EC INCEPTION IMPACT ASSESSMENT on Revision of the plant and forest reproductive material legislation
Feedback of ECO-PB

The European Consortium for Organic Plant Breeding (ECO-PB) appreciates the foreseen impact assessment on Revision of the plant and forest reproductive material legislation in order to streamline the seed market regulation with the European Green Deal, especially its Farm to Fork, Biodiversity and Climate Change mitigation and adaptation Strategies. It is important that the present PRM and FRM directives are updated and directed to present and future needs for sustainable food, fiber, wood and other production in the scope of global warming, climate change, impact of extreme weather events and growing populations.

We appreciate the ambition to lower the administrative burdens for breeders and seed saver networks and allow greater flexibility to improve the availability of diversity of crops and cultivars.

We welcome the acknowledgement of the importance of agrobiodiversity in food systems and the need for lower administrative burdens for diverse cultivars types like organic varieties, amateur varieties, conservation varieties that are important for organic and other sustainable farming systems. The notification of Organic Heterogeneous Material as regulated in EU organic regulation (2018/848) coming into force in 2022 must be reflected in the 12 directives, without further limitatons. Moreover this diversity approach should also be made available for other sustainable farming systems in all the directives. The temporary experiment on organic varieties need to be integrated in the directives.

We appreciate the consideration to exclude amateur gardeners and non-profit seed saver organisations form the scope of the regulation and find a coherent solution to support seed exchanges between farmers. Today, still 50% of the organic farmers have to rely on non-organic PRM (averaged across target crops and EU countries) due to the lack of adapted cultivars and lack of organic seed production. Following the Farm to Fork strategy to increase arable land under organic production from now 8% to 25% in less then 10 years will rely on important investment in organic breeding, cultivar testing and seed production. Here the farm-saved seed and farmer seed exchange will play an important role.

It is very important that the economic impact analysis does not only consider the return of investment of breeders, seed companies or gross margin of farmers, but also include the profit of the value chain and rural development. E.g. several organic breeding initiatives are closely linked to short value chains that create added value based on organic varieties, organic heterogeneous material or conservation varieties.

If there is a potential to develop successful value chains, the PRM and FRM directives should not prevent such innovations. A balance should be found between very strict legal regulation to have a high guarantee on performance of seed for farmer but restricted choice and a broader portfolio of diverse cultivars with less strict registration and certification controls allowing for speciality markets. Therefore we see a need to have different systems in place and give choice to the enduser if he wants to rely on official registration and seed certification system or if he relies on the labelling of the seed producer only as it is foreseen for the organic heterogeneous material.

In order to achieve the pesticide and fertilizer loss reduction of 50% by 2030 need severe changes in the registration process. VCU testing should be conducted under organic or low input conditions (no synthetic seed treatment, no herbizides, no fungizide and pestizide, low fertilizer) to really evaluate the potential of the new varieties to withstand different stresses. Moreover, mandatory sustainability parameters must be introduces (water and nutrient use efficiency, pathogen and pest resistance, feed for pollinators, etc.) and prioritized across Europe.

ECO-PB would like to support the process and is ready to give input to the impact assessments.