

Brussels, 25 November 2025

Joint letter Production and Marketing of Plant Reproductive Material reform: NGOs, farmers' and breeder representatives urge Member States to protect and enhance agrobiodiversity

Dear Minister,

As the negotiations on the new EU Regulation on the Production and Marketing of Plant Reproductive Material (PRM) are coming to an end at the Council level, we, the undersigned organisations, urgently ask you to **protect and enhance agrobiodiversity to strengthen the resilience of our food production**. While we welcome some positive elements, like adapted rules for the registration of organic varieties, more is needed to enable a **diversified seed market, implement farmers rights to seeds, and ensure farmers have access to cultivars adapted to their farming systems**.

As actors involved in the conservation, dynamic management, production, dissemination and sustainable use of the diversity of our cultivated plants, **we call on you to rectify the shortcomings of the current council proposal**, as set out in more detail below, to be able to continue our important work.

Why diversity matters

Diverse seeds and planting material are the basis of healthy ecosystems and diets, and resilient agri-food systems. They enable crops to adapt to local and changing growing conditions, resist pests and diseases, and support the production of diversified and nutritious food production. Strengthening this diversity is a key policy leverage for climate-change adaptation, ensuring farmers have the genetic resources necessary to cope with increasing climate variability.

Yet, over the past decades, agrobiodiversity has drastically declined. According to the UN, 75% of crop diversity in agriculture was lost in the last century, and 75% of the world's food comes from only 12 plants and 5 animal species.¹ This trend has been driven by a focus on uniformity and the concentration of the seed market in the hands

¹ In the last decades a lot of crucial on-farm research and innovation was carried out by breeding and research institutions as well as seed-farming organisations, centered on fostering the dynamic management, circulation, and marketing of diverse varieties or populations of all crops. This innovation was supported by European public funds channelled through the Framework Programmes and the Horizon 2020 schemes (SOLIBAM, Diversifood, Cerere, Dynaversity, LIVESEED, LiveSeeding). The innovation on diverse varieties and populations that form the basis of more sustainable, low-input and resilient farming systems needs to be reflected in the new legislation and further strengthened.

of a few large companies. In addition, most cultivars have been bred under high-input conditions, and are thus unsuitable for cultivation under organic or agroecological conditions, which moreover require a much larger range of crop (and animal) species and varieties.

Agrobiodiversity relies on non-commercial exchanges of PRM practiced by farmers and gardeners for on-farm breeding and dynamic management, as well as on small, local seed producers, many of which offer a greater range of crop diversity than some of the largest players in the market.

The future PRM regulation must include robust provisions to reverse this trend of reducing the diversity of crop species and varieties in the field. It must **create space for small and medium breeders, seed producers, farmers, and other actors** engaged in the conservation and dynamic management of a wide range of genetic resources who highly contribute to maintaining and developing agrobiodiversity.

How to enhance agrobiodiversity to protect food sovereignty

To ensure the future PRM legislation effectively protects agrobiodiversity, we call policymakers to:

1. **Exclude from the scope of the Regulation activities done for the purpose of the conservation and dynamic management of genetic diversity.**

Exchanges and transfers of PRM carried out for the purpose of breeding, conserving or dynamically managing plant genetic resources should not be considered as commercial marketing. These practices are essential to maintain diversity in fields and gardens. It is disproportionate and dangerous for agrobiodiversity conservation to be subjected to rules intended to regulate the commercial market. The purpose of agrobiodiversity conservation should be excluded in Art 2.4, as is already the case for exhibitions, research, breeding, and official tests.

2. **Guarantee farmers' right to save, use, and exchange their own seeds, including with financial compensation.**

These practices have historically created rich agrobiodiversity, and allowed farmers to adapt their seeds to their own needs and support each other in crisis. As such, they are recognised under international law (ITPGRFA, UNDROP, CBD) and must be as well recognised by EU law outside of the scope of the PRM regulation. While we welcome the aim of allowing farmer's seed exchanges through Article 30, we maintain that farmers who exchange PRM for breeding, conservation, and dynamic management purposes in the context of their agricultural production, and not for marketing purposes, should not be considered professional operators. Such exchanges are not marketing and should not be subject to the plant health and bureaucratic rules of marketing,

but only to those applicable to agricultural production, allowing farmers to exchange PRM in quantities appropriate to their agricultural production needs.

3. Facilitate registration and use of both old and new conservation varieties for all crops and without geographical limitations.

Conservation varieties are extremely important for many organic and agroecological farmers and breeders. Restricting them to a certain number of species or to their region of origin would be highly detrimental to those who currently rely on them. Therefore, those limitations must be removed, and their registration shall be simple, free, and accessible to any individual or legal entity. Plus, the definition must clearly state that these cultivars must be non-hybrid, non-GMO/NGT, and not covered by intellectual property rights.

All varieties developed for growing under particular conditions (Article 21(1) of Directive 2009/145/EC) and commonly known fruit varieties (Article 7 of Directive 2008/90/EC) need to be entered as conservation varieties in the new variety register without further bureaucratic burden to ensure their continued availability.

4. Conduct Value for Sustainable Cultivation and Use (VSCU) testing under organic or low-input conditions.

Sustainability cannot be reduced to single trait(s) or gene(s). Therefore, it must be assessed through a system-based approach. VSCU trials should be conducted under organic or low-input conditions for all varieties. For varieties suitable for organic production, the VSCU *must* be conducted under organic conditions for all species and in all Member States.²

5. Reduce administrative burden for nano-enterprises to enable a diversified seed market and avoid its further concentration in the hands of a few main players.

Contrary to the European Commission's pledge of reducing administrative burdens for SMEs by at least 35 %, the new obligations for professional operators would considerably increase the administrative burden, forcing many small seed producers to cease their operations.³ Nano-enterprises, characterised by a turnover of less than 100,000 EUR, play a key role in making available a wide diversity of varieties and especially species to farmers and gardeners. To enable continued availability of regionally adapted seed diversity,

² For more information on adapted registration protocols for organic varieties suitable for organic production, see the LiveSeeding policy brief on the [Definition of Organic Plant Breeding for registration of Organic Varieties suitable for organic production](#)

³ ARCHE NOAH, [Bureaucracy against biodiversity](#). *How new administrative burdens in the UE-PRM-Regulation could tighten agro-chemical control over our fields and plates*. May 2025.

nano-enterprises should be exempted from the new notification, administrative, and traceability obligations.

6. Ensure transparency on breeding methods and availability of information on intellectual property rights.

Transparency, i.e labeling and establishment of public and mandatory databases on breeding methods and IPRs covering marketed PRM, is essential to enable informed choices and fair access. This ensures breeders and farmers having access to the knowledge needed to develop new, diverse, and resilient (organic) cultivars. It is therefore essential that the general breeding technologies used to produce a variety and the granted intellectual property rights are made publicly available in national and Union variety registers (Annex VII).

As the impacts of climate change intensify and crop genetic diversity declines, it is crucial that the new PRM legislation meets the needs of the actors working on the ground to conserve and dynamically manage agrobiodiversity, by making these critical key changes to the proposed regulation.

Yours sincerely,

The undersigning organisations

UNDERSIGNING ORGANISATIONS



A LEVADA
ASOCIACIÓN DE PRODUCTORAS AGROECOLÓGICAS DE ALLARIZ



BIOFOP Achleitner



Agrilink



ARCHE NOAH

arrandeterra



ARTE LOW BRIZ



Tierra Fértil

agricultura regenerativa
www.agriculturaregenerativa.es



EL ENCINAR
ASOCIACIÓN

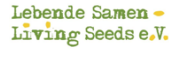


Biodynamic Agriculture Association of Ireland



Biovrt
u skladu s prirodom







GLOBAL / EU / REGIONAL

Agroecology Europe
Animal Advocacy & Food Transition
Balkan Seed Network Association, Banja Luka,
Bosnia and Herzegovina
Biodynamic Federation Demeter International
Corporate Europe Observatory

European Consortium for Organic Plant
Breeding
European Coordination Via Campesina
IFOAM Organics Europe
PAN Europe
Parents For Future Global
SAFE Food Advocacy Europe

AUSTRIA

Achleitner Biohof GmbH
Apis-Z Bio-demeter Imkerei
ARCHE NOAH
Bio Austria - Verein zur Förderung des
Biologischen Landbaus
BirdLife Austria
Demeter Österreich

Erde & Saat
Erste Raabser Walzmühle M. DYK GmbH &
Co KG
Meinklang (also for Hungary)
Parents For Future Austria
Regionalwert Niederösterreich-Wien AG
ReinSaat GmbH
Vegans for Future Austria

BELGIUM

BioForum vzw
Bond Beter Leefmilieu
Entraide & Fraternité
FIAN Belgium
Mouvement d'action paysanne

Nature & Progrès
Solidagro
Vitale Rassen
Voedsel Anders Vlaanderen

BOSNIA AND HERZEGOVINA

Foondacija ALICA, Banja Luka, Bosnia and Herzegovina

BULGARIA

AGROLINK Association
Sdruzhenie PoleRani/PoleRani Association

STEP (Society for Territorial and
Environmental Prosperity)

CROATIA

ADIPA: Society for Research & Conservation of
Croatian Natural Diversity
Association Biom - BirdLife Croatia

Biovt - u skladu s prirodom
HSEP
ZMAG

CZECH REPUBLIC

Semínkovna, z.s.

DENMARK

Foreningen Frøsamlerne / Danish Seed
Savers
Frie Bonder - Levende Land

Landsforeningen Praktisk Økologi
Permakultur Danmark

FINLAND

Maatiainen - det lantliga kulturarvet ry

FRANCE

Confédération paysanne (France)
Fédération Nature & Progrès
Génération Futures
Le jardin voyageur

OGM dangers
Pétanielle
Réseau Semences Paysannes

GERMANY

apfel:gut e.V.
Arbeitsgemeinschaft bäuerliche Landwirtschaft
(Abl.) e.V.
Arbeitsgemeinschaft bäuerliche Landwirtschaft
Mitteldeutschland
Arbeitsgemeinschaft bäuerliche
Landwirtschaft, Landesverband Bayern e.V.
Bioland Gärtnerei Haas
Climate Farmers
Dachverband Kulturpflanzen- und
Nutztiervielfalt e.V.
Dachverband Ökologische Pflanzenzüchtung
in Deutschland
Demeter e.V. (Germany)
Deutscher Imkerbund
Dreschflegel e.V.
Ernährungsrat Düsseldorf e.V.
Ev. Kirchengemeinde Gauting Umweltgruppe
Grüner Gockel
Genbänke e.V.
Interessengemeinschaft gegen
Nachbaugelände
Interessengemeinschaft gentechnikfreie
Saatgutarbeit (IG Saatgut)
K&K Stauden
Keyserlingk-Institut

KoRnzept
Kultursaat e.V. - Züchtungsforschung,
Kulturpflanzenentwicklung und -erhaltung auf
biologisch-dynamischer Grundlage (also for
German-speaking countries)
Lebende Samen Living Seeds e.V.
LohmannsHof Gärtnerei
MAIZ treemedia e.V.
Mellifera e.V.
Mienbacher Waldgarten/Selbstversorger-
Akademie
OpenSourceSeeds - Agrecol
PaLS gGmbH
Pomologen-Verein e. V.
Ritthalers Grüne Insel GmbH
Samenbau-Nordost-Kooperativ
Save Our Seeds
Schaugarten Schönhagen
Slow Food Deutschland e.V.
Umweltinstitut München
Verein zur Erhaltung der Nutzpflanzenvielfalt
e.V. (VEN e.V.)
Verein zur Erhaltung und Rekultivierung von
Nutzpflanzen (VERN e.V.)
Zukunftsstiftung Landwirtschaft

GREECE

Aegilops
Agroecological Network of Greece
(Agroecology Greece)
Athens Organic Farmers Association
COB Greece
Mamagea Environmental Organisation
Naturefriends Greece

Northern Greece Organic Farmers Association
Open Farm
Panhellenic Animal Welfare & Environment
Federation
SITO seeds
ZOPHOROS CRETE GREECE

HUNGARY

Magház Egyesület

IRELAND

Biodynamic Agricultural Association of Ireland
Cork Biodiversity Hub
Cork Community Garden Network
Cork Food Policy Council
Green Spaces for Health

Sow Diverse
Talamhbeo
The Rock Ballymacavany
Transition Kerry

ITALY

Centro Internazionale Crocevia
Rete Semi Rurali

Slow Food

LUXEMBOURG

SEED Som fir d'Erhalen an d'Entwécklung vun der Diversitéit

NETHERLANDS

Biocyclische-Veganlandbouw Nederland &
Vlaanderen
De BioTuinders
Federatie van Agro-ecologische Boeren

Foodrise
Stichting Zaadgoed
Toekomstboeren

NORWAY

KVANN - Norwegian Seed Savers

PORTUGAL

Association Demeter Portugal
CNA - Confederação Nacional da Agricultura
GAIA - Environmental Action and Intervention
Group

Living Seeds Sementes Vivas SA
Plataforma Transgenicos Fora
ZERO - Associação Sistema Terrestre
Sustentável

SLOVAKIA

Skutočne zdravá škola

SPAIN

A levada. Asoc productoras agroecologicas
Allariz
A Regadera Asoc.
Agrupación de Productores Mincha d'aquí
ALEKA Euskal Herriko haziak
Amigas de de la Tierra
APAEMA
Arran de terra SCCL
Asociación Agroganadera El Frescal:
RSLaPalma
Asociación cultural arteLombriz
Asociación de Agricultura Ecológica Tierra
Fértil
Asociación de Agricultura Regenerativa
Asociación EcoGomera
Asociación El Encinar
Asociación hortelana del Altiplano
Asociación independiente agricultores de
Nules
Asociación La Troje
Associació Agroecologia UdG

Associació de Varietats Locals, Mallorca
Associació Llavors d'Ací
ASSOCIACIÓ PER L'HORTA
Azolla Projects
BIOLUR GIPUZKOA
CERAI-Centro de Estudios Rurales y de
Agricultura Internacional
Club Sierense de Amigos de la Manzana
Col·lectiu Eixarcolant
Culturhaza
Ecologistas en Acción Ciudad de Málaga
Federación nacional asociaciones
independientes
Fundació Novessendes de la CV
Fundación Entretantos
FUNDACIÓN MARTA T.F. Tejiendo Futuro.
Fundación Savia por el Compromiso y los
Valores
Fundación Trashumancia y Naturaleza
Garúa Intervención Educativa S. Coop. Mad.
Granja la Selvatana

Hub del Norte (of Savory Institute)
Instituto de Sociología y Estudios Campesinos
L'ÀGORA DE LA TERRA (L'ÀGORA
AGROECOLÒGICA, SCCL)
La Simiente de Lebrija
LaPlasita
Les Refardes SCCL
MADRES POR EL CLIMA CANARIAS
Madrid Agroecológico
Mensa Civica
MERCADO DA RESERVA DE ALLARIZ
Moncayo Ecológico
ONGD PANKARA ECOGLOBAL
Plataforma Defensa Huerta Zaragoza
Red Andaluza de Semillas
Red Canaria de Semillas
Red de Ecomercados de Andalucía
Red de Municipios por la Agroecología

Red de Semillas "Resembrando e
Intercambiando"
Red de Semillas de Aragón
Red de Semillas Sierra de Gata
Red Extremeña de Semillas
Sdad Coop Agropecuaria la Estrella de San
Juan
SEAE Sociedad Española de Agricultura
Ecológica y Agroecología
Serranías Vivas
Sindicato Labrego Galego
Spanish association of ecological gardening
TRITICATUM
UNIÓ DE PAGESOS DE MALLORCA
Unió de Pagesos de Mallorca
Unión de Uniones de Agricultores y Ganaderos
"ZABAZAICA
Asociación de hortelanas y hortelanos de
Gúdar-Javalambre"

SWEDEN

FOBO

SWITZERLAND

HORTUS OFFICINARUM

ProSpecieRara

UNITED KINGDOM

The Gaia Foundation's Seed Sovereignty Programme (also for Ireland)