

1. INTRODUCTION

1.1 What is the name of your organisation?

The Knowledge centre for Agriculture, Plantproduction

1.2 What stakeholder group does your organisation belong to?

Other

1.2.1 Please specify

An advisory service to farmers

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?

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?

Rightly estimated

2.3.1 Please indicate the problems that have not been estimated rightly

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 of the present legislation is to improve productivity, based on a continuous effort to develop new and improved varieties. A transparent market for S&PM must be based on reliable and up to date statistics on production, consumption, trade and stocks. The issue of plant breeding/innovation needs higher attention as new and better varieties are important in securing the future for European agriculture, therefore the VCU testing must be maintained at a high level.

3.3 Are certain objectives inappropriate?

Yes

3.3.1 Please state which one(s)

It is vital that there is focus on both yield improvement and sustainability

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

4

Empower users by informing them about seed and propagating material

2

Contribute to improve biodiversity, sustainability and favour innovation

5

Promote plant health and support agriculture, horticulture and forestry

3

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)

The individual scenarios are not suited to fulfil the objectives of the legislation. A combination is needed based on scenario 2.

4.3 Are certain scenarios unrealistic?

Yes

4.3.1 Please state which one(s) and why

Option 3 and 4 will undermine VCU, that is essential for agricultural crops.

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?

No opinion

5.2.1 Please state which one(s)

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

Rather negative

Scenario 2

Very beneficial

Scenario 3

Very negative

Scenario 4

Very negative

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:

Concerning scenario 5 we find that one EU based authority will not be able to include national growing conditions in their decisions

6. ASSESSMENT OF SCENARIOS

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

Scenario with new features

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

Scenario 2 combined with other elements will be the best solution. The system must be harmonised for the entire EU. The possibility to have more strict quality demands on a national scale, must be included in the coming legislation

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:

We find that the table is inconsistent.

7. OTHER COMMENTS

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

It is important to maintain and develop the possibility for the farmer to use farm saved seed, in

respect of the breeders right to a royalty. It is important that is possible to use farm saved seed in all agricultural 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:

