1. INTRODUCTION

1.1 What is the name of your organisation?
Ministero delle politiche agricole alimentari e forestali

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
Ministero delle Politiche Agricole Alimentari e Forestali Dipartimento delle Politiche Competitive del Mondo Rurale e della Qualità Direzione Generale della Competitività per lo Sviluppo Rurale Ufficio COSVIR IX Via XX Settembre, 20 00187 Roma (Italia) tel. 0646656176 fax. 0646656277 www.politicheagricole.it

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
There is the need to analyze very thoroughfully the issues related to definitions in the different sectors. In fact, a common regulation that includes all the dispositions on seeds and propagating material appears of difficult realization. Just to start, the definitions scarcely could have a common meaning: as an example, the definition of basic material in the seed sector and in the forest material sector, definition of breeder, of maintainer that, in the seed sector, are inseparable from the varieties themselves and have nothing to do with the “supplier” figure proposed in the Plant Health normative.

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
1

Secure the functioning of the internal market for seed and propagating material
2

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
5

3.6 Other suggestions and remarks
Regarding point 3.4: on the basis of present legislation could be possible only for vegetable species but not for agricultural plant species (that require the VCU trials while for the vegetable species the VCU trials are not foreseen); The VCU is a fundamental aspect of registration procedure, and it gives the information on the agricoltural value and the use of a variety (point 3.5, third point)

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 opinion

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
N. 1: this would mean to leave the system as it is, and it has widely decided it's not possible. N.5: registration must remain at Member State level and so DUS and VCU trials; there is room for CPVO to approve and evaluate vareties denominations, under well established rules agreed with the Member States and the management of the Common Catalogue, at the same conditions stated before; N.4: the registration and certification procedures were thought to ensure a high level of quality, under every aspects, of the seeds; to allow a basic level seems to allow low quality seed material on the market;

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 opinion

5.2 Have certain impacts been overlooked?
No opinion

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)?
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
Neutral

Scenario 2
Very beneficial

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:
On a general base, Italy do not express a preference for a particular scenario. In this phase of discussion it seems a better option to take into consideration the most interesting aspects from all the proposed scenario. Particularly, it seems interesting the possibility to establish a general regulation, with general principles, followed by applicative directives with the aim of allowing a flexibility of implementation to the Member States.

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?

On a general base, Italy do not express a preference for a particular scenario (maybe a slight favour to n. 2). In this phase of discussion it seems a better option to take into consideration the most interesting aspects from all the proposed scenario. Particularly, it seems interesting the possibility to establish a general regulation, with general principles, followed by applicative directives with the aim of allowing a flexibility of implementation to the Member States.

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:
To reduce the management costs and to simplify the certification and registration system, a modification to the following points should be undertaken: - Register: reduce the number of species for which the register is mandatory, on the base of their commercial and economic importance; - DUS and VCU trials: they are essentials, but an assessment of the opportunity to involve the seed companies through a system of trials done under official supervision is needed; - Certification: extension of the certification under official supervision to the basic categories;

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: