

1. INTRODUCTION

1.1 What is the name of your organisation?

AMSEM-Romanian Association of Breeders, Producers and Traders of Seeds and Propagating Material

1.2 What stakeholder group does your organisation belong to?

Breeder of S&PM; Supplier of S&PM; SME company; Company operating on national level

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

Gheorghe Hedesan AMSEM Executive President Bucharest, Str.Vasile Cristescu 7, sect.2, Postal Code 021984 Tel/fax +40213177291 e-mail office@amsem.ro web : www.amsem.ro

2. PROBLEM IDENTIFICATION

2.1 Are the problems defined correctly in the context of S&PM marketing?

Yes

2.2 Have certain problems been overlooked?

No

2.2.1 Please state which one(s)

2.3 Are certain problems underestimated or overly emphasized?

Underestimated

2.3.1 Please indicate the problems that have not been estimated rightly

Overestimated: Sustainability issues because sustainability goals are already taken care of, by breeders in their breeding programs; to much restrictions
Underestimated: the bureaucracy and unflexibility management, to much implication of the state in the seeds market and to many restrictions on the free market

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)

Ensuring non-discriminatory conditions for SME breeders

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?

Yes

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

1

Empower users by informing them about seed and propagating material

2

Contribute to improve biodiversity, sustainability and favour innovation

3

Promote plant health and support agriculture, horticulture and forestry

5

3.6 Other suggestions and remarks

introduce in the first. rank "free internal market..."

4. OPTIONS FOR CHANGE

4.1 Are the scenarios defined correctly in the context of S&PM marketing?

Yes

4.2 Have certain scenarios been overlooked?

Yes

4.2.1 Please state which one(s)

A combination of elements presented in the different scenarios might lead to a many better scenario

4.3 Are certain scenarios unrealistic?

Yes

4.3.1 Please state which one(s) and why

: because is not better regulations

4.4 Do you agree with the reasoning leading to the discard of the "no-changes" and the "abolishment" scenarios?

No

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 impact on SMEs having to perform registration themselves, this will have the same adverse

impacts as in scenario 2. "Official label" is not necessary under accreditation in all scenario

5.3 Are certain impacts underestimated or overly emphasized?

Underestimated

5.3.1 Please provide evidence or data to support your assessment:

Rightly estimated 4 Underestimated 1;2;3; Overestimated 5 In scenario 5 the registration costs under CPVO will be surely much more expensive than in most of the Member States

5.4 How do you rate the proportionality of a generalised traceability/labelling and fit-for-purpose requirement (as set out in scenario 4)?

3 = proportional

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

Very negative

Scenario 2

Rather negative

Scenario 3

Rather negative

Scenario 4

Fairly beneficial

Scenario 5

Rather negative

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

no answer

6. ASSESSMENT OF SCENARIOS

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

Scenario 4

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?

Yes

6.2.1 Please explain:

7. OTHER COMMENTS

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

6.1. Scenario 4 will provide a choice for the operator, how costly he shall register and certify his

varieties. Scenario 4 should be more clarified and elaborated in terms of the harmonized description. Also the term "official label" should be change with "EC supplier label" S&PM review is necessary into a single Regulament and also the simplification into flexibility for choise of breeders, suppliers and users of different member state. IS VERY IMPORTANT to have the rules for only one organisation of Competent Authority as public authority in each member state which represent the stakeholders in the first (operator and users) and the government as the second. Also the governments representatives members in EC Standing committee of seeds tend to regulate the bureaucracy We consider that the VCU criterias is better to remain on the breeders public recomandations.

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:

