

## **1. INTRODUCTION**

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

Centre Wallon de Recherches agronomiques

### **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**

Département Sciences du Vivant Unité Amélioration des espèces et biodiversité Batiment Emile Marchal Rue de Liroux 4 5030 GEMBLoux

## **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)**

the problem of maintaining biodiversity and minor species

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

Underestimated

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

the problem of maintaining biodiversity and minor species

#### **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**

5

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

3

**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?**

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: VCU should not be optional to guarantee a product to the farmer

**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?**

No

**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)?**

3 = 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**

Rather negative

**Scenario 3**

Very negative

**Scenario 4**

Neutral

**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 first scenario doesn't change the rules, the second implying a private enterprise will increase the cost of registration to catalogue and for minor species is difficult from a financial point of view, the third deleting the VCU is not useful for farmers and will lead marketing instead of science to take superiority, the fourth enables to register old landraces and is useful in this sense and doesn't change the registration for the classic varieties, the fifth is just a change of operator and we don't see how this could improve the costs of the registration for the State

**6. ASSESSMENT OF SCENARIOS**

**6.1 Which scenario or combination of scenarios would best meet the objectives of the review of the legislation?**

Scenario 4

**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**

**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:**

In some scenarios, the financial impact is explained, in other it is not the case, whereas the change of the actual system is supported by the financial cost for the State In only one scenario, minor species are taken into account whereas they belong to the agricultural policy of the EU and the low input system is not mentioned

**7. OTHER COMMENTS**

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

This change is made to reinforce private and big enterprises in the seed world, minor species are endangered and only one solution is proposed to develop them

**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:**

