



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

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

Dissemination level: Public

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1. Background

This report presents the results of the workshop held in Sofia on the 2nd of October 2019, under the Horizon 2020 [LIVESEED project](#). It aims at presenting specific recommendations for Bulgaria on how to improve the production and the use of organic seeds.

This workshop gathered around 30 different stakeholders from Bulgaria, ministries in charge of agriculture issues, seeds companies, association of organic farmers or breeders.

As part of LIVESEED project¹, a national visit took place in this country from February 7th to 10th in 2018, to better understand the bottlenecks and the possibilities of improvements regarding the production and the use of organic seeds at the national level. The main outcomes of those visits are summarized in the country report (Annex IVI) that was used as a basis for the workshop discussion in 2019.

During the first part of the workshop, different stakeholders reflected on the status quo and gave testimonials on their analyses of the situation in their country. During the second part of the workshop, all stakeholders were invited to discuss the following issues. Guiding questions for discussions were:

- How to improve the organic seed database?
- How to improve the production and use of organic seeds?
- How to improve the use of organic seeds?

Based on those discussions a SWOT analysis, and policy recommendations were highlighted. The main outcomes of the discussion will be followed up by actions recorded in the Seed Declaration for Organic Seed that all stakeholders agreed to take at the end of the day (see Annex I).

2. Reflections on the Status Quo of the Organic Sector and Seed Production

With 2.9% (136,629 hectares) of the total agricultural land area being organic, Bulgaria found itself more on the lower end when compared to other EU countries (in 2017). This area, of which 29.2% were grassland, 48.5% arable crops and 22.3% permanent crops, was managed by 6,471 organic farmers. In 2017 less than half of the organic farmland was fully converted (48,463), leaving the majority in-conversion. This correlates with the statement of the Ministry of Agriculture that Bulgaria is progressing in terms of extensions of fields and producers. For certain cultivars like lavender and rose oil, it is not only leading in terms of total production but shows relatively high percentages of organic (20% in the case of rose oil).

A majority of the seed used by farmers is in general farm-saved and can reach a percentage of up to 95% in cases like cereal. Certain varieties of it and of a few other cultivars are approved as heterogeneous material, but of the 205 tonnes produced in 2018, only 64 tonnes were sold. If not farm-saved, farmers buy there seeds directly from public breeding and research institutes or international seed (trading) companies. This, and the fact that the current database is not well implemented, could be the reason for

¹ Work Package 1 'Regulation & policy framework regarding production, use and transparency of organic seed.



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the declining numbers of seed suppliers on the database in the last year (eleven in 2018 and only four in 2019)².

From 2009 to 2014 Bulgarian organic seed database was part of Organixseeds.com. In 2014 the Ministry of Agriculture and food decided to elaborate a common national database, including database of: a) organic operators, b) licensed control bodies and c) database of organic seed and propagating material. This database was managed by the Ministry with the support of an external private company, but did not function well. Especially the organic seed database is difficult to operate as seed providers are not allowed to make any corrections (they don't have access to the database), all communications are in written by post, etc. In February 2019 the Ministry of Agriculture mandated a new company to elaborate a new database (Organic register), again with 3 main parts. Up to date the new organic register is not functional. The previous database for organic seeds is not working neither. Currently, an Excel sheet with only 4 organic seed suppliers replaces the organic seeds database.

Some positive steps were initiated since May 2019. A new deputy minister was nominated, especially responsible for fruits and vegetables production and organic farming. New Department for Organic Farming in the Ministry was approved with a total number of 15 experts. Until the end of 2019 the Department should be operational. A new Organic farming development Action plan 2020-2027 was published in August 2019. The Ministry of Agriculture, Food and Forestry created a working group with the participation of stakeholder's representatives with main task to revise the National Ordinance N:5 for organic production.

3. Main Outcomes of the Group Discussions

3.1. The organic seed database and its use could be improved by:

- Applying an interactive and user-friendly online database that facilitates real-time updates and has useful features
- Providing more information on suppliers and varieties
- Adding the functionality to request derogations online
- Actively encouraging seed suppliers to register on the database
- Making the registration to the database more user-friendly

3.2. Improving the availability of organic seed could be approached by:

- Subsidies for organic seed production as an incentive to start
- Financial support for organic breeding and research (e.g. testing old varieties in field trials)
- Organizing meetings between seed producers and organic farmers. This kind of cooperation would help to bring together the supply and demand for organic seed

