 1. INTRODUCTION
1.1 What is the name of your organisation?
Bifurcated Carrots

1.2 What stakeholder group does your organisation belong to?
Breeder of S&PM; Supplier of S&PM; User of S&PM; Consumer; International organisation

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
weblogbb@patnsteph.net http://www.patnsteph.net/weblog/

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 as a result of the limited nature of DUS and VCU rules. The inability of small breeders and suppliers to make good use of the listings. The limited availability of high quality food to consumers, as a result of the limited nature of the listings. The unnecessary expense to small farmers as a result of 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
The emphasis should be on food-soveringty and not food-security.

2.4 Other suggestions or remarks
The EU legislation is unfair to everyone except large multinational companies.

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 accessibility to heritage varieties, unstable varieties (for example F3) for use in creating locally adapted varieties and newly bred varieties created by small or independent plant 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 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
3

Secure the functioning of the internal market for seed and propagating material
4

Empower users by informing them about seed and propagating material
5

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
Adequate biodiversity cannot be maintained in marketing listings as long as DUS remains a requirement.

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
1. This would be unfair for smaller businesses and limit choices for consumers. 2. Same as 1 3. Same as 1 and 2 above, in particular smaller companies would not have the capacity to perform these tests by themselves. 4. Any registration system would favor larger commercial organizations and limit consumer choice. 5. Same as 1, 2 and 3 above.

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
It is not fair to push registration costs back to companies making the registrations. This means unreasonable costs for smaller companies.

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)
You are ignoring the fact that wile jobs relating to variety registration would be lost, many more jobs would be created in the independent plant breeding and small farming sectors, in the event of liberalization of EU marketing rules.

5.3 Are certain impacts underestimated or overly emphasized?
Overestimated

5.3.1 Please provide evidence or data to support your assessment:
Your assessment on job losses 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 very strong public opposition to current EU seed laws, and proposed changes thereof.

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
Complete liberalization of market in terms of traditionally bred varieties. Genuine safety testing for novel foods, no patents or IPRs. Prohibition of GMOs pending environmental impact assessment, establishment of genuine need and true value and consumer demand. True responsiveness to consumer wises from the EU commission.

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:
I am opposed to patents or other IPRs. I am opposed to marketing lists, except when they are an expression of consumer demand.   The amount of GMOs allowed in food should be lowered to 0%.   The EU should emphasize food soverignty as opposed to food security.   The EU 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: