

Brussels, 11 April 2024

**Re: A future Plant Reproductive Material legislation for the future of EU farming**

Honourable member of the European Parliament,

On behalf of the signatories, representing the vast majority of suppliers and users of Plant Reproductive Material (PRM), we would like to share with you our fundamental concern in view of the upcoming Parliament's Plenary vote on PRM.

While the Commission proposal does require improvements in a number of areas, we believe that the Commission proposal on PRM tried to achieve a good balance between the principal common rules for all producers and all users, and that of precise defined derogations and adaptations of standards for specific plant materials and markets, i.e. between seed security and seed diversity.

**The text proposed by COMAGRI compromises this balance by introducing significant exemptions for unchecked plant reproductive material to reach the market with no assurances, no traceability and without any official oversight. This, in all likelihood, would lead to the establishment of a parallel, uncontrolled market that undermines the efforts of plant breeders and farmers to increase sustainability while ensuring food security in Europe.**

We are currently experiencing a period of great uncertainty and challenges for the agricultural community which has led to a strong commitment from both the Commission and the European Parliament to adjust direction and support Europe's farmers in developing a way forward to overcome such challenges in future years. The text adopted by COMAGRI is not in line with such a commitment; in fact, it goes in the opposite direction. Moreover, it also fails to properly take the distinct biological characteristics and plant health risks of different PRM material into account.

PRM is a key input and the starting point for all agricultural and food production. We therefore reiterate that ALL PRM must comply with certain minimum requirements, such as official oversight, compliance with Plant Health requirements and reporting obligations. ALL users of PRM must be guaranteed that the products they use conform to the appropriate identification, performance, technical quality standards and absence of pests and diseases.

Furthermore, the COMAGRI report's suggestions in respect to the testing system for new varieties raises alarms within the agricultural community. With the effects of climate change, increasingly being felt by European farmers, there's a growing demand for sustainability assurances of agricultural products. However, the lack of infrastructure and protocols for such assessments, particularly for fruit and vegetable breeders, necessitates a longer transition period. **At the same time, it is imperative that the respective testing can be carried out at breeders' premises under official supervision to be financially affordable, particularly for small and medium-sized operators. The respective trials must remain adapted to regional growing conditions to maintain trustworthiness for farmers, keep efficiency high and costs low.**

We call upon Members of the European Parliament to take these principal considerations into account by introducing the proposed amendments to the file to support a more productive and sustainable EU agriculture.

We remain at your disposal to discuss and further elaborate on these proposals in the coming weeks in preparation of the plenary vote. In its current form, the COMAGRI report cannot be supported, neither by the suppliers nor by the users of PRM.

Faithfully yours,

Patrick Pagani  
Deputy Secretary General  
Copa and Cogeca



Garlich von Essen  
Secretary General  
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