

## **1. INTRODUCTION**

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

Semences Vertes

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

Supplier of S&PM; SME company; Company operating on national level

#### **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**

Semences Vertes BP19 F-59932 La Chapelle d'Armentieres Cedex

## **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)**

Distorsion de concurrence , avec des règles pas assez précises au niveau U.E

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

Underestimated

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

Des règles précises et européenne encourage la création variérale et l'innovation sur le terroir européen

### **2.4 Other suggestions or remarks**

L'absence de règlement va favoriser les importations

## **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)**

Agriculture raisonnée Quelles informations réglementées disponibles aux consommateurs N?

### **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**

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

2

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

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

1

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

3

### **3.6 Other suggestions and remarks**

Important : protection des variétés , décrire les progrès technologiques , ceci dans des règles uniques en Europe.

## **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?**

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 5 : plus de règle de commercialisation car plus de règle VAT = dérégulation de la production et du commerce = arrêts d'activité en Europe = baisse de la diversité génétique.

**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)**

L'impact sur les consommateurs : jardiniers (gazon) , éleveurs (fourragères)

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

Underestimated

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

L'importance e la description des variétés et leur validation par des organismes officiels , c'est à dire complètement neutres .

**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**

Neutral

**Scenario 2**

Very beneficial

**Scenario 3**

Very negative

**Scenario 4**

Very negative

**Scenario 5**

Not relevant

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

Gestion par des organismes neutres des test VAT et DHS , avec des accords nombreux à construire entre pays , afin de réduire les couts.

**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?**

Un catalogue au niveau européen aves des organismes neutres de validation

**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:**

Manque de traçabilité et de sécurité d'informations pour le consommateur

**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:**



