



29th May 2019

Attn Mrs. Dorothee ANDRE & Mr. Nicolas VERLET
 DG SANTE Working Group on heterogeneous material
(In electronic format only)

Concerns Seeds in the Organic Regulation 2018/848 and the upcoming Delegated Act on
 “Organic Heterogeneous Material”

Dear Madam, Dear Sir,

As European organisations dedicated to the development of organic farming and in particular to the saving, selection, production and distribution of the best selection of varieties of seeds for a diversified organic production, we address you concerning the new **provisions related to seeds in the new Organic Regulation 2018/848**.

These provisions constitute in our view an important improvement made by the new regime which is set to regulate the organic sector starting from 1st January 2021. Within these provisions, those which need immediate attention by the European Commission and competent national authorities are those establishing the new notification regime for “organic heterogeneous material” (thereafter “OHM”), pursuant to Article 13 of said Regulation. We do in the meantime remain eager to see the temporary experiment for “organic varieties” be launched as soon as the entry into force of the Regulation, and run in parallel to the currently ongoing experiment under Directive 66/402/EEC and Commission Implementing Decision 2014/150/EU.

With regards to OHM, we would like the **upcoming delegated act to faithfully reflect the legislator's will, which clearly is to genuinely reduce administrative burden for the placing on the market of farmers' selections, heirloom cultivars, outcrossing populations, evolutionary populations, and composite cross populations**; and to bring about real alternatives in the supply of seeds for the specific needs of organic agriculture, as well as more biodiversity in organic production. The diversity in different types of OHM is important. Many of these have long traditions (farmers' selections and heirloom cultivars) and are of great value in terms of the dynamic utilization and conservation of biodiversity. Outcrossing as well as composite cross populations are of great importance for organic crop breeding. A number of new and highly innovative breeding approaches offer great potential for the development of resilient OHM particularly suitable for organic growing conditions. However, these breeding approaches should not include technical interventions into the genome of plants or into isolated cell on an artificial medium¹.

The notion of "**OHM**" is a new and stand-alone concept, arising from the will of the Legislator, that is described quite thoroughly in Regulation 2018/848. It must therefore include all materials corresponding to its legal definition, without consideration for pre-existing categories created by Commission's decisions, like "conservation varieties" or "varieties with no intrinsic value for commercial exploitation". Indeed, OHM is defined thoroughly in Article 3(18) of the Regulation; as material that *"(a) presents common phenotypic characteristics; (b) is characterized by a high level of genetic and phenotypic diversity between individual reproductive units, so that that plant grouping is represented by the material as a whole, and not by a small number of units; (c) is not a variety within the meaning of Article 5(2) of Council Regulation (EC) No 2100/94 (1); (d) is not a mixture of varieties; and (e) has been produced in accordance with this Regulation"*.

We would like to highlight the fact that the Commission Implementing Decision 2014/150/EU, which sets out the temporary experiment for so-called "heterogeneous material" is not mentioned in the Organic Regulation 2018/848; it would therefore not be justified to assume that "organic heterogeneous material" relates to the same plant reproductive material, albeit grown in organic conditions. Restricting OHM to so-called "cross-composite populations" that are targeted by Commission Implementing Decision 2014/150/EU would go against the will of the Legislator of Regulation 2018/848, and against the precepts of the Lisbon Treaty and principles of European law, by imposing additional criteria to a Basic Act through a Delegated Act. We remind you that Preamble (36) of Regulation 2018/848 states that *"there could be benefits of using [...] diverse material; [plant reproductive material that does not fulfil the variety definition as regards uniformity], in particular with regard to organic production, for example to reduce the spread of diseases, to improve resilience and to increase biodiversity"*.

¹ In line with IFOAM standard 4.8 on breeding of organic varieties, see https://www.ifoam.bio/sites/default/files/ifoam_norms_july_2014_t.pdf

The will of the Legislator is clearly to ensure that organic farmers have **access to plant reproductive material (PRM) of non-uniform cultivars and populations**, including farmers' selections, heirloom cultivars, outcrossing populations, evolutionary populations, and composite cross populations; **provided that the material falls under the defined legal criteria of OHM.**

That is why we believe that the possibilities offered by the Regulation should be interpreted widely, including all crops species; and that the delegated act should set a range of **practical rules making the placing on the market of OHM smooth and accessible to all operators, especially small ones, including farmers.** In order for OHM to qualify as "organic", we believe that the PRM in question must be developed (by human or natural selection) for at least 3 years under organic certified conditions, and origin (parent cultivars/lines) and process of OHM development must be disclosed. Any further requirement akin to additional administrative burden to the simplified notification regime foreseen in the basic act should be carefully assessed in light of any detrimental effect it may produce.

