

1. INTRODUCTION

1.1 What is the name of your organisation?

EURALIS SEMENCES

1.2 What stakeholder group does your organisation belong to?

Breeder of S&PM; Supplier of S&PM; SME company

1.2.1 Please specify

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)

- Impact on SMEs of transferring burdens from public authorities to private sector. If international companies would easily mobilize resources, for SMEs this transfer could affect their ability to perform innovation. - Complexity of legislation is closely related to the biological reality of species involved. A good balance has to be found between necessary segmentation (according to species) and an overall harmonization of the implementation. - Impact of new legislation on marketing S&PM outside the UE (certification, OECD regulation,..).

2.3 Are certain problems underestimated or overly emphasized?

Underestimated

2.3.1 Please indicate the problems that have not been estimated rightly

- Opportunity for a scenario improving harmonization in implementing the current system in all MS without a complete change of the system. - Sustainability is already taken into consideration in the current system (registration process includes environmental criteria as per ex. Resistance to diseases). - Possibility to speed up the registration process is not mentioned although some examples already exist.

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?

Yes

3.2.1 Please state which one(s)

Europe is the first exporter of seeds and compliance with international rules of trade is a necessity to maintain this activity.

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?

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

1

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

3

Empower users by informing them about seed and propagating material

4

Contribute to improve biodiversity, sustainability and favour innovation

2

Promote plant health and support agriculture, horticulture and forestry

5

3.6 Other suggestions and remarks

All the items have a great importance, so it's really difficult to prioritise them. Our wish is to put priority one on each item (but impossible)

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)

None of the scenarios is fully in line with the objectives

4.3 Are certain scenarios unrealistic?

Yes

4.3.1 Please state which one(s) and why

Scenario 2 - Management of the Common Catalogues remain unchanged - Lack of improvement of the information/traceability for users. Scenario 5 - Insufficient definition of VCU and possible differences between crops (vegetable / agricultural)

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?

5.2 Have certain impacts been overlooked?

5.2.1 Please state which one(s)

5.3 Are certain impacts underestimated or overly emphasized?

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)?

5.5 How do you assess the possible impact of the various scenarios on your organisation or on the stakeholders that your organisation represents?

Scenario 1

Scenario 2

Scenario 3

Scenario 4

Scenario 5

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

6. ASSESSMENT OF SCENARIOS

6.1 Which scenario or combination of scenarios would best meet the objectives of the review of the legislation?

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?

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:

