

# Revision of plant and forest reproductive material legislation

Fields marked with \* are mandatory.

## Public consultation Revision of the plant and forest reproductive material legislation

### Introduction

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Plant reproductive material (PRM) including seeds, young plants and plant cuttings, are plants and all parts of plants capable of, and intended for, producing entire plants for any purpose such as food, industrial uses, forestry or decoration (ornamental). The PRM legislation has successfully ensured the identity, performance, quality and health of PRM, as well as fostered a competitive PRM industry, contributing to food security in EU. Seed and other PRM constitute the very beginning of the agri-food production chain. Conservation of traditional varieties and breeding of new plant varieties contribute to the diversity of PRM that will in turn contribute to the diversity of food available on the market. For example, breeding can result in plant varieties producing strawberries in early spring, or in late summer. Likewise, plant varieties can respond to consumer preferences, for example potatoes of different sizes, textures and colours.

Forest reproductive material (FRM) is a particular type of PRM, namely forest seeds and plants, which constitutes the starting point for the creation of new forests and the reforestation of existing forests. Ensuring diversity within tree species and producing high quality seeds and other FRM are essential for the beneficial functions of EU forests, for example, recreational activities, providing timber and contributing to the mitigation of climate change. The legislation on FRM has been developed as a very particular part of the PRM legislation, with its own basic concepts and approaches that significantly differ from the other PRM s e c t o r s .

The Commission informed stakeholders and the public about its plans to change the legislation on plant and forest reproductive material through the publication of an inception impact assessment on the [Have your say](#) page .

An overview of the EU legislation under review is provided [here](#).

The EU legislation on PRM is based on two pillars: certification of PRM to be marketed and registration of the varieties of that PRM, and these pillars will remain as such. The revision does not concern GMOs (including products of new genomic techniques (NGTs)), Community plant variety rights (CPVR) or patents. They all remain separately regulated.

For the purpose of this questionnaire plant reproductive material (PRM) will refer to everything including seeds and forest reproductive material (FRM). When so needed, special reference to FRM will be made.

## About you

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### Background information

\* First name

Karine

\* Surname

Peschard

\* Email (this won't be published)

karine.peschard@graduateinstitute.ch

**You are welcome to answer the questionnaire in one of the 24 official languages of the EU. Please let us know in which language you are replying.**

\* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese

- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

\* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

Please specify if you answered "other" above

*255 character(s) maximum*

If you are replying on behalf of a company or business organisation/association, what is its type of activity?

- Breeding
- Maintaining
- Production including growing and/or multiplication of plant and/or forest reproductive material
- Storage, collection, dispatching and/or processing of plant and/or forest reproductive material
- Farming/farmers' or horticultural association
- Forest management or forest owners/managers' association
- Nature protection and restoration

- Retail/retailers' organisations (e.g. garden centres)
- Transport
- Other supply chain operations (e.g. trade, wholesale and related organisations)
- Other

Please specify if you answered "other" above

*255 character(s) maximum*

\* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

\* How many companies/members etc. does your organisation represent?

- 1 to 9 companies/members
- 10 to 49 companies/members
- 50 to 249 companies/members
- 250 or more
- Not applicable

\* Country of origin

Please add your country of origin, or that of your organisation.

- |                                      |  |                                     |  |
|--------------------------------------|--|-------------------------------------|--|
| <input type="radio"/> Afghanistan    | <input type="radio"/> Djibouti           | <input type="radio"/> Libya         | <input type="radio"/> Saint Martin                     |
| <input type="radio"/> Åland Islands  | <input type="radio"/> Dominica           | <input type="radio"/> Liechtenstein | <input type="radio"/> Saint Pierre and Miquelon        |
| <input type="radio"/> Albania        | <input type="radio"/> Dominican Republic | <input type="radio"/> Lithuania     | <input type="radio"/> Saint Vincent and the Grenadines |
| <input type="radio"/> Algeria        | <input type="radio"/> Ecuador            | <input type="radio"/> Luxembourg    | <input type="radio"/> Samoa                            |
| <input type="radio"/> American Samoa | <input type="radio"/> Egypt              | <input type="radio"/> Macau         | <input type="radio"/> San Marino                       |
| <input type="radio"/> Andorra        | <input type="radio"/> El Salvador        | <input type="radio"/> Madagascar    | <input type="radio"/> São Tomé and Príncipe            |
| <input type="radio"/> Angola         | <input type="radio"/> Equatorial Guinea  | <input type="radio"/> Malawi        | <input type="radio"/> Saudi Arabia                     |
| <input type="radio"/> Anguilla       | <input type="radio"/> Eritrea            | <input type="radio"/> Malaysia      | <input type="radio"/> Senegal                          |
| <input type="radio"/>                | <input type="radio"/>                    | <input type="radio"/>               | <input type="radio"/>                                  |

- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- 
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar/Burma
- Namibia
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia

British Virgin Islands

- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba
- 
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- 
- Niue
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- 
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States
- United States Minor Outlying Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and Futuna
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- |  |                               |  |                                      |
|--|-------------------------------|--|--------------------------------------|
| <input type="radio"/> Curaçao                                | <input type="radio"/> Laos    | <input type="radio"/> Rwanda                   | <input type="radio"/> Western Sahara |
| <input type="radio"/> Cyprus                                 | <input type="radio"/> Latvia  | <input type="radio"/> Saint Barthélemy         | <input type="radio"/> Yemen          |
| <input type="radio"/> Czechia                                | <input type="radio"/> Lebanon | <input type="radio"/> Saint Helena             | <input type="radio"/> Zambia         |
|  |                               | Ascension and<br>Tristan da Cunha              |                                      |
| <input type="radio"/> Democratic<br>Republic of the<br>Congo | <input type="radio"/> Lesotho | <input type="radio"/> Saint Kitts and<br>Nevis | <input type="radio"/> Zimbabwe       |
| <input type="radio"/> Denmark                                | <input type="radio"/> Liberia | <input type="radio"/> Saint Lucia              |                                      |

**\* Organisation name**

*255 character(s) maximum*

Geneva Academy of International Humanitarian Law and Human Rights

**Transparency register number**

*255 character(s) maximum*

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association, 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

**\* Contribution publication privacy settings**

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

**Anonymous**

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.



## Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the [personal data protection provisions](#)

**Throughout this questionnaire please select to what extent you agree/disagree with the following statements or select “no opinion” if you cannot or will not provide an answer.**

## **Regulation of PRM in the EU**

The current PRM legislation is composed of 12 directives with some dating back to the 1960s. It defines common rules for the marketing of PRM in the EU.

	Agree	Somewhat agree	Somewhat disagree	Disagree	No opinion
* The current rules are outdated, fragmented and incoherent	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Marketing of PRM needs to be governed at EU level to ensure identity (e.g. 100% of seed purchased produces red tomatoes instead of green tomatoes), quality (e.g. germination rate) and health (absence of pests) of PRM	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The current rules have enabled the free movement, availability and quality of PRM on the EU market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* PRM rules should contribute to addressing biodiversity loss and climate change adaptation and mitigation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* PRM rules should facilitate the availability on the EU market of traditional varieties (e.g. conservation varieties)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* PRM rules should facilitate the availability on the EU market of varieties adapted to local conditions (e.g. climatic conditions, cultural or historical significance)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



* Lighter rules facilitating the availability on the EU market of varieties adapted to local conditions and traditional varieties should not compromise the quality of PRM marketed in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
New varieties should contribute to sustainable agriculture and food production through, for example, efficient water and nutrient use or disease resistance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* New varieties should be climate proof (e.g. adapted to extreme weather conditions, drought tolerant)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* A wider choice of PRM intended for exclusive marketing to amateur gardeners should not compromise its quality	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

The questionnaire continues with questions on specific aspects of the PRM legislation, addressed to stakeholders with expert knowledge of this legislation. Do you wish to respond to these questions as well?

- No
- Yes, continue to the questionnaire on plant reproductive material (PRM) only
- Yes, continue to the questionnaire on forest reproductive material (FRM) only
- Yes, continue to questionnaire on both plant and forest reproductive material

### **Scope of marketing activities**

The current rules apply to the marketing of PRM to all types of users, including professional users, farmers, foresters and amateur gardeners. They also apply to activities such as the exchange of PRM in kind between farmers and marketing for non-profit purposes by seed conservation networks.

	Agree	Somewhat agree	Somewhat disagree	Disagree	No opinion
* The rules should apply to the marketing of PRM to all kinds of users with no exceptions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* The rules should not apply to marketing to amateur gardeners	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Lighter rules should apply to the marketing of PRM for non-profit					

purposes by seed conservation networks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Marketing of PRM for non-profit purposes by seed conservation networks should be exempted from the scope of the PRM legislation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Lighter rules should apply to the exchange in kind of PRM between farmers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Exchange in kind of PRM between farmers should be exempted from the scope of the PRM legislation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

## Alignment of the rules

	Agree	Somewhat agree	Somewhat disagree	Disagree	No opinion
* Lack of alignment between the existing directives (e.g. differences in definitions) leads to uneven implementation and application of the rules	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Coherence of the legislation could be best improved by aligning the structure and definitions of the 12 PRM directives, but retaining them as separate policy instruments	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Coherence of the legislation could be best improved by merging policy instruments according to crop groups (e.g. agricultural species)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Coherence of the legislation could be best improved by merging policy instruments according to the type of material (seeds, PRM other than seeds and FRM)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Coherence of the legislation could be best improved by creating a single policy instrument with different chapters per crop group	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

The current legislation allows Member States to adopt exemptions or deviate from certain rules. They have used these possibilities in different ways.

	Agree	Somewhat agree	Somewhat disagree	Disagree	No opinion
* Exemptions and deviations have caused unequal conditions for the marketing of PRM across Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Different implementation by Member States of the derogations as regards the registration of traditional varieties have caused unequal conditions for operators across Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Derogations from the EU rules in relation to the quality of PRM (e.g. identity, germination rate and absence of pests) should be kept to a strict minimum	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Member States should continue to be allowed to lay down stricter rules at national level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

## Regulated species

The current legal framework includes lists of species to which EU rules apply (EU-regulated species) but does not specify the criteria for amending these lists.

	Agree	Somewhat agree	Somewhat disagree	Disagree	No opinion
* The number of EU-regulated species should be reduced (e.g. only cover economically important species)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The number of EU-regulated species should be increased to cover more comprehensively the species marketed in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Criteria should be established for deciding which species should be regulated (e.g. market volume, production area)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*					

The procedure for adding new species to the list of EU-regulated species should be harmonised for all crop groups	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* The scope of the PRM legislation should only cover plant species and not their intended use (e.g. regulation of soybean irrespective of its potential use as oil or vegetable plant)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

## Common catalogues

Currently agricultural and vegetable crop varieties should be listed first in a national catalogue and then in the Common catalogues before they are allowed to be marketed in the EU.

	Agree	Somewhat agree	Somewhat disagree	Disagree	No opinion
* Direct notification of registered varieties by Member States to the EU Common catalogues without a Commission decision would speed up market access for these varieties throughout the EU.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

## Heterogeneous material and organic varieties

The [Organic Regulation](#) laid down rules for organic heterogeneous material intended for organic production. This is a new category of material that is highly diverse and it is not a variety nor is it a mixture of varieties. Furthermore, the Commission is preparing temporary derogations for the marketing of organic varieties suitable for organic production.

	Agree	Somewhat agree	Somewhat disagree	Disagree	No opinion
* There is a need to also establish rules for the marketing of heterogeneous material intended for non-organic production	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* There should be dedicated permanent rules for the marketing of organic varieties suitable for organic production	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

## Plant genetic resources

In order to ensure conservation and sustainable use of plant genetic resources, the current rules foresee derogations from the production and marketing requirements for:

- Conservation varieties, including landraces of agricultural and vegetable crops;
- Vegetable crop varieties with no intrinsic value for commercial crop production but that have been developed for growing under particular conditions

