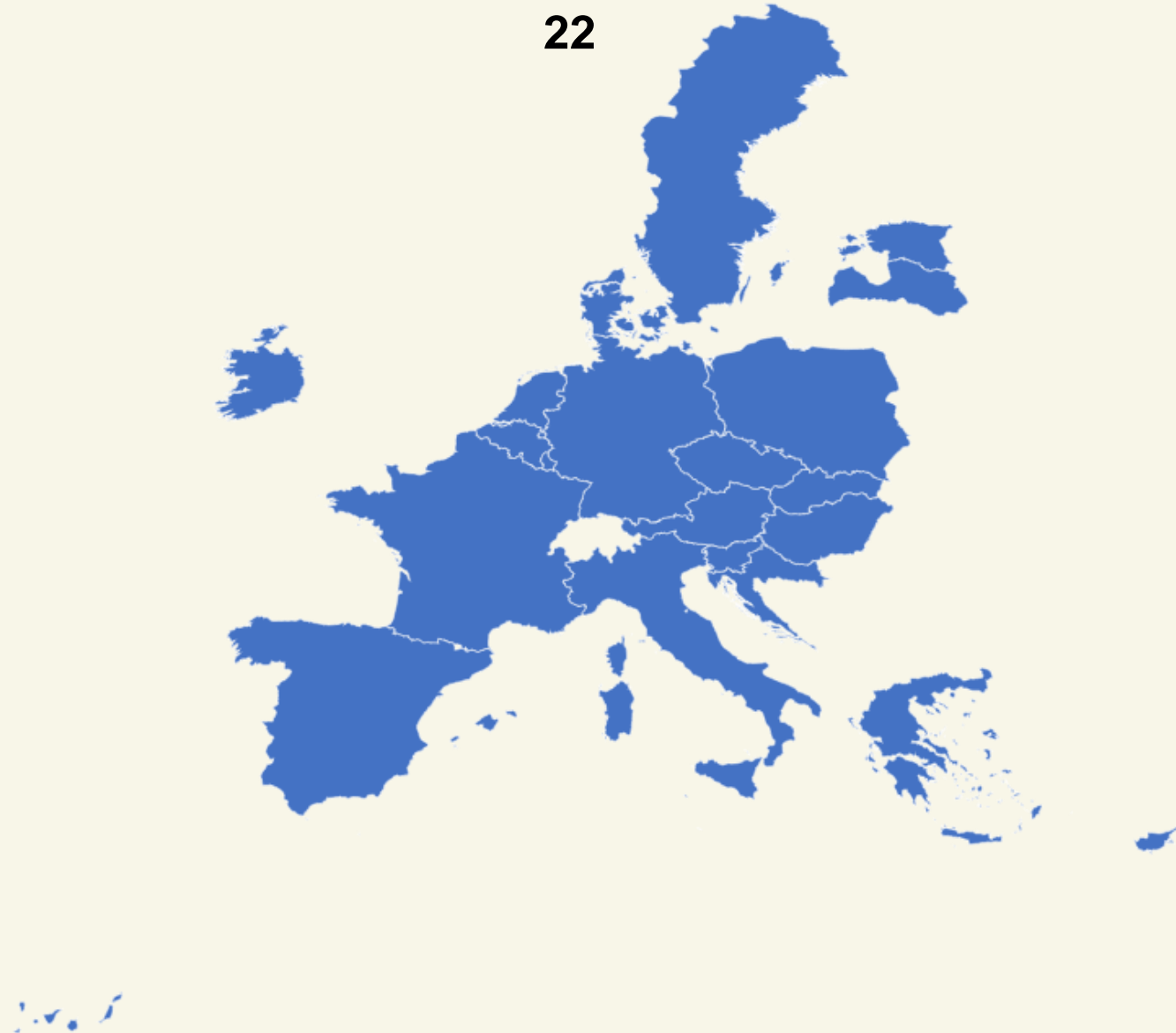


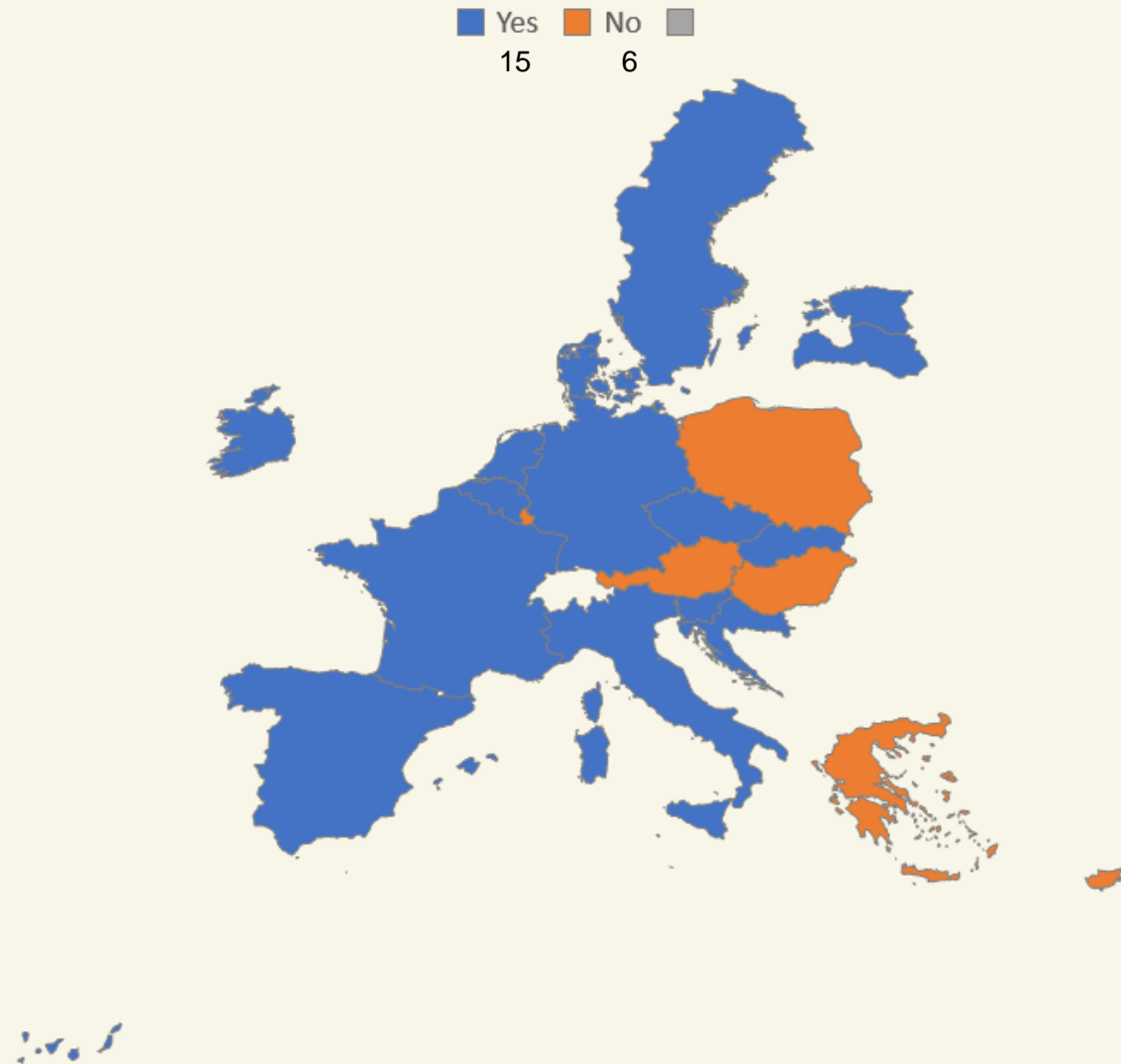
Implementation of the Official Controls Regulation (OCR) in the seed sector

Participating countries

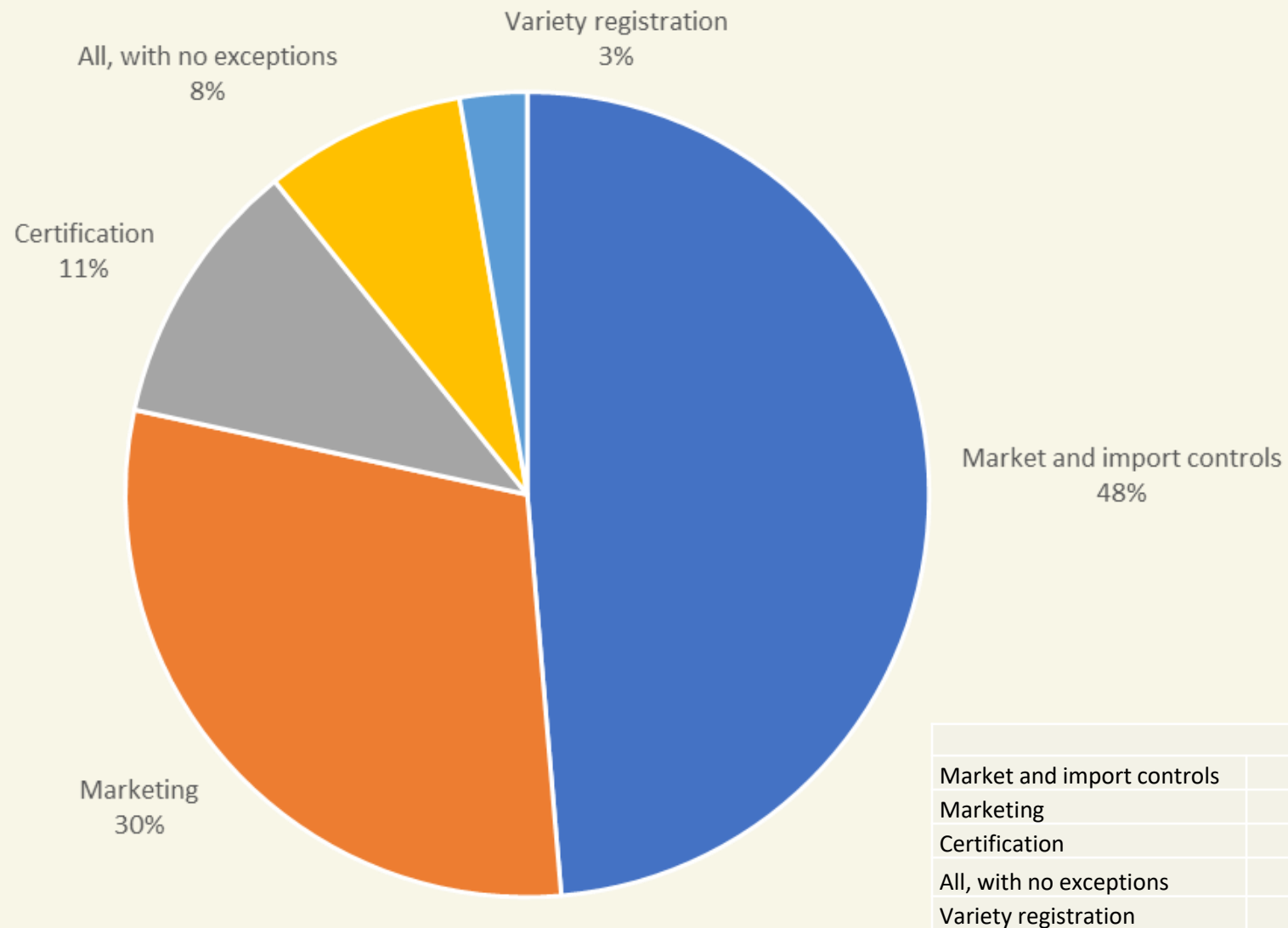
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2. Is OCR currently applied in the memberstate?



3. Which application areas of PRM legislation would be suitable for implementing OCR



4. What positive aspects would OCR bring to the certification process?

Key insights

- Uniformity, harmonization, transparency
- Improved communication
- Possibility of equal standards across EU Member States
- Standardized controls and uniform implementation of rules across MS
- Potential for harmonised post-control processes
- Merging seed equivalence checks with plant health checks at the border, common approach with food, feed, and other PMR (e.g., fruit and vine) controls
- Alignment in controls and communication between MS, improving international trade compliance
- Integrated training, monitoring, and penalties for operators under official supervision; BTSF (Better Training for Safer Food) programs for enhanced compliance training

Skepticism about OCR's Necessity

- Current seed certification system is already highly reliable, ensuring traceability and compliance without OCR
- The process is well-established and controlled by competent authorities, making OCR unnecessary in the current framework
- The existing procedures for certification already ensure accuracy and traceability without the need for OCR technology
- OCR may be more useful in controlling trade, operators, and imports rather than the certification process itself
- Its benefits might lie more in ensuring consistent enforcement of rules during trade and handling non-compliance

5. What challenges would OCR bring to the certification process?

Key insights

- **Increased administrative burden** for competent authorities and seed companies due to OCR implementation.
- **Complexity of the authorization system** for certification activities could lead to excessive bureaucracy.
- **Loss of flexibility** in the current system and potential neglect of national specificities in favor of uniformity across EU member states.

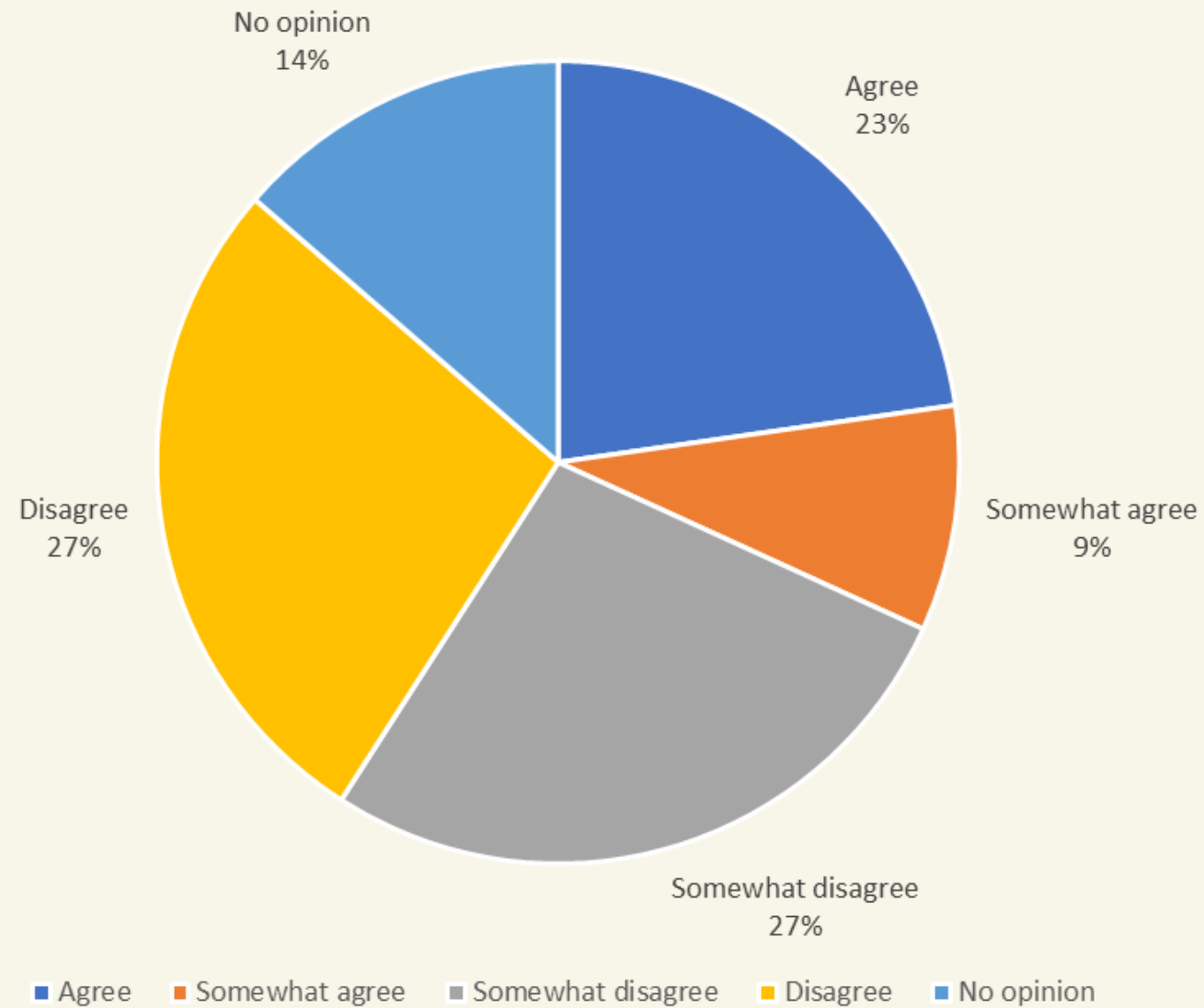
Similarities

- **Increased Administrative Burden:** Many participants agree that OCR will lead to a significant increase in administrative tasks for competent authorities and seed companies. This includes additional audits and controls that require more resources.
- **Bureaucratic Challenges:** There is a consensus that OCR introduces unnecessary bureaucratic hurdles, which contradicts the goal of simplifying regulatory processes.
- **Financial Implications:** Participants highlight that the costs associated with OCR implementation, such as accreditation and additional personnel, will be disproportionately high compared to the benefits.

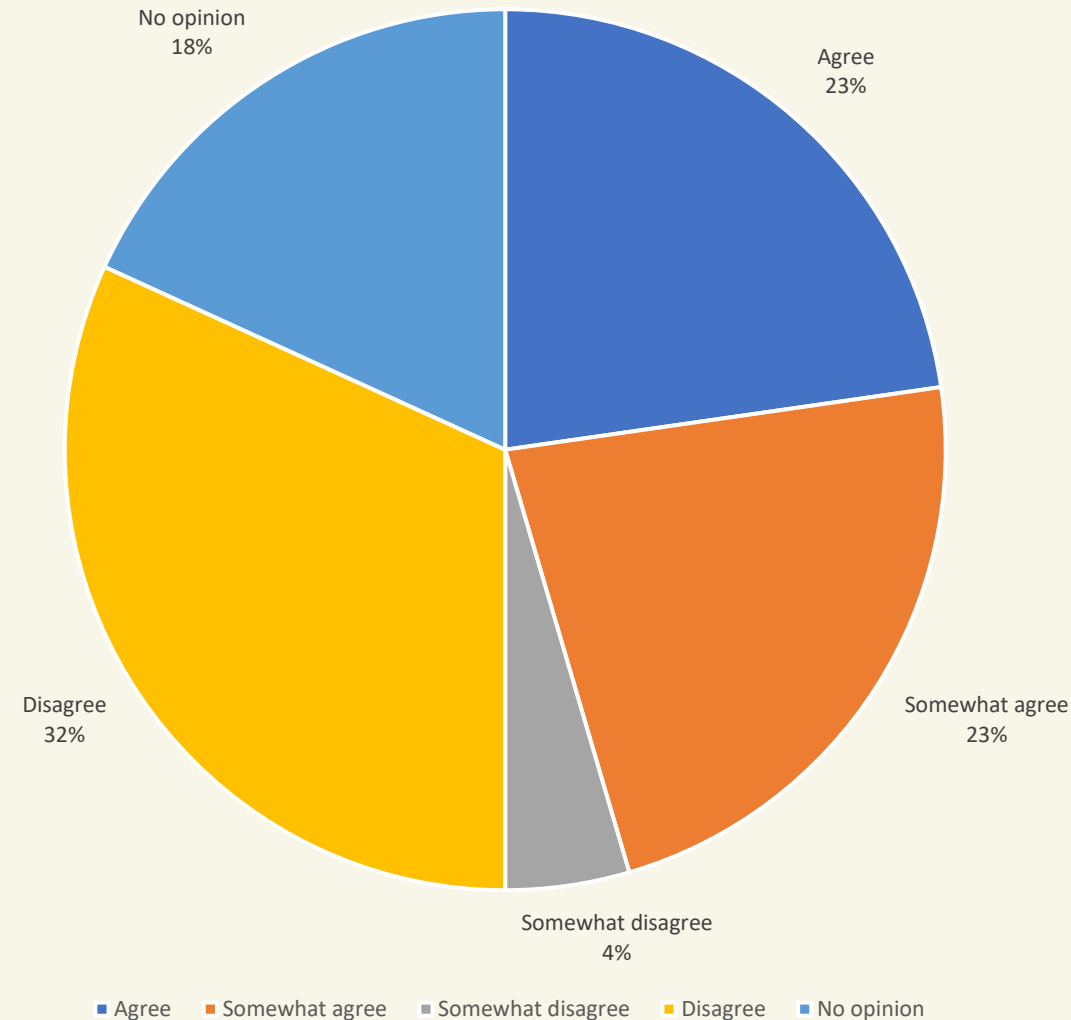
Differences

- **Perception of Value:** Some participants feel that the added value of OCR in the certification process is not obvious, while others may see potential benefits in standardization across EU member states.
- **Impact on Professional Expertise:** There are differing views on how OCR might undermine professional expertise, with some participants emphasizing this risk more than others.
- **National Specificities:** Some responses indicate a concern about neglecting national specificities in the implementation of OCR, while others focus more on uniformity across member states.

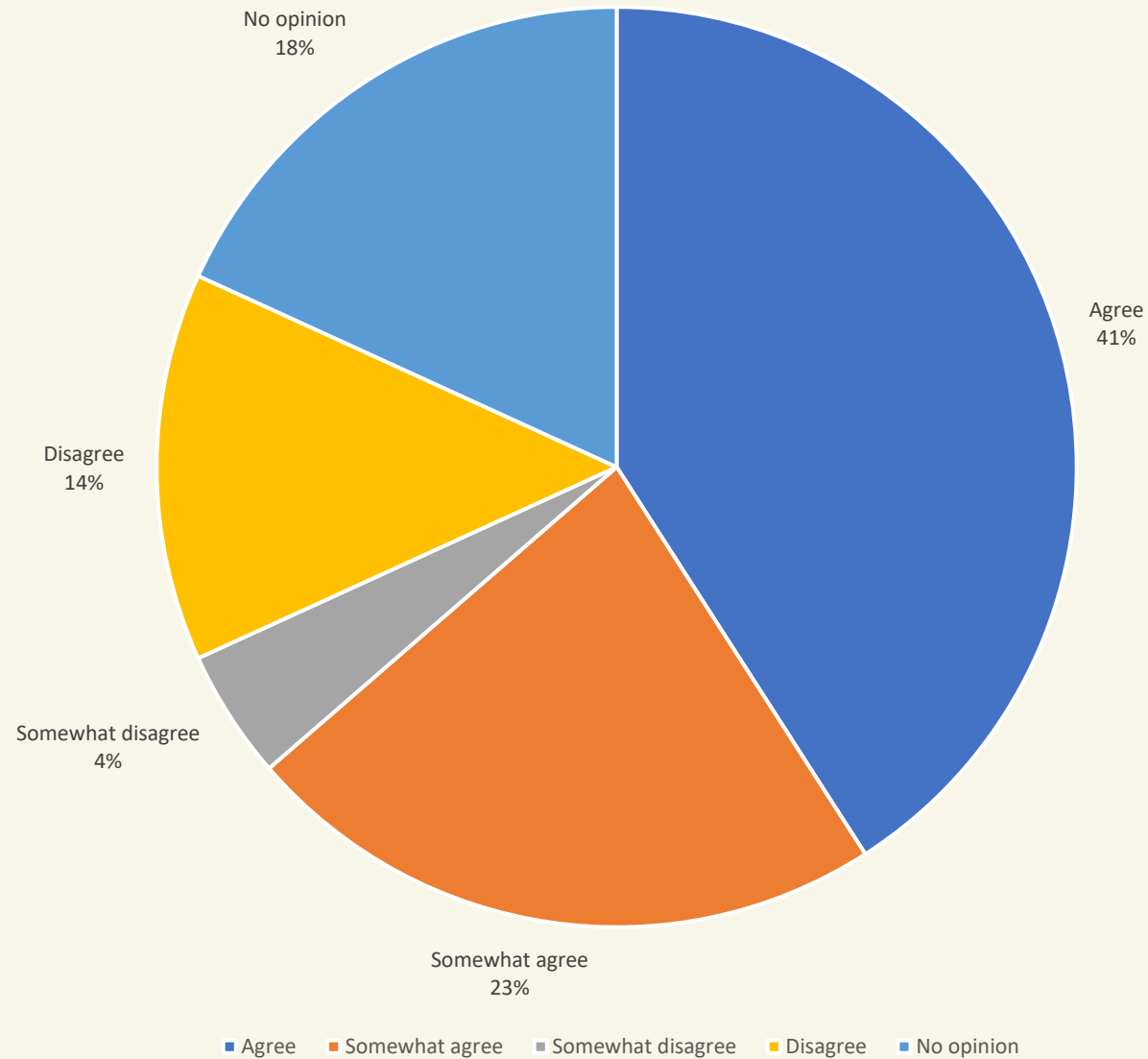
6. Would OCR bring significant changes to the seed company registration process?



7. Would the implementation of OCR entail organizational changes in the Member State through delegation possibilities or requirements for impartiality regarding areas of responsibility?



8. Are there risks that Member States will apply OCR instruments differently?



8a. Could it lead to unequal conditions for actors within the EU?

