

Position

Organic Plant Breeding Regulation 2018/848

EXECUTIVE SUMMARY

In the context of the [revision](#) of the Organic Farming Regulation, the European Parliament's Committee on Agriculture and Rural Development (AGRI) adopted [Amendment 14](#), which would empower the Commission to establish additional rules for organic plant breeding.

Euroseeds supports the development of organic farming, the supply of high-quality certified organic plant reproductive material (PRM) and a better functioning organic seed market. However, breeding varieties for organic production is not the same as regulating "organic plant breeding" as a separate process. European breeders and seed companies already invest in varieties with the agronomic performance, disease resistance and local adaptation needed in organic and other low-input production systems.

Amendment 14 extends the Commission's targeted revision into a broader breeding-policy mandate without a demonstrated need or dedicated impact assessment. It also precedes forthcoming evidence on organic PRM availability and the feasibility of organic varieties. Additionally, binding process requirements could restrict access to genetic resources and make breeding more costly and less efficient. This could reduce the varieties available for organic multiplication, limiting farmers' choice and prolonging the need for derogations.

EUROSEEDS CALLS ON THE CO-LEGISLATORS TO:

- **Remove Amendment 14**, which would empower the Commission to establish additional rules for organic plant breeding.
- **Maintain a performance-based approach**, assessing varieties according to their suitability for organic and low-input production rather than the breeding pathway from which they originate.
- **Prioritise the availability of certified organic PRM**, farmers' access to a diverse range of suitable varieties and the progressive reduction of derogations.
- **Address demand for additional organic-breeding requirements through voluntary standards**, rather than through a broad delegated power to regulate breeding programmes.

1. Amendment 14 falls outside the scope and timetable of the targeted revision

Euroseeds welcomes the Commission's proposal to amend Regulation 2018/848 to address practical production, certification, labelling and trade issues in the context of the organic certification equivalence regime with third countries. However, the AGRI Committee's amendment on organic plant breeding goes beyond the intended scope by opening a technically and legally sensitive area to future delegated acts. This proposed mandate is disproportionate and ill-suited for the Commission's proposal:

- The trilogues negotiations must be finalised before the end of 2026 to allow for the renewal of the organic equivalence regime system with partner countries, and thus the well-functioning of the European organic market. Adding unexpected amendments may lengthen negotiations against this deadline.
- The amendment contradicts the Commission's simplification imperative to reduce bureaucracy and administrative burden for organic operators and Member States' administrations, as laid out in the proposal.
- The amendment would create a new regulatory mandate before the evidence base is complete. The Commission's upcoming assessment of organic PRM availability (Art. 53) and the temporary experiments on "organic varieties suitable for organic production"¹ should inform any future policy discussion before new binding requirements are considered.

2. Breeding for organic production is not the same as regulating "organic plant breeding"

Varieties used in organic production commonly originate from breeding programmes and gene pools serving different production systems. Collaboration and exchange of genetic resources across breeding programmes are central to the development of improved plant varieties. Organic breeding requirements could limit such collaboration and hinder the development of high-performing, resistant varieties for organic production by restricting the tools available to breeders.²

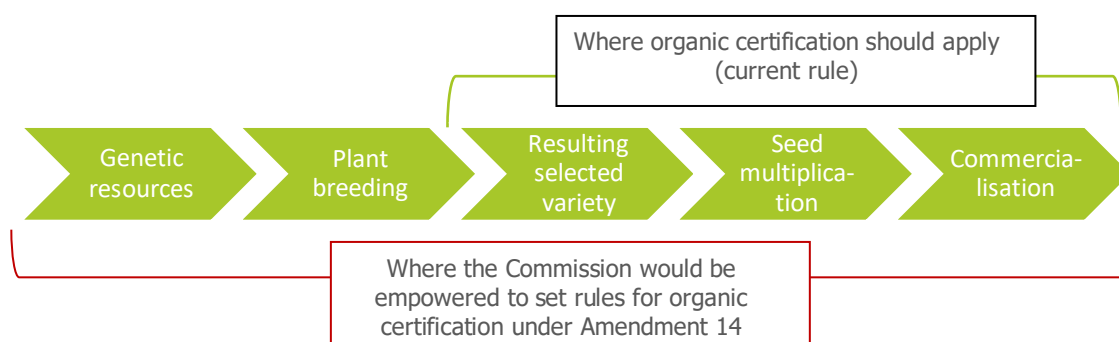
Suitability for organic farming does not logically depend on an exclusively organic breeding pathway. The relevant policy criterion should therefore be whether a variety performs well under organic conditions. The definition of organic breeding in Regulation 2018/848 points to

¹ Regulation 2018/848 introduces the concept of "organic varieties suitable for organic production" (Art.3, 19), which must result from organic breeding activities defined as "conducted under organic conditions and shall focus on enhancement of genetic diversity, reliance on natural reproductive ability, as well as agronomic performance, disease resistance and adaptation to diverse local soil and climate conditions" (Annex II, Part I, 1.8.4). While not mandatory for organically certified PRM, the Regulation encourages the development of organic varieties through organic plant breeding (Art. 6, (g) & (h) and Art. 4, (i) & (j)). Following Implementing Directives 2022/1647 and 2022/1648, Member States must report by 2030 on applications and registrations under the temporary experiments for "organic varieties suitable for organic production"

² For example, according to its definition in Annex II, Part I, 1.8.4 of Regulation 2018/848, organic breeding shall rely on "natural reproductive ability". This is open to interpretation. It should not be further specified in a way that restricts lawful breeding approaches, including the development of hybrid varieties, which can provide disease resistance, vigour and other characteristics valuable in organic and low-input systems.

the need for agronomic performance, disease resistance, and adaptation to local soil and climate conditions.

Breeding process and organic certification



3. Prescriptive breeding rules would reduce choice and investment

The proposed empowerment to issue rules on organic plant breeding could translate into programme-level requirements which could require separate infrastructure, documentation and breeding pipelines over several generations. For many crops and markets, especially smaller organic segments, these additional costs would be difficult to recover. Some programmes could be delayed, narrowed or discontinued. The result would not necessarily be more organic seed, but fewer candidate varieties available for multiplication under organic conditions.

Practical risks for the organic value chain

Restricted genetic resources	Qualification requirements for starting and crossing material could narrow access to germplasm and reduce collaboration between programmes and breeders.
Longer and less efficient breeding	Technique restrictions, disclosure duties or min. programme durations could delay delivery of performant varieties adapted to pest, disease and climate pressures.
Fewer varieties for multiplication	A smaller pool of eligible varieties would limit what can be multiplied and listed in national organic seed databases.
Reduced farmer choice	Organic farmers could face fewer options for harvest timing, resistance, quality requirements, local adaptation and agronomic performance.
Persistent derogations	Where suitable organic PRM remains unavailable, derogations for conventional untreated seed would remain necessary for longer (2036 deadline).

4. The main bottleneck is availability of organic PRM, not the origin of the breeding programme

Organic seed supply depends not only on breeding, but also on successful multiplication under organic conditions. Germination, sanitary quality and reliable volumes can be more difficult to secure where disease pressure is high, and crop protection options are limited. Policy should target these practical constraints and create conditions for investment in organic seed production.

Introducing stricter breeding-process criteria risks moving policy attention away from this objective. The cause-and-effect chain is clear: restrictive criteria reduce eligible programmes and varieties; fewer varieties are multiplied and listed; farmers have less choice; and derogations remain necessary where suitable organic PRM is unavailable. This would undermine, rather than support, the progressive reduction of derogations.

5. A proportionate and coherent way forward

Euroseeds recommends a policy approach built around performance, availability and regulatory coherence. The EU should support breeders in developing varieties suited to organic and other low-input systems while preserving access to genetic diversity, lawful breeding methods and effective collaboration.

Policy objective	Euroseeds recommendation
Suitable varieties	Maintain a performance-based approach using agronomic performance, disease resistance and adaptation to local soil and climate conditions.
Organic integrity	Continue applying organic certification requirements to the production and multiplication of PRM placed on the organic market.
Organic PRM availability	Focus action on multiplication capacity, seed quality, market information and the functioning of national organic seed databases, towards ending derogations.
Market differentiation	Allow operators to develop voluntary private standards for a premium organic-breeding segment (i.e. "organic varieties") without restricting farmers' access to suitable varieties.
Legal coherence	Keep breeding methods and intellectual property questions within their dedicated horizontal EU frameworks.

Euroseeds therefore calls on the European Parliament and the Council to remove the AGRI Committee's Amendment 14 empowering the Commission to adopt additional rules for organic plant breeding. Any future discussion on the concept should take place through a dedicated, evidence-based review with appropriate stakeholder consultation and impact assessment.



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