Amendments.
France	<p>La France apprécie l'opportunité qui lui a été donnée de commenter les propositions d'amendements de la Convention de la Commission Internationale du Peuplier. Nous saisissons par conséquent cette opportunité pour suggérer quelques ajustements et révisions aux amendements, tels que mentionnés et justifiés ci-dessous.</p> <p>Nos propositions se concentrent principalement sur des formulations qui, nous pensons, pourraient bénéficier de l'utilisation de termes plus larges, génériques et consensuels, par exemple dans les cas où les contextes ou sujets peuvent être pays dépendants (e.g. relatifs aux genres ou aux espèces).</p> <p>De façon générale, nous émettons un avis favorable sur l'engagement de cette réforme de la Convention à laquelle nous apportons plusieurs commentaires qui, nous l'espérons seront, pris en considération.</p> <p>Les modifications que nous proposons sont les suivantes :</p> <p><b>Article premier – Statut</b>  <b>page 1</b>  - Remplacer « <i>autres essences à croissance rapide utiles aux personnes et à l'environnement</i> » par « <i>autres essences à croissance rapide utiles au développement durable de l'humanité</i> »</p> <p><b>Article III – Fonctions</b>  <b>page 1</b>  - Nous préconisons de ne pas donner de liste exhaustive de genres ou espèces cités dans la mesure où il existe une grande diversité espèces au sein d'un même genre et que l'intérêt de chaque espèce peut varier d'un pays à l'autre. Nous proposons donc une formulation plus générale : Modifier la phrase suivante ainsi :  « <i>En plus des travaux menés par la Commission sur le genre Populus, les sous-groupes de la Commission peuvent mener des travaux sur d'autres genres ou espèces à croissance rapide d'intérêt pour les pays membres</i> »</p> <p>- Remplacer « <i>utilisation des ressources forestières</i> » par « <i>utilisation durable et mise en valeur des ressources forestières</i> »</p> <p>- Reformuler la phrase suivante, pour ajouter et mentionner la bioéconomie, apporter des précisions sur le volet du changement climatique et élargir la notion de puits de carbone à la question du</p>

	<p>stockage de carbone en et hors forêt :</p> <p>« Ces travaux intéressent notamment les questions relatives à la bioéconomie, à la sécurité alimentaire, aux adaptations au changement climatique, au stockage de carbone en forêt et dans les matériaux issus du bois, à la conservation de la biodiversité et la résilience face aux menaces biotiques et abiotiques, et à la lutte contre la déforestation. »</p> <p>- Remplacer « les échanges.....de matériel entre chercheurs » par « les échanges ... de ressources biologiques entre chercheurs » et ce afin de mettre l'accent sur l'intégration de la convention dans un cadre de partage de ressources génétiques dans le respect des accords de Nagoya.</p>
Germany	<p>Germany is a firm supporter of the initiated reform process of the IPC and its Convention accordingly.</p> <p>Especially the opening up of the scope of the Commission's work by also including other fast growing tree species in the activities, is an essential step for maintaining the long term liveliness and maybe also the viability of this "FAO organization". The drafted amendments should therefore in any case explicitly mention the widened scope as to "Other Fast-Growing Trees". We do not feel strongly about the usefulness of additional mentioning of some elected tree species – just as specific examples.</p> <p>As to (additional) editorial changes -also during the final voting process- we would see no problems.</p> <p>The obligatory financial contributions of the member states towards the commission should in any case be limited to the actually existing obligations. Any proposed changes should of course bare the financial feasibility in mind.</p>
India	[India] agrees with the amendments proposed
Ireland	<p>Article III.a includes the following sentence: "In addition to the Commission's work on the genus Populus, the Commission's subgroups may work on other genera such as Acacia, Pinus, Salix and Tectona."</p> <p>We would suggest that "<i>inter alia</i>" is a more suitable term than "such as" in this context.</p>
Italy	We communicate that Italy has no comments to formulate regarding the proposed amended text. We wait for the final version of the Convention before the submission to the vote.
Japan	Japan decided not to submit comments to draft amendment to the IPC-Convention. Thank you very much.
New Zealand	[We are] in agreement with all the proposed amendments and do not propose any additional amendments.
Portugal	<p>Portugal would like to share the following:</p> <ul style="list-style-type: none"> <li>- Title – there is no added-value in integrating "sustaining people and the environment" – better to keep the title focused; consider the possibility to provide some context in a "Preamble" where "sustaining people and the environment" could be mentioned;</li> <li>- Functions</li> </ul> <p>o Portugal cannot support the addition of genus Pinus to the text of this Convention as it is not part of what is understood as fast-growing species. From a technical point of view, it cannot be accepted to join Pinus with genera Acacia and Salix. This is one of the reasons why Portugal sustains it would be</p>

advisable to add, in the beginning of the text of the Convention, a new article focused on “Definitions” within which it should be defined, inter alia, what is it meant by “other fast-growing trees”;

- o Considering the proposed creation “sub-groups” – that are mentioned in this article – we think that creation should be evaluated in the context of how the Convention/Commission may function. So, perhaps it can be considered within Subsidiary Bodies or Rules of Procedure. However, this raises another question: are the referred “sub-groups” replacing the existing 6 “working parties”? or are they to be an additional structures? or is it envisaged to enlarge the scope of the working-parties? In any case, the reference to “sub-groups” and/or “working parties” should not be made in the context of “functions”;
- b) is there a need to include “on mutually agreed terms”? We are wondering what is the purpose of this add[ition]?;

- Furthermore, it would be useful a Clarification: There is no evidence in the text or its amendments of one of the described aims of the reform (as it is mentioned in the letter of “Invitation to Comment” in paragraph 4):  
“transfer the experience and the lessons learnt on poplars and willows to other fast-growing species in forestry and agroforestry systems of tropical countries”.

In addition to the above, Portugal would like to clearly state that this is a missed opportunity to carry out an in-depth reform of this Convention. Indeed, this could be an opportunity to go beyond the mere consideration of amendments to the text of the Convention, in the sense of its adequacy to modern international texts, needs and available resources, redesigning it into an up-to-date structure, applying in the text vocabulary and formulations used in similar documents. A more comprehensive streamlining and modernisation could even lead to a radical change in the very nature of the instrument and in its positioning within FAO (in this regard, it should be noted that maybe it is no longer justified to have a Convention with such characteristics, but rather a more operational structure within the Organisation).

Having the idea of an in-depth reform in mind, Portugal would like to present some facts and general observations:

- the structure and basic content of the Convention date from 1959 (with amendments from 1967 and 1977) reflecting a response to particular needs and demands of a certain period of the World History;
- Portugal deposited its instrument of acceptance of the Convention in 1963;
- the International Tropical Timber Organization (ITTO) was established in 1986 under the auspices of the United Nations reflecting a worldwide concern about tropical forests; but the origins of ITTO can be traced back to 1976;
- Portugal is a member of ITTO;
- the last decades, particularly since the United Nations Conference on Environment and Development (UNCED) in 1992, have been rich in outstanding developments concerning the forest-related international debate;
- the current trend in relation to legally binding instruments, particularly when it comes to forest-related issues, is not in the sense of narrow approaches - on the contrary, the unidimensional approaches are replaced by comprehensive and holistic frameworks that can deal with the complex and multidimensional nature of global forest related issues

- Considering the severe budgetary constraints and decrease of human resources in organisations, avoiding duplication of efforts and looking for synergies amongst related instruments should be priorities for countries and international organisations; and
- avoiding further fragmentation of forest-related matters, while enhancing coordination among international organisations, institutions and instruments addressing forest issues should also be a top priority;

which lead to the following comments on the Convention:

- The Structure of the document should be revisited and revised in accordance to up-to-date formats and language of similar instruments; a possible revised structure could be: Title; Preamble; Definitions (including the clarification of the so called “status”); Objectives; Scope (material, geographic); Executive Committee; Right to vote; Rules of Procedure (including Expenses and how the Commission may function – subgroups, working parties); Seat of the Commission/Convention; Secretariat; Subsidiary bodies; Establishment of National Commissions; Interpretation and Settlement of disputes; Amendments; Signature/Membership; Ratification/Acceptance; Entry into Force; Withdrawal; Termination ; Depositary; Authentic Texts (not Languages);
- Throughout the text consider replacing “Member Nations” by “Member of the Commission”;
- Throughout the text, beginning in “status” (which is itself very unclear), there is a confusion between Convention and Commission; consider streamlining this situation even avoiding the source of that confusion in the title of the Convention;
- Functions (better to be called “objectives”) – recall the comment already presented above on “sub-groups” within this article; and question the need to include “on mutually agreed terms”?
- Executive Committee - §2 – how many times can members of the Executive Committee be re-elected?
- Subsidiary bodies - §1 – what about the sub-groups mentioned under article 3 (functions)?
- Expenses - §3 – “except when they have been requested to perform ...” – in this case the expenses shall be borne by the organization - it should be clarified; §5 – this formulation may lead to misunderstandings concerning the expenses of delegates; so, it should be clear that expenses incurred by delegates of Parties shall be borne by the respective governments (as in §1 of this article);
- Amendments - § 4 – the last part of this § suggests that there is a possibility of having several versions of the text of the convention in force at the same time which is awkward to say the least; if a party does not accept an amendment, there is no ratification in place, hence losing the right to vote; the provisions should be clear on this;
- Acceptance/ratification - §4 – the references to reservations and their consequences are not clear;
- Geographic scope – how does the current formulation cover the aspiration of “transfer the experience and the lessons learnt on poplars and willows to other fast-growing species in forestry and agroforestry systems of tropical countries” which, to be honest, is not mentioned in the text;

	<p>- Termination – FAO has more than 190 member states – is it cost-effective and acceptable from an organisational point of view to maintain a convention and respective secretariat and subsidiary bodies with only 6 or 7 parties?</p> <p>Considering the above, Portugal strongly recommends a request to the Committee on Constitutional and Legal Matters of FAO to revisit the text of this Convention in light of the observations/ comments/ suggestions presented above. In fact, this request is in line with what is mentioned in the Report of the 100th Session of the Committee on Constitutional and Legal Matters: “the CCLM will review again the proposed amendments prior to their referral to the Council and Conference in 2017”. And we draw the attention to the fact that the version already review by the CCLM is not the version circulated for the Special Session – two major examples in the later are in the title – “and other fast-growing trees” (“and other trees” in CCLM) and the addition of Pinus mixing, with Acacia and Salix, thereby indicating Pinus as “Fast-Growing trees” which Portugal cannot support.</p>
Slovenia	<p>We have no additional comment on the draft text of proposed Amendments to the Convention of the International Poplar Commission.</p>
South Africa	<p>We have considered the proposals, as well as consulted with our forestry industry stakeholders, and we would therefore like to submit the following for your consideration:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> South Africa has removed most but a small fraction of the poplar trees, which we used to grow commercially. This was done systematically over the last two decades, in the hope of significantly reducing the amount of stream-flow reduction, which was occurring as a result of the poplar industry.</li> <li><input type="checkbox"/> While the IPC appears to be seeking to extend its mandate to include “other fast-growing trees” (including Acacias) and so in theory, this may be of interest to South Africa. It is important to note that South Africa is already represented on the FAO’s ACSFI (formerly the ACPWP). It is our understanding that the ACSFI was restructured by the FAO some years ago to broaden its mandate to deal with all commercial timber species grown and used globally. All of South Africa’s commercial genera (Pinus, Eucalyptus and Acacia) are already included in that scope. South Africa therefore, does not see any point in the IPC seeking to change its mandate to include “other fast-growing trees” as well, as this will result in duplication of some of the functions performed by the ACSFI. This will almost certainly not enjoy support from our private sector (beyond the poplar industry) as the private sector is already strongly represented in the ACSFI.</li> <li><input type="checkbox"/> Furthermore, the Convention proposes that member States should either establish a “National Commission” or designate “some other suitable national body” to perform the envisaged functions; which is not attractive to South Africa.</li> </ul> <p>For the above reasons, we cannot see how the FAO can justify having two committees with role overlaps. South Africa would therefore want to express its opposition to the change in scope of the IPC. It may be useful for the FAO to look at the ACSFI, to determine whether it could not instead be used to serve the interests of the poplar industry and thereby save the administrative burden of maintaining the IPC as an FAO Committee.</p>
Sweden	<p>The board of the National Commission of Sweden has read the Proposed Amendments to the Convention of IPC and has no further comments on the text. We have been involved in the suggested changes of the Convention since the IPC meeting in Berlin</p>

	<p>2016 and stand behind the idea of including more tree species and thereby give possibilities for more countries to be members.</p> <p>The Board of the National Poplar Commission of Sweden has communicated with representatives from the Swedish government which agreed and had no further comments.</p>
Turkey	<p>As regards the proposed amendments to the Convention of the International Poplar Commission, the Directorate-General of Forestry – Ministry of Agriculture and Forestry accepts comment on the proposed amended text with deletions using strikethrough and insertions using underlined italics, which both are yellow-coded of draft amendments – July 2018 FO: IPC/2018/3</p>