

1. INTRODUCTION

1.1 What is the name of your organisation?

CTPS section plantes fourragères et à gazon

1.2 What stakeholder group does your organisation belong to?

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?

No

2.2 Have certain problems been overlooked?

Yes

2.2.1 Please state which one(s)

The advantages of the current regulation have been overlooked. This regulation permits to drives the genetic progress for the benefit of the agriculture, the consumers, and the environment. The official registration procedures provide an independent evaluation of the new fodder and turf variety (VCU and DUS) and then encourage the research effort of the breeding companies.

2.3 Are certain problems underestimated or overly emphasized?

Overestimated

2.3.1 Please indicate the problems that have not been estimated rightly

Sustainability issues: the forage an turf VCU tests are not only focussed on productivity but also on sustainability; CTPS takes into account in the VCU test disease resistances, digestibility of the forage....

2.4 Other suggestions or remarks

The "problem definition" part of the European Commission analysis gives a clear feeling that the EU is already convinced that the current system is not efficient. But this is not proved by the EU. We have experienced for many years a high efficiency of the current system for animal feeding and for the quality of the turf in the public and private gardens. This is efficiently delivered to the end-users.

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 general objectives address the question of the information to the users. This information shall be qualified as well as reliable, impartial, independent, official and available for the all the users. The CTPS publications on the fodder and turf varieties are widely used and recognized by the users of these seeds in France.

3.3 Are certain objectives inappropriate?

Yes

3.3.1 Please state which one(s)

Reduction of costs cannot be an objective in itself; the right objective is to optimize, adapt and proportionate as regard the main objectives dealing with environmental risks, agricultural production sustainability, biodiversity protection... The choice of varieties by end users is currently difficult and made possible by the release of the information of the agronomic and use value of the varieties. Therefore, a further increase of the choice in absence of reliable information is not necessary; it might be a bad orientation since too much choice could make more difficult the identification of the best 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**

5

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

3

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

4

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)

A scenario which improves the current system with the view to better achieving good objectives and to integrate the current legislation (innovation, productivity, quality and regularity of the production) the implementation of the environmental issues. This can be done through the official evaluation of traits which determined environmental impact. The sustainable use of varieties, i.e. with adequate agronomic practices is also critical.

4.3 Are certain scenarios unrealistic?

Yes

4.3.1 Please state which one(s) and why

Scenario 2, 3, 4: forage DUS tests carried out by the industry is not realistic for distinction (The

size of the reference collection are too big).

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

The current system in France (official control) provides the government with an independent and public expertise in the field of plant breeding, seed production and agronomy.

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)

- Weakening of the suppliers, operators position on national, EU and international levels. - Impact on food security, - Impact on environmental aspects as regard sustainable genetic resistance against diseases and pests, - Agronomical impact and impact of the evolutions on the production systems.

5.3 Are certain impacts underestimated or overly emphasized?

Underestimated

5.3.1 Please provide evidence or data to support your assessment:

The positive impact of continuous and officially recognized genetic improvement is supported by many research works. For example: - Van der Heijden and Roulund, 2010. In Sustainable Use of Genetic Diversity in Forage and Turf Breeding, p 247-260 documented the continuous genetic gain of registered varieties of several perennial forage species .

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

Fairly beneficial

Scenario 2

Fairly 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:

DUS and VCU tests must be compulsory and have to be carried out by public authorities, or to a

certain extent under the supervision of national public authorities. For that reasons we consider Scenarios 3 and 4 as “very negative”. The objective of a better harmonisation and cooperation at the EU level is good. Scenario 5 pursues this goal for DUS. Varieties should be testing in DUS by official services We prefer that VCU light be replaced by a VCU official and under official supervision, allowing greater participation of the breeders at the VCU networks. As a consequence, we consider scenario 5 as “Rather negative”.

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?

Scenario 1 (with enforced environmental value and data exchange among countries when relevant and improved data analysis) combined with Scenario 2 (more trials run by private breeders under official supervision) and minor issues of scenario 5 (harmonized DUS tests and optimized management of reference variety collection). Based upon Scenario 1, and reinforcing the evaluation of cultivation use value and environmental value by sharing of information and data among countries when candidate varieties are under evaluation in various countries, including as much as possible trials run by private breeders for VCU under official supervision and more data analysis to emphasize the variety x environment x agronomic practices which documents the adaptation and provides key elements for farmers’ choice, it is proposed to improve the system of fees with fees being more proportionate depending on the economic importance of the species. Taking part of the scenario 5, it is suggested to have a harmonization of DUS tests, an optimized management of reference collection for DUS tests through sharing among member states. The regular update of the common catalogue will be improved through an administrative management by CPVO.

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

6.2.1 Please explain:

On the basis of the previous answers as regard the missing or misdefined objectives (innovation, productivity, quality, regularity of the productions) and the overlooked scenario based on the current technically and financially optimized system (current objectives complemented by the environmental issues) the comparison of the scenarios in the light of the objectives is hedged. - On the basis of the analysis of the Commission scenario 4 appears to be the most positive whereas on the basis of our arguments, the scenario 4 does not best enable to achieve the objectives as we identified them.

7. OTHER COMMENTS

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

Forage and the turf varieties should be consider as “Agricultural species”. In France, we realise VCU test on these species. This survey should be translated in the different EU languages. A lot of people in Europe do not speak English and so it is not fair to make such an important survey in English only.

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:

