REPUBLIC OF CYPRUS



MINISTRY OF AGRICULTURE, NATURAL RESOURCES AND ENVIRONMENT DEPARTMENT OF FORESTS



2009 ANNUAL REPORT OF THE DEPARTMENT OF FORESTS

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1. TARGETS AND OBJECTIVES

Progress in forestry development continued at a high rate during the year under review. All the targets set for the year, of which the main are the following, were achieved:

- Protection of the forests against fires and other biotic agents and abiotic factors
- Adaptation of forests to climate changes
- Maintenance, conservation and appropriate enhancement of biological diversity in forest ecosystems
- Expansion of forests through afforestation of new areas, especially in lowlands
- Establishment and tending of forest stands
- Provision of public recreation opportunities through the creation of National Forest Parks and the establishment, expansion and maintenance of picnic sites, camping sites and nature trails
- Sustainable management of forests through management plans
- Silvicultural treatment and improvement of forests
- Maintenance and appropriate enhancement of protective functions of forests, notably soil and water
- Production of timber, other forest products and forest reproductive material
- Provision of employment and income to the inhabitants of forest villages
- Promotion of forest education and research
- Raising of public awareness and promotion of public enlightenment
- Development and improvement of forest infrastructure (forest buildings, forest roads, vehicles, machinery, telecommunications etc.)
- Expansion of computerised methods of data recording and processing
- Strengthening of administrative and institutional framework
- Harmonisation with Acquis Communautaire, implementation of forest related international obligations and implementation of various plans and projects, which are cofinanced by the European Union and EEA (European Economic Area)

2. EXPENDITURE

With a view to achieving the above targets, the amount of €44.907.517 was approved as the Budget for the year 2009. The total amount of the Budget utilised was €37.919.907 (i.e. 84,44%).

3. REVENUE

The amount collected by the Department as revenue in 2009 was €3.882.279. The uncollected amount, representing leases of forest land, was €360.731. However, it should be noted that the value of indirect benefits by far exceeds the revenue value.

4. FOREST POLICY AND LAW

In 2009, the Technical Cooperation Programme with the Food & Agriculture Organisation (TCP/CY/2902(A)), concerning the amendment of Forest Law, initiated in 2004, continued. The drafts of the new Forest Legislation and Regulations have been sent to the Legal Service for legal vetting.

5. FOREST PROTECTION

(a) Protection against fires

The year under review is considered as an exceptional year regarding the protection of Cyprus forests and particularly as regards the extent of burned area. In 2009, 28 forest fires broke out in state forest land, burning an area of 5 ha. This area is the smallest recorded during the last decade and the second smallest since 1927 we keep records. Also in 2009, 43 fires broke out within a distance of one kilometer from the forest delimitation line, burning an area of 70,4 ha. Finally, the Department of Forests participated in the fighting of 97 rural fires, which burnt an area of 899,1 ha. The largest fire which burnt state forest land, occurred at Kavallopetra area at Lythrodondas and burnt 2 ha of state forest.

The causes of forest and rural fires were as follows:

•	Agricultural operations i.e. burning of stubble or weeds	23,2%
•	Visitors / travelers	14,2%
•	Military operations	3,6%
•	Country or permanent stay houses	6,0%
•	Hunting	1,2%
•	Works in the forest	1,2%
•	Short circuit of high voltage electric wires	1,8%
•	Burning of rubbish	0,6%
•	Rally	0,6%
•	Malicious	28,0%
•	Natural Causes (lightning)	10,1%
•	Other causes	3,0%
•	Unknown causes	6,5%

The protection of existing forests against fires, especially during the prolonged dry and hot summers, is the principal concern of the Department of Forests. For prevention, the following measures were taken:

- Recruitment of a Fire Fighting Task Force as well as the operation of fire lookout stations / observation points. Particular reference should be made to the development of 3 Rapid Intervention Fire Fighting Units, one in each Forest District. The 12-hour shift system continued successfully in all forest stations and lookout stations. The total number of staff was 458 compared to 440 during 2008.
- About 11,42 km of new forest roads were constructed out of which 10,80 km were vehicle tracks and 0,62 km extraction roads. In addition, existing forest roads were improved.
- About 2,64 km of fire breaks were built and 1 265 km were maintained.
- Five new hydrants were installed at Pafos Division.
- Two new water tanks were constructed; one at Pafos Division and one at Troodos
 Division.

- Mobile patrols in the forest, especially along the delimitation line, were carried out throughout the summer months for prevention, detection and early intervention.
- The mechanisation of the extinguishing of fires continued successfully. At present, the Department has at its disposal 40 fire engines, 37 fire-patrol vehicles and 83 water pumps. In addition, the Department purchased other secondary firefighting equipment such as water tanks, portable water pumps, fire hoses, nozzles, appliances for foam preparation, water launcher systems, etc.
- The network of automatic meteorological stations which has been installed in various regions of Cyprus, provided data for the estimation and the extrapolation of fire risk indices around Cyprus.
- In November 2009, the Department of Forests received a new aircraft. This aircraft, "Air Tractor AT 802", is characterized by increased operational abilities in comparison to the existing one. The total purchase costs came to €1.300.000.
- An automatic Fire Detection System was installed at Akamas forest. The total purchase costs, including five years maintenance, amounted to €467.500. This concerns a pilot project whose effectiveness will be evaluated during the coming summer period.
- The "Save our Forests Week" was celebrated from 8th to 15th May. During the week a
 press conference was given by the Minister of Agriculture, Natural Resources and
 Environment. In addition, a campaign for voluntary blood donation by the personnel of
 the Department took place.
- Lectures on prevention and suppression of fires were given to the National Guard, the Police and the public. In addition, extensive publicity was made through the mass media.
- Training of the Fire Fighting Task Force, the Rapid Intervention Fire Fighting Units, the Department of Forests labour force and the National Guard took place.

The Department takes all precautionary measures against forest fires and uses all possible efforts to minimise the number of fires. However, this is not feasible without the cooperation of the public. Therefore, the Department of Forests invests in the

enlightenment of the public, forest visitors and especially farmers. However, offenders are usually prosecuted.

(b) Fire Protection Plan for Rural Areas

The Department continued the implementation of the Fire Protection Plan for rural areas which started in 2001. During 2009, 3,21 km of vehicle tracks, 4 hydrants and 1 observation point were constructed. In addition, roads and fire breaks were improved or maintained.

The works in total carried out since the inception of the Plan were as follows: 81,08 km of new vehicle tracks, 448,94 km of fire breaks, 11 water tanks, 4 observation points, 4 helispots and 52 hydrants.

(c) Protection against insects

Spraying from the air against the pine processionary moth caterpillar (*Thaumetopoea wilkinsonii Tams*) continued during the year under review. Spraying was done using Bacillus Thurigiensis (Foray 48B) and Tracer 48SC which are considered harmless to the environment.

Population monitoring of other harmful forest organisms also continued.

6. EXPANSION OF FORESTS AND REFORESTATION

An area of 139,4 ha of forest was reforested during the year under review. The new practice adopted in 2001 concerning the support of natural regeneration in burnt areas, continued. With this practice, artificial reforestation using mechanical means is carried out only in special cases.

The reforestation works at Mosfiloti and Saittas state forest areas, were completed. Various maintenance works, as well as beating up of failures, were carried out.

Enrichment planting at an area of 35,5 ha, which was stressed or had insufficient regeneration was also carried out.

In addition, the works concerning the reforestation / restoration of the environment at Amiantos (Asbestos) mine, initiated in 1995 continued. The hydroseeding method used in 2003 continued with very good results.

7. NATURE CONSERVATION

During 2009, the Department contributed significantly towards the efforts undertaken by the Ministry of Agriculture, Natural Resources and Environment for nature conservation.

The Department of Forests intensified its efforts through the organisation of lectures, voluntary work, ceremonies and speeches through radio and TV for expansion of tree planting and protection of nature.

Both Athalassa and Troodos Environmental Information Centers continued their operation successfully. A total of 12 297 and 7 605 visitors, mainly from Pedagogical Institute, schools and other organized groups, visited the Troodos and the Athalassa Environmental Information Centers respectively. As from September 2008, in close collaboration with the Ministry of Education, the Athalassa Environmental Information Center is operated as an Environmental Education Center. The construction of a new building at Athalassa Education Center which was suspended during 2009 is expected to be completed in 2010.

During the review year, a tender was awarded for the construction of Cape Greko Environmental Information and Education Center. This project is expected to be completed in 18 months time.

The effort for the study, protection and systematic recording of the Cyprus indigenous and endemic plant species continued as did the completion of the botanical collection of the Department.

Even though the Project "LIFE – NATURA" (LIFE04NAT/CY/000013) was completed on 31/10/2008, some of its actions concerning the protection of nature will continue using national funds.

During the year, the works for the creation of Troodos Arboretum at Amiantos area, as well as the works for the Arboretum at Akamas, continued.

The efforts to identify, protect and maintain tree monuments continued.

As in previous years, particular emphasis was given to the protection and reproduction of the Griffon Vulture, (*Gyps fulvus*), the wild population of which numbers approximately 15 - 18 individuals. In addition, the work for the study of Cyprus bats, started in 2006, continued.

8. FOREST RECREATION

Cyprus forests provide recreational opportunities because of the variety of flora and fauna, the geomorphology, the climate and water conditions in combination with the accessibility, the short distances from towns as well as the existence of historical, archeological and other places of interest inside or near the forests.

The creation of new and the development and maintenance of existing, picnic and camping sites continued in 2009. Different works including the development of infrastructure, the configuration of the ground, the construction of wooden tables, sheds, fire places, playgrounds, toilets, rubbish disposal places, signposts etc. were carried out.

During the year, 43 picnic sites with a capacity of 23 300 persons and 3 camping sites with a capacity of 290 tents were available to the public. These sites were fully occupied during the summer high season.

During 2009, the construction works for four new nature trails (Fasouriou, Argaka dam, Agios Ioannis Pafou and Machairas Monastery – Politiko) as well as of one picnic site (Achna) were completed.

Within the framework of the policy for the development of National Forest Parks, the Department continued the implementation of the development plans, as well as the maintenance works in all Forest Parks.

During the reporting year, various works for the maintenance and improvement of nature and hiking trails in the state forests were carried out. Great interest was shown from local and foreign visitors for the trails.

9. TIMBER PRODUCTION AND DISPOSAL

During the year under review, timber extraction and supply to local sawmills continued in a satisfactory way. A volume of 7 664 m³ R.O.B timber was extracted from state forests.

In addition to the above, timber from state forests, equivalent to 4 624 m³ R.O.B., was extracted as firewood. From the above volume, 860 m³ R.O.B. were extracted from burnt areas.

During 2009, the Department issued 17 sawmill permits.

10. FOREST MANAGEMENT

The management of forest resources is done on a sustainable basis with main aim the maximisation of social and economic benefits from the forests through their multiple use, maintaining, at the same time, the naturalness and improving their composition and structure.

In 2009, the field work for the development of a Management Plan for Pafos forest was completed. The Management Plan which will cover all the aspects of management is expected to be completed in the first half of 2011.

In 2009, the works for the Management Plan for Machairas forest were continued and this is expected to be completed in 2010. Also a tender was awarded for the development of Management Plans for Stavrovouni and Rizoelia forests. This work will start in early 2010 and is expected to be completed in 18 months time.

The monitoring of the effects of drought in many areas during 2008 summer period, continued and a short term plan for the mitigation of drought in the eastern region of Troodos range and mainly in the areas of Kornos, Kakoratzia, Stavrovouni, Machairas, Athalassa and Larnaka forests was prepared.

11. SILVICULTURE - FOREST NURSERIES

During the year under review, emphasis was given in tending of forest stands. Tending operations were carried out in 1 317,9 ha of young plantations. The seed collected during the year, together with the stock of last year, was adequate to cover both the Departmental needs and requests for export. A total quantity of 1 571 kg of seed was collected. A small fraction of this quantity was exported from Cyprus.

Additionally, for the reforestation / restoration of environment at Amiantos (Asbestos) mine and Saittas burnt area, a quantity of 764 kg of various seeds was collected.

The production of seedlings at the departmental nurseries was adequate. A total of 192 383 seedlings were raised compared to 233 760 in 2008. The seedlings produced in 2009, plus the stock of 2008, amounted to 781 438. Out of this quantity, 56 615 were used departmentally, 127 719 were sold to the public, 6 656 were sold to other Government Departments, and 49 456 were donated to schools, village authorities and other organisations and institutions for planting on public or communal lands.

12. FOREST COMPUTERISATION

Seven laser printers A4, two inject printers A3, twelve inject printers A4 and six computer screens KTK colour 22" were received in 2009. At the end of the year, the Department had at its disposal 152 computers as well as sufficient software applications which were used effectively in a different number of areas including digitalising of forest maps, creation of databases, etc.

During the year under review, the English and Greek pages of the Department of Forests' website were updated.

13. FOREST ENGINEERING

a) Forest Roads

The construction of new forest roads and the improvement of existing ones, constitutes an important aspect of the work of the Department as roads serve on the one hand the

systematic management, forest protection, reforestation, tending, exploitation and on the other hand tourism and communication between forest villages.

During the year under review, 1,18 Km of the road leading to Kapoura picnic site were improved and asphalted. Also the maintenance, widening and improvement of existing roads continued and 10,80 km of vehicle tracks and 0,62 km of extraction roads were built.

The total mileage of the forest road network by the end of 2009 was 1 433,49 km of main forest roads out of which 183,62 km are asphalted, 1 006,93 km are vehicle tracks and 1 216,51 km are extraction roads.

b) Forest Telecommunications

The Department maintains a well-organised telecommunications network for proper forest protection and management. This telecommunication system at the end of 2009 included the following:

- 364,51 km of telephone lines
- 1 292,25 km of telephone cable
- 382 telephone handsets
- 12 cellular telephones
- 2 telephone switch-boards
- 1 VHF. control station
- 522 mobile radiotelephones
- 597 portable radiotelephones
- 4 radiotelephone repeaters

c) Forest Buildings

During the year under review, the following works were carried out:

- Construction of five stores; one at Kambos forest station, one at Gialia forest station,
 one at Kornos forest station and two at Athalassa nursery
- One shed for fire brigades at Kambos forest station
- A new fire lookout station at Kollatzia

In addition, usual repairs and maintenance works were carried out to various forest buildings.

The plans for the development of new Head Quarters for the Department of Forests at Athalassa were abandoned since the appropriate funds were not approved. However a decision was taken and an approval was given for renting a new building to host the Head Quarters of the Department.

d) Machinery and Vehicles

The Department of Forests has at its possession a number of machinery and vehicles which are used for all forestry works, but mainly for the construction and maintenance of roads and fire breaks. However these machinery and vehicles are used also for social purposes like fire fighting and cleaning snow from roads.

The Department was equipped with thirteen additional vehicles. Also, various minor machinery, equipment, tools and instruments were purchased including 20 chainsaws, 5 extended chainsaws, 2 water pumps, 5 electric generators, 1 mechanical sprayer, 2 air compressors, 20 grass cutters, 4 mechanical lawn grass mower, 1 mechanical hedge trimmer, 1 electric hedge trimmer, 2 multiuse machine "VIPER 3H", 2 industrial air compressors, 1 mechanical concrete mixer, 2 electric concrete mixers, 1 paper pot machine, 1 car lift and 2 concrete vibrators.

Except from the government vehicles and machinery, the Department of Forests, in 2009, rent from private sector through tenders, vehicles and machinery like trucks, tankers, bulldozers, agricultural tractors, diggers, lifting vehicles, etc. for the execution of various forestry works.

The operation of the workshop at Athalassa for the maintenance of motor vehicles and machinery continued during the reporting year.

14. FORESTRY EDUCATION

In 2009, the Cyprus Forestry College completed its fifty-eight academic year. Four Cypriot students graduated during 2009.

The new academic year began on 2nd October with a complement of 19 students out of whom 16 were Cypriots and 3 from other countries.

The Ministry of Agriculture, Natural Resources and Environment, on the basis of the positive opinion of the Department of Forests, submitted a proposal both to the Governing Board of the Cyprus University of Technology and the Ministry of Education and Culture, for covering Forest Science under the Cyprus University of Technology. The Minister of Education and Culture gave instructions to the Advisory Committee appointed by the Governing Board of the Cyprus University of Technology, to submit a comprehensive proposal for covering Forest Science under the Cyprus University of Technology until the end of 2009.

During the year under review, the Learning Unit of the Department of Forests functioned successfully. A report for the learning needs of 2010 and a plan for learning activities of 2009, were prepared. Also the learning activities materialized in 2008 were evaluated.

Through the Learning Unit activities of 2009, a number of officers participated in training courses in Cyprus and abroad.

Also a number of officers of the Department participated in various international conferences and seminars.

15. FORESTRY RESEARCH

Forest Research continued on the same lines as in past years. In summary, research dealt with the Monitoring of Forests and Environmental Interactions, the production of genetically improved seed of Brutia pine, the maintenance and improvement of the Arboretum and Tree Bank, the conservation of forest genetic resources, the use of mychorhyza at reforestation works of old quarries and mines, the protection of forests against insects and diseases, etc.

In addition, special emphasis was given in the preparation of a short term plan for the mitigation of drought in the forests.

16. EMPLOYMENT IN THE DEPARTMENT OF FORESTS

(a) Labour force of the Department of Forests

Labour force of the Department during 2009 was as follows:

Forest Officers: 278

Casual Forest Officers: 15

Clerical staff: 17

Permanent Labourers: 163

Casual Laboureres: 755

Seconded personnel to the Department of Forests: 8

During 2009, a decision was taken by the Public Administration and Personnel Department (Mixed Committee Level) for the maximization of the efficiency and effectiveness of the Department of Forests through the rearrangement of its organizational structure.

In July 2009, the following 39 new workplaces were approved by the House of Representatives:

- Two new places of Senior Conservators of Forests
- Two new places of Conservators of Forests A'
- Four new places of Conservators of Forests
- Four new places of Chief Forest Officers
- Nine new places of Senior Forest Officers
- Thirteen new places Forest Officers 1st class
- One new place of Pilot A´
- Two new places of Pilots
- One new place of aircrafts Mechanic A'
- One new place of aircrafts Mechanic

Six of the above new workplaces were filled in 2009.

(b) Provision of employment to the inhabitants of Forest Villages

Under the socio-economic policy of the Government, which is also implemented through the activities of the Department, employment was provided to the inhabitants of forest villages. The total employment, offered to both casual and regular employees, was 177 444 work days. Besides the staff employed directly by the Department of Forests, an additional number of labourers were self-employed, through tenders or otherwise, for felling and transporting of raw-material from the forests to various forest industries. Furthermore, a large number of technicians and labourers were self-employed through the policy to contract the execution of various forest works such as construction and maintenance of forest roads, maintenance of forest buildings, establishment and maintenance of roadside plantations, maintenance and cleaning of picnic and camping sites, etc.

c) Safety and Health

The Department of Forests in its efforts for safeguarding of adequate levels of safety and health at work, as from 2/1/2010, assigned the duties of the implementation of the policy regarding health and safety to a Senior Forest Officer. The Members of the Safety and Health committees were elected and the committees were created. Visits and inspections of work sites were materialized and enlightening material was distributed. At the same time about 522 workers of the Department of Forests participated in various educational programs regarding Safety and Health at work.

17. COOPERATION WITH OTHER COUNTRIES BASED ON BILATERAL AGREEMENTS

Under the Bilateral Agreement for cooperation between Cyprus and other neighboring countries, a group of Forest officers and Firefighters helped in fighting of the catastrophic fire occurred in Greece (Attiki area) between the 23 and 26/8/2009.

18. EUROPEAN UNION AFFAIRS

(a) Subjects discussed in EU Institutional Bodies

The main subjects discussed in the Institutional Bodies of the EU during the year 2009 were the following:

- EU preparation regarding the international forest dialogue:
 - Preparation for the 8th session of United Nations Forum on Forests UNFF8 (20/4 1/5/2009, New York) and evaluation of its outcomes.
 - Preparation for the 19th session of Committee on Forestry of FAO (FAO, COFO-19).
- The EU FLEGT Action Plan:
 - ➤ The proposal for a Regulation of the European Parliament and of the Council laying down the obligations of operators who place timber and timber products on the market.
 - > The negotiations on the conclusion of FLEGT voluntary partnership agreements.
- EU Forest Action Plan:
 - Interim evaluation.
 - Preparation and implementation of the 2009 Programme of Work concerning the implementation of the Action Plan for forests. In this direction / framework, the Department of Forests participated in the Ad Hoc Working Group of Standing Forestry Committee on climate change and forestry.
- Forest Fires Issues:
 - Communication towards a comprehensive Community Strategy for the prevention of natural and anthropogenic disasters.
- Evaluation of the outcomes of the 14th Conference of Parties (COP14) to the United Nations Framework Convention on Climate Change.
- The accession of EU to the International Tropical Timber Agreement of 2006 (ITTA 2006).
- The exploration of the potential added value of and possible options for a legally binding agreement on forests in the Pan-European Region (MCPFE Initiative).
- The discussion of several forest related issues that are not directly relevant to forests (Rural Development, LIFE+, etc.).
- The implementation of Natura 2000 network in forests.
- The development of a forest communication strategy.
- The availability and the efficient use of wood biomass in energy production.

 The inclusion of wood and wood products in the Directives on "Green Public Procurement".

b) Harmonization with the Acquis Communitaire

- Officers from the Department of Forests and the Department of Customs, in the framework of an ad hoc working group, continued their work on the preparation of a proposal for a national legislation for harmonization with Commission Regulation 1024/2008, laying down detailed measures for the implementation of Council Regulation (EC) 2173/2005 on the establishment of a FLEGT licensing scheme for imports of timber into the European Community. The proposal for the national legislation was forwarded to the Legal Service for legal vetting, in November 2009.
- The accession of the International Tropical Timber Agreement (ITTA2006)
 materialized on June 8, 2009, with the submission of the relevant documents to the
 General Secretary of the United Nations, which is the depository of the agreement.

c) Implementation of programmes co-financed by the European Union

Rural Development Programme

The implementation of the Rural Development Programme covering the period 2007 - 2013 was continued. The Department is the competent authority of the following three Measures:

- > 2.4 "Afforestation"
- 2.5 "Protection of forests against fires and reforestation of burnt areas"
- 2.6 "Maintenance and improvement of the social and ecological role of the forests"

The implementation of the works for the first call for applications under the Measures 2.4 and 2.5 was continued.

During 2009, there was the first call for applications for the Sum-Measures 2.6.2 "Forest-environment payments" and 2.6.3 "Forest-environment payments in Natura 2000 areas". The total number of applications received for both Sum-Measures was 61.

Also, the evaluation of the applications of Sum-Measure 2.6.1 "Non-productive investments" has been completed.

Concerning the implementation of the Rural Development Programme covering the period 2004 – 2006, the following activities were carried out:

- Provision of support for the undertakings of Measures 2.4 "Afforestation of agricultural land" and 3.2 "Afforestation on non-agricultural land and investments for the conservation and improvement of economic, ecological and social functions of forests". The total number of applications for payment claims received was 78 for a sum of public expenditure €88.165,72.
- > The compliance with the long-term commitments has also been checked.
- National Programme on the Monitoring of Forests and Environmental Interactions in the Community (Regulation EC/2152/2003 – Forest Focus)

In 2009, the implementation of the National Programme regarding the Monitoring of Forests and the Environmental Interactions in the Community continued. The programme covers activities related to atmospheric pollution and forest fires. Now this program is carried out under program LIFE with a title "Future Monitoring".

d) Implementation of Acquis communitauire

 Implementation of Directive 2000/29/EC on protective measures against the introduction into and spread within the Community of organisms harmful to plants or plant products.

For the implementation of Directive 2000/29, the systematic inspections of the permanent sample plots were continued in 2009, in order to investigate the presence or absence of the pine bark beetle, *Ips sexdentatus*, for which Cyprus has been recognized as a protected area as well as of the fungus *Seiridium cardinale* that causes the cypress ulcer disease and for which Cyprus made strong efforts to be recognized as a protected area. These investigations proved the absence of *Ips sexdentatus* and the presence of *Seiridium cardinal* which was located in six private nurseries. These plants have been destroyed in accordance with the Community and national legislation.

In addition, following the European Community Decisions 2003/127/EC, 2004/426/EC and 2006/464/EC, Cyprus carried out annual inspections for the presence of pine wood nematode (*Bursaphelenchus xylophilus*), the fungus *Phytophthora ramorum* which infects mostly Quercus spp. as well as other broadleaved species, the insect *Dryocosmus kuriphilus* which infects *Castanea* spp. and the fungus *Gibberela circinata* which infects pines. All inspections during 2009, proved their absence from Cyprus.

Implementation of Directive 1999/105 on the Marketing of Forest Reproductive Material

The implementation of the 2003 Regulation transposing Directive 1999/105 on the marketing of forest reproductive material was continued. The checks in the nurseries listed in the National Register verified their compliance with these Regulations.

19. ACKNOWLEDGEMENTS

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