

1. INTRODUCTION

1.1 What is the name of your organisation?

Eco Committee of Cork Monthly Meeting of the Religious Society of Friends in Ireland

1.2 What stakeholder group does your organisation belong to?

Other

1.2.1 Please specify

Religious Environmental Organisation concerned with International Community Sustainability, Self Sufficiency and the Ethics of such legislation

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)

The required listing of 'conservation' seeds and permitting of their users will necessarily cause great loss of genetic material, as we fear many species and varieties will not ever have these requirements applied for. In Ireland it is illegal to buy or sell native Irish grass seed. Our native grass dependent wildlife is expected to make do with foreign food! Not good This is a tragedy that should be avoided, particularly as 2011 is the first year of the UN declared decade of biodiversity.

2.3 Are certain problems underestimated or overly emphasized?

Overestimated

2.3.1 Please indicate the problems that have not been estimated rightly

Overestimated: Importance of Distinctness, Uniformity and Stability and Value for Cultivation and Use. Why do these have to be legislated for? Importance of listing, cataloguing, registering This would be a good for GM products. Harmonisation. We suggest variety and diversity is the more important tribute. Underestimated: Value of having free access by the public to all non hybrid, non GM varieties from all over the world, thereby ensuring the survival of genetic material that these laws would threaten. Global fragility of International trading systems on which our current food supplies heavily depend. An interruption in the oil supply, for whatever reason, could cause serious shortages. Also with very large specialised food producing suppliers, any incident like the fires in Russia last year or this spring's drought in Europe, can impinge on the global market for individual commodities.

2.4 Other suggestions or remarks

WE agree with the introduction to the review document, that 'Seed and propagating material (S&PM) is a cornerstone input for agricultural production. Therefore, ensuring the availability of seed and propagating material of sufficient quality is crucial for the production of food and feed.' We do not however see that EU legislation on seeds will ensure that as it is formulated at the moment. We believe that small local farmers, gardeners and seed savers have to be enabled to grow, buy, sell, or give away non GM, non Hybrid seeds without legislative restrictions, in order to develop them for their local conditions and climate, and to provide local food security into the future, as well as earning them their living. We believe that it is not the very large produces of monoculture crops that will keep us from starvation, but rather the forest gardens of Kerala, and

the millions of backyard vegetable plots in every community. We firmly believe that free and unhampered access to the very source of our food, our seeds, should be the right of every citizen of the world.

3. OBJECTIVES OF THE REVIEW

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

No opinion

3.2 Have certain objectives been overlooked?

No opinion

3.2.1 Please state which one(s)

3.3 Are certain objectives inappropriate?

No opinion

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 opinion

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

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

Empower users by informing them about seed and propagating material

Contribute to improve biodiversity, sustainability and favour innovation

Promote plant health and support agriculture, horticulture and forestry

3.6 Other suggestions and remarks

4. OPTIONS FOR CHANGE

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

No opinion

4.2 Have certain scenarios been overlooked?

No opinion

4.2.1 Please state which one(s)

4.3 Are certain scenarios unrealistic?

No opinion

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?

No opinion

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 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

Don't know

Scenario 2

Don't know

Scenario 3

Don't know

Scenario 4

Don't know

Scenario 5

Don't know

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

No time!

6. ASSESSMENT OF SCENARIOS

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

No opinion

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

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:

Sorry, I have run out of time, particularly when unwittingly we over ran our 90 minutes and had to start over again. We request that GM seeds and plants and patents on plant material are banned. If not banned, at least please test them for health and environmental impacts, intentional and unintentional. Free and generous access to un-tampered with seeds are a God given right of humanity, not to be taken from us.

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:

Genesis, Chapter 1.

