

1. INTRODUCTION

1.1 What is the name of your organisation?

Central Controlling and Testing Institute in Agriculture in Bratislava

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

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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?

Underestimated

2.3.1 Please indicate the problems that have not been estimated rightly

VCU tests

2.4 Other suggestions or remarks

VCU should remain unchanged for agricultural crops – provided by impartial organization

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?

No

3.2.1 Please state which one(s)

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 opinion

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

5

Empower users by informing them about seed and propagating material

4

Contribute to improve biodiversity, sustainability and favour innovation

2

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?

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

Scenarios 2 and 3: Passing the identity tests to the industry is unrealistic in the Slovak conditions. The industry consists of mostly smaller companies (SMEs) that not necessarily have the facilities to do the necessary testing. The problems can occur also concerning the question of the transparency and confidentiality of the official tests performed by the industry. For the breeding companies the protection of their basic material is principal. Information on the value of varieties provided on the sole of responsibilities of plant breeder's will not be transparent and depending on the competition of the companies. Harmonization of the VCU testing methods in the EU seems to be very difficult due to the different agro climatic conditions, demand of market and other factors. Scenarios 5: The system of testing is not clearly defined - how CPVO will decide in which countries the tests will be carried out. The costs for registration procedure will be increased for Slovak breeders.

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)

negative impact on SMEs companies

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)?

3 = 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

Fairly beneficial

Scenario 2

Neutral

Scenario 3

Very negative

Scenario 4

Rather 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:

Scenario 1 and 2 - the quality of testing and objectivity will be kept; increased incomes and maintain employment Scenario 3 and 4 - negative impact on plant health and quality of S&PM; negative impact on employment and jobs Scenario 5 - negative impact on employment and jobs

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?

The combination of the scenarios will be necessary. None of the scenarios fulfill the demands of all users of the system. The discussions between the different parties are crucial. The key features of new scenario (or combination of scenarios) are the high quality of the S&PM at least on the present level, the transparency, lower administrative burden and high level of the plant breeder's rights and enforcement of the rights, the impact on innovations and research and on biodiversity. The economic features and breeding activities for all crops (also for minor crops must be balanced).

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:

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:

