

1. INTRODUCTION

1.1 What is the name of your organisation?

Terre de Lin

1.2 What stakeholder group does your organisation belong to?

Breeder of S&PM; Supplier of S&PM; User of S&PM; Professional user of raw material produced by agriculture, horticulture or forestry; SME company; International company

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)

The general impression that a lot of people considers that breeders or seeds producers have no idea of what is sustainability. It is a base of our job, an that includes natural resistance to deseases, drought, lodging resistance...and yields. Breeding provides serious improvements to agriculture and human welfare. Non homogenous administration and legislation between countries, some where registration is easy, some where it is very serious and hard (espacialy for DUS). That lead to large distortions in registration. For an SME, it is hard to understand the complexe legislation. The private knowhow, network of trails is not always considered. We could be more usefull to the system, even if registration may stay under public control.

2.3 Are certain problems underestimated or overly emphasized?

Underestimated

2.3.1 Please indicate the problems that have not been estimated rightly

Mainly what I write in 2.2.1 The lack of homogeneity between european countries, the complexity of legislations, and the feeling that innovation in breeding is only considered on some aspects.

2.4 Other suggestions or remarks

Seeds are a very important product, and it's production must be organised, for the sustainability of research. The varieties registration système, as we know it in France uptill now, the seeds certification système, provides good seeds to farmers ans royalties for research. The organisation creats innovation. Could not we improve the efficiency of the system by a closer relation between official registration and breeders, even if in our flax area it is nearly yet the case.

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)

Probably the word productivity is old fashion? Sustainable agriculture cannot exist without quality and productivity. See what is happening today with the drought and the very low yields facing farmers in 2011...

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

1

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

I tried to put a 1 to any of the 3.5 question with no success. All these questions must be considered at the same level.

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)

None of the scenarios seems to countains all potentials improvements.

4.3 Are certain scenarios unrealistic?

Yes

4.3.1 Please state which one(s) and why

Scenario 1: It answer only to the cost problem and is not a very ambitious one on objectives.

Scenario 3: Increase the unhomogeneity of EU Scenario 4: A complete desorganisation, big risk of decreasing of the efficiency of innovation, quality of seeds, good information of farmers...

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)

Impacts on end users of seeds and crops products.

5.3 Are certain impacts underestimated or overly emphasized?

Overestimated

5.3.1 Please provide evidence or data to support your assessment:

A quite complexe question to answer. Will do it if my comments could be of some help

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

5 = not proportional at all

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

Fairly beneficial

Scenario 3

Very negative

Scenario 4

Very negative

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:

Scenario 1: In my crops fiber flax and linseed, the market is very small, and we have difficulties to finance innovation yet. Increasing cost will stop research, espacialy for linseed. Scenario 2: We nearly apply that scenario in flax, where we do a lot for official registration, helping the officials (very expensive and specific equipement is needed to evalute yield ans quality of flax). Scenario 3: Desorganisation of registration will desorganise markets, reduce quality... Scenario 4: Like 3, even more hard Scenario 5: why not, but need more details to analyse properly.

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 must use the today system: common catalogue, seeds controle system. We can improve it by a stronger relationship between state and private sectors

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:

