

06 January 2006

European Commission  
DG Agri  
Mrs. Isabelle Peutz  
Mr. Hermann van Boxem  
Rue de la Loi 200  
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Belgium

**Results of the 3<sup>rd</sup> Workshop on the EU Organic Seed Regime by ECO-PB in collaboration with the IFOAM EU Regional Group**

Dear Mrs. Peutz

Dear Mr. van Boxem

ECO-PB (the European Consortium for Organic Plant Breeding) recently held a workshop in Vienna about the EU Organic Seed Regime as regulated by EC Regulations (ECC) 2092/91 and (EC) 1452/2003. Altogether 25 experts from 12 different European countries participated in the workshop and discussed points of interests.

A key perspective for the workshop was the proposed re-examination in 2006 of the entire system, as mentioned in consideration 11 of EC-Regulation 1452/2003. The following common proposals were formulated by the workshop. We hereby request the Commission to address our proposals.

1. The Commission's website ([http://europa.eu.int/comm/agriculture/qual/organic/seeds/links\\_en.htm](http://europa.eu.int/comm/agriculture/qual/organic/seeds/links_en.htm)) with links to Member State's national databases for organic seed should be updated (see the link list in the attachment).
2. The implementation of national organic seed databases has not been done according to EC Reg. 1452/2003. Some Member States still have no database at all or merely have a static list of limited practical relevance for seed suppliers, growers and inspection bodies. Therefore we would like to ask the Commission to stimulate the creation in all Member States of functioning, user-friendly, up-to-date databases with as many crops as possible.
3. We strongly support the idea proposed in the EU Organic Revision project WP 5 ([www.organic-revision.org](http://www.organic-revision.org)) to improve reporting on the implementation of Regulation 1452/2003 according to Article 12 and 13 of the Regulation. In particular, reports and data on which derogations have been granted should be made publicly available, for instance through the website mentioned in point 1 above. Such reports should follow a harmonised format.

4. There is concern about the different approaches between Member States how to tackle grass seed mixtures. Since in most countries grass seed is traded as mixtures with many components, it would cause enormous administrative effort to apply for derogations for all non-organic components in the mixture. On the other hand, certain components are usually not available organically. Therefore we suggest implementing the following common European approach: list all grass seed mixtures with a maximum share of non-organic seed components of 30% (by weight) in the organic seed databases, and in accordance with article 5 of EG regulation 2092/91 for the labelling of organic produce.
5. Annex 1 of Regulation 1452/2003 is as yet empty. We feel that the consequences for growers should a species be put in Annex 1 are too far-reaching. For instance, not being able to react quickly to calamities in organic seed production could lead to severe shortages of such seed and the resulting crops. Furthermore, it is important that farmers are able to evaluate new varieties even if the respective species is placed in the annex. Such new varieties are usually not immediately available as organically produced. Therefore, we propose to revise the conditions concerning Annex 1 to allow for more flexibility in case of calamities and for research objectives, on-farm field trials carried out by farmers and variety conservation purposes.

EG Regulation 1452/2003 has been most useful to get the topic of organic seeds on the table. Further development requires specialist knowledge of organic seed production, organic plant breeding and the implications at field level. We hereby offer all the information and networking available through the ECO-PB to support the Commission's work in developing the EU organic seed regime.

We look forward to hearing your response to our proposals.

Yours sincerely,

On behalf of the participants of the ECO-PB workshop

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