	Agree	Somewhat agree	Somewhat disagree	Disagree	No opinion
* These derogations have been successful in promoting the conservation and sustainable use of plant genetic resources	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Different implementation of these derogations by Member States has created unequal conditions for operators across Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* There should be lighter rules for these varieties regarding the marketing conditions (e.g. registration and certification)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Similar derogations should be introduced for locally produced varieties adapted to local agro-ecological conditions and intended for local marketing	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

## Sustainability

Agricultural crops are currently tested for their value for cultivation and use (VCU) as regards yield, quality and resistance to pests and adverse environmental conditions. The current PRM legislation does not include any further rules and Member States implement VCU tests in different ways. Furthermore, agricultural crops are not explicitly tested for their contribution to more sustainable agri-food production (i.e. 'sustainable VCU'). There is scope to further align the PRM legislation with the objectives of the [European Green Deal](#), [Farm to Fork Strategy](#) and [EU Adaptation Strategy](#) in this regard.

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	Agree	Somewhat agree	Somewhat disagree	Disagree	No opinion
* The PRM legislation should harmonise VCU testing among Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* There should be no mandatory VCU testing as the variety characteristics should be driven by market demand	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* VCU testing should be extended to include testing of varieties for their contribution to the sustainability of the agri-food chain (sustainable VCU, e.g. water and nutrient use efficiency)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* The PRM legislation should contain a set of general sustainability criteria that Member States can apply taking into account their agro-ecological conditions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

## Harmonisation of official controls

The current PRM legislation contains only a few general requirements for official controls, which results in differences of control and enforcement across Member States. Furthermore, it is not included in the scope of the [Official Controls Regulation](#) (OCR). The OCR establishes harmonised rules on official controls across the agri-food chain, including for plant health, organic production and GMOs, while allowing adaptation to sector-specific rules (e.g. no border check system for certain sectors, possibility to exempt certification activities from the scope of the OCR). The OCR includes general principles as regards official controls (e.g. import and marketing controls), rules for competent authorities, IT systems and training to facilitate official controls.

	Agree	Somewhat agree	Somewhat disagree	Disagree	No opinion
* Further harmonisation of the rules on official controls for PRM would create a level playing field for operators across Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Further harmonisation of the rules on official controls for PRM would increase the efficiency and effectiveness of these control activities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*					

Further harmonisation of import controls would improve the quality of PRM imported from third countries and marketed in the EU	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Full harmonisation of import controls of PRM through checks at border control posts, fees for those controls and special import documentation would improve the quality of PRM imported from third countries and marketed in the EU	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The use of infrastructure established under the OCR (e.g. IT systems, EU reference centres and training) would increase the efficiency and efficacy of official controls on PRM	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Inclusion in the scope of the OCR would increase administrative burdens for competent authorities as regards marketing and import controls	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

## **Innovative processes and digital transformation**

	Agree	Somewhat agree	Somewhat disagree	Disagree	No opinion
* The rules should be able to adapt faster to innovations in PRM production processes (e.g. true potato seed) and to scientific and technological developments (e.g. biomolecular techniques in variety testing and certification)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* The rules should allow digital processes (e.g. e-certificates)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

## **Do you have any specific proposals for changing the PRM legislation?**

*500 character(s) maximum*

In the context of seed marketing rules, a concrete means to implement the United Nations Declaration on the Rights of Peasants and Other People Working in Rural Areas (UNDROP) consists in excluding peasant seed systems from the definition of seed marketing, and in strengthening their access to seeds by allowing peasant seeds but also seeds from locally adapted varieties to be regulated and marketed under a self-standing regime.

If you wish to provide additional supporting information within the scope of this questionnaire you may also upload a document, such as a position paper, related to your responses (max. 2 pages).

The maximum file size is 1 MB.

Please note that the uploaded document will be published alongside your response to the questionnaire which is the essential input to this open public consultation. The document is an optional complement and serves as additional information to better understand your position.

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

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**/GENEVA\_ACADEMY\_Contribution\_to\_the\_Open\_Public\_Consultation\_on\_the\_Reform\_of\_EU\_Seed\_Mar  
24.3.2022.pdf**

## **Contact**

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