



Brussels, 16 April 2026

## Joint letter ahead of the Trilogue of 21 April on the production and marketing of Plant Reproductive Material Regulation

Dear (shadow) rapporteur,

As trilogue negotiations on the new EU Regulation on the Production and Marketing of Plant Reproductive Material (PRM) are moving at a high pace, we are writing to you to reiterate our support for the European Parliament's amendments which have taken into account the concerns of small-scale farmers, small seed companies and of the organic sector. While we think the Parliament's proposal should have gone further, it is the institutional position that best protects agrobiodiversity and farmers' rights.

We are **deeply concerned that if the final text moves too much away from the Parliament's position on key articles, we risk losing the policy space to ensure future PRM rules can both protect Europe's cultural heritage and promote future diversity** as a key tool for responding to the complex challenges facing Europe's agri-food sector in the years to come.

We therefore wish to reiterate below our key priorities and suggested compromises.

### Exchanges done for conservation purposes (Art 2(4), 3, 29)

Exchanges and transfers of PRM for the purpose of conserving or dynamically managing plant genetic resources should not be treated as commercial marketing. These practices are essential to maintain diversity in fields and gardens.

Our ask: Conservation should be **excluded from the scope via Article 2(4)**, as per the European Parliament's position, as it is already the case for exhibitions, research, breeding, and official tests. (State) gene banks cannot conserve genetic diversity alone, and all actors involved in conservation work should be able to continue their work legally. If an exclusion from scope is not achievable, at least (i) **the concepts of marketing and professional operator must be defined precisely in line with the EP position** to avoid capturing non-commercial actors such as seed libraries, schools or churches giving seeds to their students/parishioners, and (ii) **the provisions for conservation networks under Article 29 must be proportionate.**

## Conservation (and local) varieties (Art 3, Art 26, Art 53)

Conservation varieties are vital to organic and agroecological farmers, breeders, and conservation networks. Their value is agronomic, environmental, and socio-cultural — from climate adaptation to cultural heritage and flavor. The Council's position would gravely undermine the actors who depend on them. Parliament's approach in this regard is far better as it reflects the realities of all stakeholders working with these varieties.

### Our ask:

Newly bred conservation varieties must **not be restricted to fruits and vegetables**, and their **production must not be subject to geographical limitations** (Art. 3, Art. 26). Additionally, they should not be subject to intellectual property rights.

Article **53 must be retained as a standalone provision**, as per the Parliament's and Commissions' texts. Dispersing the rules on conservation varieties throughout the Regulation would create legal uncertainty and reduce accessibility for practitioners.

## Farmers' right to save, use, and exchange their own seeds

The right of farmers to save and exchange their own seeds is both historically grounded and internationally protected. It is essential to the livelihoods of many European farmers as well as to organic and agroecological systems. Indeed, with the EU target of 100% organic seed use by 2037, farm-saved seeds will become increasingly important. In many Member States, certified organic seed supply will remain insufficient to meet demand, making farmer-to-farmer exchanges necessary.

Our ask: Ideally, peer-to-peer farmer seed exchanges should **fall outside the scope** of this Regulation, as they do not constitute marketing but mutual aid between farmers. If this is not achievable, at least **exchanges of all PRM** should be enabled **without any restriction to a local level**, as per the Parliament's position. As proposed by the Council, quantity limits could be set at Member State level, taking into account the needs of small farmers.

Additionally, farmers who exchange PRM as part of mutual aid should clearly be **exempted from the plant health and administrative requirements applying to marketing of PRM, whilst remaining subject to those applicable to agricultural production**. Subjecting exchanges between farmers to these disproportionate rules would simply prohibit them in practice and would constitute a clear violation of their right to exchange seeds. Such restriction would have an even more significant impact on farmers who cultivate in mountain areas, on islands and in other marginal areas, and who are more dependent on seeds adapted to their local conditions.

## VSCU testing (Art 47, 52)

Both the Parliament and the Council have rightly opposed extending mandatory the Value for Cultivation and Use (VCU) testing to fruits and vegetables. Doing so would increase costs and administrative burdens for SMEs and competent authorities alike and would significantly delay the registration of new varieties. Any delegation to the Commission to extend VCU testing via delegated acts must be firmly rejected, as it falls outside both institutions' agreed position.

### Our ask:

The Parliament's approach — which opens the door to **voluntary VCU testing for fruits and vegetables without making it mandatory** — already represents a sound compromise and should be defended.

On organic varieties specifically, the Parliament's provision **allowing VCU testing under in-conversion conditions** (where organic conditions are unavailable) is welcome. We further propose **allowing testing under certified organic conditions by organic professional operators under official supervision, before any resort to low-input management conditions** — which do not adequately reflect variety performance in genuine organic ecosystems.

The **option to test conventional varieties under organic conditions is also a valuable addition** that we hope will be retained.

## Exempt nano-enterprises from new administrative rules (Art 41, 42)

The European Commission has committed to reducing administrative burdens on SMEs by at least 35%. Yet the new obligations proposed for professional operators would do the opposite — forcing many small seed producers out of business entirely. Nano-enterprises (turnover below €100,000) play a disproportionately important role in making diverse, regionally adapted varieties available to farmers and gardeners.

