

## **1. INTRODUCTION**

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

SARL TOULEMONDE FRERES

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

User of S&PM

#### **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)**

we don't answer to the questions : How to improve the genetic progress in EU? How to improve the quality of the materiel in every country?

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

Overestimated

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

The cost is not an issue

#### **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 issue of the garanti of the product links with the quality of the certification is totally overlooked

### **3.3 Are certain objectives inappropriate?**

Yes

#### **3.3.1 Please state which one(s)**

to reduce the cost is not an objective

### **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**

2

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

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

4

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

1

**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)**

For the fruit it is necessary to have a scenario who authorize the commercialisation before to obtain the DUS, because the time necessary to make the official examination is too long : 4 to 6 years, and the industry would not wait that time to introduce a new cultivar in the orchard

**4.3 Are certain scenarios unrealistic?**

Yes

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

The control of the plant material in fruit have to be done by an official examiner : scenario 2-3-4-5 are appropriate. We need to have a guaranty on the final product and not only a guaranty on the process, because of the very important consequences of the plant material on the industry

**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**

There is no scenario who respect the quality of our country certification who has been built since 50 years with the participation of all the fruit industry. This certification is the best guaranty of the quality of the plant material. His efficiency has been proved with the crisis of PPV or FIRE BLIGHT.

#### **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 the evolution of the industry, the impact on the environmental aspects, the motley between the operators in each country (include official operators)

**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**

Fairly beneficial

**Scenario 2**

Very negative

**Scenario 3**

Very negative

**Scenario 4**

Very negative

**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:**

On each scenario there is some elements with a very bad impact on the fruit industry

**6. ASSESSMENT OF SCENARIOS**

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

A combination of scenarios

**6.1.1 What are your views with regards to combining elements from the various scenarios into a new scenario?**

It is important to take incount the particularite of the plant materiel in fruit, with the long time necessary to evaluate the variety and the impact of the plant materiel on the industry. Plant materiel need a special combination of some elements countain in various scenario. My new scenario would be a combination of : scenario 4 for the variety registration with an official examination for DUS, scenario 1 for the control of lots with official control for the official label (escluding the official supervision)

**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:**

The objectives proposed are not my objectives !

**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:**

