

## **1. INTRODUCTION**

### **1.1 What is the name of your organisation?**

Federation Nationale des Producteurs de Chanvre (FNPC)

### **1.2 What stakeholder group does your organisation belong to?**

Other

#### **1.2.1 Please specify**

FNPC has 2 mains activities: hemp breeder and representative of all french farmers producing industrial hemp. Otherwise, a part of staff is involved too in certified hemp seed production.

### **1.3 Please write down the address (postal, e-mail, telephone, fax and web page if available) of your organisation**

20, rue Paul Ligneul, 72 000 Le Mans France +33 2 43 51 15 00 o.beherrec@fnpc.org

## **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)**

Food safety of Europe for the last 50's year is based on 3 pillars: 1) genetic to ensure improvement of quality and quantity. Genetic needs a public orientation to ensure long term improvement and to respect the objective. 2) seed, to garanty to farmers that genetic could be available. 3) Agronomy, part made by farmer.

### **2.3 Are certain problems underestimated or overly emphasized?**

Overestimated

#### **2.3.1 Please indicate the problems that have not been estimated rightly**

Registration is said to be long and strict, but breeding activity is long. Registration doesn't appear so long compared to breeding. Regulation give the possibility to each state to transfer under official control part of the works. Each state could choose the best way for him to have an impact on the cost.

### **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 only objective is food safety in term of quality and quantity, for us and for our children in the future. This must be clearly specify.

### **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**

5

**Contribute to improve biodiversity, sustainability and favour innovation**

2

**Promote plant health and support agriculture, horticulture and forestry**

4

### **3.6 Other suggestions and remarks**

It is clear there is a need to simplify the regulation as these regulation have been written with year. Modern tools could help to have more information available to public and farmers, or to decrease some costs. These tools must be use.

## **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)**

DUS tests could be made using molecular analysis. It could be a good way to decrease costs and to have results quickly. These tests could be extend to seeds certification for part of the tests (variety purity). It miss too a system where there is an harmonised control by EU for breeding objective all over Europe.

**4.3 Are certain scenarios unrealistic?**

Yes

**4.3.1 Please state which one(s) and why**

Scenarii 3 and 4. These scenarii leads to a regression for agriculture at a time where we need to improve quantity and quality. These scenarii will be too a problem for small and medium enterprise. For these societies, access to market could be more difficult at the beginning, even if their material is better (seeds or variety), as big societies could put a range of varieties on the market. Rapidly, this will conduct to decrease biodiversity.

**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)**

Decreasing of registration processing will conduct to loose of long term vision for breeding purpose, and will be a lack to obtain food safety for the long term. This will be more important if we have to increase quality and quantity for the future, and/or improve biodiversity. European leadership on seeds and varieties, with a part of commercial exchange in favor of Europe, could disappear if we loose an organisation. And we could see imported seeds improve the volume, so have a commercial impact for Europe.

### **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**

Very beneficial

#### **Scenario 2**

Very beneficial

#### **Scenario 3**

Very negative

#### **Scenario 4**

Very negative

#### **Scenario 5**

Neutral

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

Farmers are flexible and could easily change their way of working, but they need to have pillar, as varieties and seeds, for that. For them to be able to improve quantity and quality, they need to have access to information. This problem of information will be more stronger in the near future by including environmental aspects, different way of farming (conventional, organic, ...), and registration is the best solution with one organism given information.

## **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?**

No

**6.2.1 Please explain:**

Scenario 2 is not negative for health and quality. For user information, scenario 2 could have a positive impact by changing access to information during registration. For durability and biodiversity, scenario 4 will lead to improve at the beginning, but not in a medium term. For competitiveness, scenario 3 and 4 could have positive impact at the beginning, but will quickly lead to negative impact.

**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:**

