1. INTRODUCTION

1.1 What is the name of your organisation?

MINISTRY OF RURAL DEVELOPMENT AND FOOD - DIRECTORATE OF INPUTS FOR CROP PRODUCTION

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?

Yes

2.2 Have certain problems been overlooked?

No

2.2.1 Please state which one(s)

2.3 Are certain problems underestimated or overly emphasized?

Rightly estimated

2.3.1 Please indicate the problems that have not been estimated rightly

2.4 Other suggestions or remarks

3. OBJECTIVES OF THE REVIEW

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

Yes

3.2 Have certain objectives been overlooked?

No

3.2.1 Please state which one(s)

3.3 Are certain objectives inappropriate?

No

3.3.1 Please state which one(s)

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?

Yes

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
5

Contribute to improve biodiversity, sustainability and favour innovation
4

Promote plant health and support agriculture, horticulture and forestry
2

3.6 Other suggestions and remarks
Remark on point 3.4: That posibility should be examined under certain criteria/requirements in order to define the relevant procedures.

4. OPTIONS FOR CHANGE
4.1 Are the scenarios defined correctly in the context of S&PM marketing?
Yes

4.2 Have certain scenarios been overlooked?
No

4.2.1 Please state which one(s)

4.3 Are certain scenarios unrealistic?
No

4.3.1 Please state which one(s) and why

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

5. ASSESSMENT OF OPTIONS
5.1 Are the impacts correctly analysed in the context of S&PM marketing?
No

5.2 Have certain impacts been overlooked?
Yes

5.2.1 Please state which one(s)
Our answers on points 5.1 and 5.2 are based on the fact that we do not agree with the analysis of impacts in some cases. For example, in Scenario 3, the impact on quality by eliminating VCU

tests, is expected to be more negative. On the other hand, the positive impact on competitiveness should be considered in relation to this more negative impact and for this reason, is expected to be less positive.

5.3 Are certain impacts underestimated or overly emphasized?
Underestimated

5.3.1 Please provide evidence or data to support your assessment:
As a comment on point 5.3, we would like to add that certain impacts are unerestimated, while others are overestimated. As an example, we refer to our previous comments on point 5.2.1.

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

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
Neutral

Scenario 2
Fairly beneficial

Scenario 3
Rather negative

Scenario 4
Rather negative

Scenario 5
Rather negative

5.5.1 Please state your reasons for your answers above, where possible providing evidence or data to support your assessment:
Our assessments on point 5.5 are based mainlyl on the the following: Scenario 1: At present there are no sufficient data from the private sector, which could help us to proceed to a more acurate assessment. Scenario 2: We consider that this scenario provides balance between cost reduction and quality assurance. On the part relating to registration of varieties, this Scenario is more suitable. DUS and VCU trials must be conducted under official control. Part of the experimental works can be given to suppliers, but the final decision must be taken by the official authority. Scenarios 3-4-5: The suggested procedures are characterized by a high degree of flexibility which will possibly result to an undesirable reduction of quality of the S&PM.

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?
We express a preference to Scenario 2, but in order to finalize our position, thera is a need to define a detailed regime that will regulate the proposed changes in variety registration and S&PM certification. As regards the combination of elements from the various scenarios, we would suggest the inclusion of point (4) of Scenario 4, referring to Conservation varieties, in Scenario 2.

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

6.2.1 Please explain:
The proposed potentials to achieve the objectives need to be amended, as for example in Scenario 2. In particular, we do not estimate that in this scenario the impact on plant health and quality is negative, but instead it will be neutral. On the other hand, the reduction of costs in industry will be rather negative instead of neutral. Therefore, the overall view of the relevant table on page 28 of the document "Options and analysis of possible scenarios for the review of the legislation on the marketing of seed and plant propagating material", needs to be re-examined.

7. OTHER COMMENTS
7.1 Further written comments on the seeds and propagating material review:

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: