

1. INTRODUCTION

1.1 What is the name of your organisation?

Norwegian Food Safety Authority

1.2 What stakeholder group does your organisation belong to?

Competent Authority (CA) involved in S&PM certification and control; Competent Authority (CA) involved in S&PM variety and material registration

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?

Underestimated

2.3.1 Please indicate the problems that have not been estimated rightly

The current legislations on seed and plant propagating material do not sufficiently promote or contribute a great extent to biodiversity. The legislations may perhaps be seen to complex, in such a way that it is difficult for small and medium-sized enterprises to list and market small varieties. These circumstances are underestimated in chapter 2 of the document.

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?

No

3.2.1 Please state which one(s)

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

1

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

5

Empower users by informing them about seed and propagating material

4

Contribute to improve biodiversity, sustainability and favour innovation

3

Promote plant health and support agriculture, horticulture and forestry

2

3.6 Other suggestions and remarks

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?

No

4.2.1 Please state which one(s)

4.3 Are certain scenarios unrealistic?

Yes

4.3.1 Please state which one(s) and why

Scenario 1: Not realistic because it would result in huge consequences for plant health in horticulture. This is connected with the great disproportionate expenses the supplier/producer has to cover. Scenario 5: Norway does not support this scenario. A national catalogue is in our opinion of great value.

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 opinion

5.2 Have certain impacts been overlooked?

No opinion

5.2.1 Please state which one(s)

5.3 Are certain impacts underestimated or overly emphasized?

Underestimated

5.3.1 Please provide evidence or data to support your assessment:

It is difficult to answer without studying the basic data for the assessment which are not available.

5.4 How do you rate the proportionality of a generalised traceability/labelling and fit-for-purpose requirement (as set out in scenario 4)?

No opinion

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

Fairly beneficial

Scenario 3

Fairly beneficial

Scenario 4

Very beneficial

Scenario 5

Not relevant

5.5.1 Please state your reasons for your answers above, where possible providing evidence or data to support your assessment:

Scenario 1 will give too great expenses for the producer of vegetative propagating material and that will give negative consequences for plant health. Scenario 2 will give reduction of costs and administrative burden for public authorities, but it will not give the same flexibility as for instance scenario 4. Scenario 3 will give reduction of costs and administrative burden for public authorities, but it will not give the same flexibility as for instance scenario 4. In addition it gives a risk for negative consequences for plant health as a result of removing a demand for VCU tests. Scenario 4 gives the best possibility to meet the different objectives for the review of the legislations, which is reduction of costs and administrative burden for both public authorities and the industry, improve farmers' choice, innovation, simplification and flexibility. We expect that a legislation based on this scenario, will give the best possibility to contribute to biodiversity. Scenario 5 is not relevant for Norway because giving authority to an EU institution is not consistent with the EEA.

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?

Yes

6.2.1 Please explain:

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:

