

1. INTRODUCTION

1.1 What is the name of your organisation?

Portage Perennials

1.2 What stakeholder group does your organisation belong to?

User of S&PM; Consumer

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 loss of biodiversity. The lack of competition because small are being required to purchase seeds from a limited number of suppliers.

2.3 Are certain problems underestimated or overly emphasized?

Overestimated

2.3.1 Please indicate the problems that have not been estimated rightly

Before you can have food security, you must have food sovereignty.

2.4 Other suggestions or remarks

This legislation is biased toward large corporations and against the individual. How many times must Association Kokopelli be fined???????????????

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?

Yes

3.2.1 Please state which one(s)

Accessibility to heritage varieties must be allowed in order for locally adapted varieties to be developed by small, independent breeders.

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

3

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

1

Promote plant health and support agriculture, horticulture and forestry

2

3.6 Other suggestions and remarks

Biodiversity cannot be maintained if you place bureaucratic hurdles in the way. People will simply quietly break the law by using seed swapping outside the control of the EU.

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)

Elimination of marketing lists for non novel foods.

4.3 Are certain scenarios unrealistic?

Yes

4.3.1 Please state which one(s) and why

By favouring large corporations, you hurt small businesses because small companies do not have the resources to perform the tests. This ends up limiting consumer choice.

4.4 Do you agree with the reasoning leading to the discard of the "no-changes" and the "abolishment" scenarios?

No

4.5 Other suggestions and remarks

Requiring companies to bear the registration cost biases the system toward large corporations and biases the system against smaller companies who lack the resources.

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)

More regulation leads to more jobs in the bureaucracy and less jobs in created in the independent plant breeding and small farming sectors. At the end of the day, it is the farmers and plant breeders not the bureaucrats who will feed us.

5.3 Are certain impacts underestimated or overly emphasized?

Overestimated

5.3.1 Please provide evidence or data to support your assessment:

The job loss analysis is flawed.

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

Very negative

Scenario 2

Very negative

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:

You are ignoring public opposition to current seed laws and the proposed changes.

6. ASSESSMENT OF SCENARIOS

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

Scenario with new features

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

Open up the market for heritage breeds and traditional breeding. Independent testing for new foods. Do you really believe that any corporation is going to present data that is damaging to their application? Without independent testing, you are asking the fox to guard the chicken coop. Prohibition of GMOs pending independent environmental impact assessment.

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:

GMO's have not been independently tested. Peer review of corporate tests is open to abuse.
Seed laws are a violation to human rights all over the world.

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:

