

1. INTRODUCTION

1.1 What is the name of your organisation?

Mgr. Milan Schnorrer

1.2 What stakeholder group does your organisation belong to?

Consumer

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)

The problems of non-homogenous members of EU.

2.3 Are certain problems underestimated or overly emphasized?

Underestimated

2.3.1 Please indicate the problems that have not been estimated rightly

Overestimated: Sustainability issues; Underestimated: distortion of internal markets

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?

No

3.2 Have certain objectives been overlooked?

Yes

3.2.1 Please state which one(s)

All the scenarios address only redistribution of activities which stem from present legislation. However, content of the legislation has never been opened, which in my opinion should be the merit of "better regulation". Simplification of legislation should be the core objective.

3.3 Are certain objectives inappropriate?

Yes

3.3.1 Please state which one(s)

reducing costs for public authorities

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

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

Empower users by informing them about seed and propagating material

Contribute to improve biodiversity, sustainability and favour innovation

Promote plant health and support agriculture, horticulture and forestry

3.6 Other suggestions and remarks

It is unimportant to give priorities to objectives, which are irrelevant

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)

Abolishing the EU legislation on S&PM marketing; No Change A scenario for simplification of regulation which would bring cost savings primarily to the companies is needed. The companies ultimately bear all the financial costs, either by carrying tasks by themselves or through taxes which are used to finance the public authorities. In my opinion it is not possible to have one regulation for all crop groups.

4.3 Are certain scenarios unrealistic?

Yes

4.3.1 Please state which one(s) and why

Scenarios 2, 3 are very discriminatory to small companies which will not be able to carry out registration tests themselves. I disagree with scenario 5, because it brings unacceptable centralization to the system

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

It is necessary to clarify the section 2 of common catalogue proposed under scenario 4. If it should be useful, the variety descriptions must be much simpler, than in the 1st section

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)

In scenario 3, the impact on SMEs having to perform registration themselves, this will have the same negative impacts as in scenario 2. Unequal economical conditions of the new Member States to be taken considered.

5.3 Are certain impacts underestimated or overly emphasized?

Underestimated

5.3.1 Please provide evidence or data to support your assessment:

The negative impact of scenarios on SMEs is underestimated.

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

1 = 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 negative

Scenario 3

Very negative

Scenario 4

Fairly beneficial

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:

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

Abolishing the EU legislation on S&PM marketing, No change.

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:

Improving competitiveness will not be achieved with scenario 2, 3 and 5, since only bigger companies will be able to afford to test new varieties themselves. Sustainability seems to be very

misunderstood and biased for the benefit of multinational companies. I support a bigger emphasis on biodiversity.

7. OTHER COMMENTS

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

There is too much regulation from the EU, which damages to whole European Community and pulls it economically down. Brussel's administration is overgrown and overpriced. If we will continue in this direction, EU will be the weakest region among USA, Japan and BRICs, if it is not already. The objectives presented are a clear evidence of a gross misconception of the role of EC.

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:

