



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL FOR HEALTH AND FOOD SAFETY

Crisis preparedness in food, animals and plants

**WORKING GROUP**  
**ON PLANTS, ANIMALS, FOOD AND FEED**

*Sections Seed and Propagating Material for Agriculture and Horticulture, Vine, Fruit and Ornamentals*

**Meeting on the revision of the PRM legislation - Sustainability and testing of varieties for value for cultivation and use**

**21 JANUARY 2022**

**SUMMARY**

**SECTION A**      **Information and/or discussion**

**1. The Farm to Fork Strategy and framework for a sustainable food system**

The Commission gave an update on the legislative initiative on a framework for a Union sustainable food system (FSFS). This is a key action under the Farm to Fork Strategy. Currently there is no dedicated EU framework law on food sustainability similar to the EU framework law on food and feed safety (General Food Law). The overall objective of FSFS is to ensure that all foods placed on the EU market increasingly become sustainable through a socially responsible food value chain. For this initiative, different options will be assessed, ranging from voluntary approaches, reinforcement of existing legislation to a new comprehensive framework legislation on the sustainability of the Union food system. The Commission elaborated on the indicative elements for the different options and explained that FSFS would provide a general framework without intervening with the sectoral legislation. It would thus be for the plant reproductive material legislation to provide the tools for contributing to the general sustainability objectives. An inception impact assessment on FSFS was published for public feedback from 28 September to 26 October 2021. Further consultation activities and launch of the work on the impact assessment will follow. The Commission's proposal is scheduled to be adopted by December 2023.

**2. French system of testing sustainability characteristics of plant varieties**

Geves, the French organisation for variety evaluation and seed testing, presented the French concept of variety examination for value for cultivation, use and sustainability (VCUS) that was introduced in 2011. This includes sustainability considerations in experimentation (e.g. trials in suboptimal locations, without pesticides, reduced fertilisers), in scored characteristics (e.g. pathogens, vigour, nitrogen efficiency) and in decision rules (e.g. bonus for eco-friendly varieties, rejection thresholds – for example rejection of varieties extremely reliant on

fertilisers or particularly sensitive to certain pathogens). The system has contributed to the introduction of tolerant varieties that in turn led to reduction of fungicides as well as to varieties with reduced nitrogen dependency. VCUS is obligatory in France for varieties of agricultural plant species, including rejection thresholds. Its costs are carried at 90% by the applicant and 10% by public funding. For other species (e.g. vine) the results are purely descriptive. It was stressed that the successful implementation of VCUS required steady political commitment, a stepwise approach, research funding, regular revision of criteria and transparency on protocols, decision rules and official data.

Several Member States informed that they have similar systems in place. It was also stated that significant genetic progress has been made in vegetable varieties without the VCU obligation. Often other legislation (e.g. ban of neonicotinoids) has incentivised the breeding of more resistant varieties. There was overall agreement that frameworks like VCUS should consider the cost implications and the regional differences in agroclimatic conditions, while there could be scope for harmonising certain aspects at EU level, e.g. on how tests are carried out.

### **3. Invite project**

The CPVO presented the state of play of the Horizon 2020 project “Invite” that aims to improve the efficiency of variety testing and the availability of information to stakeholders on variety performance under a range of production conditions and biotic and abiotic stresses.

The Institute for Agrifood Research and Technology (IRTA, Spain) presented in more details the work of the project on finding novel indicators for resilience and adaptation to water stress (wheat), challenging conditions in the greenhouse (tomato), biotic stress (wheat) as well as work on clonal identification and epigenetic marks for adaptation (apple).

### **4. Testing of GMO trait (MON810) in maize varieties in Spain**

The Ministry of Agriculture, Fisheries and Food of Spain presented their national procedures for VCU trials for GMO varieties transformed with the event MON810 (Bt maize).

### **5. Member States VCU network – what has been harmonised?**

Naktuinbouw (the Netherlands Inspection Service for Horticulture) presented the EU VCU platform. It was explained that this has no formal status and its annual meetings (since 2007) are informal with a view to exchange information on VCU issues. Participant countries may implement any solutions discussed in their own way and in the light of their specific conditions without any further coordination. The intention to organise the next meeting of the platform on 25-27 May 2022 in Milan, Italy was announced.

### **6. VCU testing of organic varieties**

The Commission informed about the progress towards a new proposal for derogations for organic varieties as regards the requirements for DUS and VCU examinations, envisaged to enter into force as of 1 July 2022 and for a period of seven years.

### **7. Update on the Commission policy initiative on new genomic techniques**

The Commission gave an update on the legislative initiative for plants produced by certain new genomic techniques, in particular targeted mutagenesis and cis-genesis. The objective of this initiative is to enable safe plants to provide benefits and contribute to the innovation and sustainability objectives of the European Green Deal and of the Farm to Fork and Biodiversity strategies.

## **8. Update on the revision of the plant and forest reproductive material legislation**

The Commission informed on the ongoing and upcoming activities. Work on the next couple of months would focus on drafting the impact assessment, including collection of evidence to inform this. The public consultation will run on the “have your say” webpage until 27 March 2022: [https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13083-Plant-and-forest-reproductive-material-revised-rules-/public-consultation\\_en](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13083-Plant-and-forest-reproductive-material-revised-rules-/public-consultation_en). The Commission also reminded that in the framework of the support contract for the impact assessments targeted interviews and surveys would be held by the contractor. These are addressed to national competent authorities, the industry, farmers, civil society and non-forestry users of forest and reproductive material. Those interested to participate should register at: [https://icfconsulting.qualtrics.com/jfe/form/SV\\_22Vx3CzC61hva62](https://icfconsulting.qualtrics.com/jfe/form/SV_22Vx3CzC61hva62). In parallel, Commission would investigate the potential impacts of the revision for small and medium-sized enterprises and would organise working group meetings on specific aspects of the revision.

## **9. Commission Working Document on possible sustainable VCU testing for plant varieties**

The Commission presented a working document on sustainability aspects in the context of the revision of the plant reproductive material legislation. A discussion followed on possible options in the revision of the legislation for harmonizing and/or extending the current requirements for VCU examination in order to include more sustainability aspects. Several Member States were of the opinion that the current framework is working well and already allows for these developments. There is scope for some harmonization of methodologies used (e.g. experiment design, presentation of data) but it would also be important to foresee enough flexibility for implementation according to specific conditions. Some Member States insisted on carefully examining cost aspects for any new obligations. Some pointed to the need to first define “sustainability” including the economic aspects, other would prefer to avoid such definitions and work on what would need to be achieved in terms of characteristics. Certain broad categories could be defined, for example “adaptability to climate change”, “reduction of inputs”. The Commission invited Member States to provide further input in written by 4 February 2022.