

## **1. INTRODUCTION**

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

Flemish authority: Agency for Agriculture and Fishery

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

Competent Authority (CA) involved in S&PM certification and control; 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?**

Yes

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

stringent national standards can lead to unfair competition

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

No opinion

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

#### **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?**

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?**

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**

4

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

1

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

5

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

3

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

2

**3.6 Other suggestions and remarks**

Maximal harmonisation between member states (procedures, documents...)

#### **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**

harmonisation of the costs is unrealistic (scenario 1)

**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**

#### **5. ASSESSMENT OF OPTIONS**

**5.1 Are the impacts correctly analysed in the context of S&PM marketing?**

Yes

**5.2 Have certain impacts been overlooked?**

No

**5.2.1 Please state which one(s)**

**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)?**

2 = fairly 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**

Neutral

**Scenario 3**

Very negative

**Scenario 4**

Fairly beneficial

**Scenario 5**

Rather negative

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

Scenario 1 does not encounter the need for a modernisation of current S&PM legislation. Harmonization of costs at EU level appears to be a nearly impossible challenge. Probably more expensive for our stakeholders. Scenario 2: status quo Scenario 3 would probably be the most impracticable. It is quite difficult to imagine the maintenance of official certification facilities only for export. This scenario is not really compatible with the evolution of seed certification in third countries Scenario 4: maximal flexibility, also for conservation varieties and other niche products Scenario 5 will create a too large gap between operators and centralized control. This scenario does not meet the requirement of flexibility, specially for niche markets. We would however consider favourably the "certification procedures" according this scenario. Not really interesting for SME's and probably to expensive.

**6. ASSESSMENT OF SCENARIOS**

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

Scenario 4

**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?**

Yes

**6.2.1 Please explain:**

## **7. OTHER COMMENTS**

### **7.1 Further written comments on the seeds and propagating material review:**

Scenario 4 could probably be adapted to take into consideration the specificity of FRM (to be analyzed more concretely) . Certification is not applicable for FRM, but official control could be required for some step of the production scheme (seeds harvesting e.g.). Sustainable agriculture should be a major objective of the adapted VCU It appears that the scenarios partially/greatly overlook the problematic of small and medium enterprises in the sector. The impact on the sustainability of local or regional SMEs is probably a crucial factor to guide the choice of a suitable scenario. Concentration of new varieties production and marketing in the hands of fewer enterprises could be considered detrimental to sustainable agriculture. Whatever the scenario, option of official testing or official control should be maintained to supplement the limited resources of SMEs.

### **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:**

