



## **Second Reporting Cycle**

# Report on the implementation of the International Treaty on Plant Genetic Resources for Food and Agriculture (ITPGRFA)

# **HUNGARY**

(04 October 2022)



#### ONLINE REPORTING SYSTEM

#### **Second Report on Compliance of ITPGRFA**

Online Reporting System on Compliance of the International Treaty on Plant Genetic Resources for Food and Agriculture

Pursuant to Article 21 of the Treaty, the Governing Body approved, at its Fourth Session, the Compliance Procedures that include, among others, provisions on monitoring and reporting: Resolution 2/2011.

According to the Compliance Procedures, each Contracting Party is to submit to the Compliance Committee, through the Secretary, a report on the measures it has taken to implement its obligations under the Treaty. This Online Reporting Systems facilitates the submission of such information in electronic format.

Should you need any additional information regarding the reporting on compliance or the use of the online system, please visit the Treaty's Website or contact the Secretariat at PGRFA-Treaty@fao.org.

### **Additional Reporting Information**

Name and contact of the reporting officer

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#### **Article 4: General Obligations**

Article 4. General Obligations
1. Are there any laws, regulations procedures or policies in place in your country that implement the Treaty?  Please select only one option  ☑ Yes □ No
1A. If your answer is 'yes', please provide details of such laws, regulations, procedures or policies:  3.33 In Hungary the Ministry of Agriculture, Department for Biodiversity and Gene Conservation is responsible for PGR policy, including the implementation of the Treaty. The Ministry provides financial support to the main national gene bank, the National Centre for Biodiversity and Gene Conservation.  The following legal instruments provide the background legislation and policies to the Treaty:  **Act No. LIII of 1995 on the announcement of the Convention on Biological Diversity  **Act No. LIII of 1996 on Nature Conservation  **National Biodiversity Strategy (2015-2020)  **Strategy for the Conservation Strategy of Plant Genetic Resources for Food until 2020  **National Gene Conservation Program (2019-2023)  The conservation and sustainable use of plant genetic resources for food and agriculture are laid down in the following major national legislations:  **Government Decree 358/2004 (XII.26.) on the announcement of the international treaty on plant genetic resources for food and agriculture adopted on 3 November 2001 in Rome (FAO Treaty) promulgated the Treaty;  **Decree 95/2003 (VIII.14.) FVM of the Ministry for Agriculture on the conservation and use of plant genetic material determines the national rules on the conservation and also on the use of plant genetic resources. In addition the following legislations supplement the rules that implement the Treaty:  **Act LII of 2003 on the national accreditation of plant varieties and the creation and placing in the market of breeding materials;  **Decree 104/2009 (VIII.5.) FVM of the Ministry for Agriculture on the accreditation of landraces and garden-type varieties of vegetable species and the conditions for the production and distribution of the seeds of these;  **Decree 27/2011 (VII.1) VM of the Ministry for Rural Development on the accreditation of landraces of fruits and the conditions for the production and distribution of the breeding material of these;
2. Are there any other laws, regulations, procedures or policies in place in your country that apply to plant genetic resources?  Please select only one option  ✓ Yes  □ No
2A. If your answer is 'yes', please provide details of such laws, regulations, procedures or policies:  >>> Conservation Strategy of Plant Genetic Resources for Food until 2020: The Hungarian National Strategy for the Conservation of Plant Genetic Resources for Food and Agriculture 2014 – 2020 was endorsed by the Hungarian Minister of Rural Development in April 2013. The document was prepared by experts from the Ministry of Rural Development and from other institutions, and by the National Genebank Council. The vision and targets have been developed in line with the Convention on Biological Diversity (CBD), the International Treaty on Plant Genetic Resources for Food and Agriculture and the EU Biodiversity Strategy to 2020.

2A. If your answer is 'yes', please provide details of such laws, regulations, procedures or policies:

>>> Conservation Strategy of Plant Genetic Resources for Food until 2020: The Hungarian National Strategy for the Conservation of Plant Genetic Resources for Food and Agriculture 2014 – 2020 was endorsed by the Hungarian Minister of Rural Development in April 2013. The document was prepared by experts from the Ministry of Rural Development and from other institutions, and by the National Genebank Council. The vision and targets have been developed in line with the Convention on Biological Diversity (CBD), the International Treaty on Plant Genetic Resources for Food and Agriculture and the EU Biodiversity Strategy to 2020.

National Gene Conservation Program (2019-2023): In 2017 the Ministry of Agriculture prepared a specific Gene Conservation Program, which was approved by the Government. The Program was launched in 2019; its primary goal was to develop capacities of gene conservation institutions and to maintain and expand the collections of the gene banks and national park directorates, and to establish a state gene bank network as an inventory of values, as a separate duplicate in case of any disease, natural disaster, or simply as a basis of the gene pool for the improvement of the variety. A specific Government Resolution provided resources for the implementation of the Program, including the collection of the rare genetic values still found in the Carpathian Basin and the introduction of specific sample programs. The Government Resolution provided for a total of HUF 12.3 billion for the implementation of the Gene Conservation Program. This has been a huge opportunity to preserve the conservation of genetic resources that provide the bases for agriculture and food production, also to strengthen the state's role in gene conservation and to create a genebank network.

3. Is there any law, regulation, procedure or policy in place in your country that needs to be adjusted / harmonized to ensure conformity with the obligations as provided in the Treaty?

Please select only one option  ☐ Yes ☑ No
3A. If your answer is 'yes', please provide details of such adjustments and any plans to make those adjustments:

# Article 5: Conservation, Exploration, Collection, Characterisation, Evaluation and Documentation of Plant Genetic Resources for Food and Agriculture

4. Has an integrated approach to the exploration, conservation and sustainable use of plant genetic resources for food and agriculture (PGRFA) been promoted in your country?  Please select only one option  ✓ Yes  ☐ No
5. Have PGRFA been surveyed and inventoried in your country?
Please select only one option  ☑ Yes □ No
5A. If your answer is 'yes', please provide details of your findings, specifying species, sub-species and /or varieties, including those that are of potential use.
You have attached the following documents to this answer.
Response to question 5 - Response to question 5
5B. If your answer is 'no', please indicate:
Any difficulties encountered in surveying or inventorying PGRFA; Any action plans to survey and inventory PGRFA; The most important PGRFA that should be surveyed and inventoried >>>
6. Has any threat to PGRFA in your country been identified?  Please select only one option  ☑ Yes □ No
6A. If your answer is 'yes', please indicate:
The species, subspecies and/or varieties subject to such threats; The sources (causes) of these threats; Any steps taken to minimise or eliminate these threats; Any difficulties encountered in implementing such steps; >>> Agricultural intensification pose a threat to landraces. The collecting capacity is lower than the speed of the landraces' disappearing. In order to minimize these threats Hungary has relaunched the "On farm program". The National Centre for Biodiversity and Gene Conservation improved the seed exchange and in parallel developed several program for collecting missions. During the implementation of the above mentioned steps the lack of human labour and the lack of experts were identified as difficulties.
7. Has the collection of PGRFA and relevant associated information on those plant genetic resources that are under threat or are of potential use been promoted in your country?  Please select only one option  ✓ Yes  □ No
7A. If your answer is 'yes', please provide details of the measures taken:
8. Have farmers and local communities' efforts to manage and conserve PGRFA on-farm been promoted or supported in your country?  Please select only one option  ✓ Yes  ☐ No

8A. If your answer is 'yes', please provide details of the measures taken:

>>> The on-farm network of the National Centre for Biodiversity and Gene Conservation is responsible for "increasing the dissemination, the mobilization and the spreading of genetic resources" as stated in the National Gene Conservation Program. The network was launched in autumn 2018 with the participation of 4 farmers. At the beginning of the next year 9 new farmers joined the initiative, which was complemented by 2 more persons in autumn 2019. The network further expanded with the joining of 5 new farmers in spring 2020. Today 20 members grow 94 varieties of 29 species in the different parts of Hungary. The farmers' tasks include the professional production of the local landraces by applying proper isolation techniques (for preserving the genetic purity of the gene bank samples) and performing seed collection, cleaning and storage activities. In addition, they also fill out a crop production datasheet for each variety, and take pictures of the growing plants every month. As a result of their dedicated work, seeds of high genetic value are produced, which are to be sown again in the next year. Excess seeds can be used by the farmers for different purposes, including personal consumption, dissemination through seed swaps, etc. Since financial incentives are given only in the first year of production, the success and the continuity of the initiative relies on the deep commitment and the enthusiasm of the farmers besides their multiplier effect (giving seeds to others) in the subsequent years. Cooperation between the farmers and the gene bank seems to be flourishing, and according to the responses of the members, the majority (about two-thirds) of the received gene bank samples worked well, and they are intended to be further produced even after the 2 years long "compulsory production period". In addition, all the farmers with accomplished production periods asked for 5 additional local landraces to be tested and produced at their sites besides the in situ conservation of the first 5 gene bank samples.

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9. Has in situ conservation of wild crop relatives and wild plants for food production been promoted in your country?  Please select only one option  ☑ Yes  ☐ No
9A. If your answer is 'yes', please indicate whether any measures have been taken to:  ☑ Promote in situ conservation in protected areas  ☐ Support the efforts of indigenous and local communities
9B. If such measures have been taken, please provide details of the measures taken:
10. Are there any ex situ collections of PGRFA in your country?  Please select only one option  ☑ Yes □ No
10 A. If your answer is 'yes', please provide information on the holder and content of such collections:
You have attached the following documents to this answer.
<u>response_to_question_10.pdf</u> - Response to question 10
11. Has the development of an efficient and sustainable system of ex situ conservation of PGRFA been promoted in your country?  Please select only one option  ✓ Yes  □ No
11A. If your answer is 'yes', please indicate the measures taken to promote ex situ conservation, in particular any measures to promote the development and transfer of technologies for this purpose: >>> The National Centre for Biodiversity and Gene Conservation has nation-wild responsibility on the coordination of the PGRFA conservation in Hungary. According to the National Gene Conservation Program (2019-2023) the National Genebank Network is under development.
12. Has the maintenance of the viability, degree of variation, and the genetic integrity of ex situ collections of PGRFA been monitoring in your country?  Please select only one option  ✓ Yes  □ No
12A. If your answer is 'yes', please provide details of the main conclusions of these monitoring activities

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>>> The number of the accessions maintained in different collection and their changes can be monitored via
National Gene bank Database.

13. Has your country cooperated with other Contracting Parties, through bilateral or regional channels, it the conservation, exploration, collection, characterization, evaluation or documentation of PGRFA?  Please select only one option  ☑ Yes ☐ No

13A. If your answer is 'yes', please indicate the other Contracting Parties with whom the cooperation was undertaken (where additional to cooperation through the Governing Body or Treaty mechanisms) and, where possible, details of any relevant projects:

- >>> Joint cooperation with neighboring countries based on bilateral agreements on following topics:
- common collection of landraces, crop wild relatives,
- exchange of PGRFA,
- exchange of experience.

# Article 6: Sustainable Use of Plant Genetic Resources for Food and Agriculture

14. Are there any policy and legal measures in place in your country that promote the sustainable use of PGRFA  Please select only one option  ☑ Yes □ No
14A. If your answer is 'yes', please indicate whether such policy and legal measures include:  ☐ Pursuing fair agricultural policies that promote the development and maintenance of diverse farming systems that enhance the sustainable use of agricultural biological diversity and other natural resources;  ☐ Strengthening research that enhances and conserves biological diversity by maximizing intra- and inter-specific variation for the benefit of farmers;  ☐ Promoting plant breeding efforts, with the participation of farmers, that strengthen the capacity to develop varieties particularly adapted to social, economic and ecological conditions, including in marginal areas;  ☐ Broadening the genetic base of crops and increasing the range of genetic diversity available to farmers  ☑ Promoting the expanded use of local and locally adapted crops, varieties and underutilised species  ☑ Supporting the wider use of diversity of varieties and species in on-farm management, conservation and sustainable use of crops and creating strong links to plant breeding and agricultural development  ☐ Reviewing and adjusting breeding strategies and regulations concerning variety release and seed distribution
14B. If such policy and legal measures are in place, please provide details of the measures taken and any difficulties encountered in implementing them:  >>> Preserving the varieties and landraces grown in the Carpathian Basin for a long time is an especially important national task. Since 2012 the laws and regulations allow simplified registration of landraces in order to facilitate safe preservation, which is indispensable for their appearance on the market besides the global varieties and return into small gardens and small farms. By the end of 2021 68 fruit landraces in total were added to the list of national varieties.

# **Article 7: National Commitments and international Cooperation**

15. Has the conservation, exploration, collection, characterization, evaluation, documentation and sustainable use of PGRFA been integrated into your country's programmes and policies?  Please select only one option  ✓ Yes  □ No
15A. If your answer is 'yes', please provide details of the integration of such activities:  ☑ Conservation ☑ Exploration ☑ Collection ☑ Characterization ☑ Evaluation ☑ Documentation ☑ Sustainable Use
Please indicate into which type of programmes and policies:  ☑ Agriculture and rural development □ Food security ☑ Biodiversity conservation □ Climate change □ Other
Additional details: >>>
16. Has your country cooperated with other Contracting Parties, through bilateral or regional channels, in the conservation and sustainable use of PGRFA?  Please select only one option  ☐ Yes ☐ No
16A. If your answer is 'yes', please indicate whether the aim of such cooperation is to:  ☐ Strengthen the capability of developing countries and countries with economies in transition with respect to conservation and sustainable use of PGRFA ☐ Enhance international activities to promote conservation, evaluation, documentation, genetic enhancement, plant breeding, seed multiplication, and sharing, providing access to and exchanging PGRFA and appropriate information and technology, in conformity with the Multilateral System of Access and Benefit-Sharing under the Treaty
16B. If, in addition to cooperation through the Governing Body or other Treaty mechanisms, your country has cooperated with other Contracting Parties directly or through FAO and other relevant international organizations, please indicate such other Contracting Parties and, where possible, details of any relevant projects: >>>

#### **Article 8: Techical Assistance**

17. Has your country promoted the provision of technical assistance to developing countries and countries with economies in transition, with the objective of facilitating the implementation of the Treaty?  Please select only one option  Yes  No  No  Not applicable
17A. If your answer is 'yes', please provide details of the measures taken  ☐ Exchange of information ☐ Access to and transfer of technology ☐ Capacity building
Please explain:
18. Has your country received technical assistance with the objective of facilitating the implementation of the Treaty?  Please select only one option  ☐ Yes  ☑ No  ☐ Not applicable
18 A. If your answer is 'yes', please provide details of such technical assistance:  □ Exchange of information □ Access to and transfer of technology □ Capacity building
Please explain:

# **Article 9: Farmers' Rights**

19. Subject to national law, as appropriate, have any measures been taken to protect farmers' rights in your country?  Please select only one option  ☐ Yes  ☑ No	t and promote
19 A. If your answer is 'yes', please indicate whether such measures were related to:  □ Recognition of the enormous contribution that local and indigenous communities and farme world have made and will continue to make for the conservation and development of plant gerup to protection of traditional knowledge relevant to PGRFA  □ The right to equitably participate in sharing benefit arising from the utilisation of PGRFA  □ The right to participate in making decisions, at the national level, on matters related to the sustainable use of PGRFA  □ Any rights that farmers have to save, use, exchange, and sell farm-saved seed/propagating	rs of all regions of the netic resources; conservation and
19B. If such measures were taken, please provide details of the measures taken and encountered in implementing them:	any difficulties

## **Article 11: Coverage of the Multilateral System**

20. Has your country notified all PGRFA listed in Annex I to the Treaty that are under the management and control of your Government and in the public domain as included in the Multilateral System of Access and Benefit-Sharing (MLS)?  Please select only one option  ☐ All ☐ Partially ☐ None
20A. If your answer is 'all', please provide details of any difficulties encountered in including Annex 1 PGRFA in the MLS:  >>> During the application of SMTA and MLS other laws must also be complied with, which often generate additional costs (e.g. phytosanitary certificate).
20B. If your answer is 'partially', please provide details of:  The extend to which Annex 1 PGRFA have been included in the MLS The crops that have been included in the MLS; and The difficulties encountered in including Annex 1 PGRFA in the MLS: >>>
20C. If your answer is 'none', please provide details of the difficulties encountered in including Annex 1 PGRFA in the MLS:  Lack of guidelines for the identification and inclusion of material;  There is no national genebank;  Lack of catalogue of PGRFA in the country;  Lack of specialised human resources;  Limited economic resources and the need for capacity building;
Other, please explain:
21. Has your country taken measures to encourage natural and legal persons within your jurisdiction who hold Annex 1 PGRFA to include those resources in the MLS?  Please select only one option  ☐ Yes ☐ No
21A. If your answer is 'yes', please provide details of:
The natural or legal persons within your jurisdiction that included Annex 1 PGRFA in the MLS; The crops that have been included in the MLS by these persons; and Any difficulties these persons encountered in including Annex 1 PGRFA in the MLS: >>>
21B. If your answer is 'no', please provide details, in particular details of any difficulties encountered in encouraging these persons to include Annex 1 PGRFA in the MLS:  >>>>

# Article 12: Facilitated access to plant genetic resources for food and agriculture within the Multilateral System

22. Has your country taken measures to provide facilitated access to Annex 1 PGRFA, in accordance with the conditions set out in Article 12.4 of the Treaty?  Please select only one option  ✓ Yes  □ No
22A. If your answer is 'yes', please provide details of such measures: >>> On line access to the catalogue of the seed request.
22B. If your answer is 'no', please provide details of any difficulties encountered in providing facilitated access to Annex 1 PGRFA:  ***********************************
23. Has facilitated access been provided in your country to Annex 1 PGRFA using the Standard Material Transfer Agreement (SMTA)?  Please select only one option  ✓ Yes  ☐ No
23B. If your answer is 'no', please provide details of any difficulties encountered in providing facilitated access to Annex 1 PGRFA using the SMTA:  >>>
24. Has the SMTA been used voluntarily in your country to provide access to non-Annex 1 PGRFA?  Please select only one option  ✓ Yes  ☐ No  ☐ No, but the issue is under consideration
25. Does the legal system of your country provide an opportunity for parties to material transfer agreements (MTAs) to seek recourse in case of contractual disputes arising under such agreements?  Please select only one option  ✓ Yes  □ No
25A. If your answer is 'yes', please provide details of the relevant laws, regulations or procedures: >>> This issue falls within the competence of the Court.
26. Does the legal system of your country provide for the enforcement of arbitral decisions related to disputes arising under the SMTA?  Please select only one option  ✓ Yes  ☐ No
26A. If your answer is 'yes', please provide details of the relevant laws, regulations or procedures: >>> This issue falls within the competence of the Court.
27. Have there been any emergency disaster situations in respect of which your country has provided facilitated access to Annex 1 PGRFA for the purpose of contributing to the re-establishment of agricultura systems?  Please select only one option  ☐ Yes ☑ No
27A. If your answer is 'yes', please provide details of such emergency disaster situations and the Annex 1 PGRFA to which access was provided:

### Article 13: Benefit-sharing in the Multilateral System

28. Has your country made any information available regarding Annex I PGRFA?

Please select only one option  ☑ Yes □ No
28A. If your answer is 'yes', please provide details of any information made available regarding Annex 1 PGRFA:  ☑ Catalogues and inventories ☐ Information on technologies ☐ Results of scientific and socio-economic research, including characterisation, evaluation and utilisation ☐ Other
29. Has your country provided or facilitated access to technologies for the conservation, characterisation, evaluation and use of Annex I PGRFA?
Please select only one option  ☑ Yes □ No
29A. If your answer is 'yes', please indicate whether your country:  ☑ Has established or participated in crop-based thematic groups on utilisation of PGRFA  ☐ Is aware of any partnerships in your country in research and development and in commercial joint ventures relating to the material received through the MLS, human resource development and effective access to research facilities.
Please provide details:
30. Has your country provided for and/or benefitted from capacity building measures in respect of Annex 1 PGRFA?
Please note that this question differs from question 15 as it only concerns Annex I PGRFA and is more specific.  Please select only one option  □ Yes  □ No
30A. If your answer is 'yes', please indicate whether such measures were related to:  ☐ Establishing and/or strengthening programmes for scientific and technical education and training in conservation and sustainable use of PGRFA;  ☐ Developing and strengthening facilities for conservation and sustainable use of PGRFA;  ☐ Carrying out scientific research and developing capacity for such research.
30B. If your country provided for and/or benefitted from such measures, please provide details:

#### **Article 14: Global Plan of Action**

31. Has your country promoted the implementation of the Global Plan of Action for the Conservation and Sustainable Use of Plant Genetic Resources for Food and Agriculture?
Please select only one option  ☑ Yes □ No
31A. If your answer is 'yes', please indicate whether the implementation of the plan was promoted through:  ☑ National actions ☐ International cooperation ☐ Other actions
Please provide details: >>> National Gene Conservation Program (2019-2023)

# Article 15: Ex Situ Collections of Plant Genetic Resources for Food and Agriculture held by the International Agricultural Research Centres of the Consultative Group on International Agricultural Research and other International Institutions

32. Has facilitated access to Annex I PGRFA been provided in your country to the International Agricultural Research Centres of the Consultative Group on International Agricultural Research (IARCs) or other international institutions that have signed agreements with the Governing Body of the Treaty?  Please select only one option  ✓ Yes  ☐ No
32A. If your answer is 'yes', please indicate:
To which IARCs or other international institutions facilitated access was provided; The number of SMTAs entered into with each IARC or other international institution: >>> Access is facilitated to any interested stakeholder via EURISCO, GENESYS and WIEWS.
32B. If your answer is 'no', please provide details of any difficulties encountered in providing facilitated access to Annex 1 PGRFA to IARCs and other international institutions that have signed agreements with the Governing Body of the Treaty >>>
33. Has access to non-Annex I PGRFA been provided in your country to IARCs or other international institutions that have signed agreements with the Governing Body of the Treaty?  Please select only one option  ✓ Yes  □ No
33A. If your answer is 'yes', please indicate:
To which IARCs or other international institutions access was provided; The number of MTAs entered into with each IARC or other international institution: >>> The non-Annex I PGRFA have been made available to any interested stakeholder including the IARCs via EURISCO, GENESYS and WIEWS.
33B. If your answer is 'no', please provide details of any difficulties encountered in providing access to non-Annex 1 PGRFA to IARCs and other international institutions that have signed agreements with the Governing Body of the Treaty:

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#### **Article 16: International Plant Genetic Resources Networks**

34. Has your country undertaken any activities to encourage government, private, non- governmental, research, breeding and other institutions to participate in the international plant genetic resources networks?

☑ Yes
□ No
34A. If your answer is 'yes', please provide details of such activities:
>>> Through the cooperation with the ECPGR working groups.

Please select only one option

#### **Article 18: Financial Resources**

35. Has your country provided financial resources for national activities for the conservation and sustainable use of PGRFA? Please select only one option Yes □ No 35A. If your answer is 'yes', please provide the estimated amount of funds provided during the last five years, including government resources: >>> The Ministry of Agriculture has been supporting institutions, organisations and individuals performing state gene conservation tasks every year since 2009. The financially supported stakeholders include gene conservation institutions, research institutes, higher education institutions, as well as non-profit organisations, businesses and individuals. In line with the government's objective of increasing the state's involvement in gene conservation activities and tasks, a significant increase in the budget was made from 90 million HUF in 2018 to 697 million HUF in 2021. The Gene Conservation National Program has been launched in 2019. The respective Government Resolution with which the Program as adopted, provided for a total of HUF 12.3 billion for the implementation of the Gene Conservation Program. The gene bank institutions are partly financed by the State. The National Centre for Biodiversity and Gene Conservation which is the main national plant and also animal gene bank, is financed by the Ministry of Agriculture, with approximately 1.5 billion HUF per year. 35B. Please indicate if your country has developed a strategy or other measures to enhance the availability, transparency, efficiency and effectiveness of the provision of financial resources to implement the International Treaty: >>> See response above. 36. Has your country provided financial resources for the implementation of the International Treaty? Please select only one option Yes □ No 36A. If your answer is 'yes', where possible, please provide details of such channels and the amount of the financial resources involved during the last 5 years:: >>> See response to the question 35. 36B Channel: □ Bilateral ☐ Regional □ Multilateral 36C. Please provide details: 37. Has your country received financial resources for the implementation of the International Treaty? Please select only one option ☐ Yes ✓ No 37A. If your answer is 'yes', where possible, please provide details of such channels and the amount of the financial resources involved during the last 5 years: 37B. Channel: ☐ Bilateral ☐ Regional □ Multilateral

37C. Please provide details:

>>>

#### General remarks on the implementation of the ITPGRFA

38. You may use this box to share any advice you may have arising from your country's experience with implementation of the Treaty:

>>>

39. You may use this box to share any additional information that may be useful to provide a broader perspective of difficulties in implementation of the Treaty:

>>>

40. You may use this box to share any additional information that may be useful to provide a broader perspective of measures that could help to promote compliance:

>>>

# **About this reporting**

41. Have you encountered any difficulties in completing this reporting format?
Please select only one option  ☐ Yes  ☑ No
41A. If your answer is 'yes', please provide details on such difficulties:
41B. If you have suggestions for improvement of this reporting format, please share them:
<b>&gt;&gt;&gt;</b>