

1. INTRODUCTION

1.1 What is the name of your organisation?

EUROPEAN FLOUR MILLERS

1.2 What stakeholder group does your organisation belong to?

Professional user of raw material produced by agriculture, horticulture or forestry

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)

- The global food security crisis and new climatic change constraints are not taken into account. - There is no reference to the biotechnology issue, which obviously has a role to play in increasing the agricultural raw materials supply. - Beside plant health and human health, animal health should be mentioned.

2.3 Are certain problems underestimated or overly emphasized?

Overestimated

2.3.1 Please indicate the problems that have not been estimated rightly

All other issues.

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 objectives of production quality and regularity are missing. They are crucial for the European flour millers and food first-processors in general. - Plant resistance to plant diseases, fusarium, ergot, the absorption rate of heavy metals should be quality criteria for new seeds. - The issues of innovation and traceability (reliable users' information) are also overlooked by the Commission document.

3.3 Are certain objectives inappropriate?

Yes

3.3.1 Please state which one(s)

The objectives of optimizing and adapting as regards the main objectives food and feed security and safety as well as production sustainability in general better fit than the administrative burden.

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

2

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

5

Empower users by informing them about seed and propagating material

4

Contribute to improve biodiversity, sustainability and favour innovation

3

Promote plant health and support agriculture, horticulture and forestry

1

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)

Only a combination of Commission evolution scenarii should lead to the appropriate answers.

4.3 Are certain scenarios unrealistic?

Yes

4.3.1 Please state which one(s) and why

Most of them seem unrealistic.

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)

- Weakening of the suppliers, operators position at national, EU and international levels, - Impact on food security, - Impact on environmental aspects (resistance against new diseases and pests), - Agronomical impact and impact of the evolutions on the production systems.

5.3 Are certain impacts underestimated or overly emphasized?

Underestimated

5.3.1 Please provide evidence or data to support your assessment:

The lack of mandatory certification for agricultural crops could lead to the increase in phyto-sanitary and sanitary problems.

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:

We remain at your disposal to explain the reasons and our concerns more deeply.

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 No. 2 is good. A combination of 1 and 2 seem preferable, although it does seem unrealistic.

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:

Objectives	Level of expected achievement	Alternate scenario	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5
GENERAL	Productivity, quality and regularity of the agricultural and forestry productions	XX X X	Health and quality of S&PM	- X X -	Functioning of the internal market	X X	Information of users
SPECIFIC	Reduction of costs and administrative burden for public authorities	XX XX	Sustainability/biodiversity	-	XX X -	Reduction of costs and administrative burden for the industry	XX -
	Impact on the diversity of the operators	- - XXX XX X	Improve farmers' informed choice	- - XX XX -	Information reliability	XXX XX	Innovation
	Improve competitiveness	XXX XXX -	Creativity	Improve	XX XX -	OPERATIONNAL	Simplification
	Optimisation of the means	- X X	Harmonisation	- - XX XX	Flexibility	-	X X
	Consistence with other EU policies	- X X					

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:

