



SUID-AFRIKAANSE NASIONALE SAADORGANISASIE

SOUTH AFRICAN NATIONAL SEED ORGANIZATION

NPC Reg No 1989/003392/08

2018/08/23

The Registrar, Plant Breeders Rights'
250 Harvest House
30 Hamilton Street
Arcadia
Pretoria

Dear Dr Noluthando Netnou-Nkoana,

SANSOR's Position on the accession to the 1991 Act of the International Convention for the Protection of New Varieties of Plants

The South African National Seed Organization (SANSOR) hereby would like to submit our position on the accession to UPOV 1991. SANSOR is the National Designated Authority for Seed Certification and represents, protects and further the interest of the seed trade in South Africa to the benefit of our members. As leading authority, SANSOR is responsible to represent our members nationally as well as internationally, while ensuring and furthering fair and legal seed trade to promote food and seed security through plant breeding and innovation and thereby the availability of high quality seed of improved varieties to farmers.

1. SANSOR supports South Africa to accede UPOV 1991.

- Accessing to UPOV will protect plant breeders' rights and encourage the development of new varieties for a changing environment.
- It will ensure access to new genetic material and technology from abroad to our plant breeders.

2. SANSOR supports the The Plant Breeders' Rights Bill. [B 11B—2015]

- SANSOR strongly supports the entire Article 7 and all items referred to in subsection (1)(a) to (f) in the bill in respect to harvested material. Therefore Article 14 in UPOV 1991 is also equally supported.

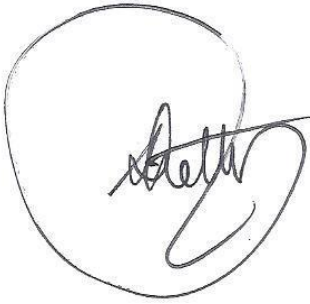
3. SANSOR strongly supports that restriction of breeders' rights in relation to farmers' rights as described in Article 15(2) of UPOV 1991 is implemented according to the proposed Plant Breeders' Rights Bill in accordance with Subsection (2) of article 10. However, the Regulations where the respective categories will be defined will need to drafted with due consideration of the purpose of Plant Variety Protection. SANSOR will remain available for consultation in this regard.

DIRECTORS

J Odendaal (Chairman), R Roselt (V-C), B Lever, DE Malan, P Smit, L Chetty, SM Hildebrand

If you have any question in this regard, please feel free to contact us

Kind Regards

A handwritten signature in black ink, appearing to read "Lukeshni Chetty", is enclosed within a faint, circular stamp or watermark.

Dr Lukeshni Chetty
General Manager