



To:

Commissioner Stella Kyriakides,

Director General SANTE Sandra Gallina,

Head of Unit Plant Health Dorothee Andre

Brussels, 20 July 2021

Subject: Review of EU Seed Directives must be in line with the new Organic Regulation (EU) 2018/848 and provide adapted criteria for the registration of organic varieties.

Dear Madam,

IFOAM Organics Europe would like to thank DG SANTE for taking upon the efforts to review the Union's options to update the existing legislation with the objective to make the Seed Directives more comprehensive and to align them with goals of the Farm to Fork and Biodiversity strategies, including the aim to facilitate the registration of seed varieties for low-input systems like organic farming. As mentioned in the study, coherence with the new Organic Regulation is key and options to modify the seed legislation must not conflict with the new possibilities regarding plant reproductive material that are defined in Regulation (EU) 2018/848.

A key point that has emerged from the PRM study is that the current legislation does not facilitate the introduction of testing requirements for the development of organic varieties suitable to organic production. In addition, the framework is not ideally suited for the purposes of enabling conservation and sustainable use of plant genetic resources and biodiversity. More flexibility and adapted criteria (DUS) for the registration of organic varieties are crucial, and the results from the Temporary Experiment on organic varieties should be streamlined into the Seed Directives on a continuous basis. In this regard, it is important to act in a timely manner to improve the situation, without waiting until 2028 to implement adaptations. A VCU adapted to organic input conditions would greatly improve the situation as yield is still given too high importance and the thresholds are currently a limiting factor to bringing new varieties on the market. In addition, the Temporary Experiment on heterogeneous material should be aligned with and implemented in the Seed Directives, also with a view to fostering the aim of increasing biodiversity on the fields.

Furthermore, it is current practice that amateur & conservation varieties are sometimes used by professional (organic) operators, especially in niche markets. For professional marketing, it is therefore essential not to exclude options that are available in the current framework (registration as conservation or amateur variety), considering that adapted protocols for organic varieties will not be ready in the short term (as the Temporary Experiment is in progress) and the Organic Heterogeneous Material category does not host varieties that currently fall under the category of conservation

varieties. Otherwise, the consequence could be a serious limitation of the number of varieties available to (organic) farmers.

Finally, there must be the option for farmers to exchange seed or other plant reproductive material (PRM). Farmers' rights to save, use and exchange farm-saved seeds and PRM are essential for maintaining cultivated diversity. Furthermore, Member state rules that allow farmers seed exchange are currently cushioning the lack of certified seed available to organic farmers in many parts of the EU.

We are looking forward to actively engage with stakeholders, competent authorities and EU institutions in the coming months to contribute to the process and to find solutions regarding the production and marketing of PRM.

Yours faithfully,

IFOAM Organics Europe



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