

1. INTRODUCTION

1.1 What is the name of your organisation?

FNPSMS Fédération nationale de la production de semences de maïs et de sorgho

1.2 What stakeholder group does your organisation belong to?

Supplier of S&PM; Other

1.2.1 Please specify

FNPSMS is an organization which groups together corn seed grower (22 local unions) and corn seed companies (22 companies) involved in the production of corn and sorghum seeds. The organization is involved in the field inspection of certification in the framework of official supervision system.

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?

No

2.2 Have certain problems been overlooked?

Yes

2.2.1 Please state which one(s)

The objective of food security and competitiveness are not expressed in the general objective. The European agriculture has a key role to provide sufficient and safe food to European citizens. The seed growers are missing in the analysis paper: they will be affected by the review of the legislation.

2.3 Are certain problems underestimated or overly emphasized?

Overestimated

2.3.1 Please indicate the problems that have not been estimated rightly

The cost reduction of the State expenses is overly emphasized considering the impact of the seed legislation on sanitary quality and food security. The registration/ certification costs are overestimated. The certification cost for seed corn are evaluated at 0,4% of the seed prices sold to grower.

2.4 Other suggestions or remarks

In France, the certification is conducted for corn seed under official supervision with an involvement of all actors of the seed sector: suppliers (22) and growers (3400). They discussed all the evolutions of the system (adaptation of the technical aspects...). This strong commitment of all is the key of the success of French corn seeds. France is the larger exporter of corn seed in the world. The customers recognise the quality of French seeds. The result is an harmonization of practices in order to always reach great quality.

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 objectives of food security and competitiveness of the European agriculture are missing. The impact of the loose of certification on the actual growers "network" involved in seed production has not been evaluated.

3.3 Are certain objectives inappropriate?

Yes

3.3.1 Please state which one(s)

The goal of reducing the cost is inappropriate in it self. A better "managment", a better organization, a better harmonization are goals that should be pursued.

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

2

Empower users by informing them about seed and propagating material

3

Contribute to improve biodiversity, sustainability and favour innovation

Promote plant health and support agriculture, horticulture and forestry

3.6 Other suggestions and remarks

"contribute to improve productivity, sustainability and favour innovation" : it ' s difficile to rank this sentence which contains so much different aspects. Productivity is missing it should be "improve sustainability production, innovation" Not clear: in this way promote plant health and support agriculture, horticulture and forestry.

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)

Yes. The scenario 5 is not clear enough.

4.3 Are certain scenarios unrealistic?

Yes

4.3.1 Please state which one(s) and why

Scenario 3 and 4 are unrealistic. By making certification in the EU market only optional and these scenarios will not be able to reach the main objectives of the review. They will destabilize the seed grower organization, end the EU's leading role in international standard setting , weaken the

competitiveness of corn seed on the international market that recognize high quality of the french seeds (because of strong certification system).

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 system of supplier's label will cause an increase of state controls with a cost that hasn't been evaluated.

5.3 Are certain impacts underestimated or overly emphasized?

Underestimated

5.3.1 Please provide evidence or data to support your assessment:

The impact analysis of scenario 3 and 4 is quite "oriented" and not fair. The loss of mandatory certification will have an impact on sanitary quality that is not taken into account properly. The negative impacts on plant health have been underestimated in scenarios 3 and 4, since the abandoning mandatory certification for seeds marketed within the EU would most probably lead to more phytosanitary problems. This would also be in contradiction with the revised Directive 2000/29 where transferring the control of several pests to the scope of the seed/certification regulation is being considered.

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

Fairly beneficial

Scenario 3

Very negative

Scenario 4

Very negative

Scenario 5

Fairly beneficial

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

see 5.3.1

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?

Our organization represents seed growers and seed companies involved in corn seed. Our main interest is certification and our proposal will be focus on this particular aspect. Registration: - DHS mandatory, harmonized at UE level, official. - Two possibilities for the tests : o The DHS tests can be managed and conducted by State with a rapid communication of the results to CPVO for European catalogue update. o The DHS tests can be managed and conducted by CPVO on their accredited stations with sufficient collection of varieties. Certification : - Mandatory with common UE criteria (germination rate, sanitary quality, identity of varieties) in link with international systems. - Under official supervision.

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:

Scenario 3 and Scenario 4: the certification is becoming optional or lost for a supplier label system and these proposals can not fulfil most of the objectives: - Improve information for growers - Fair competition - High quality of seeds guaranteed by the actual certification system (with germination tests, sanitary quality, and identity) could be lost with the supplier label. The sanitary quality is essential as seeds are the start of agricultural production.

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:

