

## **1. INTRODUCTION**

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

CETIOM (Centre Technique Interprofessionnel des Oléagineux Métropolitains)

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

Competent Authority (CA) involved in S&PM variety and material registration; User of S&PM;  
Other

#### **1.2.1 Please specify**

we are the technical institut in France in charge of oilcrops operating under the control of the Ministry of Agriculture , with public missions, in the field of applied research and development . We are linked to farmers organisations and involved in the registration process as farmers representatives.

### **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)**

1) global challenges that agriculture has to solve 2) The necessity to promote progress and genetic improvement to induce economic competitiveness and ability to answer markets and citizens demands. 3) connexions with environmental policies

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

Overestimated

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

registration costs are shared among stakeholders carrying out field trials or analyses under the supervision of officials

### **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)**

The major objective should be productivity of new genotypes , genetic progress on several criteria including sustainability, resistance to bioagressors, quality, stability precise description of each genotype is a key objective . It is a guarantee and a confidence element for the farmer about what he is going to buy and to crop in his field. an other objective should be a clear , public and official information with transparency on methods and general acceptance of results among the

stakeholders.

**3.3 Are certain objectives inappropriate?**

Yes

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

It is surprising to find objectives like improvement of competitiveness, or choice and access of farmers to a wide range of genotypes, only as specific objectives. These should be major objectives

**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**

5

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

4

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

2

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

1

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

3

**3.6 Other suggestions and remarks**

concerning question 3.4 the VCU of well defined materials is a key question for farmers who have a strong demand for independent, objective and powerful results as early as possible. Concerning question 3.5 : item 4 (contribute to improve....) : favour innovation should be the main element, sustainability the second and biodiversity is not necessarily needed because there are other regulations for that. Favour INNOVATION should be the main objective.

**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)**

actual french system is rather good scenarios should include the improvement of current systems with promotion of more coordination among SM

**4.3 Are certain scenarios unrealistic?**

Yes

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

Most of them are !! the only partially acceptable one is the scenario one for DUS and VCU, and scenario 2 for commercial seeds certification

**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)**

If a majority of scenarios would be performed, alternative systems of variety testing would have to be developed with increasing charges and competitiveness penalties for farmers and farmers organisations. Agronomic and productivity consequences are not well taken into account .

**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**

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:**

There are elements to be taken in Scenarios 1 & 2 . Strong quality of VCU aiming to guarantee genetic progress on productivity, diseases resistances, quality , with a good open and recognized information are needed and very important for farmers . These objectives are excluded by scenarios 3 to 5 which are fully unacceptable.

**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?**

Scenarios 1 and 2 could be combined for good DUS and VCU , with improvement of costs and a better european coordination among Member states.

**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:**

see the different comments

**7. OTHER COMMENTS**

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

the french actual system of CTPS should have been studied in details . This system has been very powerfull during many years , able to promote genetic progress, able to take into account technical innovations, able to promote economic competitiveness , able to adapt to new contexts or policies (exple Grenelle environmental policy). All the stakeholders : officials, researchers, seeds companies, users, food industry, consumers, farmers are around the table to make the system better each year . All those stakeholders are also sharing the costs, directly or through carrying out field trials or analyses, or through examining results in experts commissions . The door is open for international collaborations for MS if they wish to contribute for a successfull european syst , through DUS harmonization, and geographically extended trials networks for the main arable crops.

**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:**