² Source: website of the Ministry of Agriculture



- Establishing an online platform to test/share technologies and methods for researchers and producers
- Monitoring the demand to allow seed suppliers to adapt their production in time to market demand

3.3. Improving the use of organic seed could be approached by:

- Coupling a certain amount of subsidies to organic seed use to compensate for the higher prices
- Educating farmers about the advantages of organic seed
- Demonstrating the quality of certified organic seed on field trials
- Facilitating exchange between farmers and suppliers to give opportunities for expressing which varieties are needed

4. SWOT analysis – Detailed analysis of domestic opportunities based on presentations and group-work

4.1. Subsidy system

| STRENGTHS | WEAKNESSES |
|--|--|
| <ul style="list-style-type: none"> • According to the National Development Programme: Bulgaria 2020 the state commits to promoting the development of the organic agricultural sector through financial assistance | <ul style="list-style-type: none"> • Many farmers only do organic for the subsidies • Farmers often do not buy organic seeds because they can get a derogation to buy cheaper conventional seeds |
| OPPORTUNITIES | THREATS |
| <ul style="list-style-type: none"> • Plans to separate organic agriculture into an individual department could lead to more targeted subsidies • Subsidizing the production and use of organic seed • Take best practices from other countries into consideration (e.g. a point system for subsidies instead of organic in general) | <ul style="list-style-type: none"> • The last audit on the 2015 – 2017 implementation of Organic Farming (Measure 11 of the RD Program 2014-2020) found no reliable arrangements put in place for financing³, which (should it continue this way) could limit the development of the organic sector and the production and use of organic seed tremendously. |

³ Source: Bulgarian National Audit Office: Annual Report 2018

4.2. Derogation rules, national annex

| STRENGTHS | WEAKNESSES |
|--|---|
| <ul style="list-style-type: none"> • Derogations based on availability in database (according to EU organic regulation) | <ul style="list-style-type: none"> • Full compliance with organic regulation not yet achieved, as evident from DG SANTE monitoring visit (2015) • (Harsh sanctions: organic license removed if derogation policy is breached) • No subdivision of derogations into different categories • Applying for derogation is paper-based and can take a long time |
| OPPORTUNITIES | THREATS |



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| | |
|---|---|
| <ul style="list-style-type: none"> • General derogations should slowly be phased out, to stimulate suppliers to produce and farmers to use organic seeds | <ul style="list-style-type: none"> • Farm saved seeds maintain their pivotal role because no derogation is needed. |
|---|---|

4.3. Database

| STRENGTHS | WEAKNESSES |
|--|---|
| <ul style="list-style-type: none"> • To offer seed on the database it is required to prove you are an authorised seed producer or supplier and your seed must be certified, which assures good quality. • No fees are collected from producers, processors, and traders • Only the total quantity of seeds is listed in the database (prevents applicants for derogation to adapt the requested amount in favour of authorization) | <ul style="list-style-type: none"> • No continuity: data was first managed by external providers, now by the ministry and change back to external provider soon is possible • Availability of organic seeds is a problem because data is missing • Only four legitimate providers of plant propagating material on the database • Two simultaneous databases online • Database is an Excel file that is updated less than every 6 months • Registration to the database happens via letter and can take a long time |
| OPPORTUNITIES | THREATS |
| <ul style="list-style-type: none"> • Approach regarding database is currently being reviewed • Seed producers should be able to manage their own data and update in real time • More information should be available: results of field trials, country of origin, etc. • Useful features like a search engine, filters and the possibility to request derogation online, should be provided • Going back to OrganicXseeds could be a reasonable option • Seed producers could be actively invited to get on the database | <ul style="list-style-type: none"> • If database continues to be dysfunctional, organic seed production in Bulgaria is at stake • Foreign seed companies sell directly to farmers as it is easier for them this way |

4.4. Organic breeding and variety test

| STRENGTHS | WEAKNESSES |
|--|---|
| <ul style="list-style-type: none"> • Testing is done under official procedure by licensed individuals, basis for inclusion in variety list • Vegetables are approved as heterogenous material | <ul style="list-style-type: none"> • So far, no request for testing of an organic variety • Research institutes have to pay themselves for new registrations |
| OPPORTUNITIES | THREATS |
| <ul style="list-style-type: none"> • The Institute of Plant Physiology (Sofia)? wants to establish an online platform to test technologies and methods for researchers and producers • More investment in breeders and farmers associations to kickstart organic breeding activities | <ul style="list-style-type: none"> • If organic varieties are not registered, market demand cannot be met • Registration of organic varieties follows the same procedure as conventional (DUS, VCU) • Research institutes that sell organic (basic) seeds cannot compete with foreign seed companies |



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4.5. Expert roundtable

| STRENGTHS | WEAKNESSES |
|--|---|
| <ul style="list-style-type: none"> Consultative Council (often referred to as the Commission) has been set up to identify problems, support drafting of policies regarding organic legislation and consider applications for authorization of derogation. | <ul style="list-style-type: none"> The composition of the advisory committee (the Commission) is only inter-ministerial and usually does not include other stakeholders. Representatives of non-governmental organizations and specialists on specific topics may be invited when appropriate. |
| OPPORTUNITIES | THREATS |
| <ul style="list-style-type: none"> The importance of exchange between stakeholders is recognised by many There is a need for monitoring the demand of organic seed as production now is happening blindly A strategic plan regarding derogations and organic seed production and use for coming years should be developed | <ul style="list-style-type: none"> ... |

4.6. Traditional varieties and farm-saved seeds for own use

| STRENGTHS | WEAKNESSES |
|---|---|
| <ul style="list-style-type: none"> Farmers have a wealth of knowledge, The use of farm-saved seeds is very significant in the sector as it is accepted as organic seed. | <ul style="list-style-type: none"> Farmers themselves are not motivated to buy/use organic seeds A large majority of some crops is produced with farm-saved seeds |
| OPPORTUNITIES | THREATS |
| <ul style="list-style-type: none"> Financial support for testing old varieties in the conditions of trial fields Online platform to test technologies and methods for researchers and producers | <ul style="list-style-type: none"> Widespread use of farm-saved seeds limits the demand and therefore the incentive for companies to start organic seed production The use of farmed saved seed will remain significant until organic certified seed is much less expensive and does provide the yield or quality expected by growers |

5. Policy changes proposed based on the Organic Regulation

- Subsidies for organic seed producers to compensate for higher production costs and make organic seed eventually cheaper
- Subsidies for organic seed users – especially when certified – to incentivize farmers to buy high quality seed and reduce use and exchange of farm-saved seed
- Carefully limit derogations to raise demand and facilitate production, have a strategy in place
- Develop a national annex and different categories for derogations (see Dutch example)
- Improve current database in terms of content and possibilities to interact or reintroduce OrganicXseeds



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- Raise the awareness of organic producers about the database and provide training and information on how it is used
- Provide training and establish demonstration fields to convince farmers of the advantages of organic seed
- There is a need for more research and investment in organic breeding to be able to develop and test more organic varieties
- Include stakeholders to define breeding targets and participate in the breeding itself
- Activate consultative council / establish an expert group to advise on derogation strategies and propose ways to further increase production and use of organic seed

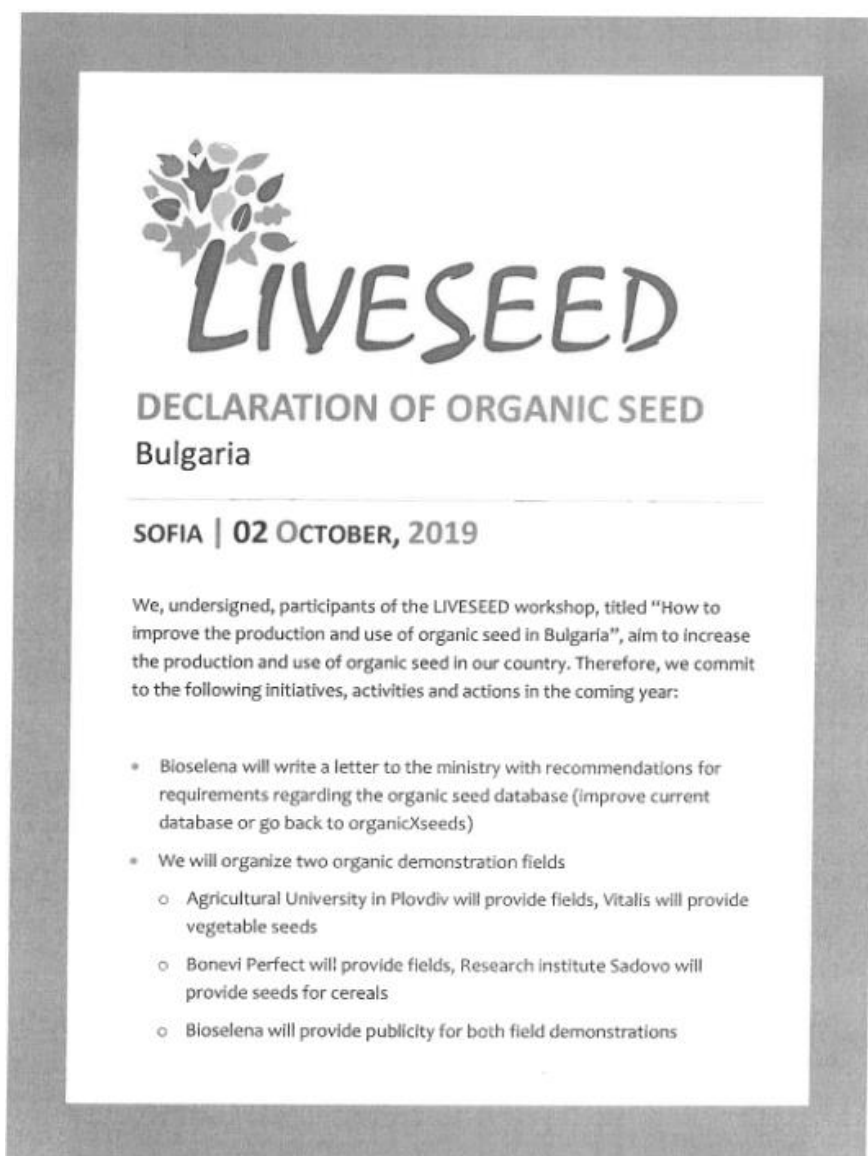


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Annex I: Declaration of Organic Seed Bulgaria

The National Workshop 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 the Bulgaria. In 2020, during the last phase of this project, an assessment will be done to compare this following agreement and see what was done in the country, what was not feasible and if the situation regarding organic seeds improved.



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- Boril Nikolov (Vitalis) will collect and disseminate information about different types of organic seed and difference to conventional seed
- Assoc prof. Marina Marcheva (Agricultural University Plovdiv) will write a proposal to ask Ministry to fund registration of varieties for organic production
- The Bulgarian association of organic producers will ask Ministry that extra payment for production and use of organic seeds will be included in the payments of the CAP
- National organic association will ask Ministry for a special program to encourage farmers to use organic seeds within the national organic action plan
- Bioselena asks the Ministry to make the derogation report public
- Eli Vitanova and Mihaela Metodieva will start a group in social media where stakeholders in organic farming sector will keep in touch and share information

Signed in Sofia, on the 02nd of October 2019 by:



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Annex II. Workshop Agenda

How to improve the production and use of organic Seed in Bulgaria

Sofia, Bulgaria, October 2nd 2019

Hotel Rila, Tsar Kaloyan 6, 1000 Sofia, Bulgarien

| Timing | Agenda |
|---------------|---|
| 9.30 - 10.00 | <i>Registration + coffee</i> |
| 10.00 - 10.10 | Stoilko opens the meeting Welcome and Opening |
| 10.10-10.40 | Current national situation(s) <ul style="list-style-type: none"> Bulgarian ministry of agriculture, food and forestry: <i>Mr. Chavdar Marinov – Deputy Minister</i> <i>Ms. Diana Bosashka – Directorate Organic Agriculture</i> Agency of Plant Variety Testing, Approbation and Seed Control – Ms. Bistra Pavlovska |
| 11.00-11.45 | Context <ul style="list-style-type: none"> Aim of the LIVESEED project. Results from the national visit and short explanation of the aim of the LIVESEED workshop (<i>Maaik Raaijmakers; Bionext</i>) EU legal framework (Thomas Haselberger, <i>IFOAM EU</i>) Explanation of the Router database (Xenia Gatzert, <i>FiBL-DE</i>) |
| 11.45- 12.30 | Testimonials from other stakeholders, how to increase production and use of organic seed in Bulgaria: <ul style="list-style-type: none"> Certifier: Balkan Biocert - Mr. Krasimir Kunchev Farmers representative - Ms. Veselina Ralcheva Seed producers: Biosem - Mr. Ivan Filipov Researchers: Ms. Tsvetanka Dincheva |
| 12.30- 12.45 | Introduction to group work IFOAM EU |
| 12.45- 13.30 | <i>Lunch</i> |
| 13.30-15.00 | Group work - 2 groups Topic 1. how to improve the seed database Topic 2. how to increase the production and use of organic seed in Bulgaria Topic 3. how to improve cooperation between the stakeholders (seed expert group) |



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| | |
|-----------------------------|--|
| <p>15.00-15.30</p> | <p>Summaries from working group moderators and drafting of the declaration of organic seed</p> |
| <p>15.30-16.00</p> | <p><i>Coffee break</i></p> |
| <p>16.00 - 17.00</p> | <p>Plenary session Presentation and signing of the declaration of organic seed; Conclusions and follow up</p> |



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Annex III. Participants of the Workshop

| | | |
|-------------|-----------|---|
| Bakardzhiev | Yasen | TEM Bulgaria |
| Boneva | Ruska | Bonevi Perfect Ltd |
| Bosashka | Diana | Ministry of Agriculture Food and Forestry |
| Bruszik | Agnes | IFOAM EU |
| Danailov | Zhivko | |
| Dimitrova | Boryana | Natural and fine food Europe |
| Dincheva | Zvetanka | Maritsa Vegetable Crops Research Institute |
| Filipov | Ivan | Biosem Bulgaria |
| Gatzert | Xenia | FiBL-DE |
| Georgi | Filipov | Biosem Bulgaria |
| Guenov | Vassil | NCB |
| Haselberger | Thomas | IFOAM EU |
| Ilieva | Eli | Bulgarian Assosiation Bioproducts |
| Ivanov | Ivailo | Lider Consulting Ltd |
| Jordanov | Jordan | Agricultural University, Plovdiv |
| Junakova | Mariya | Bulgarian Agricultural Academy |
| Kalapchieva | Slavka | Maritsa Vegetable Crops Research Institute |
| Kazakov | Petar | Center of Plant Biology and Biotechnology |
| Kunchev | Krasimir | Balkan Biocert Ltd |
| Marcheva | Marina | Agricultural University, Plovdiv |
| Marinov | Chavdar | Ministry of Agriculture Food and Forestry |
| Marinova | Evelina | Lider Consulting Ltd |
| Metodieva | Mihaela | Agricultural University, Plovdiv |
| Nikolov | Boril | Enza Zaden / Vitalis |
| Pavlovska | Bistra | Agency of Plant Variety Testing, Approbation and Seed control |
| Raaijmakers | Maike | BIONEXT |
| Ralcheva | Veselina | INA Ltd |
| Simeonova | Albena | Albena Simeonova 1 Ltd |
| Smilenova | Zdravka | Amitizia Ltd |
| Sommer | Martin | IFOAM EU |
| Stoichev | Chavdar | Louisa-Svetlina Tocheva |
| Stoyanov | Milen | Bulgarian Assosiation Bioproducts |
| Sujeeth | Neerakkal | Bio Atlantis Ltd, Ireland |
| Todorova | Rumyana | |
| Vitanova | Elisaveta | Komoss Ltd |
| Zvetkov | Veselin | Bulgarian Assosiation Bioproducts |



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Annex IV. Country Report



Country Report for Bulgaria

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

Dissemination level: Public

Publication Date: 20 Sept 2019

Authors: Maaïke Raaijmakers (Bionext, Netherlands)

Local partner involved in the visit and the revision of the report: Stoilko Apostolov, Petya Pencheva (BIOSELENA)

WP Leader: Freya Schaefer (FiBL-DE)



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About the report

This report has been produced in the framework of the Horizon 2020-funded project LIVESEED.³ 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) 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 Bulgaria took place on 2nd October 2019 in Sofia and was co-organised by the LIVESEED partner BIOSELENA.

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:

Ms. Maaïke Raaijmakers: raaijmakers@bionext.nl

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

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Visit our website: liveseed.eu, and our social media: Facebook and Twitter: LIVESEEDeu

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³ <http://liveseed.eu>



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Implementation of the regulation on organic seed in Bulgaria

Findings from the national visit to Bulgaria, 7-10th February 2018

1. General information

In 2017 there were 6,471 organic farmers in Bulgaria covering 2,9 % (137,000 ha) of the agricultural land area. From this area 29.2 % is permanent grassland, 48.5 is covered with arable crops and 22.3 % are permanent crops (source: IFOAM EU).

2. Production and use of organic seed

There are a few Bulgarian seed companies that produce organic seed or organic vegetative propagating material, for instance from lavender and soft fruit (berries). Also, several international seed (trading) companies, offering both conventional and organic seed, are active in the Bulgarian market. In 2018 eleven, mainly Bulgarian, seed suppliers were offering their seed and vegetative propagating material on the organic seed database.

Public breeding and research institutes play an important role in the production of pre-basic and basic seed from the main agricultural crops. Many (organic) farmers, are registered as seed producers, especially for cereals. They buy (pre) basic seed and multiply the seeds themselves.

It is estimated that in cereal production 95% of the seed used is farm saved seed. Farm saved seed is accepted as organic seed. This means organic farmers can use it without derogation. The control body asks for a declaration stating that the farmer has produced and used his own seeds. Farmers that are in conversion to organic, need a derogation if they want to use their own farm saved seed.

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

The department for organic production from the Bulgarian Ministry of Agriculture, Food and Forestry is responsible for the management of the database and for the derogation policy. The technical management of the database is done by an external IT company that maintains the website and updates the database based on input from the Ministry.

Until 2014, Bulgaria worked with the database called OrganicXseeds⁴ that is hosted by FiBL. Since 2015 they have used a different database system. This database is updated twice a year. Before the update the Ministry sends all the seed suppliers on the database a letter to check if they still have organic seed available. If they do not react, their offer on the database will be marked as “exhausted”. If they are sold out the seed suppliers can also send an e-mail to the Ministry themselves and their offer will be removed directly from the database.

To offer seed on the database you must prove you are an authorised seed producer or supplier and your seed must be certified as organic. Seed suppliers must submit all documents to the Ministry which will

⁴ <https://www.organicxseeds.com/international/countryselect>



respond within a month. Foreign companies (traders or producers) need to present an additional certificate from the Seed Control Agency. Also, they must submit the contract between the original seed producer and their certifying body. When offering seed on the database, seed suppliers must include information about the quantity and delivery period of the organic seed or vegetative propagating material and about the region where it can be delivered.

A farmer can ask for a derogation if the variety he wants to use is not available on the database. The derogations are granted by one of the certification bodies according to a standardized procedure, checked by the Ministry.

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

The Ministry stimulates through national policies the production of organic varieties at breeding and research institutes.

5. Obstacles and opportunities

Many farmers produce organic just to receive more European subsidies. They do not always sell their products on the organic market and they are not interested in organic seeds. Farmers can also easily circumvent the use of organic seed. They just ask for a variety for which no organic seed is available on the database. At the same time, there is clearly not enough organic seed available on the market yet. Farmers that actively look for organic seed find the choice of varieties limited and not always meeting their demand.

The organic seed database is not functioning optimally. Information is missing, it is not updated regularly, and many farmers do not know where to find it. Foreign seed companies find it very difficult to get their seed offered on the database. Therefore, they sell their organic seeds directly to farmers.

The research institutes that sell organic (basic) seeds feel they cannot compete with the foreign seed companies. The companies are better traders and can offer the farmers extras like free samples, advice and deferral. Another obstacle is, that many farmers only buy (basic) seed once and then exchange or sell the seeds without paying royalties to the seed producers.

For producers of organic vegetative material, it is a problem that farmers order too late. As a consequence, the organic plants are now often sold on the conventional market.

An opportunity is the fact that some farmers are consciously using organic seed because they have a good quality and the right disease resistances. They are in close contact with the organic seed suppliers and try to solve their cultivation problems together.

6. Recommendations from the stakeholders

- Create incentives for seed producers and farmers to make organic seed more attractive.
- Make the procedure to register organic seeds on the database clearer and simpler. For some companies, it is not clear how to get their seed offered on the database.
- Many farmers don't know about the database and where to get organic seeds, this information should be widely spread.



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- Make a specific ordering period obligatory for vegetative planting material. For instance, plants from lavender must be ordered between November and February and from roses between November and June.
- Make sure all certifiers ask for the same information when farmers apply for a derogation.
- Control bodies must check if the farmers are really growing the variety that they asked a derogation for.
- Make it more difficult to get a derogation and introduce a non-derogation list.
- Install an expert group on organic seed that can advise the government.
- Subsidize farmers that use organic seed.
- All seed companies should test their varieties both under organic and conventional conditions.
- Invest more in organic breeding so farmers have more choices of suitable organic varieties.
- The seed authority must check if farmers who want to register as seed producers have a contract with the owner of the seeds they are going to sell.

7. More information

Bulgarian seed database:

https://www.mzh.government.bg/media/filer_public/2019/06/28/poseven_autosaved.xlsx

National legislation for organic farming:

<https://lex.bg/bg/laws/ldoc/2137187013>

Register of seed producers:

<https://iasas.government.bg/bg/register.html>



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