

## **1. INTRODUCTION**

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

Pre Basic Growers Association, a grouping of producers of pre basic seed potatoes in the UK

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

Supplier of S&PM; 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)**

Especially for seed potatoes plant health issues have either been overlooked or have been given insufficient weight. Because of the manner in which seed potatoes are multiplied plant health is significantly more important than with true seeds. We also think that the inherent profitability (sustainability) of the seed potato industry should have been given more consideration.

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

Underestimated

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

Plant health and seed potato industry profitability.

#### **2.4 Other suggestions or remarks**

We remain unconvinced that the issues facing the European seed potato industry have been accurately analysed and presented. We do not recognise the range and extent of the problems presented by the scenarios nor the solutions that have been proposed.

## **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)**

Seed potato industry profitability and sustainability

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

Yes

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

We believe the paper places undue emphasis on smaller niche market issues and on conservation varieties.

**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**

3

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

4

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

2

**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)**

We believe a further option would be to take some aspects of each scenario.

**4.3 Are certain scenarios unrealistic?**

Yes

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

Any scenario that does not give due weight to plant health security is unrealistic for seed potatoes.

**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?**

No

**5.2 Have certain impacts been overlooked?**

Yes

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

The impact of plant health and industry profitability/sustainability

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

Underestimated

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

no answer

**5.4 How do you rate the proportionality of a generalised traceability/labelling and fit-for-purpose requirement (as set out in scenario 4)?**

No opinion

**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**

Rather negative

**Scenario 3**

Rather negative

**Scenario 4**

Rather negative

**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:**

no answer

**6. ASSESSMENT OF SCENARIOS**

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

Scenario with new features

**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**

We favour official control of the marketing of seed potatoes but with sufficient flexibility to meet the changing requirements of the industry and its customers. Specifically, we favour a scheme with uniform EU minimum standards based on UNECE Standards along the lines proposed by the EU's group of experts. We support the retention of Community Grade regions to protect plant health.

**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:**

We do not recognise the scale and range of problems presented and we do agree that the scenarios presented represent an improvement in regulating the sale and movement of seed

potatoes

## **7. OTHER COMMENTS**

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

The Pre Basic Growers Association feel that the issues affecting the marketing of seed potatoes in the EU have not been accurately or consistently defined and we do not believe that the scenarios presented as options for the future offer an improvement on the current arrangements. We are very surprised at the short period permitted for consultation – this issue is much too important to require such prompt responses.

**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:**

