



## EUROPEAN COMMISSION

HEALTH AND CONSUMERS DIRECTORATE-GENERAL

Director General

Brussels,  
SANCO.E2/TW/lav Ares (2013) 1658973

Dear Mr Riekeberg,

**Subject: Proposal for a Regulation on plant reproductive material**

Thank you for your e-mail dated 6 May 2013 and addressed to several Commissioners. Commissioner Borg, who is in charge of the file, asked me to reply on his behalf. We reassure you that your concerns were taken into account from the very start of the review process.

The proposal for that draft Regulation, which was adopted by the Commission on 6 May 2013, aims at ensuring a broader choice for users of plant reproductive material. It will offer the possibility for production and marketing of new improved and tested varieties, plant material not fulfilling variety definition, traditional varieties and niche market material. The marketing rules are adapted to type of material, the production systems and the size of business. Thus material will be available for all kinds of production systems and needs: improved varieties for sustainable agriculture, better testing covering the needs of organic agriculture, heterogeneous material for organic or other low input systems, traditional varieties adapted to regional or local conditions and niche market material for local small scale production. These provisions will help to achieve the aim that diverse varieties are in fact used in a sustainable manner. Furthermore, the proposal also excludes from its scope certain activities, since they are carried out by non-professional operators, or since they serve special purposes, like the conservation of genetic resources. One of the activities to be excluded is the exchange of seeds and other plant reproductive material between non-professionals.

The Commission remains convinced that also organic agriculture will benefit from the testing and registration of varieties specifically bred for this kind of production system. Farmers, consumers and the environment will benefit from varieties that have proven that they can contribute to food security under low-input conditions or under situations of increased climatic variability.

**Mr Andreas Riekeberg**

Räubergasse 2a

D-38302 Wolfenbüttel

[a.riekeberg@jpberlin.de](mailto:a.riekeberg@jpberlin.de)

Contrary to statements in your letter, the proposal will also play an important role in maintaining the diversity of the plant reproductive material industry in the EU. The Commission has no data suggesting that multinational corporations currently dominate the plant reproductive material sector in the EU market. Available data show that a large majority of the operators in the sector are micro-enterprises and SMEs. The Commission acknowledges these types of enterprises as key drivers for economic growth, innovation, employment and social integration and aims to improve the business environment for micro-enterprises and SMEs, to allow them to realize their full potential. The proposal contains exemptions specifically designed to support micro-enterprises, which play a significant role in the sector. Such enterprises are, for instance, exempted from variety registration fees.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Paola Testori Coggi', followed by a small flourish.

Paola Testori Coggi