

Brussels, 12 July 2017

Dorothee ANDRÉ
Unit G1 – Plant Health
DG Health and Food Safety
European Commission

Request for prolongation of the temporary experiment set up by Commission implementing Decision 2014/150/EU providing for certain derogations for the marketing of populations of plant species pursuant to Council Directive 66/402/EEC

Dear Ms André,

We are writing to you regarding the temporary experiment for certain derogations for the marketing of plant populations, which the Commission started in 2015 with the Decision COM2014/150/EU for four cereal crops (wheat, barley, oats and maize), and which will expire at the end of 2018. IFOAM EU is asking you to consider the prolongation of this experiment up to 2025, and the inclusion of all crop species into its scope. We also believe that, in the mid-term, the relevant legislation (Council Directive 66/402/EEC) at EU level should be changed, so that heterogeneous material can be marketed legally in the EU.

Relevance of temporary experiment for marketing plant populations

Open pollinated populations of outcrossing species, as well as Composite Cross Populations (CCPs) of self-pollinating species, are characterised by a high level of genetic diversity (ITPGR 2009), as they consist of a mixture of many different genotypes. Therefore, their phenotype is not homogeneous and can evolve over time, as it will adjust to growing conditions. Precisely for this reason, such heterogeneous reproductive material does not comply to the variety definition regarding uniformity. To allow seed from those populations to be marketed, it would be necessary to amend points E, F and G of Article 2(1) of Directive 66/402/EEC, to add the possibility to market seed which does not fulfil the requirements concerning uniformity and stability of DUS tests.

There has been great interest in the marketing of such populations which, in contrast to the presently released varieties, have a high level of genetic heterogeneity. This temporary experiment has been taken up in at least 6 countries: Italy, France, Germany, the Netherlands, Denmark and the United Kingdom. So far, there have been positive results. However, it took quite some time for the necessary legal framework for the temporary experiment to be implemented in the different countries. Therefore, more time is needed to examine the results of the experiment in more depth in these countries, and to allow more countries to participate to it. Moreover, the benefit of heterogeneous material is not restricted to cereals but also true for vegetable or other crops (Campanelli et al. 2015).

Research Projects providing scientific evidence for the advantage of heterogeneous populations

The use of heterogeneous material is of high importance, not only for organic farmers, because these heterogeneous populations have a higher buffering capacity to adapt to various abiotic and biotic stresses compared to homogeneous varieties that must pass the DUS (distinctiveness, uniformity, stability) test to get authorisation for marketing. These heterogeneous populations offer, therefore, a great potential for the adaptation to the impacts of climate change and contribute to broadening the existing genetic diversity. The advantages of heterogeneous populations, and especially the new concept of CCPs, have been studied in different crops in several European Projects like FP7 Solibam, core-organic COBRA, or Horizon2020 DIVERSIFOOD, and will be further improved in new projects like LIVESEED and ReMIX (Annex I).

Moreover, these populations consist of different genotypes and can adapt to local farming conditions. This allows farmers to select within these populations according to their needs and enables them to develop modern improved landraces by participatory breeding (Döring et al. 2011). Small scale and organic farmers' needs should be considered because they can contribute substantially to the improvement of cultivars suitable for their specific farming conditions and methods. Heterogeneous populations can improve performance and yield stability, especially under organic and low-input agricultural conditions, or in regions with less favourable growing conditions (Ceccarelli et al. 2010; Raggi et al. 2017).

Request for extension of the temporary experiment for certain derogations for the marketing of plant populations

While European and national research projects further develop the concepts of breeding for heterogeneous material, it is important to adapt the legal framework in order to allow the marketing of such material through changes in Directive 66/402/EEC. In the meantime, a prolongation of the temporary experiment will allow to gather more experience on the registration, characterisation, marketing and traceability of such heterogeneous populations for various crops in the different EU countries.

IFOAM EU believes that the **prolongation of this experiment** and the **inclusion of all crop species**, accompanied by changes of Directive 66/402/EEC to permanently **allow the marketing of such heterogeneous populations**, would improve the performance of organic and low input agriculture in Europe. Based on the Council conclusions of December 2015 (Council 15380/15), more agrobiodiversity will be achieved and this will contribute positively to the resilience to existing and upcoming farming challenges, such as climate change.

We hope for a positive reply to our request and remain at your disposal for further discussion.

Yours sincerely,



Eduardo Cuoco
IFOAM EU Director

Cc: Nicolas VERLET, Head of Unit Organics B4, DG AGRI, Päivi MANNERKORPI and Diana CHARELS, G1 DG SANTE

Annex I: European Project to improve the concept of heterogeneous material in plant breeding

FP7 Solibam: Strategies for Organic and Low-input Integrated Breeding and Management
www.solibam.eu 2010-2014

Core organic COBRA: Coordinating organic plant breeding activities for diversity www.cobra-div.eu
2013-2016

Horizon 2020 DIVERSIFOOD: Embedding crop diversity and networking for local high quality food
systems, www.diversifood.eu 2015-2019

New Horizon 2020 LIVESEED: Improve performance of organic agriculture by boosting organic seed
and plant breeding efforts across Europe 2017-2021m

New Horizon 2020 ReMIX: Redesigning European cropping systems based on species MIXtures 2017-
2021

Annex II: Literature

Campanelli et al. 2015 Participatory tomato breeding for organic conditions in Italy; Euphytica DOI
10.1007/s10681-015-1362

Ceccarelli et al. 2010 Plant breeding and climate change. J. Agric. Sci. 148:627-637

Council 15380/15 http://www.consilium.europa.eu/en/meetings/env/2015/12/st15380_en15_pdf/

Döring et al. 2011 Evolutionary Plant Breeding in Cereals – Into a New Ear, Sustainability 3:1944.1971

International Treaty on Plant Genetic Resources, 2009 FAO <http://www.fao.org/3/a-i0510e.pdf>

Raggi et al. 2017 Evolutionary breeding for sustainable agriculture: Selection and multi-environmental
evaluation of barley populations and lines, Field Crops Research, 204: 76-88