



## Compilation of policy briefs on enabling strategies to promote organic seed and plant breeding

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## History of changes

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V1.1	22/09/2025	Mariano Iossa (FiBL Europe)	Comments
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**LiveSeeding - Organic seed and plant breeding to accelerate sustainable and diverse food systems in Europe** is a 4-year Innovation Action funded by the European Union, the Swiss State Secretariat for Education, Research and Innovation (SERI) and UK Research and Innovation (UKRI). The project started in October 2022 and brings together 37 organisations operating in 16 European countries. LiveSeeding provides science-based evidence and best practice solutions to help achieve 100 % organic seed.

LiveSeeding contributes to the transition towards environmentally friendly, climate-neutral, healthy and fair food systems through a **PUSH-PULL-ENABLE** strategy to:

- Enhance the availability and adequacy of organic seeds of cultivars appropriate to organic farming (PUSH),
- Increase and stabilise the market demand for organic seeds of cultivars appropriate to organic farming (PULL),
- Foster an enabling policy and regulatory environment where both demand and supply can harmoniously and productively negotiate without irrelevant constraints due to legal restrictions and/or regulatory fragmentation (ENABLE).



LiveSeeding addresses the topics in a **holistic multi-actor, multi-stakeholder, participatory approach** involving stakeholders along the value chain in 17 local **Living Labs** (LLs) and 3 established networks of organic breeders (**ECO-PB**), seed savers (**ECLLD**) and Milan Urban Food Policy Pact (**MUFPP**). 16 European countries cover the different pedoclimatic zones and socio-economic contexts, including countries with a low level of development in organic seed and breeding in East and South Europe.

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## List of abbreviations

PRM	Plant Reproductive Material
OV	Organic variety suitable for organic production
OHM	Organic heterogeneous material
OPB	Organic Plant Breeding
DUS	Distinctness, Uniformity, Stability
VSCU	Value for Sustainable Cultivation and USE
WPs	Working Packages

## Summary

This deliverable is part of the activities lead by task T4.4 of the LiveSeeding project that aims to **unlock project outcomes to policymakers**. It wishes to compile recommendations based on the outcomes of the research done during the project as well as from the long-term experience of partners. As such, it is an intersectional task as it involved collaborative exchanges and collaboration with contact points of the different working Packages (WPs).

This first compilation includes two policy briefs:

- Policy Brief #1 (April 2024, updated September 2024) – focuses on EU seed marketing reform;
- Policy Brief #2 (October 2025) – focuses on the Definition of Organic Plant Breeding for registration of Organic Varieties suitable for organic production.

## Scope & Introduction

The purpose of these policy briefs is to translate the outcomes of the LiveSeeding project into evidence-based recommendations for policymakers, thereby fostering a **stronger dialogue between science and policy**. Those recommendations are grounded both in the scientific results of the LiveSeeding project and in the long-standing practical experience of consortium partners, including organic breeders actively engaged in the field. This combination ensures that recommendations are not only research-driven but also tested against real-life practice.

The briefs respond directly to the demand from policymakers for research-based input to guide decision-making. As such, they contribute to the enable dimension of the push-pull-enable strategy developed by LiveSeeding: they support the creation of an **enabling policy and regulatory environment** in which organic seeds and plant breeding can thrive, recognising that policies and funding frameworks strongly influence the capacity of breeders, farmers, and seed initiatives to act.

The scope of the policy briefs is primarily European, since EU regulations and funding schemes have a direct impact on seed systems and organic breeding. However, the topics addressed may also resonate with national or local policy contexts. In this case, while the European Commission and members of the European Parliament are the main target audiences, the briefs are also relevant for national authorities and other stakeholders involved in the implementation of EU rules.

## Methodology

The policy briefs were developed through a **collaborative, multi-partner process**. Task 4.4 provided the framework, but contributions were open to all consortium partners beyond the formally listed participants. The entire process was coordinated by the designated task leader, who ensured overall coherence and consistency across the documents.

The work began with consultations between the last leader and the work package leaders to define the focus and scope of each policy brief. This led to the creation of an editorial team made up of experts responsible for writing the main content and a coordinator responsible for making the text readable and understandable. Once a draft was consolidated, it was circulated among all consortium partners for feedback and comments. As is often the case with policy briefs, differing perspectives emerged. To address this, it was agreed that the **views expressed in the policy briefs represent those of the authors and their supporting organisations**, and not necessarily those of the entire consortium.

The policy briefs were shared with relevant policymakers at EU level, including representatives of the European Commission and Members of the European Parliament. In addition, targeted workshops and stakeholder meetings were organised to support their dissemination, foster dialogue, and ensure that the recommendations reached both decision-makers and practitioners in the field. Notably, in January 2025, LiveSeeding held a session with IFOAM Organics Europe and Eco-PB during an online webinar on the PRM regulation specifically targeted to Permanent Representation of Member States to the European Union and national Agricultural ministries. The recommendations laid down in the first policy briefs were presented and discussed.<sup>1</sup>

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<sup>1</sup> This webinar was co-organised with ARCHE NOAH, European Coordination Via Campesina, FIAN Belgium, Geneva Academy, Biodynamic Federation Demeter International, Brot für die Welt, Dachverband Kulturpflanzen Nutztiervielfalt, IFOAM Organics Europe, Eco-PB and LiveSeeding. No recording is available as this webinar was not public.

## Policy briefs

### 1. Policy brief #1: EU reform on the seed marketing regulation from the perspective of organic breeders. April 2024, updated in September 2024

#### Context and abstract

The first policy brief focused on the European Commission's proposal on the production and marketing of Plant Reproductive Material (PRM). As this legislation will shape the future of seed systems in Europe and as such, it was important for the LiveSeeding consortium to ensure that the needs of the organic were taken into account.

The brief therefore evaluates several key elements:

- Organic Heterogeneous Material (OHM)
- Value for Sustainable Cultivation and Use (VSCU) testing
- Adapted DUS protocols for organic varieties
- Conservation varieties
- GMOs and new genomic techniques (NGTs)
- Transparency, accessibility, and governance

The policy brief highlights some **positive steps**—such as the easier registration of new cultivar types or the possibility for farmers to exchange seeds— while also also **raising important concerns** for the organic sector. In particular, it stresses that unclear provisions, rigid testing protocols, and the risk of additional administrative burdens could undermine organic breeding, restrict access to diverse cultivars, and slow down the transition to 100% organic seeds by 2036. The brief therefore sets out key recommendations to safeguard genetic diversity, protect farmers' and breeders' rights, and ensure that the new legislation provides a coherent and supportive framework for the development of organic seed systems in Europe.

#### Key recommendations

The key recommendations highlighted in the policy brief are:

- **Preserve the integrity of the Organic Regulation (EU) 2018/848**, ensuring that provisions for OHM and Organic Varieties (OV) remain unchanged.
- Keep the VSCU testing voluntary for vegetable and fruit crops, conduct the test under organic conditions to not restrict the testing of sustainability to a single trait, and consider frugal post-release on-farm testing for arable crops.
- Adapt DUS testing protocols for organic varieties.
- **Introduce a specific category for “Diversity Varieties”**, without unnecessary restrictions on region, packaging size, or marketing duration.

- **Exclude GMOs and new genomic techniques (NGT)** from organic breeding, and enforce a strict ban on patents on plant reproductive material.
- Guarantee farmers' privilege and breeders' exceptions.
- **Enhance transparency** by developing a European portal with full access to information on available organic seeds and breeding material.
  - **Reduce administrative burdens** and adopt a multi-actor governance model involving organic breeders, farmers, and seed initiatives.

The full policy brief is available [here](#).

## 2. Policy brief #2: Definition of Organic Plant Breeding for registration of Organic Varieties suitable for organic production

### Context and abstract

The second policy brief, published in September 2025, addressed the need for a clear and consistent definition of **Organic Plant Breeding** (OPB). Indeed, while the Organic Regulation (EU) 2018/848 introduced Organic Varieties suitable for organic production (OV) and Organic Heterogeneous Material (OHM), it did not sufficiently specify how such cultivars can be developed. Without a precise definition of OPB, authorities and examination offices face difficulties in distinguishing between different breeding strategies—such as conventional breeding, breeding for organic (BfO), and fully organic breeding. This lack of clarity hampers the implementation of adapted registration protocols and creates uncertainty for breeders and authorities.

To address this gap, LiveSeeding partners built on the work of the European Consortium for Organic Plant Breeding (ECO-PB), which developed a [proposed definition](#) in 2024, to support a clear definition of OPB. This should allow to clarify the framework for organic varieties, facilitate the implementation of Implementing Directives (EU) 2022/1647 and 2022/1648, and ultimately, support the development of cultivars that are well-adapted to organic farming conditions, diverse local contexts, and the long-term goal of sustainable food systems.

### Key recommendations

The recommendations of the second policy brief include:

- **Adopt a clear definition of organic plant breeding**, as proposed in Table 1, requiring all breeding activities (crosses, selection, maintenance, multiplication) to be carried out under certified organic conditions from the earliest stage of the program until variety registration.
- **Allow a 4-year transition period** (until December 2028) for implementation, for ongoing programs to adapt.

- **Perpetuate and expand adapted DUS/VCU protocols** to more species,
- **Harmonise OHM notification procedures** across EU Member States.
- **Ensure full transparency on techniques**, excluding GMOs, NGTs, cell fusion, induced mutagenesis, and in vitro culture (except meristem culture).
- **Guarantee farmers' privilege and breeders' exemptions**, and prevent the use of patents.

Table 1: Proposed definition of organic plant breeding by LiveSeeding

For organic plant breeding programs, *all breeding activities (crosses, selection, maintenance and multiplication of plant reproductive material) are conducted under certified organic conditions, starting*

- (i) in case of mass selection, with the beginning of selection,
- (ii) in the case of crossbreeding, with the crosses,
- (iii) in the case of hybrid breeding, with the development of parental lines, and
- (iv) in case of clone breeding, with the crosses.

The breeding process continues until the organic variety is registered.

Certain exemptions from certified organic production are permitted, as laid out in the ECO-PB position paper '[Definition on Organic Breeding and Organic Varieties](#)';

- Non-organic PRM of parental material to start organic breeding programs as mentioned under 1.8.4.1;
- Parental material used for crosses which might be kept in pots under documented organic conditions;
- Crossing activities to be conducted by public or non-profit research institutes in the framework of a collaboration or service for organic breeders / farmers without respective resources. Such crosses might be performed under non-certified but documented organic conditions with organic fertilization and organic plant protection;
- Screening for resistance against certain pests or diseases which are under quarantine regime (e.g. requirement of a security green house or growth chamber);
- Cases of mandatory phytosanitary treatment (e.g., quarantine pest and diseases) or emergencies to rescue the genetic resources and breeding material during the breeding or maintenance process, a non-organic treatment can be granted by a temporary derogation followed by a conversion period of at least 3 years before this breeding material can be registered as OV.

All selection steps must be conducted under certified organic conditions for:

- At least 5 years and at least 5 sexual generations (from seed to seed) in case of annual seed propagated crop species (e.g., wheat);
- At least 3 years and at least 3 vegetative generations (from cutting to cutting, from grafts to grafts, or other form of vegetative multiplication steps) for annual vegetative propagated crop species (e.g., potato);
- At least 8 years and at least 4 sexual generations (from seed to seed) in case of biennial and perennial seed propagated crop species (e.g., carrot);
- At least 4 years for biennial vegetative propagated crop species (e.g., strawberry);
- At least 8 years for perennial vegetative propagated crop species including fruit observations in case of fruit bearing perennials (e.g., apple, grapes).

The full policy brief is available [here](#).