

Joint letter ahead of the Agriculture and Fisheries Council – 23 June 2025: Safeguarding farmer seed exchange and the foundation of agrobiodiversity and food sovereignty

Dear Minister of Agriculture,

We, the undersigned organisations – ARCHE NOAH, Biodynamic Federation Demeter International, European Coordination Via Campesina, IFOAM Organics Europe, and Slow Food – urge Member States to ensure the new Regulation on Plant Reproductive Material (PRM) protects farmers' rights to save, use, exchange, and sell their own seeds and PRM. It is essential to take important steps to ensure the dynamic conservation and management of biodiversity, especially that of cultivated plants, both in the EU and beyond, acknowledging the cross-border implications of EU legislation.

Seed exchange is a cornerstone of food security, biodiversity, and cultural heritage and is, as such, protected by the UN Declaration on the Rights of Peasants (UNDROP).¹ For millennia, farmers, and more recently, gardeners have saved and shared their seeds, adapting crops locally and developing vast agrobiodiversity. These decentralized, non-commercial systems remain essential today—for preserving rare and climate-resilient varieties, fostering collective and social innovation, food cultures, and sustaining rural livelihoods. Through peer-to-peer seed exchange, farmers can benefit from, and breed varieties adapted to their local growing conditions, contributing in return to fostering on-farm diversity and economic resilience.

Cultivated biodiversity has already significantly declined in recent decades, which severely impacts the long-term resilience of our farming systems, particularly in the face of climatic hazards. In this regard, it is essential to reverse this trend by supporting on-farm diversity and resilience rather than restricting it. Applying one-size-fits-all rules—designed for commercial seed trade—could undermine these peasant-led seed systems and conservation activities. Overregulation risks sidelining those who safeguard genetic diversity in fields and gardens, building resilient food systems from the ground up. Conversely, legislation must recognize the existence of different farming systems with different needs and as such, enable farmer-to-farmer exchanges recognizing that this does not compromise the integrity and functioning of the commercial seed market.

The PRM regulation plays a crucial role in shaping the future of practical actions to conserve and sustainably use agrobiodiversity which, in turn, will shape the future of food sovereignty. We therefore call on you to:

- **Safeguard farmer-to-farmer exchange of PRM,** including appropriate financial compensation, in line with the International Treaty on Plant Genetic Resources for Food and Agriculture and the Declaration of the Rights of Peasants (UNDROP) enshrining farmers' rights to save, exchange, sell and use their own seeds.
- **Exclude farmer-to-farmer seed exchanges which are done in the context of their agricultural production** - with a view to dynamic management and breeding, and not with a view to marketing

¹ [United Nations Declaration on the Rights of Peasants and Other People Working in Rural Areas](#). Resolution adopted by the Human Rights Council on 28 September 2018.

(public sale offer) from the scope of the regulation, to ensure the administrative and phytosanitary rules are adapted to these farming systems (i.e. subjected to the rules of agricultural production).

- In the absence of an exclusion from scope, at the very least secure unrestricted farmer-to-farmer exchange through an **improved article 30 that respects farmers' right to seed**.
- **Reject geographic limits for farmer-to-farmer seed exchange**, as proposed by the Council, which would restrict seed diversity and farmers' adaptation capacity.
- **Ensure quantity limits reflect farmers' actual needs** to ensure resilient farming systems and the preservation of agrobiodiversity.
- **Guarantee access to diverse PRM**—including traditional varieties and commonly known fruit varieties, organic heterogeneous material, and conservation varieties—without disproportionate regulatory barriers.
- And more broadly, **align the regulation with EU biodiversity, climate, and resilience goals**.

This is a historic opportunity to support farmers in adapting to climate change and building a long-term resilient agri-food system. Let us ensure that the future of seeds remains diverse, decentralized, and democratic.

Sincerely,

