1. INTRODUCTION

1.1 What is the name of your organisation?

MINISTRY OF AGRICULTURE NATURAL RESOURCES AND ENVIRONMENT, DEPARTMENT OF AGRICULTURE, PLANT HEALTH AND QUALITY CONTROL SECTION, PLANT PROPAGATING MATERIAL

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

MINISTRY OF AGRICULTURE NATURAL RESOURCES AND ENVIRONMENT, DEPARTMENT OF AGRICULTURE, LOUKI AKRITA AVE, 1412, NICOSIA, CYPRUS, EMAIL ADDRESS: inspection@da.moa.gov.cy, TEL: 0035722408639, FAX: 0035722408645, WEBPAGE: www.moa.gov.cy/da

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)

Overlaping with other legislation (i.e. plant health)

2.3 Are certain problems underestimated or overly emphasized?

Rightly estimated

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
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?
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
Scenario 3. Certification should be an obligation for the internal market (for higher quality of propagating material). Of course it depends on the minimum requirements that will be defined.

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?
Yes

5.2.1 Please state which one(s)

In scenario 3, impacts on plant health have been underestimated. It only mentions «credible system». More strict rules have to be applied in some member states. A pest is maybe important for a country (pest free areas) but not for another.

5.3 Are certain impacts underestimated or overly emphasized?
Rightly estimated

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
Fairly beneficial

Scenario 2
Fairly beneficial

Scenario 3
Neutral

Scenario 4
Fairly beneficial

Scenario 5
Fairly beneficial

5.5.1 Please state your reasons for your answers above, where possible providing evidence or data to support your assessment:
Scenario 1: it is considered to be failrly beneficial as regards cost recovery (incomings will increase). All other terms remain the same as it is now (registration, controls). Scenario 2: it will reduce the «administrative cost» of our service (some procedures will be passed to private sector). Scenario 3: it means less effort for certification, but may arise the cost for official controls, in case of problems caused by the reduced number of controls (plant health issues may increase). Scenario 4: it gives too many options to choose (it has big flexibility). Scenario 5: it is considered to be fairly beneficial because it will reduce costs when material is produced under official supervision.

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?
We support a combination between the procedures for certification (controls of lots) from scenario 5 and registration procedures from scenario 4

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:
More information as regards certification procedures or definition of minimum requiremnets/criteria that are mentioned in some scenarios

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: