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To Whom it May Concern,

As a representative of ELTE University in Hungary, having researched *Robinia pseudoacacia* for a number of years we wish to make the following statement regarding the species:

Robinia pseudoacacia L., native to North America, was first introduced to Europe in 1601. It is a tree species with high density hardwood that has been cultivated for a long time, with characteristics which allow it to be grown under controlled, plantation conditions. With the appropriate varieties, such as Turbo Obelisk, it can be outstanding for commercial purposes with its valuable products. These new, cloned varieties of *Robinia pseudoacacia* grow uniquely fast and with a straight stem and are capable of producing exceptionally high yields of quality industrial wood with increased long-term carbon sequestration.

On a global level, *Robinia pseudoacacia* is the most planted tree species after *Eucalyptus* and Poplar. When cultivated under plantation conditions, taking ecological and environmental aspects into account, *Robinia pseudoacacia* cannot be considered an invasive species and does not pose a threat to biodiversity.

In Hungary, it was first planted in 1710 and the large-scale utilisation of *Robinia pseudoacacia* began around 1800, primarily for quicksand fixation purposes in the Plains of Hungary (Alföld). This significantly changed the landscapes of the Plains, resulting in an increased biodiversity in the region. This is especially true considering that nothing was able to survive in these low quality, sandy soils beforehand.

It is also important to note that *Robinia pseudoacacia* cannot infiltrate into existing and well growing forests due to its high requirement of sunlight.
It is also vital to emphasize the following:
1. In its native habitat, it does not form continuous forest populations, only isolated and mixed occurrences are known.
2. The germination capacity of the seed of the tree species is very low due to its hard shell. Therefore, before sowing, the *Robinia pseudoacacia* seeds are made capable of germination with various treatments

such as the abrasion of the seed shell. This means that the species does not spread via seeds by itself, only in instances such as forest fires.

3. The ability of the seeds to spread is limited, the majority of the seeds remain in the growing area.

4. The sprouting ability of harvested *Robinia pseudoacacia* is strong, but sprouting mainly occurs from stumps and damaged roots close to the surface in a limited area of a few meters.

5. When maintained and cultivated under plantation conditions, this sprouting can be easily managed by disking in-between the rows, which you would perform anyway to get rid of the weeds. Once the canopy closes, this is not necessary.

6. Despite its strong sprouting abilities, it can be completely removed by chemical means.

7. It is not invasive under extreme conditions (eg. Semi-desserts), even if not maintained as a plantation.

Furthermore, climate change threatens the most important native tree species in Europe because of lower ground water levels and extreme weather conditions, leading to low success rates with afforestation. Examples of these species include: *Fagus syilvatica*, *Picea abies*, *Fraxinus excelsior*, *Pinus nigra*, *Quercus petraea*, *Quercus robur*. This means that we must adapt to the changing conditions and must utilise species, and outstanding varieties within these species, which tolerate these drastic conditions.

Best Regards,

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Senior research leader