Our ask: In addition to activities under Articles 29 and 30, **nano-enterprises must be exempted from all new obligations under Articles 41 and 42** to preserve diversity and the livelihoods of those who maintain it.

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*There is a lot at stake. We urge you to **strongly defend the European Parliament's position in the coming days and weeks**. We thank you again for your support and remain fully available to provide further input as negotiations progress.*

*Yours sincerely,*

*The undersigning organisations*

## List of undersigning organisations

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ARCHE NOAH

Biodynamic Federation Demeter  
International

European Coordination Via Campesina

IFOAM Organics Europe

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AEGILOPS

Agrobiointitute

Agroecological Network  
of Greece

AGROLINK Association

Arbeitsgemeinschaft  
bäuerliche  
Landwirtschaft (AbL)  
e.V.

Arbeitsgemeinschaft  
bäuerliche  
Landwirtschaft e.V.,  
Landesverband Bayern

Arran de terra SCCL

Asociación La Jeruga

Associació de la  
Producció Agrària  
Ecològica de Mallorca  
(APAEMA)

Associació de Varietats  
Locals

Associació Llavors  
d'Ací

Association Demeter  
Portugal

Association Quinta das  
Águias

Asturias Ganadera

Balkan Seed Network  
Association

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BioForum

Biovt - u skladu s  
prirodom

BIOZO - Hellenic  
Consumers' Association  
«BIO-CONSUMERS  
FOR QUALITIVE LIFE»

BirdLife Austria

Brodsko ekološko  
društvo-BED

Broederlijk Delen

Centro Internazionale  
Crocevia

CIDSE

Citizens in action

Climate Farmers

Confédération  
paysanne

Coop Mas Les Vinyes  
SCCL

Culturhaza

Curly Creek Ranch

Dachverband  
Kulturpflanzen- und  
Nutztiervielfalt e.V.

Diamantis  
Georgopoulos

DIO, Inspection and  
Certification  
Organization of Organic  
Products

Dreschflegel e.V.

Ecological Movement of  
Patras

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Ecological Recycling  
Society - (ERS or  
ECOREC)

ECO-Pb

El Delfín Blanco -  
Ecologistas en Acción  
Ciudad de Málaga

Entraide & Fraternité

Federation of  
Agroecological Farmers

FIAN Belgium

FOBO

Fondacija Alica

Foro Asturias  
Sostenible para el  
conocimiento y  
desarrollo del medio  
rural (FAS)

Fundación Entretantos

Fundación Savia por el  
Compromiso y los  
Valores

Genbänkle e.V.

Grab

Gregos

Helesion

Hub del Norte

INSTITUTE OF  
ECOLOGICAL  
AGRICULTURE DIO

Institute of organic  
agriculture, University  
of Maribor

Interessengemeinschaft  
gegen  
Nachbauggebühren

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KOO - Co-ordination  
Office of the Austrian  
Bishops` Conference  
for international  
Cooperation and Global  
Church

Landsforeningen  
Praktisk Økologi

Lebende Samen e.V.

Living Seeds Sementes  
Vivas SA

Magház Association

MedINA (Mediterranean  
Institute for Nature and  
Anthropos)

Mensa Civica

Miljøbevægelsen  
NOAH

Naturefriends Greece

North aegean ecolo  
wind-Region of North  
Aegean Greece

Northern Greece's  
Organic Farmers  
Association

Observatorio para una  
Cultura del Territorio

OGM dangers

Organic Farmers  
Association of Ileia

OrganicSeeds Institute

Oxfam

Panhellenic Animal  
Welfare & Environment  
Federation

PoleRani Association

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ProSpecieRara  
Schweiz

Reinsaat GmbH

reLife Earth

Seminkovna, z.s.

Sito Seeds

Skutočne zdravá škola  
o.z.

Slow Food

Slow Food Deutschland

Solhatt økologisk  
hagebruk AS

Solidagro

Sow Diverse

Talamh Beo

Dreikönigsaktion der  
Katholischen Jungschar

The Danish Seed  
Savers  
(Landsforeningen  
Frøsamlerne)

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The Environmental  
Forum

Unión de Uniones

Unión de uniones

Vitale Rassen

Voedsel Anders

Zeleni klik! (name in  
English: Click Green!)

ZERO - Associação  
Sistema Terrestre  
Sustentável

ZOPHOROS CRETE

ΕΝΩΣΗ ΠΡΟΣΤΑΣΙΑΣ  
ΦΥΣΙΚΟΥ και  
ΠΟΛΙΤΙΣΤΙΚΟΥ  
ΠΕΡΙΒΑΛΛΟΝΤΟΣ  
ΚΟΡΙΝΘΙΑΚΟΥ -  
ΠΑΤΡΑΙΚΟΥ ΚΟΛΠΟΥ "  
Ο ΝΗΡΕΑΣ "

ΣΥΛΛΟΓΟΣ  
ΠΡΟΣΤΑΣΙΑΣ ΥΓΕΙΑΣ  
και ΠΕΡΙΒΑΛΛΟΝΤΟΣ  
περιοχής  
Κ.Υ.Χαλανδρίτσας