

1. INTRODUCTION

1.1 What is the name of your organisation?

Lindbloms Frö

1.2 What stakeholder group does your organisation belong to?

Supplier of S&PM; Company operating on national level

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

Hjälmarödsvägen 16 SE-27732 KIVIK SWEDEN +46-414 70880 +46-414 70009
www.lindbloms.se

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)

1. What about the new Commission Directive 2009/145/EG? Will those who have chosen to register an amateur variety automatic get their varieties registered in the non-tested catalogue and will the quantity rules be changed to unlimited. The rules for amateur varieties are very hard to understand for customers. I guess amateur variety catalogue will be in existence only a short period of time. 2. Very little about the changes in the market that Internet and e-commerce have caused? When someone find what seems to be a interesting variety on the Net they often also want it immediately. Many e-commerce companies try to offer what is requested even if the varieties are not listed. Hundreds of unlisted varieties are sold in Sweden, thousands in the UK. And not just for amateurs.

2.3 Are certain problems underestimated or overly emphasized?

Underestimated

2.3.1 Please indicate the problems that have not been estimated rightly

See 1.2 above.

2.4 Other suggestions or remarks

Why is the EU-market of vegetable varieties so closed. Scandinavia today hardly have any vegetable breeding. I suppose russian varieties often would be good for our needs, but very few are available. Why can't DUS tested varieties from countries with climate as in Europe, be registered without high costs?

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?

No

3.2.1 Please state which one(s)

3.3 Are certain objectives inappropriate?

Yes

3.3.1 Please state which one(s)

the cost of the administrative burden

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?

Yes

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

I like the following quotes from "Options and analysis" page 7: 1. Improve farmer's choice and access to a wide diversity of plant varieties 2. foster innovation in plant breeding with focus on varieties that can be grown in a more sustainable manner.

4. OPTIONS FOR CHANGE

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

Yes

4.2 Have certain scenarios been overlooked?

No

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

Hope of saving cost as much as calculated. It's theoretical figures.

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?

Yes

5.2 Have certain impacts been overlooked?

Yes

5.2.1 Please state which one(s)

big risk if companies in the private sector will control it self. Control just as certification must either be public or private and officially controlled at a high cost. Don't forget the cost of the control and revision.

5.3 Are certain impacts underestimated or overly emphasized?

Overestimated

5.3.1 Please provide evidence or data to support your assessment:

The estimated lower cost if more private is overestimated.

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

3 = 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

Rather negative

Scenario 3

Very beneficial

Scenario 4

Fairly beneficial

Scenario 5

Rather negative

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

We prefer the Scenario 3. It for us seems to be nearest the legislation in north America, that makes it possible for the seed merchants there to offer more vegetable Heirlooms than in Europe. Scenario 4 is also of interest, but seems more valid for the national conservation of old varieties. That's not often valid in Sweden. With scenario 3 I hope we will manage to do what we want, not so often restricted by legislation as today.

6. ASSESSMENT OF SCENARIOS

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

Scenario 3

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?

Yes

6.2.1 Please explain:

7. OTHER COMMENTS

7.1 Further written comments on the seeds and propagating material review:

We now wait for new better rules. This is important especially in Scandinavia, eastern Europe and other small European countries. As a part of these better rules the number of species regulated in legislation should be reduced. The following vegetable varieties could be taken out: Anthriscus cerefolium Beta vulgaris (Mangold) Cynara cardunculus Phaseolus coccineus Rheum rhabarbarum Scorzonera hispanica Valerianella locusta Zea mays The registration fee should not be the same for conservation, traditional open pollinated and hybrid varieties. We want a lower fee for niches like organic breeding. We also think when the market is only national the fee must be lower or maybe just an administrative fee.

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:

In the autumn of 2010 there were a big protest storm in Sweden about the necessity to register vegetable varieties for the amateur market, as a part of commission directive 2009/145/EC. There were 650 referrals written to the authority. Only one referral were positive – my own. The reason for this positive attitude were that I hoped this were the beginning for better legislation. The fact is that the legislation were so bad that anyone who dared to stand up against it would be considered a hero on the market and get good PR. 1997-98 I myself made a protest action when I told the authorities that I didn't want to stop sales of a handful of not listed varieties. Later (May 1998) there were a change in the Swedish legislation. If the seed were sold in small packings, not listed varieties from 1990 or older, it were accepted to be sold on the Swedish market. Of course it soon were sold in other counties as well. For us this were not a good solution, as sales to professionals were forbidden. The legal conflicts about Kokopelli Seed Foundation (former Terre de Semences) and french authorities, is very central. But they (Dominique Guillet) haven't made any statements about Commission directive 2009/145/EC, as we know.

