



# National Report for Spain: How to improve the production and the use of organic seeds? National recommendations for Spain

**Work Package:** WP01 - Regulation & policy framework regarding production, use, and transparency of organic seed

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## Background

This report presents the results of a national level workshop held in Madrid on the 8<sup>th</sup> of April 2019, under the Horizon 2020 funded LIVESEED project<sup>1</sup>. The overall aim of LIVESEED is to boost the production and use of organic seed across Europe. This report was prepared as part of Work Package 01 of the project titled ‘Regulation & policy framework regarding production, use and transparency of organic seed’. The Workshop was co-organised by our LIVESEED partners Society for Organic Farming & Agroecology (SEAE) and Ecovalia.

This workshop was a follow-up of a national visit to Spain that took place between 16-21 April 2018 and aimed at better understanding the bottlenecks and possible improvements regarding the production and the use of organic seeds in Spain. The main outcomes of the visit were summarized in a country report<sup>2</sup> that was used as basis for the workshop discussion of the national workshop in 2019.

The national workshop gathered around 30 different stakeholders from Spain involved in the production and use of organic seed, including the Ministry of Agriculture, seed companies, the associations of organic farmers or breeders, local seed networks, and associations of seed savers. A representative from a Portuguese association on organic agriculture (AGROBIO) presented the situation of organic seed use and production in neighbouring Portugal, and the potential cooperation fields between the two countries.

During the first part of the workshop, different stakeholders presented their view of the situation, and their examples of best practices, and suggestions to develop the access to organic seeds, and reflected on the country report in Spain (see chapter 1).

During the second part of the workshop, all stakeholders were invited to discuss in depth the following key issues (see chapter 2):

- Which political measures and activities would be necessary to increase the production and the use of organic seeds in Spain?
- What is the actual availability and cost of organic seeds?

Based on the discussions, a SWOT analysis (see chapter 3), and country-level policy recommendations were proposed (see chapter 4).

The main outcomes of the discussion were then followed-up in making concrete tangible commitments by the stakeholders present to improve the situation in the country in the form of a ‘Declaration of Organic Seed’ that all stakeholders in the workshop co-signed at the end of the day (see Annex 1.).

This national report is an internal working document, aimed at national policymakers, and all stakeholders involved in the production and use of organic seed: national authorities, farmers, certifiers, producers, retailers, plant breeders and seed authorities in Spain.

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<sup>1</sup> [Liveseed.eu](http://Liveseed.eu)

<sup>2</sup> The country report is available in [[en](#)].



## 1. Production and use of organic seeds in Spain

### Reflections from stakeholders on the situation of organic seed in Spain

Both the number of organic producers and processors in Spain has grown since 2016, the most significant change was connected to a slight increase in land area for permanent crops. Organic agriculture is undertaken on 8.9% of the agricultural land area (2 million hectares, with land area growth of 0.2%).<sup>3</sup>

In Spain, a paradox exists: despite a lot of cultivated biodiversity, they import a lot of seeds from foreign countries. On the Spanish organic database, currently 750 varieties of 170 different crops are registered, 80% are vegetables.<sup>4</sup> This quantity and diversity of organic seed available in the Spanish market from Spanish producers are still very low. Based on the presentations, this is due to several factors:

- Perceived high prices of and low demand for organic seed from farmers;
- There are two main paths perceived in the organic seeds sector in Spain, with a major gap between them:
  - A) Products from locally produced seed and traditional varieties (e.g. Red de Semillas), only produced for the local market;
  - B) Organic seeds bought from multinational companies for organic export produces (e.g. peppers in Almeria and Murcia) to offer a product that guarantees export demand and high yield.
 According to the large cooperatives, they would buy locally produced seeds, but there is a general lack of coordination;
- There is a strong interest of farmers in very specific varieties versus types of seed in general: there is a mismatch of demand and supply, which generates a high level of derogation requests, and a low interest in the production of organic seed (e.g. several sterilized varieties/hybrids are available that farmers are not looking for, while e.g. open-pollinated/traditional varieties are not available). At the same time, seed producers lack information about the varieties that organic farmers prefer;
- Agrobiodiversity is a very strong theme in Spain where organic farming is seen as an opportunity to increase diversity in crops. Industrial seeds/certified seeds are just one category of seeds available for farmers amongst others, but there are also uncertified, GMO-free seeds, which are better for agrobiodiversity, but their status is not clarified in the regulations. Local and traditional varieties are very heterogeneous, which also contributes to the development of cultivated biodiversity, and farmers' interest in them is increasing in the country, yet local varieties cannot be submitted for certification;
- Some crop groups are not available at all in the database for farmers, e.g. lentil/green beans/cereals;
- Issues around intellectual property, patents and breeding methods should be better clarified for all stakeholders involved in seed production and seed use;

<sup>3</sup> <https://www.ifoam-eu.org/en/organic-europe>

<sup>4</sup> Based on the presentation of Esperanza de Marcos Sanz, Subdirección General de Calidad Diferenciada y Agricultura Ecológica (SGCDAE), Dirección General de la Industria Alimentaria (DGIA), Secretaría General de Agricultura y Alimentación, Ministerio de Agricultura, Pesca y Alimentación (MAPA).



- There are difficulties in registering new varieties, partially due to a lack of descriptors to characterize them (e.g. Les Refardes is trying to introduce about 30-40 new varieties a year, but they can only register 5 out of them. Furthermore, they have 94 varieties but only one of them is registered in the database).

#### General further reflections from participants included:

- Certifiers should make it clear that derogation should only be obtained for specific varieties;
- It should be possible to enter on the database a larger diversity of seeds, e.g. those that are not necessarily registered as varieties, but they should be organic certified;
- There are initiatives to develop a logo ‘from farmers’ seeds’ to increase awareness and production of seeds from local breeding (following other examples, e.g. Bio Breizh) and to defend the rights of farmers to have access to good quality and diverse seeds - these trends should be taken into account;
- There is openness from stakeholders to collaborate with the SGCDAE (sub-direction of the Ministry of Agriculture of Spain in charge of organic agriculture) that oversees the Spanish organic seed database to improve the current issues around the database and to identify where the obstacles lie in variety registration and how to solve it; There should be a discourse among stakeholders to achieve a common understanding and definition on ‘organic seed’ (organic seeds produced within an organic agricultural system), involving farmers, local seed networks and policymakers. E.g. *Les Refardes* understands organic seeds as:
  - No patent, no intellectual property
  - No hybrid
  - No GMOs
  - Selected by a group of people in a participatory system
  - Farmers have a right over them
  - Contribute to variety conservation, can easily adapt and reproduce under organic conditions.
- The divided competencies between the competent authorities and control bodies across the 17 Autonomous Communities of Spain make it difficult to harmonise the regulations and improve seed production across the country;
- There is a lack of motivation to change the situation in Spain. The Ministry will not improve the situation on its own without some external motivation. All participants should take this first step together and push the Ministry of Agriculture on Organic Farming (which is in charge of the organic seed database), the Competent Authority on seed registration, organic regional competent authorities and control bodies for the creation of a specific national working group on this subject to foster progress.



## 2. Stakeholders' views from the group discussions

### 2.1 Political measures and activities that are necessary to increase the production of organic seeds in Spain

In Spain, it is essential to distinguish between larger, multinational seed companies and SME scale seed producers. For the large companies, producing organic seed, even at a higher cost, is no problem. Their main bottlenecks are the lack of demand on the local market and the lack of coordination for some crops (e.g. pepper with triangle shape are cultivated organically. The requested varieties of this kind of pepper are known and it is easy to forecast how many seedlings are needed per hectare. However, for better planning the coordination with small local farmers needs improvement).

To increase the demand, the following suggestions have been made:

- Develop a standardized, authorized, certified seed production system in Spain;
- Only authorise an organic label on the final product, if it is grown from organic seeds;
- Limit derogations for certain crops to ultimately limit derogations and significantly improve the coordination of supply and demand;
- Assess real demand for varieties per region;
- Assess how supermarkets can be allies of seed producers to develop the market for organic seeds;
- Explore additional customer markets for organic seed, e.g. urban farmers.

In Spain, an ongoing process of market concentration is observed: small seed companies are taken over by larger companies that are more in favour of patents and the use of fertilizers. Measures for SMEs should be developed to be more competitive and stay on the market.

The measures to prevent market concentration mentioned:

- Improving access to larger sales networks;
- Incentives facilitating SMEs in investing in R+D (e.g. reducing the 25% of taxes for all R+D costs in small and medium companies);
- Improving access to facilities for seed health and seed resilience testing;
- Setting up a network to monitor the market concentration processes.

For SME scale producers, the development of “guarantee systems” is needed, ensuring:

- That the produced organic seed will be sold by better coordinating and planning supply and demand;
- That the organic seed produced will be of high quality, and therefore the price of the final product can compensate for the higher price of the seeds;
- That there are enough varieties available suitable for OA;
- That there is a system of damage control and mitigation in place for SMEs (e.g. for crop failure or other damages due to weather conditions).

Several participants mentioned trust, tracing and labelling as important issues to discuss:

- CCPs (mainly spelt and barley) and seed mixtures that enter the value chain for retail shall have a proper tracing system of parental lines and origins to promote transparency in the markets (national and international) and to restore trust among farmers and seed producers;
- To overcome issues concerning ownership and living patents on seeds, the development of a labelling system for local varieties that explains the breeding techniques applied was suggested;



- Consumers could also contribute to an increasing market demand for organic seeds. Specific labelling of products which were produced from organic seeds and information about the risks of residues when conventional seeds are used could stimulate the demand.

Breeding programs for organic need to be promoted and supported. There is a need to distinguish between breeding that creates new varieties, and farmers managing biodiversity by maintaining and improving seed over time (i.e. breeding within traditional farming). The formulation and agreement on definitions are needed for the different types of breeding for organic in Spain, and the development and financing of breeding programs in support of these activities to create a wider variety assortment for organic. A discussion on participatory breeding is also necessary in Spain.

## 2.2 Political measures and activities that are necessary to increase *the use of organic seeds in Spain*

For certain crops, especially those with short growing seasons (e.g. spinach, lettuce) or crops with well-developed international markets (e.g. barley), the organic seed is often preferred in Spain.

However, farmers, in general, do not necessarily see the point of using organic seeds if:

- they can use conventional untreated seed that are cheaper,
- the organic seed promises lower yield or quality of the final product;
- using organic certification has no impact on their sales.

But it must be noted that it is not just the responsibility of farmers to avoid using organic seeds. Seed companies must provide more transparency in their labelling (e.g. using ‘*seeds for organic*’ or ‘*ecological seeds*’ that are in reality not organic seeds at all), and in their offers. For instance, some companies offer organic seeds on the database despite the fact they are out of stock, to afterwards convince the farmer to buy the ‘untreated seeds of the same variety’. Seed companies should agree on an ethical code to avoid loss of trust with farmers.

To increase the use of organic seed, farmers could be:

- Forced by eliminating or reducing the derogations to a minimum;
- Obligated to use at least a certain percentage of organic seeds to be certified as organic farmer;
- De-incentivised for using certain seeds;
- Motivated by subsidies or compensations to use organic seeds;
- Motivated morally through awareness-raising of the benefits of using organic seed (e.g. their suitability for organic farming, the benefit of local varieties, varieties that are more resistant e.g. to climate change impacts without being dependent on external inputs, biodiversity etc.);
- Trained on varieties available for organic farming and on existing political measures and regulations.

An important aspect in Spain is the division of the local seed networks producing local varieties versus the large companies mostly involved in the value chain. Organic farmers using farm saved seeds and local/traditional varieties have different breeding goals and perspectives. Their priority is that local varieties are “recognised” as “on the right side of the law”. This is an important message from the stakeholders to consider, in the light of the new EU Organic Regulation, how to develop a common understanding with local seed networks: What will be possible to register as a variety? What will be possible to register on the seed database? Farm saved seeds should also be tackled in the future as part of the implementation of the new Organic Regulation. An interesting approach would be to organize pilots to sell organic seeds from local varieties in different regions.



There should also be more collaboration with farmers, explaining to them how to produce seeds and why it is important. In Mallorca, for instance, many local farmers buy seedlings and seeds on the local market. For organic varieties, seed cleaning infrastructure should be promoted in many regions, to ensure that farmers have enough good quality seeds that are also traceable.

## 2.3 The availability and cost of organic seeds

The perceived extra cost of organic seed is 10% compared to untreated conventional seed. Moreover, there is a price difference between conventional treated and conventional untreated seed that farmers must pay. However, for some crops, the price difference is higher, e.g. for conventional barley seed the price is 260 EUR/t and for certified organic barley seed it is 360 EUR/t.

The multinational seed companies can influence the prices e.g. lowering the price to clear the stock and offering different prices among different countries according to their price level. Local seed producers cannot compete with that. Furthermore, the price depends on where the seeds can be sold geographically, which allows for some speculations on the regions. Local varieties' added values and real costs are sometimes defined by their proximity to a given region. Large companies perceive a lack of demand from the market as main bottleneck and not the production costs of seeds. Often, the market dictates the availability and not the supply or the price. Distributors play an important role in dictating the seed demand.

The situation on supply and demand is different for large companies and for small-scale producers, as well as it is different from region to region in Spain. Stakeholders of strategic sectors could analyse the regions separately in terms of real demand for both large- and small-scale farmers.

Farmers usually only consider the costs of the seeds and their margin. Many farmers have not studied the costs in detail and cannot trace the costs of the entire chain, packaging, labelling, etc. in organic. In order to have a better understanding of the total costs, data should be collected, analysed and shared on a regular basis, including authorization requests, species, varieties, amounts of seeds requested/ordered etc. and in trainings the real costs of not using organic seeds for farmers should be explained. It would also be necessary to inform farmers about the existence of the organic seed database and how they can benefit from using it.

Improving access to existing information is very much needed. It became clear during the discussions, that it would be beneficial to set up a national working group on seed involving all stakeholders to share information and use existing platforms to put seed on the agenda (e.g. the seed working group meeting could be connected to the yearly meeting of public certifiers).

### Participants gave examples of documents they are willing to share:

- Las Refardes' protocol to start a micro seed company;
- Red de Semillas will publish a study to show the benefit of organic seeds;
- Vitalis' leaflet about the difference between organic and conventional seeds;
- SEAE and Ecovalia will share meeting information on their websites;
- Ecovalia could share data on the use of seed, varieties used in organic, etc.



### 3. SWOT analysis

#### 3.1 Derogation rules, national annex

STRENGTHS	WEAKNESSES
<ul style="list-style-type: none"> <li>Control bodies send the derogation information to the autonomous regions 4 times a year, which then report to the Ministry;</li> <li>Once a year, the ministry prepares the national report;</li> <li>Farmers need to ask for derogation 15 days before sowing;</li> <li>To obtain derogation, farmers need to prove that there is no/not enough seed available;</li> </ul>	<ul style="list-style-type: none"> <li>No categories for derogations have been developed;</li> <li>Easy to ask for a derogation, e.g. ask for a variety that it not offered in organic quality;</li> <li>There is a lack of overall coordination and benchmarking of goals for organic seed which makes it difficult to plan a strategy to ultimately phase-out derogations;</li> </ul>
OPPORTUNITIES	THREATS
<ul style="list-style-type: none"> <li>Introduce categories for derogations (and some vegetables could be added to the “no-derogations-granted”-category in future);</li> <li>Small local producers largely deal with traditional varieties that are promoted from farmers to farmer.</li> <li>The companies dealing with derogations chiefly can be described as large companies. These derogations could be addressed through more strategic planning per region;</li> <li>Justifications for derogations should be made stricter by certifiers; a stricter interpretation of the Organic Regulation should be applied.</li> <li>Develop standardised reasoning for derogations to increase transparency which should be used by the different certifiers;</li> <li>Coordinate demand and supply: ask farmers what they need, ask seed companies to produce the requested seed and do not allow derogations later-on;</li> <li>Define a list of varieties that are similar to be able to decline derogation authorisation requests because the variety could be substituted easily;</li> </ul>	<ul style="list-style-type: none"> <li>Seed mixtures/CCPs could make the derogation situation even more complicated, if they mix organic and conventional varieties;</li> </ul>



### 3.2 Database

STRENGTHS	WEAKNESSES
<ul style="list-style-type: none"> <li>• About 750 varieties are currently entered on the database, 80% vegetables, 8% aromatic plants;</li> <li>• In 2018, availabilities of cereal seeds increased;</li> <li>• There is willingness to improve the database on behalf of the authorities, since 2015, the Ministry of Agriculture has worked on improving the database;</li> </ul>	<ul style="list-style-type: none"> <li>• Database is not directly modifiable by users;</li> <li>• It is cleaned up twice a year;</li> <li>• The database should enable a higher diversity of seeds to be registered (e.g. aromatics, legumes etc.);</li> <li>• Commercial names in the database do not match the variety as defined in the national catalogue;</li> <li>• Sometime varieties are not added to the database;</li> <li>• If a variety is not in the catalogue (met CPVO criteria), they will not be taken into account for registration in the database. If it is not a clear variety, they are not placed in the catalogue;</li> <li>• Not enough organic seed on the database to satisfy demands of organic farmers;</li> <li>• Low awareness of the database by farmers;</li> </ul>
OPPORTUNITIES	THREATS
<ul style="list-style-type: none"> <li>• Develop incentives for seed suppliers to enter their offers on the database;</li> <li>• Improve the database to host certified organic varieties and crop types currently not having a common catalogue;</li> <li>• Develop the steps through which local varieties can also find their ways to the database (e.g. maybe a sub-database, or subpage)</li> <li>• The database could be improved with more information available (e.g. the quantity of seeds available, organic seeds breeder profile, etc.).</li> <li>• Connect other existing databases for transparency, e.g. cereal crops database is available for farmers, control authorities should provide access to see actual supplies,</li> <li>• Expand the database internationally to be able to supply seeds of varieties suited for organic production in Spain;</li> <li>• Make it user friendly, and accessible by seed companies and farmers;</li> </ul>	<ul style="list-style-type: none"> <li>• The use of the database at the moment is voluntary, which gives floor to distortion, it should be made compulsory/obligatory to limit the number of derogations;</li> </ul>

### 3.3 Training opportunities

STRENGTHS	WEAKNESSES
<ul style="list-style-type: none"> <li>• Well-developed local seed networks in frequent contact with farmers;</li> <li>• Several NGOs and organisations already offer training services;</li> </ul>	<ul style="list-style-type: none"> <li>• There are several knowledge niches for farmers, seed producers and consumers alike;</li> <li>• No compulsory education is in place connected to organic certification for farmers;</li> </ul>
OPPORTUNITIES	THREATS
<ul style="list-style-type: none"> <li>• Training for farmers on organic seed production, on the difference and benefits of organic seed versus untreated conventional seed;</li> <li>• Training for famers and seed suppliers on the database and how they could benefit from the database, and on the availability of varieties offered on the database;</li> <li>• Compulsory training on organic production connected to certification could be introduced.</li> </ul>	<ul style="list-style-type: none"> <li>• Awareness remains low and knowledge remains scattered across the regions, making it difficult to plan out agreed national level scenarios to phase-out derogations by 2036.</li> </ul>



<ul style="list-style-type: none"> <li>• Standardize existing definition of training and training subjects carried out by the different regions for farmers, and provide a national uniformity in that respect;</li> <li>• Offer farmers a training to assess the total costs across the entire chain, including packaging, labelling, etc. in organic;</li> <li>• Training for consumers on organic seed and the value of local varieties;</li> <li>• Training for farmers to raise awareness of measures and regulations apply for organic seed;</li> <li>• Sharing and multiplication of knowledge on new varieties and variety trials by the autonomic communities' authorities;</li> <li>• More collaboration in trainings between authorities and seed networks and NGOs providing farmers' training;</li> </ul>	
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### 3.4 Expert roundtable

STRENGTHS	WEAKNESSES
<ul style="list-style-type: none"> <li>• There are several stakeholder groups to be involved in an Expert group given the complexity of the situation;</li> <li>• There is openness and willingness to participate by the stakeholders;</li> <li>• The themes for discussions and debates are identified;</li> </ul>	<ul style="list-style-type: none"> <li>• The divide between seed networks promoting local varieties and large companies involved in organic seed production and derogations is large, it is difficult to engage them in discourse to yield common outcomes;</li> <li>• There is no acceptance of all actors along the value chain by all stakeholders, makes it more difficult to draw the circle of stakeholders that should be part of the expert group;</li> <li>• Currently, there is not sufficient communication among the stakeholders and between the stakeholders and the authorities;</li> <li>• There are several topics that would require regular discussions in Spain, but that would first require a levelling of knowledge across the different stakeholders and regions.</li> </ul>
OPPORTUNITIES	THREATS
<ul style="list-style-type: none"> <li>• A national level expert group should include the competent authority, representatives of organic farmers, control bodies, producers, greenhouses, leaders of seed networks, and also large companies, e.g. SEAE could lead the process of seed expert group. This group could deal with the development of the derogation categories, the improvement issues of the seed database, and provide input for the implementation of the new EU Organic Regulation in Spain, and coordinate knowledge and data exchange from different stakeholder groups;</li> <li>• Expert groups at the regional level might be necessary; these groups could define region-specific recommended variety lists for seed suppliers based on assessment of regional demands; recommended replacement varieties before derogation; assess training needs in the region, organise local debates on a given topic to collect input from stakeholders at this geographical scale for the national level group.</li> </ul>	<ul style="list-style-type: none"> <li>• The level of complexity remains high, it will not result in national level resolutions (at best solutions remains regional);</li> <li>• Lack of trust between the stakeholders involved may erode the collective power of a potential expert group.</li> </ul>



### 3.5 Traditional varieties

STRENGTHS	WEAKNESSES
<ul style="list-style-type: none"> <li>• Very strong interest of farmers in local or traditional varieties;</li> <li>• High level of knowledge and experience of farmers;</li> </ul>	<ul style="list-style-type: none"> <li>• Not acknowledged as “variety”, cannot appear in national catalogue, or in database;</li> </ul>
OPPORTUNITIES	THREATS
<ul style="list-style-type: none"> <li>• They can be transferable from one region to another – can create an alternative market or a submarket;</li> <li>• Local varieties are adapted to local conditions and may be the best choice for stable yield and resistances;</li> <li>• A system and conditions should be developed to provide a legal basis for these varieties to be able to appear in a catalogue;</li> </ul>	<ul style="list-style-type: none"> <li>• The divide will further deepen between the two main threads (seed networks promoting local varieties and large companies involved in organic seed production), hindering dialogue.</li> </ul>

## 4 Policy recommendations

Based on the SWOT analysis and the LIVESEED booklet ‘*How to implement the organic regulation to increase production & use of organic seed*’<sup>5</sup>, here are some recommendations for Spain to increase the production and the use of organic seeds:

- It is crucial that Spain organises a stakeholder discussion around how to set up expert groups on organic seeds across the regions and nationally to be able to prepare for the deadline set for the phase-out of derogations by 2036 in line with the new Organic Regulations;
- Distinguish between large-scale and small-scale organic seed producing companies when developing incentives targeted at them;
- Improve the information-flow to inform farmers and other stakeholders on the database, the availability of varieties, the advantages of organic seed and topics identified in the section on training in the SWOT analysis;
- Improve the derogation system:
  - ask the authorities to install a derogation system with different categories;
  - set benchmark goals for organic seed to support the phase-out of derogations;
  - apply stricter rules for farmers to get a derogation.
- Oblige organic farmers to use a minimum percentage of organic seeds, and also motivate small scale farmers with incentives and subsidies that compensate the higher price of the organic seed (*see guarantee systems on page 5*);
- Improve access to and information on the database for all stakeholders involved, and improve the database itself with extended information on variety characteristics and information on organic seed quantities available;
- Organize pilots to sell organic seeds from local varieties, and explore the legal options for acknowledging local varieties to be able to enter the national catalogue and the database in light of the vegetative propagation materials involved in the new Organic Regulation (EU) 2018/848;
- Improve labelling systems to provide further transparency for consumers, targeting awareness raising on local varieties, on organic seed used for final organic products, and for traceability of seed mixtures and CCPs;
- Involve supermarkets in the boosting of market demand for organic seed;

<sup>5</sup> <https://www.liveseed.eu/wp-content/uploads/2019/01/LIVESEED-FinalV2-WebInteractive-1.pdf>



- Improve the registration process for new varieties, e.g. through developing descriptors for their characterization and through identifying where the obstacles lie in variety registration and how to solve it with stakeholders and experts of varieties.



## Annex I. Declaration of Organic Seed - Stakeholders agreement

The National Workshop hold in Madrid in April 2019, gave the opportunities to the different stakeholders participating to discuss and agree on the best activities to implement in order to increase the production and the use of organic seeds in Spain. In 2020, during the last phase of this project, an assessment will be done to compare those following agreement and see what was done in the country, what was not feasible and if the situation regarding organic seeds improved.

# DECLARATION OF ORGANIC SEED

## Spain

**MADRID | 08<sup>TH</sup> APRIL 2019**

We, undersigned, participants of the LIVESEED workshop, titled “Solutions to improve the problematic of the use of organic seeds in Spain”, aim to increase the production and use of organic seed in our country. Therefore, we commit to the following initiatives, activities and actions in the coming year:

- Request to the ministry to create a working group in which participates all the competent authorities in the field of agriculture, the control authorities, the organic producers and the seed, in addition to all the actors involved in the agri-food chain and representatives of civil society.
- Improve the transmission/dissemination of existing information to promote the use and production of organic seeds, through the platforms of the representative organizations of the sector.
- Share the initiatives and successful results with the participants
- Compile information on the benefits of using organic seeds to promote incentives for its use
- Analyze the causes of the exceptions to the use of organic seeds to be able to define better requirements in a harmonized way through the improvement of the application for authorization.
- Gather information on the possible ways of developing organic seeds for legumes

Signed in Madrid, on the 8<sup>th</sup> of April 2019 by:





## DECLARATION OF ORGANIC SEED Spain

**MADRID | 8 ABRIL 2019**

Los abajo firmantes, como participantes del taller del taller LIVESEED “Soluciones a las problemáticas en el uso de semillas ecológicas en España”, con el objetivo de incrementar la producción y uso de semillas ecológicas en nuestro país. Por lo tanto, nos comprometemos a las siguientes iniciativas actividades y acciones para este próximo año:

- Solicitar ante el ministerio un grupo de trabajo en el que participen las autoridades competentes en materia de agricultura ecológica, las autoridades de control, productores ecológicos y de semilla, además de todos los actores involucrados en la cadena agroalimentaria y representantes de la sociedad civil.
- Mejorar la transmisión de información existente para fomentar el uso y producción de semilla ecológica, a través de las plataformas de las organizaciones representativas del sector.
- Compartir las iniciativas y resultados exitosos con los participantes



- Compilar la información sobre los beneficios del uso de semilla ecológica para promover incentivos a su utilización
- Analizar las causas de las excepciones al uso de semillas ecológicas para poder definir de una forma armonizada unos mejores requisitos a través de la solicitud de autorización
- Recopilar información sobre las posibilidades de desarrollo de semillas ecológicas para leguminosas

Firmado en Madrid, el 9 de Abril 2019 por:



The block contains several handwritten signatures in blue ink. Some of the legible names include 'Luis Flecha', 'Celaya', 'Félix', 'García', 'helen', 'Esteban', and 'Adrián'. Below the signatures are several line drawings of agricultural products: a wheat stalk, a carrot, a tomato, a cross-section of a tomato, another tomato, a slice of tomato, and another wheat stalk. At the bottom left is the European Union flag, and at the bottom right is the Swiss flag. A small number '2' is visible at the bottom center of the page.

## Annex II. Workshop Agenda

### Workshop – Solutions to problems in the use of organic seeds in Spain Madrid, april the 8<sup>th</sup>, 2019

[La Casa Encendida, Ronda de Valencia, 2,  
28012 Madrid](#)

Time	Agenda
9:30 – 10:00	Registration + welcome breakfast
10:00 – 11:00	<b>Introduction</b> <ul style="list-style-type: none"> <li>Welcome from the organizers, SEAE and ECOVALIA</li> <li>Explanation about the objectives of the LIVESEED project and workshop– <i>Maaik Raaijmakers (Bionext)- videos</i></li> <li>Regulation framework in EU concerning organic seeds – <i>Pauline Verrière (IFOAM EU)</i></li> <li>Explanation of the router database – <i>Katharina Brühl (FiBL-DE)</i></li> </ul>
11:00 – 11:30	<b>Current situation and evolution in Spain and Portugal</b> <ul style="list-style-type: none"> <li><i>Spain</i> – <i>Esperanza de Marcos Sanz, Food Quality and Organic Farming General Sub-directorate of the Ministry of Agriculture, fisheries and Food</i></li> <li><i>Portugal</i> – <i>Luiz Manuel Gonçalves da Silva, Agrobio</i></li> </ul>
11:30 - 13:00	<b>Examples of good practices from Spain:</b> Juan José Soriano Niebla, IFAPA / Red de Semillas Organic seed and reproductive material producers: <ul style="list-style-type: none"> <li>Aina Sociés, Associació de varietats locals de Mallorca</li> <li>Esther Casas, Les Refardes (Barcelona)</li> <li>Biosemillas (Almeria)</li> </ul>
13:00 – 14:15	<b>Organic lunch</b>
14:15 - 14:30	<b>Explanation of the workshops structure - IFOAM EU</b>
14.30-16.30	<b>Workshop – main questions to be discussed:</b> <ol style="list-style-type: none"> <li>Policy measures and other activities needed to increase organic seeds production and use.</li> <li>Availability and real cost of organic seeds</li> </ol>
16:30 – 17:00	<b>Coffee break</b>
17.00 - 18.00	<b>Plenary</b> Outcome From the workshops (moderators) Presentation of the “seed declaration” Conclusions and following up



## Annex III. List of Participants

Ágnes	Bruszik	IFOAM EU
Aina	Socies Fiol	Associació de Varietats Locals de Mallorca
Aina	Calafat Rogers	SEAE
Alberto	Fonseca	Semillas Vivas
Ángela	Morell Pérez	ECOVALIA
Carlos	Serrano Salcedo	CAAE, delegación de Castilla La Mancha
Carolina	Davico	NATURASI ESPAÑA
Elisa	Lizana Montero	CAAE
Esperanza	de Marcos Sanz	Subdirección General de Calidad Diferenciada y Producción Ecológica, MAPA
Esther	Casas	Les Refardes
Évelyne	Alcázar Marín	ECOVALIA
Felipe	Berenguel	BIOSEMILLAS SCA
Feliu	Cusido	Bejo Iberica SLU
Guiomar	Carranza Gallego	Laboratorio de Historia de los Agroecosistemas, Universidad Pablo de Olavide
Helena	Cifre	SEAE
Jesús	Ochoa	ARAE
Joan	Guillaumet Illa	Ceràlia
José Ángel	Navarro Castillo	CAAE, delegación Almería
José Aurelio	Navarro Lanchas	Industrias Agrarias Castellanas
Juan Antonio	Pérez González	APROSE
Juan José	Soriano Niebla	Instituto Andaluz de Investigación y Formación Agraria, Pesquera, Alimentaria y de la Producción Ecológica (IFAPA)
Katharina	Brühl	FiBL - DE
Luiz Manuel	Gonçalves da Silva	AGROBIO
Maaike	Raaijmakers	Bionext
Miguel	Arribas Miranda	Aleka Bioanitzasuna
Miriam	López Rodríguez	Vitalis
Pablo	Palomo López	CEREALES PALOMO S.A.
Pauline	Verrière	IFOAM EU
Mar	Pancorbo Lopez	PARTICULAR
Ramon	Sorta Martinez	Asociacion Agroecologica Consciencia Grows
Adrian	Rodriguez Burrero	UPV
Carolina	Banon Munoz	Comite de Agricultura Ecologica de Madrid
Isabel	Sonwar Gonzalez	Comunitaria
Jose Alberto	Moreno Lopez	CAEM



## Annex IV. Country Report for Spain



## Country Report for Spain

**Work Package:** WP01 - Regulation & policy framework regarding production, use, and transparency of organic seed

**Dissemination level:** Public

**Publication Date:** 28 March 2019

**Authors:** Maaïke Raaijmakers (Bionext, Netherlands)

**Local partners involved in the visit and the revision of the report:** Angela Morell Perez (Ecovalia) and Aina Calafat (SEAE)

**WP Leader:** Freya Schaefer (FiBL-DE)



LIVESEED is funded by the European Union's Horizon 2020 under grant agreement No 727230 and by the Swiss State Secretariat for Education, Research and Innovation (SERI) under contract number 17.00090.



## About the report

This report has been produced in the framework of the Horizon 2020-funded project LIVESEED.<sup>6</sup> The main aim of LIVESEED is to boost the production and use of organic seeds and plant breeding for organic agriculture across Europe. It is co-ordinated by IFOAM EU, and its scientific coordinator is FiBL-CH.

Work Package 01 of LIVESEED explores EU Member States in terms of their implementation and best practices connected to the EU Organic Regulations, in the contexts of national regulatory and policy frameworks, specifically regarding the production, use, and transparency of organic seed.

As part of this Work Package, Bionext, FiBL-DE and IFOAM EU visited selected countries during 2017-2018, where the organic seed production is low, to understand their bottlenecks and possibilities for improvements regarding the production and the use of organic seeds at the national level. During the visits, several stakeholder groups were interviewed (competent authorities, seed database managers, seed companies, research institutions, organic farmers, seed associations, organic certifiers, etc) in each country.

The main outcomes of the visits were summarized in country reports presenting the status quo for that given Member State. The reports' findings then were disseminated among a wide range of national stakeholders in 2019 and discussed during workshops to define viable next steps to improve the status quo in each country. The Workshop for Spain took place on 08<sup>th</sup> April 2019, in Madrid, and was co-organised by our LIVESEED partners Ecovalia and Society for Organic Farming & Agroecology (SEAE).

This country report is recommended for national policymakers, and all stakeholders involved in the production and use of organic seed: national authorities, farmers, certifiers, producers, retailers, plant breeders, seed authorities, and the general public.

For further information concerning this report, please contact:

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Bionext is the Dutch chain organization for organic agriculture and food.

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<sup>6</sup> <http://liveseed.eu>



## Implementation of the regulation on organic seed in Spain

### Findings from the national visit to Spain 16-21<sup>st</sup> April 2018

#### 1. General information

There are 36,207 organic farmers in Spain covering 8,7 % (two million hectares) of the agricultural land area. From this area 52,1 % is grassland, 24,4 % is covered with arable crops and 23,5 % are permanent crops. (Source: IFOAM EU 2016). Andalucía is the main organic producing region covering around 47% of the total Spanish organic production. Castilla La Mancha covers 18% of all organic land.

#### 2. Production and use of organic seed

There are two seed associations in Spain (ANOVE and APROSE) representing national and international conventional seed companies. Some of their members, for instance Intersemillas SL, also sell organic seeds. Around 20 seed producers and trading companies offer organic seed on the Spanish seed database. Most of the organic seed comes from foreign companies.

In addition, there are many regional seed networks in Spain aiming to increase agrobiodiversity and fostering the use of traditional varieties. *Red de Semillas* is the national organisation coordinating the regional networks that are involved in conservation and multiplication of traditional seeds for organic farming.

For the production of vegetables organic farmers often use organic transplants. According to the transplant producers, the majority of the seeds used are untreated conventional seeds. Transplants from organic seed are on average 10-25% more expensive.

The use of farm-saved seed by organic farmers is very low (1% or less of the total). This is mainly due to the fact that organic farmers must prove to the authorities that they used certified seed in order to receive European subsidies. Only very few small producers preserve and exchange their seeds and sell the products (fruits, vegetables, bread) on local organic markets. In terms of cereals, some farmers from Catalonia and Malaga (Andalusia) still preserve and grow open pollinated materials in organic.

#### 3. Implementation of the EU regulation: the database and derogation policy

The National Ministry of Agriculture, Fisheries, Food and Environment (MAPAMA) is responsible for the management of the organic seed database. The autonomic regions are in charge of the implementation of the organic regulation and the derogation process.

In 2017, there were 727 varieties offered on the organic seed database, mainly from vegetable crops. To enter an offer on the seed database a seed supplier must apply at the competent authority from one of the 17 regions. They check if the company complies with the seed law and is certified organic. This information is sent via mail to the Ministry, which then enters the offer to the database. The organic seed database is updated twice a year. In Andalucía and Catalonia, the regional authorities have delegated the derogation process to the control bodies (certifiers).

Farmers can request derogation at their certifier if they want to use a variety that is not offered on the seed database. To prove that organic seed from this variety is not, or no longer available, they must add a screenshot from the database and an email from the seed company. Once a year, the regional authorities send an update to the national Ministry which prepares the national report.



In case conventional seeds are used, farmers must prove that their seeds are untreated with a declaration from the seed producer.

#### 4. Policy measures to increase production and use of organic seed

The Valencian Agricultural Diversity Plan, which started in 2016, has the objective to guarantee the conservation of Valencian local varieties and their dissemination. The traditional seeds conservation centre in Valencia describes and conserves cultivars. They focus on regional cultivars from vegetables that are not (or no longer) registered and commercialised but still are interesting for farmers.

Part of the plan is to promote the use of traditional varieties within organic farming. Therefore, a network of organic multipliers has been created. Organic farmers who want to multiply the seeds sign a contract with the seed centre. A disclaimer in the contract states that the seeds are not commercial. The farmers can use the seeds for themselves and within the network, but they cannot sell them to others. The seed users are mainly small organic producers, producing for the local market.

#### 5. Breeding research and field trials

Since the 1980's, researchers at the SERIDA Institute have been devoted to the conservation of apple landraces and to breeding for organic cultivation, with special focus on Northern Spain (Asturias). They are considered a pioneer group in organic breeding in Spain.

Several research institutes are gradually expanding their efforts in organic breeding in recent years.

The financing is primarily based on public funds from European, national or regional research programs. In the past 5-10 years, new lines of research have been developed in Valencia (Universitat Politècnica de Valencia) for organic breeding in vegetables.

Currently, there is also a national project (funded by INIA-Spain) focusing on Capsicum peppers landraces. Around 100 landraces were tested, also under organic conditions. They performed well in organic cultivation in the open field. The first 15 varieties have been selected for higher scale trials and for more locations in the coming years. Next step will be introgression of resistances to some (main) viruses that modern varieties have.

#### 6. Constraints and opportunities

There is not enough organic seed available on the Spanish market and at the same time there is not enough demand for organic seed. Most organic farmers ask for a certain variety, not for a type of seed (conventional or organic). They want top quality varieties with the newest resistances. They see no advantage in the use organic seed. It is only more expensive.

Since there is no clear demand for organic seed and farmers can easily get a derogation to use cheaper conventional (untreated) seed, there is no incentive for conventional seed companies to invest in organic seed production. They have no confidence they can sell their organic seed to Spanish farmers. According to some Spanish seed companies, organic seed is currently not a profitable business in Spain because a high diversity of varieties is used, and the amount of organic seeds needed per variety is too small. They lack information about the varieties that organic farmers prefer.

The seed database is only updated twice a year; therefore, the information is often outdated.

The seed marketing legislation hinders the use of organic seed from traditional and local varieties. For some farmers it is a problem that the exchange and sales of uncertified seeds is not allowed. They are



forced to buy seeds from seed companies. At the same time the local varieties they produce cannot be submitted for certification.

There is no good definition of organic seed in the organic regulation; traditional seeds are not mentioned. The regional authorities fear that strict rules for the use of organic seed might threaten the agrobiodiversity and limit the use of traditional seeds. They see a strong movement to increase the use of local varieties.

The MEC-ECO meeting, where all the regional authorities meet, could be a good opportunity to discuss organic seed and the development of a common strategy, for instance, to improve the seed database. Another opportunity is that the regional initiatives promote the use of (organic) seed from local varieties. In Valencia, there is a regional seed network for traditional varieties. In this group they also look at the derogations and if there is a high demand for a certain variety the organic farmers in the network start producing organic seed from that variety.

## 7. Recommendations from the stakeholders

- The seed regulation needs to be adapted; the exchange of seeds among farmers should be allowed. Now farmers are forced to buy seeds from seed companies.
- The big conventional seed companies that now dominate the organic market should receive less prominence. Stricter regulation is needed to force seed companies to produce more organic seed.
- Make it more difficult for organic farmers to get a derogation to use conventional seed.
- Create incentives for farmers to use organic seed. If supermarkets would ask for organic seed, everything would start to change; the market is decisive.
- Farmers need teaching about organic agriculture including seeds; a helpdesk for organic farmers is needed.
- There is a need for organic field trials to test which varieties perform best under organic conditions.
- The responsibility to increase the production of organic seed should lay with the control bodies/competent authority. The certifiers should engage with the seed suppliers and push for more organic seed production, only then the farmers can be obliged to buy it.

## 8. More information

Organic seed database:

[www.mapama.gob.es/app/EcoSem/ListadoSemillas.aspx?idPro=-1&idEs=-1&idPa=100000](http://www.mapama.gob.es/app/EcoSem/ListadoSemillas.aspx?idPro=-1&idEs=-1&idPa=100000)

Link to the National ‘interpretation’ of the organic regulation ‘MECOECO’

[https://www.mapa.gob.es/es/alimentacion/temas/produccion-ecologica/programacontrolecoactualizadoversdic2018\\_tcm30-379436.pdf](https://www.mapa.gob.es/es/alimentacion/temas/produccion-ecologica/programacontrolecoactualizadoversdic2018_tcm30-379436.pdf)

Red de Semillas: [www.redsemillas.info](http://www.redsemillas.info)

