

## **1. INTRODUCTION**

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

SA JOUFFRAY-DRILLAUD

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

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

#### **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)**

Level of Administrative Burden: -the absence of synergy between MS in sharing tasks (e.g. automatic recognition of DUS between MS, no possibility to assess VCU in homogenous agro-climatic zones, possibly across national intre EU borders) leads to cost increase at national levels and lack of information for consumers. - The impact of environmental criteria added to the existing ones is not mentionned as increasing costs. - The private sector could bear, to some extent, the burdens transferred from public authorithies, mainly for VCU testing. Distortions on the internal market: - The functioning of the common catalogue is not taken into account: delays and access modalities. - Harmonization in implementing the current system in all MS should be a 1st objective. Sustainability issues: - The current regulation already takes into consideration sustainability criteria. - This survey does not provide a clear definition of sustainability which should not be opposed to productivity. In particular, the need to improve, or at least to maintain, productivity under adverse conditions (e.g. drought, pathologies) should be emphasized. The adaptation of varieties to new economic itineraries and better crop management should be indicated.

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

Underestimated

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

General remarks: - The existence of regulation is not a limitation to innovation and, in some cases, supports it. - Speeding up of the registration process was not mentioned in the scenarios (e.g. marketing in advance procedures, two DUS cycles performed in one year, for almost all vegetable species in France).

#### **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)**

„Independency of food and feed supplying in EU by productivity, quality and consistency of crop productions? is not mentioned. - „Enhancing of productivity combined with a sustainable agriculture? is not clearly indicated. - „Food safety and quality in EU through productivity? has not been included as a general policy objective, while S&PM is at the origin of every food pathway.

**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**

2

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

4

**Empower users by informing them about seed and propagating material**

3

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

1

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

5

**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?**

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 1 - Only answers to the „cost objective? and does not fulfil the requirements of the other objectives. - Partly takes into account the objective of cost reduction: impact of cost transfer to the

private sector is not weighted. Scenario 3 - Introduces market distortions due to the assessment of VCU and certification being optional. - Exclude ornamentals. And what happens with ornamentals in the other scenarios? Scenario 4 - Goes against the general objectives of competitiveness and innovation. - Presents risks of degrading the overall quality of the varieties on their performance, seed quality and identity. - Would badly influence food security since low quality seeds could be marketed, due to the enforced low seed costs. - Would introduce distortions with a 3-level system which would create confusion and would induce a loss of visibility on markets. - Means serious risk to users? ability to make an informed choice, due to lack of impartial and reliable information. - Would lead to a limited choice of varieties driven by processors on industrial crops, dangerously reducing the number of varieties in some specific species (see the current market position of spring barley varieties in EU). - Presents a risk of negative impact on international trade as a negative model for standard-setting at the international level.

**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**

Scenario 5 is a good compromise for Jouffray-Drillaud.

**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)**

Impact on users (farmers)

**5.3 Are certain impacts underestimated or overly emphasized?**

Overestimated

**5.3.1 Please provide evidence or data to support your assessment:**

Actually, some impacts are underestimated and others overly emphasized. Scenario 3 and 4 will have a bad impact on innovation particularly on forage species as this will lead to the actual situation of forage species in USA where innovation and value on this market is very low. Scenario 1 could preserve the value on the forage market but the costs will still be high and information for farmers at EU level will still be heterogeneous. The cost for the private sector for scenario 2 will increase and can lead to less innovation.

**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**

Fairly beneficial

**Scenario 3**

Very negative

**Scenario 4**

Very negative

**Scenario 5**

Very beneficial

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

Scenario 5 can help breeders at national level to have access to all EU market at less costs than today and guaranty the protection of innovation.

**6. ASSESSMENT OF SCENARIOS**

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

Scenario 5

**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:**

Negative impact of scenario 3 and 4 on inovation and research, environmental impact and competitiveness are not well estimated and quite negative.

**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:**

