

## **1. INTRODUCTION**

### **1.1 What is the name of your organisation?**

SCA UNEAL

### **1.2 What stakeholder group does your organisation belong to?**

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**

SCA UNEAL 1 RUE MARCEL LEBLANC 62233 SAINT LAURENT BLANGY FRANCE

## **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)**

Problems are the impact of selection and marketing of seeds on production: \* improvement of productiveness and quality (flour-milling wheat, barley brewing) \* impact of the seeds sector in the reduction of inputs (chemicals, fertilizers)

### **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. It is necessary to think about the Sustainable development wich must be carried . In seeds, regulations are there to encourage a good management of 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 to advocat a sustainable agriculture with 3 objectives: economic, social, environmental.

### **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 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 firm.

**4.3 Are certain scenarios unrealistic?**

Yes

**4.3.1 Please state which one(s) and why**

Scenario 3 and 4 are very liberal.

**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)**

Impacts on plant health and 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:**

The seed regulation favours the provisioning 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 of a certain number of common rules for inscription in the catalogue and a certain seeds trade control. As a cooperative, 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?**

Scenario 2

**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

**6.2.1 Please explain:**

The evaluation made seems to us subjective and likely to orientate persons that are questioned and might not be specialized in the very technical domaine of seeds, towards the scenario 4 wich

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:**

Results of the Millenium Ecosystem Assesment show the necessity of correction of a trajectory only founded on performance and market.