With these aspects in mind, we hereby attach our **detailed proposals for the content of the future delegated act.** We thank you, in advance, for taking it into serious consideration. As a complement, we **kindly request a meeting with you**, in order to discuss these proposals further. Awaiting your kind answer on that point,

Please accept our best regards,

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| 1. <i>AGROECOL, Germany</i> | 23. <i>MAITRES DE MON MOULIN, France</i> |
| 2. <i>ALLKORN, Sweden</i> | 24. <i>MILLE VARIETES ANCIENNES, France</i> |
| 3. <i>ARCHE NOAH, Austria</i> | 25. <i>NORTHERN GREECE ORGANIC FARMERS ASSOCIATION, Greece</i> |
| 4. <i>CHEVAUX & CHEMINS, France</i> | 26. <i>NOTKOMITTEE ZUR ERHALTUNG DER WEIZENVIELFALT OHNE GENTECHNIK, Germany</i> |
| 5. <i>CONSERVATOIRE DE LA TOMATE, France</i> | 27. <i>OZ GENOFOND, Slovakia</i> |
| 6. <i>CYPRUS SEED SAVERS, Cyprus</i> | 28. <i>PELITI, Greece</i> |
| 7. <i>DACHVERBAND KULTURPFLANZEN, Regional</i> | 29. <i>PERMASEMINKA, Czech Republic</i> |
| 8. <i>ESVY, Finland</i> | 30. <i>PRO SPECIE RARA, Switzerland</i> |
| 9. <i>FEMMES SEMENCIERES, France</i> | 31. <i>REAL SEEDS CATALOGUE, United Kingdom</i> |
| 10. <i>FOPA, Finland</i> | 32. <i>RESEAU MEUSE-RHIN-MOSELLE, Regional</i> |
| 11. <i>FROESAMLERNE, Denmark</i> | 33. <i>ROMANIA IN TRANZITIE (ART), Romania</i> |
| 12. <i>FUNDACIA AGRINATURA, Poland</i> | 34. <i>SARDIGNA TERRA BIA, Italy</i> |
| 13. <i>GAIA, Portugal</i> | 35. <i>SEED, Luxembourg</i> |
| 14. <i>GRAINES DE TROC, France</i> | 36. <i>SEED COOPERATIVE, United Kingdom</i> |
| 15. <i>HSEP, Croatia</i> | 37. <i>SOS SAVE OUR SEEDS, Germany</i> |
| 16. <i>IFOAM EU, Europe</i> | 38. <i>VERN, Germany</i> |
| 17. <i>INSTITUTUL DE CERCETARE IN PERMACULTURA (ICPR), Romania</i> | 39. <i>VITALE RASSEN, Belgium</i> |
| 18. <i>INTELLIGENCE VERTE, France</i> | 40. <i>ZMAG, Croatia</i> |
| 19. <i>LATVIAN PERMACULTURE ASSOCIATION (LPA), Latvia</i> | 41. <i>WAKESEED, Portugal</i> |
| 20. <i>LE JARDIN DE TANTUGOU, France</i> | |
| 21. <i>LONGO MAI, Regional</i> | |
| 22. <i>MAADJAS, Estonia</i> | |

ANNEX: Concrete proposals for the content of the future Delegated Act under Article 13.3 of Regulation 2018/848

Rules for the production and marketing of plant reproductive material of organic heterogeneous material

- The Delegated Act should not be limited to ***any particular genera or species*** as nothing in the Basic Act restricts the regime to certain genera or species, but it should take into account the needs and specificities of different genera and species in one single act.
- OHM can be non-uniform cultivars and populations, including modern landraces, farmers' selection, heirloom cultivars, outcrossing populations, evolutionary populations, composite cross populations.
- ***(a) the description of the organic heterogeneous material, including the relevant breeding and production methods and parental material used;***
 - The "description" should focus on the characteristics of OHM relevant for organic farmers; and should not require additional phenotypical traits per species, as OHM per definition has a wider range of phenotypic variations;
 - "*Relevant breeding and production methods*": should include a broad range of breeding methods, such as cross-pollination or marker assisted selection, but also mass selection on the fields, and selection for the purposes of conservation and climate change adaptations, but excluding methods interfering with the integrity of the cell so any form of genetic engineering and cell fusion techniques². The description of these breeding and production methods in the dossier should include information on the particular pedo-climatic conditions where the material was bred and produced. The breeding or development of OHM, including maintenance breeding and multiplication must take place under certified organic conditions for at least 3 years prior to the marketing.
 - "*Parental material used*" needs to be understood as referring to either specific lines, plant varieties, populations, landraces, genetic resources or to OHM itself, either giving way to new populations or conserving and reproducing adapted old or new populations or landraces. A simple description of well-known farmers' varieties, landraces, populations or heirloom varieties should be accepted in this section as sufficient description of parental material used.
- ***(b) the minimum quality requirements of seeds lots, including identity, specific purity, germination rates and sanitary quality;***
 - Quality requirements close to those set out in the horizontal legislation on the marketing of plant propagating material, as regards the four criteria laid down in (b), could work. A reference to these criteria to each specific Directive would be sufficient;
 - The marketing of seeds of OHM should however be possible if it does not satisfy the requirements concerning germination. In this case, the supplier shall guarantee and be liable

² The breeding methods used should be in line with IFOAM standard 4.8. on breeding of new varieties : https://www.ifoam.bio/sites/default/files/ifoam_norms_july_2014_t.pdf: 'Technical interventions into the genome of plants are not allowed (e.g. ionizing radiation; transfer of isolated DNA, RNA, or proteins)' (4.8.4); 'Technical interventions into isolated cell on an artificial medium are not allowed (e.g. genetic engineering techniques; destruction of cell walls and disintegration of cell nuclei through cytoplasm fusion)' (4.8.5).

for a specific germination rate which he shall state for marketing purposes on a particular label bearing his name and address and the reference number of the seed lot; this distinction must be clearly indicated;

- Sanitary quality is regulated by an independent piece of legislation, to which Regulation 2018/848 does not derogate. No additional sanitary quality criteria above what is already required by the new plant health Regulation 2016/2031 should be set, taking into account the latter's rules on sales to final users.

- **(c) labelling and packaging;**

- Specific quantities of PRM of OHM in sales packages, not even mentioned in the basic act, should not be limited. It should be allowed to sell large packages.
- The Regulation provides no quantitative restrictions on the total number of PRM lots and total amount of PRM of OHM allowed to reach the market. Accordingly, no quantitative restrictions should be added in that respect.
- The Regulation provides no geographical restrictions of PRM lots allowed to reach the market. Accordingly, no geographical restrictions should be added in that respect.
- Labelling requirements should allow the customer to acquire sound knowledge of the material that is placed on the market, and not put additional constraints on operators. In that sense, labelling rules could provide that packages or containers of PRM of OHM should bear a supplier's label or a printed or stamped notice including the following information:

(a) the words 'EU rules and standards';

(b) the name and address of the person responsible for affixing the labels or his identification mark;

(c) the year of sealing expressed as: 'sealed ...' (year), or the year of the last sampling for the purposes of the last testing of germination expressed as: 'sampled ...' (year);

(d) the species;

(e) the denomination of the OHM;

(f) the words "Organic Heterogeneous Material" under the denomination;

(g) the European organic production logo;

(h) the country of production;

(i) the year of production of the PRM

(j) the germination rate and date of internal testing

(k) the reference number of the lot given by the person responsible for affixing the labels;

(l) the declared net or gross weight, or declared number of plant reproductive material;

These provisions on labelling could also provide that suppliers *may* also provide any relevant information as to specific uses or specific pedo-climatic conditions for which the cultivation of OHM is deemed appropriate.

Provisions on packages could provide that PRM of OHM may be marketed only in closed packages bearing a sealing device. However, no requirement should be laid down concerning a particular type of sealing device, and especially not a sealing system that "cannot be opened without damaging the sealing system or leaving evidence of tampering on the supplier's label or on the package", as these provisions imply very expensive investments. Provisions on packages should remain low-cost, as certain OHM will cater to extremely specific or small markets.

- ***(d) information and samples of production to be kept by the professional operators;***
 - On a notebook to be kept on the exploitation and ready to be controlled by competent authorities: Proof of purchase or reference to any other means of acquisition of OHM, or history of development of OHM including parental material, breeding goal, pedo-climatic conditions where the breeding or development took place, breeding methods applied, number of years of development under certified organic conditions, history of place and size of propagation, multiplication, selection and/or breeding, actions undertaken each harvest year (simplified seed saving, selection and breeding log);
 - Minimum samples to be kept should be realistic and proportionate to the volume that is put on the market.

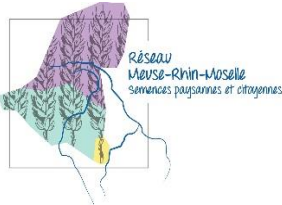
- ***(e) where applicable, maintenance of the OHM***
 - When maintenance is required, it shall be undertaken under organic conditions. However, maintenance shall not be required when small markets are targeted and small volumes are put on the market.

DESCRIPTION OF SIGNATORIES

REGIONAL

IFOAM EU is the European umbrella organisation for organic food and farming and fights for the adoption of ecologically, socially and economically sound food systems based on the principles of organic agriculture – health, ecology, fairness and care. With more than 210 member organisations, its work spans the entire organic food chain and beyond: from farmers and processors, retailers, certifiers, consultants, traders and researchers to environmental and consumer advocacy bodies.

LONGO MAÏ is a European cooperative founded in 1973. It is composed of four establishments in France, one in Germany, one in Austria, one in Switzerland and one in Ukraine, with a total of about 200 members. Each farm has developed considerable experience in the conservation, multiplication and production of seeds of a collective collection of 250 heirloom varieties and traditional landraces of cereals and 500 heirloom varieties of vegetables and medicinal plants. In addition, Longo Mai has an extensive pedagogic activity around seed production: it organises many workshops, seed swaps with farmers and gardeners, and has published a complete set of 4 educational DVDs made up of 40 short films on seed production (“From seed to seed”), in several languages, which is now accessible free of rights on <https://www.diyseeds.org/>.



RESEAU MEUSE-RHIN-MOSELLE is a transregional platform (BE, LU, NL, FR) created to foster exchange and cooperation between actors of crop diversity and to raise their political and societal momentum.



DACHVERBAND KULTURPFLANZEN- UND NUTZTIERVIELFALT is an umbrella organization created in 2009 by several associations aiming to preserve and promote crop and livestock diversity, active at national and regional levels in Germany and Austria. The organization serves as a common platform for policy advocacy, but also sharing technical knowledge and experience relevant to the conservation and sustainable use of agrobiodiversity”

AUSTRIA

ARCHE NOAH is a Seed Savers’ association dedicated to the conservation and sustainable use of crop biodiversity, based in Schiltern, Vienna and Brussels, with more than 14.000 individual members. It preserves over 6000 populations in its centralized Seed Archive and decentralized network of Seed Guardians, as well as being involved in participatory breeding projects in the context of organic agriculture.

BELGIUM

VITALE RASSEN aims to preserve and revive agrobiodiversity in Belgian fields. To do so, it develops and commercializes open pollinated varieties that are adapted to local and organic conditions, and that are still connected with farmers-seed savers.

CROATIA

HSEP is an umbrella association of Croatian organic producers working jointly to preserve the national treasures of soil, water and air by advocating for a fair agro-ecological policy, promoting organic agriculture and healthy food systems.



ZMAG is a non-governmental organisation formed in 2002, located near Zagreb in Croatia. Our work focuses on practice and advocacy of just and fair social and economic systems and appropriate technologies. The organisation's seed bank gathers over 250 accessions from Croatian organic gardeners who have been keeping their seeds for generations.

CYPRUS



CYPRUS SEED SAVERS is a non-for-profit group dedicated to finding, multiplying and sharing heirloom seeds to local hobby gardeners and farmers. A core value of the group is to cultivate culture and inspire education on natural farming such as organic farming and permaculture and natural living, such as pesticide and synthetic fertilizer free food. Cyprus Seed Savers has an active relationship to the Agriculture Research Institute of Cyprus and is connected to local and international environmental groups, taking part in ecology events, such as the national annual Cyprus Eco Festival. The group is active in shaping local policy through participation in Parliamentary Committee of Agriculture.

CZECH REPUBLIC



PERMASEMINKA is a company specializing in organic seed production committed to crop biodiversity. The farm also conducts independent amateur organic vegetable breeding, and cultivates and maintains around 200 varieties and populations of vegetables.

DENMARK



FRØSAMLERNE, DANISH SEED SAVERS was founded in 1987 and has 950 members from all over Denmark. Working to preserve genetic resources of primarily cultivated plants in a decentralized genebank run by its members. The association spreads seeds and knowledge among its members and to the general public through markets and courses.

ESTONIA

Maadjas

MAADJAS works on increasing the cultivated biodiversity in Estonia. The associations carries out garden inventories and educates people on biodiversity and heritage seeds issues. Through the project Growing Seed Savers, together with Latvians and Lithuanians, they carry out common discussions and advocacy actions towards public authorities in order to make seed saving and seed swapping legal.

FINLAND



FOPA (Finnish Organic Farmers Alliance) is the umbrella organization regrouping Finnish organic farmers and producers.

ESVY
Etelä-Suomen
Luonnonmukaisen
Villjelyn Yhdistys

ESVY (Southern Finland Organic Farmers Association) represents organic farms and farmers but also the whole value chain from greater Helsinki and Southern Finland area consumers as its supporting members.

FRANCE



NATIONAL TOMATO CONSERVATORY at the "CHATEAU DE LA BOURDAISIÈRE" was created in 1995 by Louis Albert de Broglie and certified in 1998 by the CCVS (French official Conservatory of specialized plant collections). The National Tomato Conservatory conserves a unique collection of more than 700 varieties of tomato, and is dedicated to creating new ones. In 2018, the Conservatory has launched together with the Tomato Protected Designation of Origin, a laboratory-incubator called the "Tomato Lab" designed to encourage research and the creation of derived products. The Château de la Bourdaisière also welcomes every year, the Tomato' Festival (between 6 and 8000 visitors every year), which has been celebrating the diversity of that fruit for 20 years.



CHEVAUX & CHEMINS is an association that has been collecting and freely distributing a living collection of 2.000 varieties of tomato and basil, most of them being heirloom and endangered varieties, for the past 12 years. Also dedicated to innovation in their show garden, the association created and stabilized around 50 new varieties of tomato, based on a double criteria: gastronomy and aesthetics (“cuisine of colours”).



FEMMES SEMENCIERES is a movement co-created in 2011 by Pierre Rabhi and Claire Chanut. Its main objectives are to inform on the threats hanging over the seed patrimony of Humanity as well as to support and connect local initiatives for the conservation and reproduction of traditional varieties of seeds in low-input and organic conditions. Multiple programs are ongoing in France, Haiti, Senegal, Mali, Moldavia, Gaspésie (Canada), México, La Réunion and New Caledonia.



GRAINES DE TROC is an association that acts for the defence of agrobiodiversity. Through its multiple projects, it promotes the free exchanges of seeds and associated knowledge. It also runs an online platform (grainesdetroc.fr) gathering around 20.000 gardeners who freely swap their seeds, as well as an important network of 500 “seed libraries” (places where people can share and swap seeds, hosted in public spaces like public media libraries).



« **INTELLIGENCE VERTE** » ET LE CONSERVATOIRE PÉDAGOGIQUE DE SAINTE-MARTHE
Funded in 1999 by Philippe Desbrosses, the association promotes the discovery and free use of seeds from the Public Domain, through educational actions (formations) for diverse audiences aiming at regaining a qualitative food autonomy. Created in 1974, the Conservatory of Sainte-Marthe conserves and reproduces a thousand heirloom varieties of vegetables in organic conditions. It is an open space, where the public can discover a permanent exhibition on the great diversity of seeds of traditional varieties and a specialized.



« **LE JARDIN DE TANTUGOU** » is an association that aims to contribute to the transmission of knowledge associated to seeds and to enable European gardeners’ to access rare vegetable varieties. It preserves a collection of 1.000 seed varieties, multiplied and distributed by lots of around 120 varieties per year. The Association produces its seeds respecting the “Nature & Progrès” specifications and the Masanobu Fukuoka’s alternative farming methods.

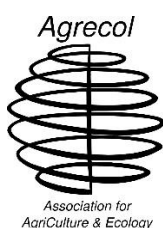


MAITRES DE MON MOULIN Funded in 2006 by Roland and Valérie Feuillas, “Les Maîtres de Mon Moulin” is a company that fosters the development of a sustainable agriculture, based on the preservation of agrobiodiversity, and promotes new economic models based on the respect for Life. Specialized in bakery, the company collaborates with about 30 organic farmers with whom it produces yearly more than 50 traditional cereal varieties, extracted from a collection of 500 wheat varieties, on approx. 500 hectares of land. This production is used to make flour and bread, whose nutritional values, duly analysed, are exceptional.



« **MILLE VARIETES ANCIENNES** » is an association that aims to help the general public rediscover heirloom varieties of fruit and vegetables, as well as the traditional seeds from which they originate. For that purpose, the association organizes workshops and pedagogic activities at the Conservatory of Sainte-Marthe (Sologne, France), in order to transmit knowledge and competences on the reproduction of seeds in home gardens. The Association conserves, reproduces and distributes a collection of about 1.500 varieties of organic vegetable seeds.

GERMANY



AGRECOL - Association for AgriCulture and Ecology supports organic and sustainable agriculture in developing countries for more than 30 years. In addition, AGRECOL focuses on generating new knowledge and extending new concepts in agriculture. Since many years, AGRECOL promotes the principle of seeds as commons; it has therefore developed an open-source seed licence and it manages the service provider OpenSourceSeeds, a European initiative, which is based in Germany.



VERN (Verein zur Erhaltung und Rekultivierung von Nutzpflanzen in Brandenburg) is a non-profit organization established in 1996 to improve the availability of seeds of old varieties, stimulate their on-farm/ in-garden management, encourage saving and propagation, and imparting knowledge. With around 600 members, the association holds a collection of about 2000 old varieties of cereals, vegetables, herbs, fruit trees and other useful plants, propagates and distributes seeds non-commercially. The catalogue of maintained varieties is published yearly for home gardeners, while on-farm activities are pursued in two networks of gardeners and mostly organic farmers.



NOTKOMITEE ZUR ERHALTUNG DER WEIZENVIELFALT OHNE GENTECHNIK has been created in 2008, as a result of a conference on worrying tests undertaken by the Gatersleben (DE) gene bank. It is composed of a network of 230 individual farmers and gardeners engaged in the preservation and reproduction of 1.500 heirloom landraces of cereals.



SAVE OUR SEEDS was established by the Foundation on Future Farming in Berlin in 2002 with a goal of ensuring seed purity; prevent the contamination of conventional and organic seed with genetically modified organisms. The initiative also supports the promotion and development of varieties of pollinating (not hybrid) crops and its free exchange through the community development of 'ecologically adapted seed'.

GREECE



NORTHERN GREECE ORGANIC FARMERS ASSOCIATION was founded in 2002 and count 120 members, who constantly cultivate and conserve over 60 traditional varieties of cereals and vegetables in organic conditions.



PELITI is a Greek seed savers' organization, which has been working since 1995 to promote seed saving and to regenerate the traditional type crop varieties that undergo genetic erosion, in order to support biodiversity. Involved in the conservation of 2000 varieties, the Association has 1000 members and close to 30000 friends in social networks. Each year, the Peliti Seed Festival celebrates plant and animal diversity and is one of the largest seed exchanges of the world.

ITALY



SARDIGNA TERRA BIA is a Sardinian association involved in the defence of the environment and biodiversity from pollution and degradation. The association's vision of agriculture comprises of agro-ecology models based on organic farming for sustainable self-sufficiency, including seed freedom.

LATVIA



LATVIAN PERMACULTURE ASSOCIATION (LPA) strives to advance sustainable and regenerative practices in Latvia. It operates as an umbrella organization for urban and rural inhabitants contributing to the permaculture movement in Latvia.

LUXEMBOURG



SEED (Som fir d'Erhalen an d' Entwécklung vun der Diversitéit) is the Luxembourgish platform for the preservation and the development of crop diversity (vegetables, cereals and fruits) involved in practical, political and pedagogic work. Next to training and awareness-raising activities, the association also commercializes seeds, plants and products of crop biodiversity, mostly in the context of organic agriculture.

POLAND

FUNDACJA ROLNICZEJ RÓŻNORODNOŚCI BIOLOGICZNEJ AGRINATURA (Foundation AgriNatura for Agricultural Biodiversity) is a foundation whose main goal is to support agricultural biodiversity, organic farming and sustainable rural development. Since its creation in 2007, over 500 farmers have taken part in different projects or activities, including helping organic vegetable growers reintroduce traditional varieties in orchards, and supporting local food production efforts.

PORTUGAL

GAIA (GRUPO DE ACÇÃO E INTERVENÇÃO AMBIENTAL) is an environmental activist organisation that exists since 1996, and have been political advocates for banning GMO's since 2007 and for seed freedom since 2011. Having campaigned for the freedom of seed saving and for protecting local and organic seeds, the association also manages a seed library to stimulate the exchange of farmers and gardeners' seeds and organise monthly Seed Saving meetings where speakers and practitioners share knowledge of agro-ecology and seed saving.



WAKESEED is an association dedicated to participation, democracy, and agro-ecology. Its project **CIRCULOS DE SEMENTES** started in 2012 as a means to share knowledge around seeds, and to ensure the need for people to multiply and share these gems in a local context. To the Seed Collection and Conservation Workshops, we have added the concept of Seed Circles, so that the energy of each one of them feeds all.

ROMANIA

ASOCIATIA ROMANIA IN TRANZITIE (ART) is a NGO born to support the growth and materialization of emerging Romanian Grass-Roots initiatives and to promote community-oriented projects focused on sustainable development. It has an important contribution on raising awareness towards the role of the local & traditional seeds for biodiversity and organic agriculture. Since 2014, ART initiated and is developing Seminte Libere (Free Seeds), the national network of traditional seed lovers and now is developing a Community Seed Bank.



INSTITUTUL DE CERCETARE IN PERMACULTURA DIN ROMANIA (ICPR) is a network of people, professionals and entrepreneurs from diverse professional backgrounds (permaculture, engineering, anthropology, horticulture, psychology, economics, environment etc.), developing projects in the field of socio-ecological ethical enterprise, actively dedicated to supporting the practice of permaculture in Romania. Since 2017, ICPR is developing a network of urban community gardens in Bucharest and all over the country.

SLOVAKIA

OZ GENOFOND is an association that brings together friends of old varieties of cultural plants and livestock breeds. Focused on research, educational activities, publishing, economic networking, the association also grows young trees for the need of close surroundings, realizes projects, exchanges experience and knowledge, cooperating at international level to achieve these goals.

SWEDEN

ALLKORN was founded 2004 and is a Swedish association working with cereal diversity in organic agriculture. The association has members from all levels of the value chain that collaborates to promote products that benefits agrobiodiversity. Many of the members are growing heterogeneous material (mainly landraces and farmers' evolutionary populations) with a good result. The association has its own seed bank and actively work with educational activities.

SWITZERLAND

PRO SPECIE RARA is a Swiss foundation to safeguard the genetic cultural diversity of domesticated animals and plants. The foundation has been founded in 1982 and leads a network of over 4'750 activists that are maintaining 32 rare breeds and care for over 5'000 endangered cultivated plants in the context of organic agriculture. The organization has developed a label to promote diversity on the market of Switzerland and southern Germany.

UNITED KINGDOM

For 20 years, **REAL SEEDS** has specialised in making available a unique collection of traditional open-pollinated vegetable varieties to home gardeners, sending out a quarter of a million packets of seeds each year. The focus is on breeding, conservation and public education about seed saving. Together with the Gaia Foundation, they train smallholders & market-gardeners to become professional seed breeders and seed producers, forming a network of traditional seed production across the UK. As part of its public education program Real Seeds have given out over 180,000 sets of seed-saving instructions.



SEED CO-OPERATIVE is a community-owned organic seed company in the UK established in 2014. It is composed of 380 community shareholders and 7.000 customers. It relies on a network of 15 organic seed growers around the UK along with a privately owned farm. Together the Seed Co-operative produces about 60 varieties a year, this number increasing annually. It sells 380 varieties of vegetable, herb and flower seeds to gardeners, market gardeners and farmers, as well as small packets through health food shops and organic farm shops. The Seed Co-operative has also lately engaged in plant breeding activities.