

## Public consultation: Organic crops – boosting resilience through a genetically diverse planting mix

We very much appreciate the open consultation procedure during the development of the delegated act on production and marketing of organic heterogeneous material and the present opportunity to comment on it. We very much appreciate the present state of the delegated act and especially the exclusion of field inspection requirements for the propagation of OHM under Art. 6 (12). However, we want to raise 2 important points that still need some improvements:

### 1) Terminology: organic propagation material of organic heterogeneous material

We understand that it is shorter to talk about «organic heterogeneous reproductive material», however this is a very misleading term as it contributes to the often observed misunderstanding of organic seed and vegetative propagation material and the development of an organic cultivars. It is often overlooked or mixed up that organic propagation material of organic heterogeneous material involved two successive steps which is needed for the commercialization of OHM:

1. Development of organic heterogeneous material (OHM) as described in Article 4 (2)
2. Multiplication of OHM to obtain organic reproductive material.

The 1. step needs at least 3 years for the development of OHM under organic conditions for annual crops and at least 5 years for biennial or perennial crops in order to adapt to organic conditions (in contrast to non-organic heterogeneous material that is developed under non-organic conditions).

The 2. step to produce organic propagation material of the OHM needs only one generation under organic conditions. The multiplication step will be repeated several times and will contribute to a dynamic adaptation of the OHM to the propagation environment.

Thus, the whole process from development of OHM and multiplication of organic plant reproductive material takes at least 4 years under organic growing conditions.

Therefore, we insist that throughout the whole text and the Annex “**organic propagation material of organic heterogeneous material**” is used to avoid any confusion. This term “organic propagation material of OHM” is fully in line with the organic regulation 2018/848 Articles 6, 13, and 26 and the title of the present delegated act.

If the term is too long we propose “**organic propagation material of OHM**”

### 2.) Clear definition of organic heterogeneous material:

The present draft of the delegated act misses a clear definition of organic heterogeneous material as it does not clearly explain the organic nature of organic heterogeneous material compared to organic reproductive material of non-organic heterogeneous material. The latter can be produced in just one year, if conventionally developed OHM is multiplied on a certified organic farm. Therefore, it is important to stress this in the description on the development of OHM. This unclear definition can be easily misused by producing and putting on the European market organic plant reproductive material of unfinished conventional breeding material. This could result that organic propagation material of non-organic heterogeneous material enters the market pretending that it is

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adapted to organic, which is not the case, it is just organic seed. The promise that OHM would be better adapted to organic farming systems and have a better capacity to adjust to climate change would be undermined.

Therefore it should be added under **Art. 4 (2)** :

**“The material referred to in paragraph 1(b) may be generated for at least three years for annual crops and five years for biennial/perennial crops under organic production rules by one of the following techniques:”**

Moreover it is important that no organic heterogeneous material is entering the market when breeding techniques are applied that do not comply with organic principles. This ensures the integrity and the traceability of the organic sector which is value and process based. For the development of organic heterogeneous material the same rules must apply as for defined for organic varieties suited for organic production in the Regulation (EU) 2018/848

Art. 6 (h): the production of organic varieties through natural reproductive ability and focusing on containment within natural crossing barriers;

Annex II 1.8.4: the organic breeding activities shall be 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.

Therefore, it need to be added under **Art. 4(2)**

**“(c) any other technique used for breeding or production of organic heterogeneous material which complies with organic principles, and specifically respect the natural reproductive ability and the natural crossing barriers, and excluding technical interventions directly into the genome or an isolated cell, producing similarly diverse heterogeneous material as in (a) and (b). “**

We hope that we could contribute to the final delegated act on marketing of organic reproductive material of organic heterogeneous material

With best regards

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