

1. INTRODUCTION

1.1 What is the name of your organisation?

CHAMPAGNE CEREALES

1.2 What stakeholder group does your organisation belong to?

User of S&PM; Other

1.2.1 Please specify

Champagne Céréales is a French agro-industrial cereal group. At the heart of our group is a cooperative (a turnover of 674 million euros): • It federates 8285 independent farmers, • A presence in the North-East quarter of France, • 154 silos spread over 7 departments, • 2,762 million tonnes harvested in (2009/2010), • Over 3000 breeder members

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

2 Rue clement Ader BP 1017 51685 REIMS FRANCE (33) 0326786200 <http://www.champagne-cereales.com/>

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?

Yes

2.2.1 Please state which one(s)

The positive impact of selection and marketing of seeds on production are been overlooked: - Improvement of productiveness and quality (flour-milling wheat, barley brewing, fava bean for human feeding) - Impact of the seeds sector in the reduction of inputs (chemicals, fertilizers, resistance to parasites). The functioning of the common catalogue is not taken into account: delays and access modalities

2.3 Are certain problems underestimated or overly emphasized?

Underestimated

2.3.1 Please indicate the problems that have not been estimated rightly

The liberalization of the market is not the only priority. It is necessary to think about the Sustainable Development which must be carried on by public institutions. The existence of regulation is not a limitation to innovation and, in some cases, supports it. In seeds, regulations are there to encourage a good management of a common gene patrimony (notion of Public Goods).

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)

For future, we need to have a sustainable agriculture - Economic (productiveness / quality / quantity to feed the world) - Environmental (protection of environment and biodiversity). - Social

(take into account the importance of seed industry)

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

4

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

5

Empower users by informing them about seed and propagating material

2

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

These objectives are not compulsorily contradictory and can be taken into account at the same time in a global thought.

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)

It would be a scenario whose target would be to improve the current system through financial optimisation and integration of new environmental issues.

4.3 Are certain scenarios unrealistic?

Yes

4.3.1 Please state which one(s) and why

Scenario 3 and 4, very liberal, are unrealistic. By allowing breeders and suppliers to supply the market without any formal and official control, compare to the current situation these scenarios represent a strong regression, specially with regard to user informations and public leverage aimed at orientating genetic progress.

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

The totality of the commercialized varieties must be inscribed to the catalogue and subjected to all the control tests.

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 european seed industry of optional scenarii 3 and 4 have not been really studied

5.3 Are certain impacts underestimated or overly emphasized?

Underestimated

5.3.1 Please provide evidence or data to support your assessment:

For instance ergot cereal, the farmers with the seed regulation use diseases-free varieties.

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

Rather negative

Scenario 2

Very beneficial

Scenario 3

Rather 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:

We are clearly in favor of compulsory registration, and certification of seeds for agricultural crops

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?

For agricultural and vegetable crops the scenario 2 seems to be the most adapted to reach the objectives of the european policy on seeds

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 impact on competitiveness and trade of scenarii 3 and 4 is clearly negative with the end of harmonized standards through OECD seed scheme

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:

