

## **1. INTRODUCTION**

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

The James Hutton Institute

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

Breeder of S&PM; International organisation; Other

#### **1.2.1 Please specify**

Holder and pathogen tester of berry fruit nuclear stock and breeder of berry fruits

### **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?**

Yes

### **2.2 Have certain problems been overlooked?**

Yes

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

Differences in national standards and requirements have been largely ignored

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

Overestimated

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

Cost compared to maintaining standards

### **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**

3

**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**

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?**

Yes

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

There is a role for industry in determining value of a new berry crop variety but not in DUS or plant health requirements.

**4.3 Are certain scenarios unrealistic?**

Yes

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

No scenario which has a negative impact on plant health should even be considered.

**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?**

No

**5.2 Have certain impacts been overlooked?**

Yes

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

By dilution of the existing standards the overall well being of the industry will be reduced. Traceability across national borders is essential for maintaining a workable berry certification scheme.

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

Overestimated

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

The potential role of industry in a regulatory system has been greatly overstated.

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

4 = not 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**

Don't know

**Scenario 2**

Rather negative

**Scenario 3**

Very negative

**Scenario 4**

Rather negative

**Scenario 5**

Rather negative

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

Requirements are - Registration of varieties with CPVO and mandatory certification scheme for berry fruit propagating material.

**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**

Mandatory certification scheme for berry fruit propagating material and registration of varieties with CPVO

**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:**

Existing rules regarding plant health and varietal certification must be maintained or strengthened for the benefit of respective industries across the EU. Many aspects of the scenarios presented in the review do not fulfil this basic requirement. For berry fruit production a mandatory certification

scheme (to EPPO guidelines) should be enforced.

**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:**

[www.eppo.org/STANDARDS/standards.htm](http://www.eppo.org/STANDARDS/standards.htm)

