

## **1. INTRODUCTION**

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

CGB

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

Other

#### **1.2.1 Please specify**

french sugar beet growers confederation

### **1.3 Please write down the address (postal, e-mail, telephone, fax and web page if available) of your organisation**

43 rue de Naples 75008 Paris France

## **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 main problem is to define the conditions under which farmers can choose the relevant varieties for their farm. Therefore, the main problem is to define: - the information farmers need to make an appropriate choice taking into account more and more parameters related to productivity, quality and sustainability; - the most effective way of making reliable the information delivered to farmers. The European Commission paper does not address this important issue.

### **2.3 Are certain problems underestimated or overly emphasized?**

Overestimated

#### **2.3.1 Please indicate the problems that have not been estimated rightly**

- Costs of the regulation implementation: the cost for Member States budget of the regulation implementation is not high should the tests be carried out under the supervision of the national authorities and not directly by them. - Sustainability issues: in the beet sector, VCU tests are not only focussed on productivity but also on sustainability; therefore it is wrong to assert that sustainability issues is a problem linked to the present legislation.

#### **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. In the sugar beet sector, CGB and growers have experienced for many years a high efficiency of the current system for farmers. However it can probably be improved.

## **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 main general objective is to improve productivity of agriculture and to ensure a stable and high quality of seeds. -Informing farmers about S&PM has not only to be achieved as mentioned in the EU document, but it needs also to be achieved in a reliable and impartial way.

### **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 get a good cost/efficiency ratio. -The choice of varieties for farmers is currently very large; therefore, increasing the choice more is not necessary; it might be a bad orientation since too much choice could blur the differences between varieties. -Fostering innovation is not achievable through S&PM legislation but through GMO legislation.

### **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**

1

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

2

### **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 present system with the view to better achieving good objectives.

### **4.3 Are certain scenarios unrealistic?**

Yes

#### **4.3.1 Please state which one(s) and why**

Scenario 2, 3, 4, 5: DUS tests carried out by the industry is not realistic for D (dinstinction)  
Scenario 5: Each member State has got specific farming conditions which need catalogue at national level; moreover the scenario 5 would likely cost more than the current system.

### **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)

-Impact on the rationalization of varieties farmers choice; -Impact on the genetic progress, - Impact on farm productivity and sustainability

#### 5.3 Are certain impacts underestimated or overly emphasized?

Underestimated

##### 5.3.1 Please provide evidence or data to support your assessment:

According to the french beet institut (ITB), genetic progress is responsible for 50% of sugar beet yields increase. Therefore the impact on the genetic progress of any S&PM legislation change has to be estimated.

#### 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

Very 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 at national level by public authorities, or to a certain extent under the supervision of national public authorities. However, the objective of a better harmonisation between member States is good.

### 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?**

-Registration of varieties: scenario 1 with DCU carried out by the industry under the supervision of national authorities; -Certification/Inspection: scenario 2; Registration of breeders: scenario 2  
Approach to conservation varieties: scenario 4

**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:**

Because of missing, overlooked or unrealistic objectives, scenarios and impacts, as explained in the previous answers, one cannot agree with the comparison of the scenarios as proposed by the European Commission analysis.

**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:**

