

## **1. INTRODUCTION**

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

KAVB - Royal General Bulbgrowers' Association

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

International organisation; Other

#### **1.2.1 Please specify**

KAVB is the international organisation for professional bulb growers, breeders and traders of ornamental bulbous-, cormous- and tuberousrooted crops, therefore we give only our opinion for ornamentals.

### **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)**

We missed attention to the private scheme of the international cultivar registration of cultivars as organised by ISHS under the umbrella of UNESCO.

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

No opinion

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

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

The position of the ornamentals is rarely discussed.

## **3. OBJECTIVES OF THE REVIEW**

### **3.1 Are the objectives defined correctly in the context of S&PM marketing?**

No opinion

### **3.2 Have certain objectives been overlooked?**

No opinion

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

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

Yes

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

The enhancement of the role of the common catalogues is absolutely not necessary for ornamentals. An already existing system of international cultivar registers under the umbrella of ISHS and ultimately UNESCO can be used in addition to the variety registers of all EU member states (not only CPVO). An official common catalogue of ornamentals will be very costly as many

crops are only bred on a small scale.

**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**

3

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

5

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

4

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

There is no reason to restrict such an automatic registration (see 3.4) to CPVO grants, as there will be plenty varieties with national grants only. CPVO / PBR grants are not always economically feasible or even possible for smaller crops and sometimes even large crops. These will be registered in the (private) international cultivar registers.

## **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)**

A scenario for the ornamentals is not included.

**4.3 Are certain scenarios unrealistic?**

Yes

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

All scenarios with compulsory VCU are not realistic and not acceptable for ornamentals.

**4.4 Do you agree with the reasoning leading to the discard of the "no-changes" and the "abolishment" scenarios?**

No opinion

**4.5 Other suggestions and remarks**

Th reasoning for ornamentals is not clear, except for scenario number 3.

## **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?**

No opinion

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

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

Overestimated

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

We see no reasons that scenario 3 & 4 will have a negative impact on the health and quality of S&PM. As soon as there will be a negative impact the free market in ornamentals will correct this. The same applies for information of users. The environmental impact is not correctly estimated as the influence of the availability of crop protection is not ruled by the directives involved. The impact on employment and jobs does not take into account that many work will be done by the industry itself and grooso modo it will be only a change from public to private.

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

No opinion

## **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**

Very negative

### **Scenario 3**

Fairly beneficial

### **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:**

Scenario 3 will result in more market forces in the chain of companies giving economic advantages or profits. Scenario 1, 2, 4 and 5: The national/EU list is too heavy instrument and can be replaced by the existing International Cultivar Registration Authorities under the umbrella of ISHS and ultimately UNESCO for ornamentals in addition to the existing national and EU PBR registers. All ornamentals bred in the EU are for the world market, many varieties come from outside the EU, so any variety registration with an international (not just EU) scope is necessary for the trade. The controls can be done privately by the industry in a more efficient and economic way. VCU light and classic are too expensive for all ornamentals and can be done by the industry or only those where there will be a need. A centrally organised variety registration will be expensive and bureaucratic and will lack knowledge of the varieties and crops. Even more when many varieties in ornamentals are not covered by PBR.

## **6. ASSESSMENT OF SCENARIOS**

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

Scenario 3

**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 opinion

**6.2.1 Please explain:**

## **7. OTHER COMMENTS**

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

Avoid complex hybrid regulations leading to points already mentioned in your analysis like fragmentation and non harmonised application among members states. We see no reasons that scenario 3 will have a negative impact on the health and quality of S&PM. As soon as there will be a negative impact the free market in ornamentals will correct this. The same applies for information of users. The idea that scenario 3 will have a negative impact on harmonisation seems strange as no regulations for ornamentals will form the maximal harmonisation. According to the analysis the current structure with regulations shows lack of harmonisation. We feel that most scenarios are written around the agricultural practice of today and are missing a specific approach for the different fields as forestry, ornamentals etc. A minor general regulation might be possible with for every sector differently more detailed approach added to it. The identity and needs of the various sectors are very different.

### **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:**

We are prepared to inform you more thoroughly about the International Cultivar Registers. (see also International Code of nomenclature for cultivated plants, 2009. Scripta Horticulturae 10, ISBN 1813-9205)

