

1. INTRODUCTION

1.1 What is the name of your organisation?

SPANISH PLANT VARIETY OFFICE (OEVV) – Ministerio de Medio Ambiente, Medio Rural y Marino

1.2 What stakeholder group does your organisation belong to?

Competent Authority (CA) involved in S&PM certification and control; Competent Authority (CA) involved in S&PM variety and material registration

1.2.1 Please specify

1.3 Please write down the address (postal, e-mail, telephone, fax and web page if available) of your organisation

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2. PROBLEM IDENTIFICATION

2.1 Are the problems defined correctly in the context of S&PM marketing?

No

2.2 Have certain problems been overlooked?

Yes

2.2.1 Please state which one(s)

Lack of information and datas about the situation in members states

2.3 Are certain problems underestimated or overly emphasized?

Overestimated

2.3.1 Please indicate the problems that have not been estimated rightly

Overestimated: fragmentation of legislation

2.4 Other suggestions or remarks

To study the real problems in each sector and to propose specific solutions , or common ones if possible

3. OBJECTIVES OF THE REVIEW

3.1 Are the objectives defined correctly in the context of S&PM marketing?

No

3.2 Have certain objectives been overlooked?

Yes

3.2.1 Please state which one(s)

too many objectives and some ones too general

3.3 Are certain objectives inappropriate?

Yes

3.3.1 Please state which one(s)

- to reach only one single horizontal rule for all sectors - General words/concepts including biodiversity, sustainability, etc

3.4 Is it possible to have a regime whereby a variety is considered as being automatically

registered in an EU catalogue as soon as a variety protection title is granted by CPVO?

No

3.5 If there is a need to prioritise the objectives, which should be the most important ones? (Please rank 1 to 5, 1 being first priority)

Ensure availability of healthy high quality seed and propagating material

1

Secure the functioning of the internal market for seed and propagating material

3

Empower users by informing them about seed and propagating material

2

Contribute to improve biodiversity, sustainability and favour innovation

Promote plant health and support agriculture, horticulture and forestry

4

3.6 Other suggestions and remarks

3.4. :not for species with VCU. In general we need to harmonised the equivalences of descriptions DUS before 3.5 All frame of legislation on S&PM is thecnical. The directives are technical rules to improve the quality of the propagation material, nothing more, , and we need just to have a good, transparent, simply common rules wich has to be implemented in harmonised way in all member states

4. OPTIONS FOR CHANGE

4.1 Are the scenarios defined correctly in the context of S&PM marketing?

No

4.2 Have certain scenarios been overlooked?

Yes

4.2.1 Please state which one(s)

Scenarios for specific sectors

4.3 Are certain scenarios unrealistic?

Yes

4.3.1 Please state which one(s) and why

- everything unrealistic for the forest sector - Scenario 4 for agricultural species , because DUS by suppliers and coexistence of two levels of register

4.4 Do you agree with the reasoning leading to the discard of the "no-changes" and the "abolishment" scenarios?

Yes

4.5 Other suggestions and remarks

In a voluntary certification system , the production of certifies category decreased. Is it what we want?

5. ASSESSMENT OF OPTIONS

5.1 Are the impacts correctly analysed in the context of S&PM marketing?

No opinion

5.2 Have certain impacts been overlooked?

No opinion

5.2.1 Please state which one(s)

5.3 Are certain impacts underestimated or overly emphasized?

No opinion

5.3.1 Please provide evidence or data to support your assessment:

5.4 How do you rate the proportionality of a generalised traceability/labelling and fit-for-purpose requirement (as set out in scenario 4)?

No opinion

5.5 How do you assess the possible impact of the various scenarios on your organisation or on the stakeholders that your organisation represents?

Scenario 1

Very beneficial

Scenario 2

Rather negative

Scenario 3

Don't know

Scenario 4

Rather negative

Scenario 5

Very beneficial

5.5.1 Please state your reasons for your answers above, where possible providing evidence or data to support your assessment:

no answer

6. ASSESSMENT OF SCENARIOS

6.1 Which scenario or combination of scenarios would best meet the objectives of the review of the legislation?

A combination of scenarios

6.1.1 What are your views with regards to combining elements from the various scenarios into a new scenario?

Scenario 1 for certification, Scenario 5 for Register

6.1.1 Please explain the new scenario in terms of key features

6.2 Do you agree with the comparison of the scenarios in the light of the potential to achieve the objectives?

No opinion

6.2.1 Please explain:

7. OTHER COMMENTS

7.1 Further written comments on the seeds and propagating material review:

- Directives S&PM are technical procedures for quality and need to be adjusted to each sector. -
Good harmonised implementation in all member states - Revision of requirements and
administrative burden must be made in each sector

**7.2 Please make reference here to any available data/documents that support your answer,
or indicate sources where such data/documents can be found:**

