1. INTRODUCTION

1.1 What is the name of your organisation?
ARGE Streuobst - Österreichische Arbeitsgemeinschaft zur Förderung des Streuobstbaues und zur Erhaltung obstgenetischer Ressourcen

1.2 What stakeholder group does your organisation belong to?
User of S&PM; Consumer; Other

1.2.1 Please specify
Austrian working group (consortium) for preservation of fruit genetic ressources and extensive orcharding

1.3 Please write down the address (postal, e-mail, telephone, fax and web page if available) of your organisation
Höhere Bundeslehranstalt und Bundesamt für Wein- und Obstbau; Wienerstraße 74; A-3400 Klosterneuburg; Austria; Speaker: DI Dianat Katharina; www.arge-streuobst.at; mail: info@arge-streuobst.at; Tel.: 0043-67683555455

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)
+ GMO at fruit breeding is not regulated at all

2.3 Are certain problems underestimated or overly emphasized?
Rightly estimated

2.3.1 Please indicate the problems that have not been estimated rightly

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 opinion

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?

No opinion

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
3

Secure the functioning of the internal market for seed and propagating material
4

Empower users by informing them about seed and propagating material
1

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

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?
No

4.3.1 Please state which one(s) and why

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

4.5 Other suggestions and remarks
There is no information about the classification of the registration and introduction of genetically modiefied varieties (transgen- cisgen)

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)?
2 = fairly 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
Very negative

Scenario 2
Don't know

Scenario 3
Neutral

Scenario 4
Fairly beneficial

Scenario 5
Don't know

5.5.1 Please state your reasons for your answers above, where possible providing evidence or data to support your assessment:
Scenario 1: to expansive for SME and/or NGO/private suppliers --> decrease of genetic variability; "full VCU"-testing could be constricting genetic biodiversity; competitive advantage for big breeding/suppling companies Scenario 2: impact is not clear; in my opinion it would be probelamtic, if companies will controll their poduct by themselves (controls of lots); there is no rule about GMO Scenario 3: intransparent for consumers and public authorities ; independent, experimental research would be at risk; genetic diversity could be advanced; no rule about GMO Scenario 4: genetic diversity will be advanced; better market acsess for SME and/or NGO/private suppliers intransparent for consumers and public authorities; independent, experimental research would be at risk; no controll about GMO (market access via "non-tested varieties") Scenario 5: impact is not clear; it would behalf on the political course of the EC

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?
Variety registration: Scenario 3; Controls of lots: Scenario 4; BUT: VCU light at independent experimental stations (consumer and envrionment protection) AND obligatory clearly defined rules for GMOs;

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:

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.arge-streuobst.at "Streuobstinfo"-newsletter of "ARGE Streuobst"