Euroseeds
Embracing Nature

Position

Brussels, 15 September 2019

Seeds for organics – The way forward

Euroseeds is a key stakeholder in organic farming

Europe's plant breeders and seed producers are and remain committed to serve all types of farming with the best possible plant reproductive material of new and improved varieties conforming to European standards and requirements.

Euroseeds is a key stakeholder in the organic farming debate and is proud to represent companies active in research, breeding, production and marketing of seeds of agricultural, horticultural and ornamental plant species – including for the organic sector. Each year the number of varieties for the organic market is growing, from just a handful 20 years ago to hundreds today. Currently, the biggest share of plant material for organic agriculture is marketed by Euroseeds represented companies[1].

Euroseeds members are engaged in meeting the growing and changing demand in the organic sector, including certified organic seed. Working to ensure that farmers have sufficient seed adapted to their needs drives their investment decisions.

The organic sector is large and diverse. Currently, organic farming represents around 6,5% of the total EU agricultural area and it is foreseen to increase up to 10% by 2030[2]. Euroseeds experience is that many growers active in the sector are keen to deal with professional seed companies who can guarantee high quality seeds of varieties with an optimized performance

[1] Boosting organic seed and plant breeding across Europe 2017 – 2021. LIVESEED, H2020 research project: https://www.liveseed.eu/wp-content/uploads/2017/10/LIVESEED_general_presentation.pdf

[2] The 2018 EU Agricultural Outlook conference – European Commission

under organic conditions. This is of paramount importance to meet the challenges of the sector in view of increasing organic production.

Plant Reproductive Material for organic farming

The diversity of farmers and growers in the organic sector have different needs and preferences when it comes to plant reproductive material. Therefore, different types of material should be available, provided that organic seed is not established as a minor quality category of seed (i.e. identity, performance, reliability).

Most of the plant reproductive material produced by Euroseeds members is especially suitable for the organic sector: a high level of uniformity makes it easier to mechanise weed control, and reduces the time and energy required to harvest and package – all resulting in reduced CO2 emissions and more sustainable production systems, in line with the organic philosophy.

The use of "organic heterogeneous material" will be permitted under new European rules for organic production, subject to additional rules to be laid down before January 2021[3]. Euroseeds members are not producing such material, which is serving a separate niche market segment.

The ongoing temporary experiment[4] on the suitability of heterogenous material seeks to establish conditions for the development of "organic varieties suitable for organic production" and explores exactly how such guarantees and information may be provided to farmers on heterogeneous material, with a view to laying down specific conditions under which such material may be marketed in future.

At EU level there is a robust regulatory system in place covering variety registration and seed marketing. This pre-market authorisation system provides downstream benefits to the entire agri-food chain and constitutes a trigger to continuous improvement.

Furthermore, such a system is extremely important for many reasons: in addition to ensuring quality, safety and reliability, the system also ensures equal opportunities for all market participants (thus counteracting market concentration). Official checks offer a very valuable and objective source of information for farmers on variety performance under different conditions. In view of this it is important, to put in place appropriate conditions and safeguards are in place to ensure that the marketing of heterogeneous material does not undermine the existing quality assurance system (see Annex I on organic heterogeneous material).

---

[3] Regulation (EU) 2018/848 of the European Parliament and of the Council of 30 May 2018 on organic production and labelling of organic products and repealing Council Regulation (EC) No 834/2007 OJ L 150, 14.6.2018, p. 1–92. Definition Article 3(18), specific provisions Article 13

[4] 2014/150/EU: Commission Implementing Decision of 18 March 2014 on the organisation of a temporary experiment providing for certain derogations for the marketing of populations of the plant species wheat, barley, oats and maize pursuant to Council Directive 66/402/EEC; OJ L 82, 20.3.2014, p. 29–36

According to the new Organic Regulation[5], derogations shall expire on 31 December 2035. However, depending on the availability of organic plant reproductive material, this deadline can be extended beyond that date. Euroseeds is of the opinion that the principle of organic production may still be preserved if organic seed is multiplied from untreated, non-organic basic seed. Furthermore, decisions on derogations shall solely be taken on the basis of assessment of organic seed availability on EU level.

