

## **1. INTRODUCTION**

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

Latvian Seed Association

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

Other

#### **1.2.1 Please specify**

Organization uniting S&PM breeders, suppliers and users

### **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?**

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?**

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?**

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**

3

**Empower users by informing them about seed and propagating material**

2

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

5

**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?**

Yes

**4.2 Have certain scenarios been overlooked?**

Yes

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

3<sup>rd</sup> and 4<sup>th</sup>

**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?**

Yes

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

protection of breeders and users of S&PM, administrative burden

**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)?**

3 = 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**

Rather negative

**Scenario 2**

Rather negative

**Scenario 3**

Fairly beneficial

**Scenario 4**

Fairly 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:**

In our opinion more acceptable would be the scenario 4 because it enables the breeder or grower to choose whether to test and certify S/PM or to place it on the market without testing and certification

**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?**

Proposals: 1) We do not support the proposal for a new Regulation to cover species not currently regulated because it will increase the administrative burden for both producers and controlling institutions. 2) Concerning labeling of seed batches, we support the opinion that the last seed categories (C,C2) as well as ST, small packages and K categories of seeds batches could be labeled with the supplier's labels. 3) Concerning propagation material of fruit trees and berries there must be a possibility for a variety to be included in the list of varieties based on the variety description submitted by the supplier 4) It would be desirable to lay down standard categories also for agricultural crop seeds.

**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:**

