

Changing EU PRM regulation

Perspective from Euroseeds





Exemptions (with

restrictions)

Commission policy goals for reorientation towards sustainable food system have not been delivered by EP

Sustainable rood system have not been delivered by Er							
	1	Retain the basic framework		DUS, VCU, Catalog, Certification, Plant health	 Dynamic conservation, conservation variety and derogated exchange risk large scale activity out of scope of any regulation 		
	2	Move focus to sustainability		VCU becomes VSCU and extended to all species	 VSCU 'clear improvement' driver weakened to material in scope Characteristics for clear improvement on official label 		
	3	Modernize control measures		Official Supervision	 Only for vegetables: Missed opportunities for synergies cost and speed. Drives 'country shopping' for low cost access to catalog 		
	4	Harmonize across member states		Official controls	 Drivers for a level playing field between member state remain unclear 		
					 Official oversight and transparency of impact for 		

Transparency for

usage and impact

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derogated PRM deleted

Plant health risks created



What is 'Dynamic Conservation' that is out of scope?

(35a) 'dynamic conservation' means the preservation of genetic diversity within and between cultivated plant species, and includes both in situ conservation and ex situ conservation, with the aim of a sustainable use of plant genetic resources and agro-biodiversity in a way and at a rate that does not lead to the long-term decline of biological diversity, thereby maintaining the potential to meet the needs and aspirations of present and future generations.

In/ex situ conservation

Breeding nursery & Breeders genebanks?

 Continual evaluation of local adaptation to climate, soils and changing agricultural best practices

Aim of sustainable use

Breeders selections?

 Continual adaptation to overcome pathogen and pest evolution with new genetic variation

Increasing biological diversity

- Crossing programs creating new biodiversity?
- New conservation varieties, Heterogeneous material

Out of scope of any official oversight FRAUD RISK



How might breeders and seed distributors manage new challenges?

A

Compete with unregulated sustainability claims

 Make full use of dynamic conservation provisions and apply private standards

В

- Manage registration costs
- Competition between countries
- NGT with separate sustainability assessment?

C

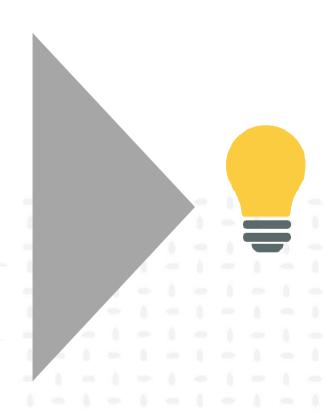
- Provide reliable and compliant comparative information
- Establish private networks of trials

D

- Market monitoring for fraud
- 'Police' actions for officials for investigations for enforcement

Ε

- Compete with low priced unregulated seeds in low value commodity crops
- Reduce costs of breeding and variety development





Consequence of current draft for Competent Authorities















DUS	VSCU	Certification	Plant health
Identity infringementORDCatalogTesting	 Limited scope Optional species New criteria Testing 	 Increase in uncertified PRM Fraudulent marketing Import/export Testing 	Increased phytosanitary riskTesting
 Management of reference collections Risk based official auditing Incomplete information Incomplete catalog vs market 	 Sustainability characteristics: Existing protocols New protocols for optional species High cost pressure without official supervision 	 International equivalence Sustainability claim for specific characteristic on official label? 	 International equivalence Uncontrolled material until export
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What genetic characteristics contribute to VSCU

Reduce pesticide use Reduce land and fertiliser use Fungal pathogens Resource use Resistance Virus pathogens Yield efficiency Rapid evolution & local strains Downstream resource Clear Adaptation to climate and efficiency **Improveme** User soils nt Local Complex processing e.g. Malting, quality baking ..taken as a Multi location testing Consumer preferences e.g. veg whole.. Stability in weather extremes Reduce food waste Standability Post harvest Resilience Storage & shelf life Multi year productivity test Consumer appeal e.g. veg Multi location testing: Consistency/uniformity wet/dry/early/late

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