



11 March 2026

Joint Letter regarding the Trilogues on the EU Plant Reproductive Material Regulation

To the

Rapporteur, Mr Herbert Dorfmann

European Commissioner for Health and Animal Welfare, Mr Olivér Várhelyi

Ministers of Agriculture

Dear Madam, Dear Sir,

On behalf of the signatories - ACT Alliance EU, BD, Brot für die Welt, Caritas Europa, Caritas Africa, Caritas Mona, CCJP Harare, CELAM, CIDSE, ECEN, HEKS/EPER, Misereor, SECAM, WCC, a coalition of faith-based and development organisations working with partners in Africa, Asia and Latin America - we would like to share with you our fundamental concern in view of the ongoing trilogue negotiations on the PRM Regulation. As organisations engaged in human rights issues, development cooperation and humanitarian work, we are particularly concerned about the impact of EU seed legislation on farmers' human rights, global food security and biodiversity, both within and beyond the EU.

Our recommendations are based on our commitment and conviction that farmers' right to seeds is a cornerstone of the human right to food, as enshrined in the International Covenant on Economic and Social Rights (ICECSR) and developed both in the International Treaty on Plant Genetic Resources for Food and Agriculture (ITPGRFA), and in the UN Declaration on the Rights of Peasants and Other People living in rural areas (UNDROP).

Recommendations

1-Guarantee farmers' rights to seeds

Enable farmer-to-farmer exchange of *all* PRM (not only seeds), including *with* monetary compensation and *without* regional limits.

Justification: Farmers should be empowered to exchange seeds through mutual aid – with appropriate requirements for farm-based systems. They should have access to locally adapted varieties, both conservation varieties and heterogenous material, as part of a diversification of pathways to the EU seed market and a just agroecological transition.

2-Increase EU action to tackle the global biodiversity loss to guarantee food security

Ensure conservation of agrobiodiversity in Article 2(4) is exempted from the scope of the regulation.

Justification: Protect genetic resources and seed diversity. Enhance actions to conserve genetic resources and seed diversity, not only in gene banks but also in local ecosystems. It is essential that small amounts of seeds can circulate freely outside the scope of commercial regulations, which should focus solely on market activities.

3-Diversification of seed markets

- Allow the registration of both traditional varieties and newly developed local varieties as conservation varieties for every crop, not just fruits and vegetables.
- The definitions of conservation varieties should exclude F1 hybrids, GMO/NGT and IP-restricted varieties (to allow on-farm and in-garden conservation).
- The production of conservation varieties should not be limited to a “region of origin”.
- “Nano-enterprises” should be exempt from Articles 41–42. Heavy administrative rules would force hundreds of small seed initiatives out of the market.

Justification: The new conservation variety scheme should help diversifying the seed genetic base in the market for adapting to local growing conditions, supporting food security and resilience. The law should provide for a proportionate and adapted regime for the marketing of locally adapted varieties, whether conservation varieties or heterogenous material. Locally adapted non-DUS varieties have proven better equipped to adapt to lower input agroecological production, especially in marginal areas and local markets rooted in territories and communities.

4-Provide transparency and participative governance structure:

- Retain minimum requirements for cultivation conditions.
- Establish transparency over breeding techniques and intellectual property rights.
- Prevent the misappropriation of traditional resources. Ensure informal varieties are considered in the check of distinctiveness and denomination as part of variety registration.

Justification: All users should have the right to an informed choice about the seed they are purchasing or receiving. Transparency regarding breeding methods and access to information about intellectual property rights are essential to protect both farmers and breeders. The national and the EU Variety Registers should contain mandatory information about IPRs and about breeding techniques that could restrict the use of seeds. A participative governance structure should include provisions for meaningful stakeholder participation in seed laws and policies. The legislation should build effective safeguards to protect traditional knowledge held by farming and local communities – preventing misappropriation of farmers’ varieties and their names.

To sum up, the EU seed marketing legislation should therefore provide enhanced flexibility for all users of seeds and plant reproductive material. **It should offer options for seeds adapted to local conditions, while respecting the diversity of agricultural and seed systems, respecting, fulfilling and protecting human rights to seeds.** This can offer important anchor points for better governance and participation, setting a precedent to enshrine farmers' rights to seeds and the right to food in seed laws.

Yours sincerely,

ACT Alliance EU - Action by Churches Together

BD - Broederlijk Delen

Brot für die Welt

Caritas Europa, Caritas Africa, Caritas Mona

CCJP - Catholic Commission for Justice and Peace Harare

CELAM - Latin American and Caribbean Episcopal Council

CIDSE - International family of Catholic social justice organisations

ECEN - European Christian Environmental Network

HEKS/EPER - Swiss Church Aid

Misereor – German Catholic Bishops’ Organisation for Development Cooperation

SECAM - Symposium of Episcopal Conferences of Africa and Madagascar

WCC - World Council of Churches

Background

Why the Right to Food is relevant to EU Seed Laws

Seed diversity in the hands of peasant communities is an important pillar when it comes to ensuring the right to food and the fight against hunger and malnutrition. This is particularly true in countries in Africa, Asia and Latin America, where peasant seed markets are still the backbone of food security. Therefore, we faith-based organisations are working to ensure that farmers rights to seeds are respected, protected and fulfilled by the EU and EFTA and countries of the Global South. We are calling to ensure that this EU reform strengthens rather than undermine rights to seeds and seed diversity.

Our advocacy approach is based on Policy Coherence for Development and the EU Better Regulation Guidelines, which address policy coherence concerns. The EU acts as a global standard-setter and an economic actor and important trading partner in the global seed market. Its seed regulations have an impact on seed systems in the Global South, whether through trade agreements, procurement regulations, donor support, technical assistance and capacity building in third countries, or other mechanisms.

Catering to the needs of all farmers and their diverse seed systems should be at the heart of the reform of the EU's seed marketing legislation, recognising their contribution to the conservation of agrobiodiversity and taking all necessary steps to respect, protect and fulfil farmers' rights to seeds. Farm-based seed systems are influenced and shaped by numerous laws and policies that impact the movement of seeds, their use and marketing. The EU seed marketing legislation presents an opportunity to foster a supportive environment for farm-based seed systems, all the while making linkages with existing laws such as seed health rules, and parallel legislative reform processes. Farm-based seed selection is an important pillar to implement the right to food.

We are building on the expertise and experience of our partners in the Global South, evoking the EU's treaty obligation to consider Policy Coherence for Development in its policymaking. Of importance to development policy is the extent to which the EU's seed marketing laws respect and support farmers' rights to seeds, and the extent to which they may harm or advance the EU's commitment to preserve and enhance biodiversity in the EU and beyond.

Access to diverse seeds is a key strategy to counter the risk of lower food production as climate change impacts become more severe. It is also key to produce nutritious crops. Considering that food insecurity can drive instability and fuel unrest and forced displacement, protecting the rights to seeds also goes beyond promoting food security – it is an investment in stability and lasting peace.