National shortages in the one or other species generally can easily be compensated by supply from companies in other Member States, when suitable for the local growing conditions and farming practices. Less derogations may stabilise and increase the share of certain markets and therefore, improve their viability. In return, this may incentivise companies to invest in such markets.

Breeding programmes for organic farming

Organic growers and farmers currently have access to and benefit from high quality seed developed from a wide range of different breeding methods. It must be emphasized that only few breeding programs are dedicated solely to the organic sector; given the rather small size of the organic market in general and of some specific organic markets specifically, such exclusive dedication is not economically sustainable. Varieties for organic production therefore commonly derive from the same breeding programmes as their non-organic counterparts. During the long breeding history of any new variety, a huge diversity of genetic resources is combined in the breeding pedigree, each of them resulting from different and innovative breeding methods. This use, of course, always complies with any relevant legislative requirements.

As regards organic production, generally all breeding methods are suitable and, for the European Union, solely the use of GMOs regulated under EU legislation is prohibited. Finally, varieties developed for or specifically suitable for organic production generally are tested under respective organic growing conditions to verify that their performance meets the expectations of farmers and growers in practical production.

Euroseeds acknowledges that next to legislative rules and regulations, private definitions and standards may be developed and used as marketing tools by individual groups of economic operators in the organic market. Euroseeds underlines that a restriction of breeding methods for organic variety development would have significant consequences for all organic farmers and growers. For many crops, there will be less diversity and choice. For some species, even no organic seed will be available anymore.

---

[5] Regulation (EU) 2018/848 of the European Parliament and of the Council of 30 May 2018 on organic production and labelling of organic products and repealing Council Regulation (EC) No 834/2007 OJ L 150, 14.6.2018, p. 1–92. Article 53

Lastly, exclusively organic breeding programmes would, based on the size of the sector, be much smaller, thus more expensive, riskier (exposure of bred lines to diseases, pests, etc.) and consequently lengthier; such an approach is contrary to the urgent needs of growers – especially organic growers – to meet current and future agricultural challenges, such as climate change.

Euroseeds proposals for the future

According to article 26.1 of Regulation 2018/848, Member States shall ensure the regular update of a national database which lists plant reproductive material available on its territory. From Euroseeds' point of view, this approach represents a disruption of the Single Market.

Therefore, Euroseeds suggests the integration of the existing national databases and the information supplied therein into a common EU-level database on the availability of organic seed, similar to the system of the EU Common Catalogue of plant varieties. Such approach fulfils the criteria establish in the Regulation while at the same time advances in the Single Market, creates reliability for investments in improving products for the organic market and helps reducing the number of derogations granted.

The seed sector has a long history of producing increasingly healthy, useful, safe and sustainable plant varieties and seeds. Proactive, structured and transparent engagement and dialogue is an opportunity to deliver accurate and up to date information on plant breeding and the resulting products.

Moreover, Euroseeds participates in different EU research projects with the aim of improving availability and competitiveness of the organic seed and breeding sector.

Other positive developments in the organic sector

There is more to organic seed production than breeding only. Euroseeds members have also been working to develop new seed enhancement and disinfection methods compliant with organic production rules. These not only help to boost the competitiveness of the organic sector but can also be applied to practices in the conventional market.

Many Euroseeds companies run organic programmes alongside conventional programmes. Such parallel activities can positively influence each other, improving the sustainability of the companies' investments and its practices overall, and bringing experience, professionalism and know-how to emerging market segments.

Annex I. Organic Heterogeneous Material

Placing of organic heterogeneous material on the market should not be at the expense of the quality currently provided to farmers.

Potential value of organic heterogeneous material

Heterogeneity may entail agronomic benefits in cultivation under certain sub-optimal conditions. This is the case when the grower is unable to control or react to biotic (i.e. pests and diseases) or abiotic stresses (i.e. drought, flood, soil salinity).

Restrictions in the use of pesticides and fertilizers lead to lower potential yields, as it is the case in organic farming[6]. In this case, organic heterogeneous material can become a buffer against environmental hazards and loss of production.

In some other cases, heterogeneous material may also represent a higher plant health risk due to earlier breakthroughs of resistance or higher pest and disease pressure on the field (i.e. *Phytophtora* in potatoes). Moreover, other disadvantages linked to the use of heterogeneous material in agriculture are different growth rates, crop cycles, maturity index, ripening season, etc.

Therefore, heterogeneous material may be a potential valuable addition to the organic market provided that minimum thresholds in phytosanitary and quality requirements are established and maintained. This can be only the case if a clear distinction between heterogeneous material and varieties is made, enforcement is in place and fraud can be prevented[7].

Finally, there are certain market barriers for heterogeneous products which need to be considered. In the case of arable crops, the processing practices often require a high level of uniformity to ensure a homogeneous end product. Also, in the case of vegetables, uniformity is of high importance.

When would heterogeneous material be relevant?

For those crops where a maximum degree of heterogeneity is established within the varieties, in accordance with the definition in Article 5(2) of Regulation (EC) 2100/94, the opening up of the

[6] Farming without plant protection products
http://www.europarl.europa.eu/RegData/etudes/IDAN/2019/634416/EPRS_IDA(2019)634416_EN.pdf

[7] Not only among heterogeneous material and organic varieties but also organic heterogeneous material entering the conventional market and disrupting it with low quality material.

market for extra heterogeneous material has little or no added value and can easily be detrimental to the Community Plant Variety Office (CPVO) crop protocols and the plant breeders' right that these protocols are intended to protect. As a consequence, plant species that are heterogeneous by nature, which among others include species of clover and grass, should be exempted from any potential amendment of the current regulation, including the definition in Article 5(2) of Regulation (EC) 2100/94.

Allowing this heterogeneous material to be placed in the market without having to take into account the requirements established in seed marketing directives, opens the possibility for fraud and marketing of intrinsically inferior starting material.

Finally, there are temporary experiments with populations of a number of cereal crops. There is little to no knowledge on how populations adhere to varieties and whether the perceived benefits are expressed. Therefore, we recommend building up knowledge on the different species before establishing the certification schemes.

Proposals

Provisions established in Commission Implementing Decision 2014/150[8] already establish a good basis to be considered in order to set up the appropriate framework for organic heterogeneous material.

Particularly, we consider that the following aspects should be considered:

- To establish a system of seed registration and certification scheme for populations of heterogeneous material
- To have a description of the main phenotypic characteristics, including breeding methods and parental material used and "value in use" depending on each species with the information of variability of each characteristic (average and standard deviation) to have the possibility to identify the heterogeneous material, to check whether the heterogeneous material sold corresponds to the declaration or it's not plagiarism of varieties (mixture of varieties, F2)
- To define a level of heterogeneity depending on species to avoid for example that varieties which failed to homogeneity test could be sold under heterogeneous material. This level depends on species and should be higher than heterogeneity level defined for population in CPVO Guidelines

[8] organisation of a temporary experiment providing for certain derogations for the marketing of populations of the plant species wheat, barley, oats and maize pursuant to Council Directive 66/402/EEC https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32014D0150&from=EN

- To ask for post-control of heterogeneous material by the national competent authorities to check the identity and the level of heterogeneity of heterogeneous material sold to farmers, in comparison with the representative sample
- To ask for control of the maintenance of the heterogeneous material to make sure the heterogeneous material keeps conform to the phenotypic and agronomic characteristics declared in the notification as a guarantee for growers
- To ask for the same requirements of germination, analytical purity and phytosanitary quality as varieties of the same species defined in marketing directive and Plant Health Regulation. This should guarantee the quality for growers, especially important for organic production
- To register the applicants so that they are easily identifiable in case of dispute

Avenue des Arts 52
1000 Brussels

www.euroseeds.eu

#EmbracingNature