

## **1. INTRODUCTION**

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

FN3PT) - Fédération Nationales des Producteurs de Plants de Pommes de Terre

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

Competent Authority (CA) involved in S&PM certification and control; Competent Authority (CA) involved in S&PM variety and material registration; 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**

FN3PT 43-45, Rue de Naples 75008 Paris FRANCE tel: 33 (0)1 44 69 42 60 fax: 33 (0)1 44 69 42 61 email: fnpppt@plantdepommedeterre.org

## **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)**

Guarantee the implementation of a system of organization for the production, the control and the marketing for each of the member states and the EU. Make sure of the sanitary control of each of the member states and of the EU.

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

Overestimated

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

Know if the cost and the administrative loads are bearable with regard to the prices of products and importance of the sector of seeds and PM. In certain cases an increase of cost can be necessary (case of a strengthened or implemented sanitary protection of sanitary standards for some of the species).

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

Develop a respectful legislation of the requirements of each of the member states (conditions of grounds, climatic, sanitary traceability, etc.). The reductions of costs must be only envisaged if it is imperative (leads), in the case of the plantations of potato the cost of the control represents between 1 and 2 % of the turnover and the envisaged economy is unimportant with regard to the taken risks by reducing the qualitative requirements of certification or registration of the varieties. Unique standards are difficult to imagine because according to the species they differ according to the climatic conditions (strong differences between Mediterranean countries and of the North: standards virus for potato for example).

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

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

No

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

Yes

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

The sanitary requirements and the constraints due to the climatic conditions.

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

Yes

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

The basic principle is that seed produced in third countries is considered equivalent to seed produced in accordance with Community legislation, e.g. seed may be marketed within the EU if the seed affords the same assurances as seed officially certified within the Community. The seed should be officially certified and seed packages officially closed in accordance with the OECD schemes for the Varietal Certification of Seed moving in International Trade.

### **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**

3

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

4

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

2

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

5

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

The scenarii are not defined correctly because they burst a system which works in a multitude of small independent systems which cannot manage conflicts of interests in particular.

## **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)**

France or The Netherlands works with systems low expensive for the public finances because it is the product which supports a big part of the cost for control and certification as well as the registration in the catalogue. The actions of control are delegated to private structures which are audited and accredited by public authorities. This system could be generalized in the other member states.

### **4.3 Are certain scenarios unrealistic?**

Yes

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

Scenarii 3 and 4 are not suitable for marketing the potato seeds because it's optional to certify

and register the seeds. The seed potato market the reciprocity recognition system. One third of the french seed production is exported from our country.

**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)**

The compulsory system have very good results in the potato seed sector in france and in a lot of european countries. If the optional options proposed in scenarii 3 and 4 will be applied the risks of pests and diseases are higher; the innovation in varieties will decreased and the genetic answers to the environmental objectives ( reduction of chemicals and adaptation to the climate changes).

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

Underestimated

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

The propositions on the table neglected totally the impact on phytosanitary and sanitary issues. Those impacts must be very expensive if there is problems with quarantine parasites or diseases.

**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**

Fairly beneficial

**Scenario 2**

Fairly beneficial

**Scenario 3**

Very negative

**Scenario 4**

Very negative

**Scenario 5**

Neutral

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

All participants of the potato industry in France are in favour of a compulsory and official certification and registration of seeds.

## **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?**

The scenario 2 is the most adapted to fulfill the objectives of a european policy on potato seeds. In one hand for financial reason and in the other for phytosanitary and sanitary reason. For potato seed production compulsory DUS and VCU under official control is absolutely necessary. tracability is also important in our sector for an improved fighting against pests and deseases (especialy when it is quarantine!).

#### **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:**

The impact of scenario 2 is positive on potato seeds health and quality. The scenarii 3 & 4 impact is very negative on trade and also on environnemental issues. The VCU completed with new criterias on environnemental aspects have much more positive impacts on breeding activities in scenarii 1 ,2 &3 than the others scenarii.

## **7. OTHER COMMENTS**

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

The traceability is major and it involves a control from a genealogical scheme.

### **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.plantdepommedeterre.org](http://WWW.plantdepommedeterre.org)

