

## **1. INTRODUCTION**

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

Association of biodynamic plant breeders eV (ABDP)

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

Breeder of S&PM; 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**

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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?**

Yes

#### **2.2.1 Please state which one(s)**

A differentiation between high risk varieties and low risk varieties is missed. If a variety is grown on a hugh area immediately after being released there is a high vulnerability related to biotic and abiotic stress. If a variety will not cover i.e. less than 1% of the area or the seed lots of a member state every risk for the community is much lower. High costs for testing could go together with a high market share, but only low costs for testing to release a variety together with low market share can increase biodiversity and small scale innovations.

### **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**

## **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)**

At the moment there is little or no differentiation in the requirements for the breeder considering S&PM with relatively high market shares and S&PM for very small scale niche markets. It would be logic if the requirements to be fulfilled by the breeder for S&PM targeting higher market share are higher than those of S&PM for niche markets. Hence, it could sensible to have higher certification requirements regarding seed quality for S&PM exceeding a specific market share of i.e. 1% and lower certification requirments for S&PM with market share below this scale.

**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**

2

**Contribute to improve biodiversity, sustainability and favour innovation**

1

**Promote plant health and support agriculture, horticulture and forestry**

5

**3.6 Other suggestions and remarks**

Testing protocols and scoring should be harmonized, but testing procedures and growing circumstances should be user-oriented diversified with regard to different climatic-areas, intensity-levels and farm-marketing-structurs.

**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?**

Yes

**4.2.1 Please state which one(s)**

in case that Scenario 1, 2, 3 or 5 is favoured by the Commission, comment 3.2.1 is applicable

**4.3 Are certain scenarios unrealistic?**

No

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

**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?**

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)?**

2 = fairly 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**

Very negative

**Scenario 2**

Rather negative

**Scenario 3**

Fairly beneficial

**Scenario 4**

Very 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:**

Breeding for organic farming has to take into account more different farming systems related to climate, soil, manure, crop rotation and consumer demands. This needs more small or i.e. niche market varieties and a testing and description of varieties related to defined organic environments and end use. But also organically bred varieties for higher areas have to be tested related to organic farming conditions in particular. This needs an adapted system to get variety descriptions of use for organic farmers and seed multipliers. It could be better, more flexible and efficient organised and managed by public-private partnerships. The national seed office (CPVO either) could help to make the testing protocols and environment descriptions more comparable all over Europe and neighbouring countries. Niche market varieties need a low cost releasing for not to burden them with too high costs, which are counterproductive for an innovative breeding of such 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 4

**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 opinion

**6.2.1 Please explain:**

## **7. OTHER COMMENTS**

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

DG SANCO does well to do such a public consultation. This improves the closeness to European citizens. Food security has been an important task in the past. Nowadays, there are other priorities, especially the dramatic loss of biodiversity. In several countries organic plant breeding and breeding for niche markets as well as the highly needed strengthening of biodiversity suffers from the present unequal implementation of the S&PM regulation. The situation is counterproductive in markets that have become more and more divers over the years. Moreover, quality management of private breeders and breeding companies have reached a high level, which is able to keep up the quality even if S&PM is more liberalised.

**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:**

