

1. INTRODUCTION

1.1 What is the name of your organisation?

Danish Seed Council

1.2 What stakeholder group does your organisation belong to?

Breeder of S&PM; Supplier of S&PM; User of S&PM

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?

Yes

2.2 Have certain problems been overlooked?

No

2.2.1 Please state which one(s)

2.3 Are certain problems underestimated or overly emphasized?

Rightly estimated

2.3.1 Please indicate the problems that have not been estimated rightly

2.4 Other suggestions or remarks

Seed is the starting point of all agricultural production. Therefore the proposal for a new Seed Law in the EU must secure high quality seeds with high standards. This can be ensured by a transparent, innovative and cost effective system whereby the end users have access to certified grass- and leguminous seeds. Certified grass- and leguminous seeds with high germination rates, high purity, DUS testing/variety listing and VCU testing are important matters in order to secure the competitiveness of European farming. Also imported grass- and leguminous seed intended for sowing purposes must follow EU standards or at least be (OECD-)certified. The European Community should engage harder in eliminating illegal non-certified seed imported as 'bird seed' or the like.

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)

The major objective of the present legislation is to improve productivity – this is done by a continuous effort to develop better varieties. A transparent grass seed market requires reliable statistics on production, consumption, trade and stocks. Also the issue of plant breeding/innovation needs higher attention as new and better varieties are a major building block in order to secure the future of the European seed sector as well as the high output varieties

farmers and consumers need. To this end a VCU testing is very useful no matter the intended use of grass seed (fodder purpose or amenity grasses). Also innovation is important.

3.3 Are certain objectives inappropriate?

Yes

3.3.1 Please state which one(s)

The high focusing on landraces/conservation varieties which we find unnecessary.

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

1

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

2

Empower users by informing them about seed and propagating material

3

Contribute to improve biodiversity, sustainability and favour innovation

5

Promote plant health and support agriculture, horticulture and forestry

4

3.6 Other suggestions and remarks

Innovation/plant breeding should have a separate line and be rated very high – No.2 rank

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)

The proposed individual scenarios are not suitable to fulfil the objectives of the legislation. A combination is needed with scenario 2 as base.

4.3 Are certain scenarios unrealistic?

Yes

4.3.1 Please state which one(s) and why

And, if so, why?_Options 3 and 4 will undermine the VCU and certification systems – and they are crucial to the grass- and leguminous seed sector – farmers as well as companies. Certification should be mandatory for grass- and leguminous seed. Also voluntary systems will undermine existing structures.

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?

No

5.2.1 Please state which one(s)

5.3 Are certain impacts underestimated or overly emphasized?

Rightly estimated

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)?

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

Not relevant

Scenario 2

Very beneficial

Scenario 3

Very negative

Scenario 4

Very negative

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:

no answer

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?

Option 2 where private enterprises work under official supervision combined with other elements will be the best solution. The system must be harmonised all over EU, but room for different climatic and agricultural zones should be incorporated in the rules. The use of certified seed must be mandatory for grass- and leguminous seed. If conservation varieties/landraces must be

marketed it must be limited as much as possible.

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:

Grass- and leguminous seed should only be marketed if is certified seed under official supervision. The proposed system must be harmonised in the EU. Seeds imported intended for sowing purposes must follow EU rules or be OECD certified. Innovation and plant breeding should be encouraged in order to improve farming results. Collection of royalties should be possible in order to pave the way for plant breeding/better varieties. Uncertified grass or clover seed must not be marketed in Europe. Conservation varieties are to be avoided or at least limited as they in most cases does not improve production or quality. Conservation varieties should be subject to the same conditions concerning DUS and VCU as conventional varieties.

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:

