1. INTRODUCTION

1.1 What is the name of your organisation?
The Research Centre for Cultivar Testing (COBORU)

1.2 What stakeholder group does your organisation belong to?
Competent Authority (CA) involved in S&PM variety and material registration

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
PL-63-022 S?upia Wielka sekretariat@coboru.pl tel.: +48 61 2852341 fax.: +48 61 2853558 www.coboru.pl

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?
Yes

3.2 Have certain objectives been overlooked?
Yes

3.2.1 Please state which one(s)
DUS testing for national PVP / variety registration purposes

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
2

Empower users by informing them about seed and propagating material
3

Contribute to improve biodiversity, sustainability and favour innovation
5

Promote plant health and support agriculture, horticulture and forestry
4

3.6 Other suggestions and remarks

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?
No

4.2.1 Please state which one(s)

4.3 Are certain scenarios unrealistic?
Yes

4.3.1 Please state which one(s) and why
Scenario 5 - it seems to be too centralized and difficult to implement correctly in all MS; risk of losing of national expertise in S&PM, especially in smaller MS

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?
Yes

5.2 Have certain impacts been overlooked?
No

5.2.1 Please state which one(s)

5.3 Are certain impacts underestimated or overly emphasized?
Rightly estimated

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)?
4 = not very 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
Don't know

Scenario 2
Rather negative

Scenario 3
Very negative

Scenario 4
Don't know

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:
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 2

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:
1. We strongly support the review of EU legislation on S&PM in order to make it more harmonized, simpler and more user friendly. 2. National Plant Breeder's Right regimes are not taken into account, at all. This is correlated with DUS testing in the future. In our country DUS tests are done both for national listing as well as for national variety protection purposes. 3. The role of the concept "one key several doors in DUS testing" is not clearly defined in the scenarios in relation to the variety registration. 4. The finally chosen scenario should take into consideration both the economical situation in seed sector of different MS and the above-mentioned aims of the

review. 5. In our opinion, the scenarios 1-3 and 5 especially favour bigger breeding and seed companies.

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: