

## **1. INTRODUCTION**

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

UNISIGMA

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

Breeder 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**

UNISIGMA 2 rue Petit Sorri 60480 FROISSY France

## **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)**

Delay and access modality Costs of environmental criteria

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

Underestimated

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

Harmonization could be good, but not by the lowest level

#### **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?**

Yes

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

We have the chance to have good soil and areas in EU, and common rules should be to help to have better varieties to feed the world in respect of health law.

### **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?**

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**

1

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

2

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

5

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

4

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

3

**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)**

I don't agree with none of the scenarios. Could we find something between 2 and 5

**4.3 Are certain scenarios unrealistic?**

Yes

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

1 the death of small breeders, 3 distortion on the market, 4 negative impact on our seed market model...

**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**

no

#### **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)**

What about the respect of users?

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

Overestimated

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

impact on users of seed and 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**

Rather negative

**Scenario 2**

Fairly beneficial

**Scenario 3**

Very negative

**Scenario 4**

Very negative

**Scenario 5**

Don't know

**5.5.1 Please state your reasons for your answers above, where possible providing evidence or data to support your assessment:**

1- Cost for SME 2- with some adaptations 3- not realistic regarding the target of improve quality and better agricultural production in EU. 4- The death of innovation, good solution for some big distributors 5- reducing the number of testing station could be acceptable with a reduction of costs for breeders, and if quality of decision is guarantee

**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**

A European catalogue with DUS harmonized and VCU for agricultural crops

**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 are preparing a better future

**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:**



