



Brussels, Thursday 12 March

Regulation on the production and marketing of plant reproductive material – conservation and local varieties

Dear Minister of Agriculture,

IFOAM Organics Europe, the European Consortium for Organic Plant Breeding (ECO-PB) and Biodynamic Federation Demeter International, representing the organic and biodynamic sectors, would like to share their views on conservation and local varieties, ahead of the ITMs discussing these cultivars.

Conservation and local varieties are essential for organic farmers and breeders. Although they do not meet the DUS criteria, they offer important agronomic, environmental, and socio-cultural benefits – such as adaptation to specific climatic condition, cultural heritage, or taste. Many organic farmers and breeders currently rely on these varieties, which also play a crucial role in maintaining and enhancing genetic diversity. We therefore urge that the final text adequately reflects the needs of farmers and breeders with regard to conservation (and local) varieties.

Keep traditional and newly bred varieties in a single category

Contrary to the European Commission and Parliament's position, the Council differentiates between conservation (i.e. traditionally grown landraces) and local varieties (i.e. newly bred varieties). Such differentiation adds **unnecessary legal complexity** for the breeders and networks developing such cultivars, without delivering any clear regulatory benefit. We therefore advocate for keeping traditional and newly bred cultivars under the "conservation variety" category, in line with the Commission and European Parliament's position.¹

Ensure newly bred varieties are allowed for all species

Restricting newly bred varieties to only fruits and vegetables is not only difficult to understand but would also have **dramatic consequences for the organic farmers who use them, as well as for the organic breeders, networks and seed producers who develop and market them**. Such category is crucial because some populations would neither be able to meet the DUS criteria nor be heterogeneous enough to be notified as organic heterogeneous material (OHM). The examples below concretely show why such category is necessary for arable crops:

¹ References to "local varieties" throughout this document are made for clarity purposes only.

- In Italy, [Rete Semi Rurali](#), together with an organic farmer in Veneto, attempted to notify a wheat OHM under the name “180”, in reference to the 10 years of cultivation and selection of a mixture of 180 old varieties. The competent authorities denied the approval on the ground that “*soft wheat is a predominantly autogamous species, and the percentage of spontaneous crossing that characterizes the species cannot guarantee the level of crossing and the consequent level of heterogeneity that distinguishes a heterogeneous material as defined by the regulations*”. This shows that for self-pollinating species such as wheat, it can be difficult to achieve very diverse materials through on-farm selection.
- In Greece, the [AEGILOPS](#) network revived *skilropetra*, a soft wheat variety that, through its revival process, has taken the form of a population. Currently cultivated in several Greek regions by organic farmers, it shows strong weed competitiveness, and resistance to lodging and drought.
- In Switzerland, [Getreidezüchtung Peter Kunz](#) (gzpk), a non-profit organisation grain breeding organisation, currently has several varieties of wheat, spelt, triticale, emmer and corn registered under the Swiss “niche variety” category. Once the PRM Regulation is adopted, these would qualify as local varieties. Restricting local variety registration to fruits and vegetables would therefore significantly impact this organisation's work.
- In Denmark, [Landsorten](#) is a membership organization distributing non-DUS organic seeds of arable crops, bred by organic breeders. Several of these locally adapted cultivars would identify as local varieties. They demonstrate important benefits for organic farmers (e.g. the PopKorn winter wheat has strong smut resistance, while the Mariagertoba is a robust spring wheat with good weed competition and resistance to common bunt).

These examples illustrate how landraces of arable crops offer genuine value to organic farmers and breeders. Removing the possibility to develop new local varieties of arable crops would therefore leave breeders with only two options: highly uniform DUS varieties or highly heterogeneous OHM. **An intermediate category is necessary to protect the work — and the viability — of these actors.**

Remove geographical restriction for the production of local and conservation varieties

The production of local and conservation varieties should not be restricted to their region of origin. The value of these cultivars lies precisely in their ability to adapt to specific local and climatic conditions. A variety developed in one Member State (for example, Greece) may be highly relevant for farmers in another (such as Spain). This flexibility is particularly important in the context of climate change, as shifting environmental conditions may lead farmers to adopt varieties previously unsuited to their regions. It is also especially relevant for interregional areas divided by administrative borders but not by climatic ones.

Furthermore, such restrictions would have significant consequences for certain crops that need to be propagated outside their region of origin. Fruit trees such as apple, pear, plum, and cherry, for instance, are often propagated in organic nurseries in other countries if nursery capacity is insufficient in their region of origin.

Explicitly excludes GMO, NGT, and intellectual property rights from conservation and local varieties

Conservation and local varieties serve to increase genetic diversity and empower farmers to produce their own seed adapted to their specific farming conditions and constitute an important pool of genetic resources for organic breeders. For these reasons, they should be explicitly free from genetic engineering (GMOs and NGTs) and from intellectual property rights (IPR) and patents, which would restrict farmers’ privilege and breeders’ exemption. This will allow organic farmers and breeders to



safely use these cultivars with confidence while ensuring that no unintended or undetected GMO, NGT1 and NGT2 introduction will happen via less strict rules and full transparency and traceability of NGT1, NGT2 and GMO.

Thank you in advance for the consideration given to the points raised. We remain at your disposal for any questions you may have.

Yours sincerely,

The European Consortium for Organic Plant Breeding
Biodynamic Federation Demeter International
IFOAM Organics Europe

