

2 December 2024

## **Call for Urgent and Important Changes to the Proposed EU Regulation on the Production and Marketing of Plant Reproductive Material**

Dear Minister,

On 9-10 December 2024 you will discuss the proposed new EU Regulation on the Production and Marketing of Plant Reproductive Material (PRM) at the Agriculture and Fisheries Council in Brussels.

**We, the 139 undersigned organisations, represent actors involved in the preservation, development, production and use of the diversity of our cultivated plants, especially cereals, vegetables, and fruits.** Our work ensures that farmers and gardeners continue to have access to PRM of species and varieties not offered by the global seed industry, including traditional regional varieties, varieties well-suited for cultivation without pesticides and synthetic fertilisers and in marginal areas, and varieties and heterogenous material that can evolve on farm and continuously adapt to local conditions owing to broad genetic intra-varietal diversity.

A diversity of crop species and varieties as well as diversified, decentralised and community-based approaches to the conservation and production of PRM are indispensable for sustainable, crisis-proof food systems. The importance of our work is recognised under the International Treaty on Plant Genetic Resources for Food and Agriculture, and the United Nations Declaration on the Rights of Peasants and Other People Working in Rural Areas<sup>[2]</sup>.

The current rules on the production and marketing of PRM promote seeds and other PRM developed for industrial agriculture, which can be sold together with harmful pesticides and synthetic fertilisers, and grown in monocultures. The agro-industry is pushing for the rules to go even further, outlawing diversity to make both the seed and our food system even more uniform and therefore vulnerable. What we need is exactly the opposite. We need legislation that secures our right to healthy, diverse and tasty food, by enhancing diversity in fields and in gardens, supporting local varieties, and respecting farmer's rights.

Worryingly, the new EU PRM Regulation proposed by the European Commission in July 2023 threatens the conservation and circulation of the diversity of our cultivated plants. It disregards farmers' right to harvest, use, exchange and sell their own seeds, as enshrined in international law. It is unacceptable.

**Together with over 130,000 citizens who have signed the petition *Raise our Forks – for Diversity!*<sup>[3]</sup> we call on you to rehaul the proposal. Please ensure that the regulation enables the circulation of diverse seeds, enhances biodiversity, respects farmers' rights, and lays the foundation for a sustainable, resilient and diverse food system!**

The conservation and sustainable use of locally adapted crop diversity is the overriding priority.

According to the UN we have already lost 75% of crop diversity in agriculture<sup>[4]</sup>. What remains is our lifeline. We will need to protect and utilise the remaining diversity to adapt our food production to more extreme weather conditions and new pests and diseases.

The human right of farmers and gardeners to harvest, use, exchange and sell their own seeds and other PRM must be implemented fully.

This right is enshrined in Article 19 of the United Nations Declaration on the Rights of Peasants and Other People Working in Rural Areas, as well as in Article 9 of the International Treaty on Plant Genetic Resources for Food and Agriculture, and is binding for the European Union and its Member States.

The marketing of diverse and locally adapted varieties by regional seed producers must be facilitated.

Rules designed to regulate industrial seed production must not be (ab)used to restrict the sale of diverse local varieties and species by artisanal producers. In light of the climate and biodiversity crises, we need to diversify the production of seeds, not further increase our dependency on industrial seed sources. Efforts by the agro-chemical lobby to destroy all alternatives via over-regulation must be resisted!

Newly approved varieties must not be dependent on pesticides or synthetic fertilisers.

To enable farming methods that protect our environment and climate, we need seeds that flourish under organic and/or low-input growing conditions.

**We call on you to not succumb to the industry's pressure, but to protect and promote the diversity of our cultivated plants as well as farmers' right to harvest, use, exchange and sell their own PRM. We kindly request a meeting with you to discuss the importance of cultivated plant diversity and our concerns with the proposal.**

Yours Sincerely,

The Undersigning Organisations

P.S. In the enclosed book, *Eating to Extinction – The World's Rarest Foods and Why We Need to Save Them* by BBC journalist Dan Saladino you can discover stories of endangered local varieties of cereals, vegetables and fruit from Europe and beyond. The book showcases why this genetic diversity, which the proposed regulation would threaten further, is critical not only to the preservation of traditional food cultures and local farming systems, but also represents the “genetic toolkit” humanity will need to adapt to a wider range of environmental and climatic conditions. Enjoy!

<sup>[1]</sup> <https://www.fao.org/4/i0510e/i0510e.pdf>

<sup>[2]</sup> <https://digitallibrary.un.org/record/1650694?ln=en>

<sup>[3]</sup> [www.raiseourforks.org](http://www.raiseourforks.org)

<sup>[4]</sup> <https://www.fao.org/4/y5609e/y5609e02.htm>



**GLOBAL / EU / REGIONAL:** Balkan Seed Network Association, CEEweb for Biodiversity, CIDSE, Compassion in World Farming, Oxfam, PELUM Association, RMRM – Réseau Meuse-Rhin-Moselle, Seeds4All, Slow Food

**AUSTRIA:** ARCHE NOAH, BirdLife Austria, Brot für die Welt, Demeter Österreich, DIE UMWELTBERATUNG, DKA Austria, Erde & Saat, FIAN Austria, Global 2000 - Friends of the Earth Austria, Sortenwerkstatt, Welthaus Diözese Graz-Seckau

**BELGIUM:** BioForum, Boerenforum, Bond Beter Leefmilieu, Broederlijk Delen, Climaxi, CNCD-11.11.11, Entraide & Fraternité, FedeAU - Fédération Bruxelloise des Professionnel.le.s de l'Agriculture Urbaine, FIAN Belgium, GRAB, Iles de Paix, Mouvement d'Action Paysanne/Ecole Paysanne Indépendante, Le Réseau des GASAP, Solidagro, UNAB - Union des agricultrices-eurs bio de Wallonie, VELT (also for the Netherlands), Vitale Rassen, Voedsel Anders

**BOSNIA AND HERZEGOVINA:** Foundation Alica

**BULGARIA:** Agrolink, Fondatsia Badeshte 21 vek, Fondacia Bioselena, Natsionalen Sayuz na gradinarite v Bulgaria, Sdrujenie Blagodaria

**CROATIA:** Biovrt - u skladu s prirodom, Croatian Organic Farmers' Associations Alliance, ZMAG - Zelena mreža aktivističkih grupa

**CZECH REPUBLIC:** Semínkovna

**DENMARK:** Foreningen Frøsamlerne (Danish Seed Savers), Frie Bøner - Levende Land, Landsforeningen Praktisk Økologi

**FRANCE:** Epices ROELLINGER, Femmes semencières, Graines de Troc, Les Maisons de Bricourt, Les Maîtres de Mon Moulin (MMM), Mauro Colagreco - Mirazur, Réseau Semences Paysannes, Terre & Humanisme

**GERMANY:** Arbeitsgemeinschaft bäuerliche Landwirtschaft (AbL), Dachverband Kulturpflanzen- und Nutztiervielfalt, Dreschflügel, Interessengemeinschaft Nachbau, Lebende Samen, Saatgutgärtnerei KoRnzept, Verein zur Erhaltung und Rekultivierung von Nutzpflanzen (VERN)

**GREECE:** AEGILOPS, Agroecological Network of Greece, ANEMOESSA, ANIMA, CALLISTO Wildlife and Nature Conservation Society, COB, Ecological Intervention of Heraklion, Ecological Movement of Patras, EPARKEIA KOINSEP, Forest Voice, Georgas Family, Hellenic Centre of Mindful Eating, Κοινσ επ Joyce 'n' Fun, Mamagea Environmental Organisation, Natural Farming Center, Naturefriends Greece, Northern Greece Organic Farmers Association, Oikotropio, Open Farm, Organization Earth, Panhellenic Animal Welfare and Environment Federation, Peliti, Sito Seeds, Sylogos Energon Politon Aeginas, Union of Organic Farmers Attika, Zophoros

**HUNGARY:** Banya Tanya Foundation, Budafoki Kosár Közösség, Fenntartható Téréség Foundation, Magház Association

**IRELAND:** Irish Seed Savers Association, Sow Diverse

**ITALY:** Rete Semi Rurali

**LUXEMBOURG:** SEED – Som fir d'Erhalen an d'Entwécklung vun der Diversitéit

**NETHERLANDS:** AVVN samen natuurlijk tuinieren

**PORTUGAL:** Quinta Das Aguias, Plataform Transgenicos Fora, Sementes Vivas

**ROMANIA:** Eco Ruralis Association

**SPAIN:** Amigos de la Tierra, Asociación La Regaera, Asociación La Troje, Asociación Un Paso Atrás, Spanish Association of Ecological Gardening (AEJECO), APAEMA, Associació de Varietats Locals, Associació L'Era, Espai de Recursos Agroecològics, Biltar, BIOGRUP SL (ECOCENTRAL), La Buena Siembra S.Coop.And., CERAI-Centro de Estudios Rurales y de Agricultura Internacional, CERES CASTILLA Y LEÓN, Connecta Natura, Ecologistas en Accion, El Enjambre sin Reina, Fundación Entretantos, Fundación Savia por el Compromiso y los Valores, Grupo de acción medioambiental GRAMA, Huerta Molinillo S.Coop., Huerta Molinillo S.Coop., Llavors d'Ací, Red Agroecológica de Cádiz, Red Andaluza de Semillas, Red Canaria de Semillas, Red de Semillas "Resembrando e Intercambiando", La Simiente de Lebrija, TRITICATUM, Unión de Huertas Agroecológicas de Madrid, UNIÓN DE UNIONES DE AGRICULTORES Y GANADEROS, Universidad Rural Paulo Freire Sierra de Huelva, Xarxa Catalana de Graners

**SWEDEN:** Föreningen Sesam

**SWITZERLAND:** Pro Specie Rara

**UNITED KINGDOM:** The Seed Sovereignty Programme (also for Ireland)