

## **1. INTRODUCTION**

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

Röttle natur och kultur

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

Other

#### **1.2.1 Please specify**

Working with plant genetic resources both with information and propagating varieties

### **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 opinion

### **2.2 Have certain problems been overlooked?**

No opinion

#### **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**

Small scale propagation is not considered. If the commission really wants to keep and use the plant genetic resources there should be some simpler way for small companies and farmers to be able to sell seed from own propagation.

#### **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?**

No opinion

#### **3.2.1 Please state which one(s)**

### **3.3 Are certain objectives inappropriate?**

No opinion

#### **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**

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

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

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

**Promote plant health and support agriculture, horticulture and forestry**

**3.6 Other suggestions and remarks**

It is stupid to put biodiversity against health. Of course you need good quality and healthy seeds and plants. But as a consumer of seeds and plants you can do your own choice. If you want to be really sure about the quality you will buy controlled seeds and plants. That is more necessary if you are growing large fields. But there should be a possibility for small scale farmers and companies to be able to sell seeds and plants that is not controlled in every detail. Of course as an entrepreneur you want to have your customer back and therefore you will think about quality as well. Therefore there should be two levels. One that keeps the legislation of today but of course makes it more harmonised between all the legislation. And the other one is when farmers and others are selling directly to consumers of the seed and plants. In that case it should be without legislation, maybe with some upper limit to avoid disease transmission. The smallscale production is needed if increased biodiversity in grown plants is a goal. But as long as it is too much controls and rules there will be none that will be interested to grow seeds and propagate plants in small scales when you probably have to pay more in controls and fees than you will get as income from the business.

**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 opinion

**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 5 seems to be the simplest one but the risk that this will lead to less biodiversity and not taking care of the countries' different considerations makes it too unrealistic. Scenario 6 also seems to be unrealistic but the reason for this is that we are depending on each other and different legislations will be too complicated.

**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?

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)?

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

Don't know

##### Scenario 2

Don't know

##### Scenario 3

Don't know

##### Scenario 4

Don't know

##### Scenario 5

Don't know

##### 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 2

##### 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?**

No opinion

**6.2.1 Please explain:**

**7. OTHER COMMENTS**

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

The legislation and the suggestions still is regarded to big business. And concerned to this the options are rather good descriptions. And in that case I prefer Scenario 2. Of course this is also the main part of seed and plant business. But smallscale companies and farmers do also have to follow the legislation (even if you only grow 10 plants of tomato or 2 dl seed of pea). And there is nothing in the scenarios that takes care of this. There is a try for this in Scenario 4 but still the so called voluntary level in this is not smallscaled. Instead of this level make a zero level where it is free to sell seeds and plants as long it is in small scale and direct from the farmer/company that is growing the seeds or plants to the consumer in own shops or at local markets. This will probably lead to more varieties on the market than the legislation around conservation varieties. Scenario 2 plus this zero level is what I prefer.

**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:**

