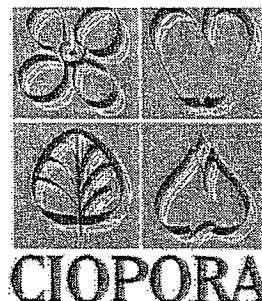


**Communauté Internationale des Obtenteurs de Plantes
Ornementales et fruitières de Reproduction Asexuée**



INTERNATIONAL UNION FOR THE PROTECTION OF
NEW VARIETIES OF PLANTS (UPOV)
Consultative Committee and COUNCIL

34, chemin des Colombettes
CH-1211 Genève 20

Switzerland

Administrative office:
Rothenbaumchaussee 78
D-20148 Hamburg
Germany

Phone: +49 40 555 63 702
Fax: +49 40 555 63 703
E-Mail: info@ciopora.org
Internet: www.ciopora.org

Hamburg, 28 October 2008

**CIOPORA comment on the Draft Law on the Breeders' Rights of the Republic
of Macedonia**

Dear members of the Consultative Committee and Council,

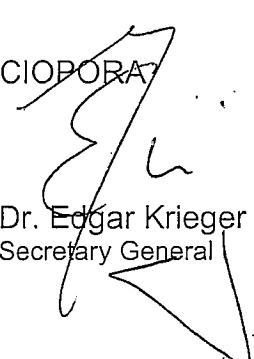
CIOPORA appreciates it that the Republic of Macedonia has now submitted a draft PBR law to UPOV that in its core is in compliance with the UPOV 1991 Act.

However, CIOPORA would like to point out that in the draft law no reference is made to customs activities for the enforcement of the right of the PBR title holder to export and import material of the protected variety. However, this is an indispensable requirement for the compliance of the PBR law with Article 30 (1) (i) of the UPOV 1991 Act.

CIOPORA suggest that the Council asks the Republic of Macedonia to either include a respective provision into its law or to make a reference to the respective national customs law, which has to be applicable for Plant Breeders' Rights. At least the government of Macedonia should ensure the Council that customs activities in Macedonia are in force and are applicable for Plant Breeders' Rights.

Respectfully yours,

CIOPORA


Dr. Edgar Krieger
Secretary General