

1. INTRODUCTION

1.1 What is the name of your organisation?

Agrarian Chamber of the Czech Republic (AK CR)

1.2 What stakeholder group does your organisation belong to?

Other

1.2.1 Please specify

AK CR associates majority of entrepreneurs in agriculture, forestry and food industries, promotes and defends interests of its 103 000 members and provides consulting and information services in the entire territory of the Czech Republic

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?

No

2.2 Have certain problems been overlooked?

Yes

2.2.1 Please state which one(s)

the objectives of productivity of top quality product, as condition for the competitiveness of growers, are missing. Productivity for the competitiveness and food security

2.3 Are certain problems underestimated or overly emphasized?

Underestimated

2.3.1 Please indicate the problems that have not been estimated rightly

Underestimated: specificity of the forest reproductive material Overestimated: influence of the breeding on biodiversity

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?

No opinion

3.2 Have certain objectives been overlooked?

Yes

3.2.1 Please state which one(s)

food security and competitiveness of farmers in the quality products

3.3 Are certain objectives inappropriate?

Yes

3.3.1 Please state which one(s)

more wide utilization of the biodiversity by farmers and the importance of the conservation varieties

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

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

4

Promote plant health and support agriculture, horticulture and forestry

5

3.6 Other suggestions and remarks

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 modified version of the Scenario 2 is recommended –VCU and DUS must to be in the responsibility of the official national authority. VCU can be conducted by national authority or under its supervision. Namely VCU tests must cover areas of the users and provide the best estimation of the variety performance for farmers

4.3 Are certain scenarios unrealistic?

Yes

4.3.1 Please state which one(s) and why

1 full cost recovery, 3,4, dual regime for the varieties of the same crop, do not secure users and also breeders, 5 centralization brings increasing of the cost for registration, namely in the new MS and most probably information about CPVO registered varieties will, tested only on the accredited stations, not be reliable and sufficient for growers, because the testing network will be most probably strongly reduced (500 stations with 1500 employers will not be functioning-3 people per station and is really question what number of the stations will continue and where)

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?

Yes

5.2.1 Please state which one(s)

the EU is not in terms of performance of economy a homogeneous unit, it is necessary to analyze and take into consideration impacts on the new MS.

5.3 Are certain impacts underestimated or overly emphasized?

Underestimated

5.3.1 Please provide evidence or data to support your assessment:

Plant health in scenarios 3 and 4

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

Neutral

Scenario 2

Very beneficial

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:

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?

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

The modified version of the Scenario 2 is recommended –VCU and DUS must to be in the responsibility of the official national authority. VCU must be conducted by national authority or under its supervision. Namely VCU tests must cover areas of the users and provide the best estimation of the variety performance for farmers

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:

no answer

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:

