transgenic trees should incorporate accumulated experience from both risk assessment and production of transgenic row crops with similar traits, and the cultivation of forest tree species under the intensive management practices used in commercial plantations.

Plantation forest trees have only a few characteristics relevant to environmental risk assessment that clearly distinguishes them from annual crop plants. The size and extended life cycles of trees should be taken into account when considering levels of exposure and possible new routes of exposure.

Generally, forest tree species are less domesticated and have higher levels of heterozygosity than annual crop species, potentially increasing uncertainty about what constitutes a suitable comparator species. However, while an isogenic or near isogenic counterpart may be considered a desirable and convenient comparator, it is not a necessity and applying a broader concept of comparators to the environmental risk assessment of plantation forest tree species still enables a valid risk assessment to be conducted.