

1. INTRODUCTION

1.1 What is the name of your organisation?

INVIVO

1.2 What stakeholder group does your organisation belong to?

Breeder of S&PM; Supplier of S&PM; International company; Other

1.2.1 Please specify

INVIVO is the largest French agricultural cooperative group with 271 member cooperatives formed into a national union. 4 strategic activity areas: Agri-supplies and seeds, Grain trade, Animal Health and Nutrition and General Public. INVIVO has a turnover of € 4 433M and 6 300 people, including half overseas.

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?

Yes

2.2.1 Please state which one(s)

Underestimated problems are the positive impact of selection and marketing of seeds on production: - historically: improvement of productiveness and quality (flour-milling wheat, barley brewing, fava bean for human feeding) - and tomorrow: impact of the seeds sector in the reduction of inputs (chemicals, fertilizers, resistance to parasites).

2.3 Are certain problems underestimated or overly emphasized?

Underestimated

2.3.1 Please indicate the problems that have not been estimated rightly

They keep too much importance to the liberalization of the market, which is not the only priority. It is necessary to think about the Sustainable Development which must be carried on by public institutions. In seeds, regulations are there to encourage a good management of a common gene patrimony (notion of Public Goods).

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?

Yes

3.2.1 Please state which one(s)

It is necessary to advocate a sustainable agriculture with 3 objectives: economic (productiveness / quality / quantity to feed the world), social (take into account the importance of seed industry), environmental (protection of environment and biodiversity).

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?

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

4

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

5

Empower users by informing them about seed and propagating material

2

Contribute to improve biodiversity, sustainability and favour innovation

1

Promote plant health and support agriculture, horticulture and forestry

3

3.6 Other suggestions and remarks

These objectives are not compulsorily contradictory and can be taken into account at the same time in a global thought.

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)

It would be a scenario which indeed takes into account all objectives without setting them against each other while allowing a reduction of expenses by delegating certain functionalities to the firms, without calling into question regalian functions of public institutions.

4.3 Are certain scenarios unrealistic?

Yes

4.3.1 Please state which one(s) and why

Scenarios 3 and 4, very liberal, confer on market actors a role of orientation of selection and seed trade without real authorities watching, especially for an eco-responsible orientation for agriculture.

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

We are in favour of the fact that the totality of the commercialized varieties are inscribed to the catalogue and subjected to all the control tests.

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)

On the whole, impacts on plant health and on environment were neglected.

5.3 Are certain impacts underestimated or overly emphasized?

Underestimated

5.3.1 Please provide evidence or data to support your assessment:

As a whole, the seed regulation favours the provision to the farmers of diseases-free varieties (for instance cereal ergot). This avoids, on middle-long term, important health problems to be managed by authorities.

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

4 = not very 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

Rather negative

Scenario 2

Very beneficial

Scenario 3

Rather negative

Scenario 4

Very negative

Scenario 5

Neutral

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

We are favourable to the continuity, within Europe, of a certain number of common (and not optional) rules for inscription in the Catalogue and a certain seeds trade control. As a Union of Cooperatives, we are favourable to an objective broadcast of information on varieties through a European Catalogue who takes into account productiveness, quality but also future environmental value of varieties.

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?

No opinion

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:

We did not give the same importance to the different chosen criteria. The evaluation made in this table seems to us very subjective and likely to orientate persons that are questioned and might not be specialized in the very technical domain of seeds, towards the scenario 4 which we reject.

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:

Among many others, results of the Millenium Ecosystem Assessment show the necessity of correction of a trajectory only founded on performance and market.

