

Brussels, 11 June 2026

## Trilogue on June 15, 2026: Regulation on the production and marketing of plant reproductive material

Dear Minister of Agriculture,

Ahead of the trilogue negotiations on June 15 regarding the production and marketing of plant reproductive material (PRM) regulation, IFOAM Organics Europe, the Biodynamic Demeter Federation International and Eco-PB, representatives of the organic and biodynamic sectors and breeders, would like to share their views on the proposal, especially with regards to the development of organic plant breeding, which is crucial for the sector.

### Registration of organic varieties

Through adapted Distinctness, Uniformity and Stability (DUS) protocols and adjusted Value for Sustainable Cultivation and Use (VSCU) examination, the new regulation will facilitate the registration of organic varieties, a fundamental element to guarantee the development of organic varieties suitable for organic production.

- **Adjusted DUS protocols for organic varieties suitable for organic production (art 47(2))**

Regarding the adapted DUS protocols for organic varieties, the Commission's proposal foresees **the assessment of uniformity based on the proportion of off-types**. This element is central as it provides guidance for organic breeders until the adoption by the Commission of the related implementing acts defining the adapted DUS protocols for each species. Developing and adopting these implementing acts for each of the 60 to 80 species will indeed be a lengthy process. It is therefore necessary to **retain this paragraph in the final text**, as the standard registration process is not fit for organic varieties, which must be assessed with more flexibility on uniformity.

For simplification purposes, **the percentage of off-type acceptability could be lowered to 5% for self-pollinating varieties and to 10% for outcrossing species. Off-types should be assessed at the level of the relevant trait(s) or gene(s)**. These traits must be determined **according to the crop species** as the characteristics to be less uniform might differ depending on the species (e.g. for vegetable crops, market relevant characteristics should be sufficiently consistent).

- **VSCU testing for organic varieties (art. 52)**

We welcome that the VSCU testing for organic varieties should be primarily carried out under organic conditions and in-conversion if it is not possible to carry it under organic conditions. VSCU testing under low-input conditions is not adequate for organic varieties as such conditions do not reflect the

variety performance in organic ecosystems, which is composed of different biotic and physical soil properties and diverse cropping systems (e.g. crop rotations). A cost effective approach would be for **organic professional operators** to conduct the testing under **official supervision**.

To foster crop resilience and diversity, it should also be **possible to conduct the VSCU testing for conventional varieties under organic conditions**. Varieties derived from conventional breeding programs or from Breeding for Organic (BfO) programs are particularly interesting in this regard and already exist in certain Member States such as Germany or Austria. These varieties should however not be labelled as ‘organic varieties’ but as ‘varieties suitable for organic farming and tested under organic conditions’.

Further, Member States should have the **possibility to collaborate with other Member States with similar agro-ecological conditions** when it comes to VSCU testing. As less testing sites are available for the VSCU testing under organic conditions, it is especially relevant if Member States can collaborate by sharing for instance their testing facilities.

Finally, the development of new organic varieties should not be hampered by the extension of mandatory VSCU testing for **vine and potatoes** as both crops are widely used and produced also in the organic sector.

#### **Transparency on breeding techniques (art 56)**

Transparency on the different breeding techniques used is a key element for organic breeders as they not only use organic varieties but also conventional varieties for the development of new PRM. Therefore, they must make sure not to use any material developed with a breeding technique prohibited either by the EU Organic Regulation or by organic national/private standards.

Not only should the use of NGTs and GMOs be disclosed, but also **cytoplasm fusion, protoplasm fusion, chemically induced mutagenesis and induced random mutagenesis by irradiation**, which are prohibited by several organic national or private standards (Demeter, BioSuisse, Naturland, Bioland, BioAustria).

When applying for the registration of a variety, certain questions must be answered concerning the breeding process. It should therefore not be cumbersome in addition to listing the different breeding techniques and asking the applicant to indicate if any of them were used in the development of the variety. Other information like the parental materials will remain confidential.

#### **PRM sold to amateurs (art 28)**

Organic breeders and seed companies do not only sell organic varieties to final users, but also to amateurs. Therefore, **PRM produced and marketed for final users shall not be limited by species**. Organic seed companies do not only commercialise fruits and vegetables but also cereals, legumes

and cover crops for non-professional users. Various examples illustrate this reality: see for instance this organic seeds company from [France](#) selling only to amateurs with a focus on cover crops, another one from the [Netherlands](#) selling also only to amateurs, or this [company](#) in Germany selling arable crops to amateurs. Including more species would also not increase plant health risks as PRM sold to amateurs must as well respect plant health rules and package sizes.

#### **Administrative rules for nano-enterprises (Art 41, 42)**

Organic breeding and seed companies are often small or medium scale operators and play an important role in the development of organic varieties, organic heterogeneous material and organic seed supply. They already face important costs related to DUS and VSCU testing for the registration of organic varieties. It is therefore important to ensure that the administrative rules are proportionate to support their development. **Micro-enterprises must therefore be lifted from the identification, monitoring and record keeping requirements** in the marketing and production processes. In light of the overall objective to reduce administrative burden and foster Europe's sovereignty, reducing administrative burden is crucial to support SMEs.

#### **Farmers seed exchange (art. 30)**

Farmers seed exchange and their own seed production of local varieties are also a useful pathway in organic production as those seeds are often well adapted to the different climatic conditions and ensure resilient varieties. Therefore, organic farmers regularly revert to exchanging seeds in the constant search of finding the best quality seed for their production. **Farmers seed exchange should consequently not be limited by species** to guarantee farmers' rights and participate in achieving the objective of 100% organic seeds by 2037.

Farmers' seed exchange must also be excluded from the obligations laid down in Article 41 as they would constitute increased additional burden and are not fit for this practice.

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,

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