

## **1. INTRODUCTION**

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

CTPS, SECTION PLANTES PROTEAGINEUSES : Chairman and Technical Secretary

### **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**

CTPS-GEVES - Domaine de la Boisselière - 49250 Brion - France - Tel : 33 241 57 23 22 - Fax 33 241 57 46 19 - jean-michel.retailleau@geves.fr - http://www.geves.fr

## **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 contribution to answering the increasing global food demand must be strongly underlined. Tolerance of varieties to climatic change associated to new or stronger abiotic and biotic stresses must be a challenge taking into consideration geographic zone specificities (genotype x environment interactions).

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

Overestimated

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

Costs issue is overestimated. At the French level, the implementation of the regulation (registration and certification) does not represent 3% of the value of the sector but about 0,3%. The transfer of certain tasks performed by industry under official supervision would not reduce the total costs but transfer some public costs to the industry.

#### **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)**

- The general objective of productivity, quality and regularity of the productions should be placed in 1st position. - The evaluation of variety x environment interactions will amplify the knowledge of environment adaptation and will contribute to the biodiversity in agriculture.

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

Yes

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

The right objective is not to reduce the costs related to the application of the regulation, but to optimize, adapt and proportionate as regard the main objectives dealing with food and sanitary security, environmental risks, agricultural and forestry production sustainability, biodiversity protection...

**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**

5

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

3

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

2

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

1

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

4

**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)**

Miss a scenario, combining sub-parts of the different proposed scenarios: that enables the improvement of the current system through technical and financial optimisation (and not reduction) to integrate to the objectives of the current legislation (innovation, productivity, quality and regularity of the production) the implementation of the environmental issues. This can be done through the official environmental evaluation of the varieties and their sustainable use.

**4.3 Are certain scenarios unrealistic?**

Yes

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

Scenario 3, 4, 5 do not assure right evaluation of agronomic and technologic values of varieties for registration. Scenario 1 and 2 requires to define joint policy for evaluation of this value (direction towards agronomic , technology,, environmental traits), and requires a share of costs between species and definition of evaluation measures. Scenario 2,3,4,5 are not assuring correct distinction of varieties. Scenario 1 requires official and homogeneous rules of DUS defined by CPVO. In scenario 2, each entreprise cannot establish an adequate reference collection for certification, juridic or technical reasons.

**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**

The issue of innovation shall not be mistaken with the notion of creativity. The increase of the varietal flow through the increase in the number of varieties available for the users does not guarantee the actual diversity of the offer. Indeed this offer shall be officially characterized in conformity with the objective of the users' protection.

**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)**

- Weakening of the suppliers, stakeholders, operators position on national, EU and international levels. - Impact on food security, - The question of variety adaptation to geographical zones and to climatic situations - Impact on environmental aspects as regard sustainable genetic resistance against diseases and pests , - Agronomical impact and impact of the evolutions on the production systems.

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

Underestimated

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

The loose of mandatory certification for agricultural crops could lead to the reinforcement of phytosanitary and sanitary problems for human consumers.

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

5 = not proportional at all

**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**

Very negative

**Scenario 4**

Very negative

**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:**

The answer given above does not enable to take into account the possibility to propose a combinatory scenario.

## **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?**

For registration An adapted scenario 1 implying the establishment of shared rules for DUS (defined by CPVO) and joint policy for criteria (agronomic, technologic , environmental assessment) For Certification, scenario 2, with obligatory official control is acceptable. For niche conservation the specific section 2 in scenario 4 may be adapted.

#### **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?**

No

#### **6.2.1 Please explain:**

- On the basis of the previous answers as regard the missing or misdefined objectives (innovation, productivity, quality, regularity of the productions) and the overlooked scenario based on the current technically and financially optimised (current objectives completed by the environmental issues) the comparison of the scenarios in the light of the objectives is hedged. - On the basis of the analysis of the Commission, scenario 4 appears to be the most positive where as on the basis of our arguments, the scenario 4 does not best enable to achieve the objectives as we identified them.

## **7. OTHER COMMENTS**

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

### **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:**

