



Seed diversity in need of help

April 2012

Open letter

to the Members of the European Parliament
 to John Dalli, Commissioner for Health and Consumer Protection
 to Dacian Cioloș, Commissioner for Agriculture and Rural Development
 to Janez Potočnik, Commissioner for the Environment
 to László Andor, Commissioner for Employment, Social Affairs and Inclusion
 to Antonio Tajani, Commissioner for Industry and Entrepreneurship
 to Andris Piebalgs, Commissioner for Development
 to Johannes Hahn, Commissioner for Regional Policy

Review of the EU legislation on the Marketing of Seed and Plant Propagating Material (S&PM)

Dear Madam/Sir,

We write to you to urge you to take the single opportunity to enhance the EU legislation on Seed and Plant Propagating Material and make it more respectful towards the environment, consumers' expectations and the needs of small actors in the seed chain.

A change is badly needed, as the current legislation has **contributed to a massive loss of biodiversity** in European agriculture over the last decades. The legislation disproportionately **discriminated against actors in the seed sector** that have objectives that go beyond productivity, and it has **restricted consumers' choice** in accessing diverse varieties.

Therefore, the review must be rebalanced. Improving agro-biodiversity has to become the first goal of the review. Offering seed users a greater choice of varieties, including seeds most adapted to local conditions would help, in relation with appropriate agricultural practices such as crop rotation, to reduce dependency on pesticides, fertilisers and water demand. This would lead to less pollution of soil and water and therefore contribute to a more sustainable and diversified agriculture, which in turn would enhance the diversity of wild plants, animals and micro-organisms.

Encouraging *on farm* biodiversity of cultivated plants will enhance the number of varieties grown for food and feed and contribute positively to food quality by enhancing choice, colour and taste. As the Commission assessed in its "Options and Analysis" paper, there is growing demand for a greater choice of varieties: *"Protection of the environment has become more important and specific markets, such as for organic crops, are increasing their share of the market"*. (1)

However, today ten multinationals are controlling 74% of the global seed market (2) and the concentration process is still going on. Many of those companies provide genetically narrow

varieties and seeds that cannot be reproduced, leading to alarming dependency for farmers and consumers on one hand and ecological risks connected to genetic uniformity such as poor pest resilience on the other hand.

A change in EU S&PM legislation towards less restrictive requirements that allows for easier market access will increase the number of suppliers and stabilise the amount of SMEs, with indirect positive effects on biodiversity and employment in rural areas.

Representing civil society as organisations working on environment and biodiversity issues including actors from the seed sector like small and organic breeders, suppliers, farmers, gardeners, seed savers, consumer cooperatives and consumers, we call on you to take a stand for an environmentally and consumer friendly S&PM regulation. **This must allow for the marketing of less homogenous, but genetically broader and better locally adapted varieties, and remove obstacles to the marketing and the exchange of seeds of old, rare and farmers' varieties, to enhance diversity and sustainability in European agriculture and better meet consumers' demands.**

Consumers' safety and plant health related precautions can be ensured by clear provisions regarding transparency. Further pre-market requirements will not only lead to the above mentioned negative effects for biodiversity and food consumers, but will also lead to overlap and confusion regarding food and plant health laws.

For all the above reasons, the review of the legislation on the Marketing of Seed and Plant Propagating Material must rebalance the regulation towards more consumer and environmentally friendly rules, allowing for the reuse, exchange and selling of old, rare and farmers' varieties and leading to diversification in agriculture. We have concrete proposals to achieve these goals and would be available to discuss these ideas with you in the coming weeks and months.

Yours sincerely,

Arche Noah
ARC2020
APRODEV
Birdlife Europe
Euro Coop
European Coordination Via Campesina
EEB European Environmental Bureau
European Professional Beekeepers Association
GRAIN
IFOAM
International Slow Food Foundation for Biodiversity

For more information and for all signatures, please visit this link: www.seedforall.org

- (1) European Commission: Options and analysis of possible scenarios for the review of the European Union legislation on the marketing of seed and plant propagating material" - Point 2.2: Room to strengthen sustainability issues.
- (2) ETC Group Report "Who will control the Green Economy", 15 December 2011
<http://www.etcgroup.org/en/node/5296>