

## **1. INTRODUCTION**

### **1.1 What is the name of your organisation?**

Central Union of Agricultural Producers and Forest Owners (MTK), Agriculture Group,  
Registration number: 56039441735-48

### **1.2 What stakeholder group does your organisation belong to?**

User of S&PM

#### **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?**

Overestimated

#### **2.3.1 Please indicate the problems that have not been estimated rightly**

SEEDS There is need to review of S & PM legislation but the objection of harmonization is overestimated. The situation between member states is different. It has to take account of different climate conditions, length of growing period, different length of day etc. All these affects the different needs in different member states. The legislation has to be flexible and good and well functioning elements of old legislation should be maintained. Variety registration and certification is still needed in future too. In Finland the national legislation on wild oats is important and needed in future too. Harmonization in fees is not realistic approach and thus there should not be rules on fees at EU level. Niche markets and conservation varieties should have less stringent requirements which would be more appropriate and realistic in relation to market size.

#### **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?**

No

### **3.2 Have certain objectives been overlooked?**

No opinion

#### **3.2.1 Please state which one(s)**

### **3.3 Are certain objectives inappropriate?**

Yes

#### **3.3.1 Please state which one(s)**

From the farmers point of view it is important that there is available varieties which are beneficial, fit for use and for sustainable intensification. The large diversity of varieties itself is not the goal.

### **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**

5

**Empower users by informing them about seed and propagating material**

4

**Contribute to improve biodiversity, sustainability and favour innovation**

2

**Promote plant health and support agriculture, horticulture and forestry**

3

### **3.6 Other suggestions and remarks**

The prioritization differs between agriculture and forestry. Biodiversity and sustainability questions are highlighted in forestry and forest ecosystems because of the long life span and important ecological role of forests.

## **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?**

No opinion

#### **4.2.1 Please state which one(s)**

### **4.3 Are certain scenarios unrealistic?**

Yes

#### **4.3.1 Please state which one(s) and why**

SEED SECTOR: A modified version of scenario 2 is best solution to ensure the high quality of healthy seed. Scenario 1 is not good because of actually no changes. Scenarios 3, 4 and 5 are not appropriate to seed sector. Scenario 3 presents system where variety performance testing and official certification is optional. We do not see this possible approach to ensure high quality seed production. VCU -tests are very important to users of seed especially in specific cultivation conditions like in Finland. Possibilities to DUS testing in regional level have to be maintained. The extended role of CPVO in variety registration would lead to very complicated and time consuming process. CPVO can manage the database of varieties but decision making on listing of varieties has to be maintained on national level. Scenario 4 would lead to very difficult and unharmonized

system and this would cause confusion from the user's point. Scenario 5 is not applicable. There is danger that this would lead to disappearing of national testing stations. Centralisation would probably lead to higher registration costs and prolonged time is needed to get variety listed to EU-register. Approach on conservation varieties/niche markets could be liberalised but plant health risk has to be taken into account. Requirements for conservation varieties have to be reasonable and realistic in regard to market size, market value and significance. Quantitative restrictions for conservation varieties should be more flexible if the regional limits will be maintained.

**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)**

Impact analysis of the different scenarios to the seed growers' sector is missing.

**5.3 Are certain impacts underestimated or overly emphasized?**

Underestimated

**5.3.1 Please provide evidence or data to support your assessment:**

Seed and plant health in scenarios 3 and 4 in the context of the reduction of pesticides available in the market.

**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**

Neutral

**Scenario 2**

Very beneficial

**Scenario 3**

Very negative

**Scenario 4**

Very negative

**Scenario 5**

Very negative

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

In scenario 2 the quality of the seed is secured in the best way and the different conditions in

different member states can be taken account in the best way

## **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?**

SEED SECTOR: 2 scenario is closest to our approach. Elements of current regulations on certification and DUS and VCU-testing have to be preserved. In very special climatic areas like in Finland it is utmost important to maintain VCU-testing. VCU tests serve valuable information to farmers and to users of seed. There should be flexibility in transferring tasks to industry. It is not possible for small companies to perform all tasks. CPVO could maintain Common catalogue as it now has the database on denominations but national catalogues have to be maintained. Decision making on listing of varieties have to be remained in national level. The information in national catalogue is in mother language and thus it serves users in better way. There are species which are not listed in Common catalogue or species which are only cultivated in very local area thus national catalogues are needed. One key several doors principle is highly recommended. Registration of operators and traceability are very important elements in future legislation. Risk-based monitoring is profitable. Legislation has to take account international rules and standards and international trade. Especially plant health requirements have to be align with new Plant Health law. Approach to conservation varieties should be revised. The limits in production areas have to be reasonable. Legislation should encourage the biodiversity not limit the biodiversity.

#### **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:**

### **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:**

