Council Must Urgently Revise PRM Position to Safeguard Europe's Agrobiodiversity, Warns a Coalition of more than 200 Organisations

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Brussels, 25 November 2025 - As EU Member States enter the final phase of negotiations on the Regulation on the Production and Marketing of Plant Reproductive Material (PRM), a large coalition of more than 200 farmers', breeders', seed savers and environmental organisations sent today a joint letter to EU Agricultural Ministers, raising an urgent alarm: unless critical safeguards for agrobiodiversity and farmers' rights are restored in the coming days, Europe risks locking in a seed system unfit for climate resilience, sustainable agricultural practices and food sovereignty.

The signatories - including representatives of organic and agroecological agriculture, small seed companies, and conservation networks - warn that the current Council proposal fails to provide the legal space necessary for farmers, breeders, and seed initiatives to continue conserving and developing Europe's crop diversity. On the contrary, it risks being a severe setback for certain essential rights already recognised in various European countries. According to the current Council planning, the Danish Presidency aims to test Member State support at the attaché meeting on 28 November, followed by a possible COREPER mandate in mid-December, which would conclude the Council's internal process. "*If the Council does not correct course before finalising its position, Europe will undermine the very actors who keep agrobiodiversity alive*," said Magdalena Prieler of ARCHE NOAH. "*We are now just days away from a decision that could either safeguard farmers' rights and seed diversity - or irreversibly restrict them. Member States must choose wisely*."

Eric Gall, Deputy Director of IFOAM Organics Europe, stressed the need for a framework that reflects the realities of organic and agroecological systems: "*It is essential that the future PRM legislation provide the legal space for a diversified seed market and for farmers to choose the cultivars best suited for their farming systems. For example, limiting conservation varieties to only certain crop species and to their region of origin will highly hamper the many organic and agroecological farmers and breeders who currently rely on them*."

Agrobiodiversity Under Threat

Crop and variety diversity is the foundation of resilient agriculture. Higher genetic diversity allows plants to adapt to pests, diseases, and rapidly changing climatic conditions, and supports sustainable food production. Yet, agrobiodiversity has been drastically declining for decades. Small seed producers, conservation networks, and farmer-to-farmer exchange systems are essential for maintaining and renewing this diversity. However, the current PRM draft risks **tightening the regulatory framework around these non-commercial, diversity-enhancing activities**, instead of protecting them.

"*On-farm PRM breeding, dynamic management and exchanges between farmers are essential to adapt plants to local growing conditions and are a cornerstone of agroecology,"* said Alessandra Turco for the European Coordination Via Campesina. *"These practices are not marketing, they must be recognized as farmers' collective rights outside of the scope of the PRM regulation, as it is already the case in several EU countries*."

A Decisive Moment - With Severe Consequences if Missed

With the Council's internal deadline approaching rapidly, civil society organisations warn that Member States have a final, narrow window to integrate essential safeguards:

1. **Exclude on-farm conservation and dynamic management activities from PRM rules.** Treating exchanges for conservation or breeding as commercial marketing threatens thousands of grassroots seed initiatives.
2. **Guarantee farmers' rights to save, use, and exchange their seeds - including with financial compensation.** These rights are recognised internationally (ITPGRFA, UNDROP, CBD) and must be implemented in EU law, outside of the scope of PRM marketing.
3. **Ensure simple, accessible registration for old and newly developed conservation varieties, for all species and without geographical limitations.** Their use must not be restricted by

regional or crop-type limitations.

4. **Require that Value for Sustainable Cultivation and Use (VSCU) testing is done under organic or low-input conditions.** Sustainability must be assessed as a system, not as isolated traits.
5. **Protect nano-enterprises from disproportionate administrative burdens.** These small seed companies are essential for keeping locally adapted seed diversity available.
6. **Guarantee transparency on breeding methods and intellectual property rights.** Farmers and breeders need clear information to make informed decisions and safeguard free access to genetic resources.

The coalition urges Agriculture Ministers to correct the proposal **before the Council finalises its position**, ensuring the regulation reflects the needs of the farmers, gardeners, breeders and seed networks who maintain Europe's agricultural resilience.

A failure to do so would represent a historic setback for agrobiodiversity, farmers' rights, and Europe's capacity to adapt to the climate crisis.

The joint letter to EU Agricultural Ministers: www.arche-noah.at/jointletteronprm

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