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# POSITION

## POTENTIAL FOR GROWTH

### SMARTER RULES FOR SEED

#### **ESA European Seed Association's Position on the Legislative Package on Healthier Animals & Plants for a Safer Food Chain**

European agriculture is faced with an enormous challenge: to foster economic growth, reduce environmental impact and ensure food security at the same time. The identity, performance, quality and health of seeds are fundamental for all agricultural and horticultural production and the key factors to address this challenge successfully.

#### **ESA's vision of a modern EU regulatory framework for seed**

The main objective of this package is to simplify, harmonise and modernise existing legal frameworks on plant health, plant reproductive material and official controls to contribute to the growth and competitiveness of Europe's agriculture, to the benefit of farmers, consumers and the environment. As a result, the main innovation of this package is the integration of seed and plant health under the overall responsibility of the Food and Veterinary Office.

ESA welcomes the main objectives and innovation of the package and underlines that official controls play a key role to ensure the identity, performance, quality and health of any plant and plant reproductive material in the Union. This is fundamental for agriculture and the overall integrity of the EU food and feed chain, while supporting consumer protection, public health and environmental safety.

Nevertheless, in order to ensure there is indeed harmonisation, simplification, traceability and effective implementation, ESA is of the opinion that some key cross-cutting principles should apply to the whole legislative package. These principles are essential to successfully modernise the legal frameworks for seed, plant and animal health and of official controls at the very start of the European food and feed chain.

- **Harmonisation**

Harmonisation of the rules, and their implementation, is a pre-condition to establish a true common market for seeds and allow for a level-playing field for all operators.

ESA looks forward to a single regulation covering Plant Reproductive Material, a single Regulation covering Plant Health and a single Regulation on Official Controls. These will ensure that the agreed rules are implemented in a consistent and harmonised manner across Europe.

Yet ESA calls for ambitious synergies to be found between the Plant Reproductive Material Law, the Official Controls and the Plant Health Law, in order to reinforce the coherence between those three regimes, through shared use of certification schemes, labels and registers.

- **Simplification**

ESA is convinced that governance based on public-private partnership, and delegation of tasks to private operators under official supervision, is essential for simplification of official controls. While ESA fully recognises the important role played by official controls, the seed sector is committed to take on more responsibility and bring about a simplified, cost-efficient and improved control system.

- **Traceability**

Consumer protection and information is the highest priority of all operators in the food and feed chain. For the seed sector, this means that the legislative package must drive all operators to ensure that farmers access the healthy and high quality seed that will feed Europe's citizens and cattle. For seed in particular, traceability is of utmost importance in order to guarantee the identity, quality and health of the plant reproductive material.

In particular, ESA welcomes the register of professional operators established under the Plant Health regulation, which should ensure there is increased transparency and traceability.

- **Coverage and Scope**

Harmonisation, simplification and traceability will only be achieved if the control system applies consistently to all professional operators.

ESA is concerned with the numerous derogations foreseen for micro-enterprises. These derogations from fees and from specific requirements would apply to a very large number of operators in Europe. In the seed sector, it is estimated that more than 70% of all operators are micro-enterprises. ESA insists that the legislative package should apply to all professional operators active in the food and feed chain so that all meet the same level of quality, traceability and responsibility. There should be no exemption from these requirements for any professional operator. Should an exemption for fees remain for micro-enterprises, ESA is of the opinion that the cost-recovery principle should be provided for by a dedicated budget and not reflected in the cost for fees paid by other operators.

ESA is committed to support fair rules and proportionate requirements for all operators of plant reproductive material. It is our objective to ensure farmers' access to healthy seed of the highest quality and of the

best plant varieties, and to safeguard the leading international position of Europe's plant breeders and seed producers, based on a true common market. The seed sector stands ready to contribute its experience and expertise and to share responsibility in the implementation and control of the new legal framework, striving for more efficiency.

Consequently, ESA will put forward specific recommendations to Members of the European Parliament and Member States in order to further improve the Commission's legislative proposals.

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ESA is the voice of the European seed sector. ESA's members are national associations and individual companies active in research, breeding, production and marketing of seeds of agricultural and ornamental plant species. ESA represents more than 7000 seed businesses in the EU and beyond.

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