

1. INTRODUCTION

1.1 What is the name of your organisation?

LABOULET Semences

1.2 What stakeholder group does your organisation belong to?

Breeder of S&PM; Supplier of S&PM; SME company

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)

VCU process is too focused on grain yield only. In France, the "Valeur Agronomique & Technologique" is mainly based on productivity, that's true, but also on some qualitative criteria that are an improvement for the specie. For example, LABOULET is a breeder and producer of oil crops (linseed, sunflower, rapeseed...), corn and pea. We have a linseed variety which has a "linola" type, ie very low C 18-3 content, and is very well fitted for oil industry. Its grain yield is not better than those of current market standards, but close to them, and moreover this variety is one of the 2 only in EU with less than 2% of C 18-3, so it is useful to have rules allowing it to be registered on Catalog. Same for tolerance to diseases or pathogens, which are required in the aim to reduce phytosanitary use, Ecophyto 2018 plan, water quality etc...

2.3 Are certain problems underestimated or overly emphasized?

Overestimated

2.3.1 Please indicate the problems that have not been estimated rightly

For integrity and quality insurance, DUS testings should be filled by official Agricultural organism of each european country, following common EU rules. Thus, DUS is uniform and not much expensive than done by private breeders under official control.

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

3.2 Have certain objectives been overlooked?

Yes

3.2.1 Please state which one(s)

To be able to fill the needs of farmers and consumers, EU should consider as a priority the regular supply of certified seeds and plants propagating material.

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?

Yes

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

5

Contribute to improve biodiversity, sustainability and favour innovation

4

Promote plant health and support agriculture, horticulture and forestry

3

3.6 Other suggestions and remarks

Question 3.4 : yes, it would be very useful for the breeders and producers to have possibility to get a variety which was successful in DUS / CPVO testing, automatically been registered on EU Catalog, for some specific uses : for example, the linola linseed reported earlier, some sunflower hybrids with stripped kernels for bird food, protein pea tolerant to aphanomyces, oil crops for industrial uses for which there is no official VCU testing or Catalog (lunaria, castor bean, cameline...).

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 best would be scenario 1 for DUS and scenario 1+2 for VCU (cost mutualizatio + evaluation under official control).

4.3 Are certain scenarios unrealistic?

Yes

4.3.1 Please state which one(s) and why

Scenario 3 : no more Distinction nor VCU testing. Does not respect aim of EU harmonization, nor the evaluation of differences and improvements given by the new varieties proposed for registration.

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 impacts on environment and food safety.

5.3 Are certain impacts underestimated or overly emphasized?

No opinion

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)?

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 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:

As said before, the best would be a mix between scenarii 1 & 2 in order to guarantee: - DUS testings allowing to prove that varieties are distinct, new from existing ones in the EU market, provided by official organisations only - VCU which takes in both genetic progress (productivity, resistance to stress & diseases) and qualitative aspects (oil / protein profile, benefits for health or environment...), with cost pooling under official control, and for some specific purposes (niche markets or species : linola flax, stripped sunflower, castor bean...), extend DUS or CPVO to automatic Catalog registration.

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?

As said before, mix of scenarri 1 & 2.

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:

In our mind, scenarii 3 & 4 are very negative regarding the objectives and our needs as breeder but also seeds seller.

7. OTHER COMMENTS

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

CPVO rule is important but should be focused only on EU DUS harmonization, Catalog gestion, but leave each national official organism lead the VCU testings.

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:

