

1. INTRODUCTION

1.1 What is the name of your organisation?

Société Française des Gazons - SFG

1.2 What stakeholder group does your organisation belong to?

Other

1.2.1 Please specify

National Association for development about the turfgrass knowledge - 200 members (professional users, consumers, schools, trainers, towns and cities ...)

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 current regulation permits to drive the choice of the consumers for a better use, with the respect environment and competition

2.3 Are certain problems underestimated or overly emphasized?

Underestimated

2.3.1 Please indicate the problems that have not been estimated rightly

in France, more tests takes into account in the VCU

2.4 Other suggestions or remarks

french consumers and users are satisfied with french current system

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)

consumers and users have to have independent, comparable and objective information and preferably official. Geves publication is unanimously used by consumers.

3.3 Are certain objectives inappropriate?

Yes

3.3.1 Please state which one(s)

cost reduction described will result in a lower quality of products offered or unsuitable for use, and therefore an increase costs for end consumers

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

4

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

5

Empower users by informing them about seed and propagating material

1

Contribute to improve biodiversity, sustainability and favour innovation

2

Promote plant health and support agriculture, horticulture and forestry

3

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)

the current system meets the current expectations of the consumer, it must integrate environmental impacts and be more flexible to allow the marketing of real innovations

4.3 Are certain scenarios unrealistic?

Yes

4.3.1 Please state which one(s) and why

with scenarios 2,3 and 4: a distinction (DHS) carried out by private companies is not credible

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 protection of consumer interests are not taken into account impact on the declining quality of

new varieties distortion of competition between national or international operators environmental impact not considered as resistance to pests the environmental and economic impacts with agronomic management systems

5.3 Are certain impacts underestimated or overly emphasized?

Underestimated

5.3.1 Please provide evidence or data to support your assessment:

- impact environmental : permanent breeding reduces inputs and reduced waste clipping (INRA-ACVF study 2009) - impact on research and development / innovation - impact on consumers

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

Rather negative

Scenario 2

Fairly beneficial

Scenario 3

Very negative

Scenario 4

Very negative

Scenario 5

Fairly beneficial

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

DUS testing should be mandatory and conducted by governments, it's the same for VCU. harmonization and centralization at the EU level is a good direction.

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 2 (more tests run by private breeders under official control) and scenario 5 (DHS - VCU harmonized tests and optimized management of variety reference collections)

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:

missing goals or they are poorly defined (in order to defend consumer)

7. OTHER COMMENTS

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

consumer interest and product quality are totally absent from the survey and environmental impacts

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:

