



Slow Food®



CALL FOR A WELL-GROUNDED REFORM OF THE EU SEED AND OTHER PRM MARKETING LAW

Dear Chairs and Coordinators of the Committee on Agriculture and Rural Development,

As the EU Commission is preparing to present its working programme in the weeks to come, DG SANCO has been busy testing waters on political options concerning a very sensitive file: the review of the plant reproductive material marketing law ([\(COM \(2013\) 262\) final, 2013/0137 \(COD\)](#)). As you may well be aware of, the **European Parliament rejected the initial Commission proposal in March 2014** at first reading with an overwhelming majority across all political groups, undoubtedly showing the inadequate nature of the proposed reform. In October 2014, the conference of Presidents of the newly elected European Parliament confirmed the outgoing assembly's position. **It seems that the Commission is not planning on following this request.**

The question at hand today is of high importance: Should the proposal be withdrawn and replaced by a new one, as the European Parliament has clearly requested, or should DG SANCO be allowed to come up with an amended yet inherently similar text? It seems DG SANCO itself has been informally advocating the latter option before the Parliament's AGRI Secretariat.

As representatives of civil society, we call on you: Please do not accept a renewed referral based on an unknown "amended" proposal. Please do demand a real reform, based on a new proposal, and insist that a genuine impact assessment be conducted.

We would indeed like to remind you that the outdated proposal has been drafted without a truly comprehensive impact assessment, causing numerous shortcomings and misconceptions in the proposal itself. The document presented as an "impact assessment" outlined regulatory options, but *failed to systematically assess the expected impact* of such options on different actors. Furthermore, since there are no *independent figures* on the seed and PRM market in Europe, the Commission relied on the figures provided by the seed industry when drafting the current proposal, neglecting a wide array of activities. Last but not least, the *Commission's Impact Assessment Board had rejected the first version of the "impact assessment"*, and the second version still earned severe criticism ([\(IAB Decision, Ares\(2012\)368782\)](#)) that have not been entirely addressed. Amending the existing draft hastily and rashly cannot possibly make up for these shortcomings. One cannot rebuild a poorly constructed house without solid foundations. Only a genuinely and thoroughly conducted impact assessment can be the foundation for a successful revision of the EU legal framework on seed and PRM marketing.

As Commissioner Frans Timmermans considers the Seed and PRM marketing Regulation proposal to be a candidate for withdrawal and revision, please make sure that this actually happens and that an unsound yet cosmetically modified draft does not come on your desks through the back door.

Good legislation needs thorough analysis and sufficient time. Building a house in a hassle on shaky foundations will provide satisfying results neither for seed producers, nor seed users and not the least for consumers. Therefore, **we urge you to demand a new proposal and insist that a real impact assessment be conducted.**

Thank you for your consideration.

Sincerely yours,

Arche Noah, Austria
Garden Organic, United Kingdom
Slow Food, Italy

BirdLife Europe, Belgium
Global 2000, Austria