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**Subject: No new administrative burden on microenterprises under the new EU Regulation on Plant Reproductive Material (PRM)**

Dear President of the European Commission Ursula von der Leyen,

Dear Executive Vice-President Stéphane Séjourné,

Dear Commissioner Health and Animal Welfare Olivér Várhelyi,

Dear Minister of Agriculture, Rural Development and Environment Maria Panayiotou,

Dear Member of the European Parliament Herbert Dorfmann,

**XX** May 2026

We, **XX** small seed companies, fruit nurseries and farmers marketing plant reproductive material (PRM) from across the European Union, write to you with an urgent appeal: **Please ensure the new EU PRM Regulation does not put us out of business!**

**The proposed regulation, currently in trilogue, contradicts the commitment of the European Commission to reduce administrative burden by at least 35 % for SMEs.** The proposed regulation introduces a swathe of new administrative burden for operators who produce and/or market seeds and other types of PRM, such as seed potatoes or stocks or scions of fruit trees. This burden (e.g. new registration, reporting and record-keeping obligations) comes *on top of* the central provisions of the regulation ensuring the identity and quality of the crop varieties placed on the market. An overview of the proposed new burdens can be found in the annex.

**Faced with these constraints, small enterprises will have only two options: reduce the number of varieties we maintain or exit the market entirely.** Under the proposal, maintaining a high number of varieties becomes financially and administratively impossible.

**The consequences of the new administrative burden for small enterprises have largely been rendered invisible in the legislative process to date.** While the proposal foresees a simplification for larger companies – by introducing the possibility for operators to carry out seed certification under official supervision, as opposed to having to pay for checks by the authorities – no derogations or easements are foreseen for small enterprises. The effect of the new administrative burden on small enterprises was also not considered in the impact assessment process<sup>1</sup>.

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<sup>1</sup> Only one aspect of the administrative burden was considered under the Impact Assessment: the requirement under article 41 (b) to be registered as an operator under the EU Plant Health Regulation (2016/2031).

**The “one-size-fits-all” approach is particularly inappropriate for the seed sector, where there is huge distinction between the largest and the smallest operators.** One of the stated aims of the new PRM Regulation was to promote agrobiodiversity. However,

small enterprises would be doubly penalised by the proposed new administrative burden – to the detriment of agrobiodiversity. First, small enterprises do not have the human or financial resources to carry out even more disproportionate and unmanageable obligations. Second, small enterprises specialising in diversity will face a higher overall burden, as the amount of administrative work is directly linked to the number of varieties and species produced and marketed by the operator.

Why does this matter?

**Small enterprises play a central role in the safeguarding of the EU’s agricultural heritage by maintaining and making available traditional and local varieties thus contributing to cultivated biodiversity as a necessary basis for food security.** In addition, we are also continuously adapting our varieties to the challenges of climate change and newly emerging plant diseases and pests. This work is defined by the United Nations as “on-farm conservation and development”. And it is, next to gene banks, the second pillar of the safeguarding of cultivated biodiversity. Based on a survey conducted in late 2024 of nearly 200 operators in 16 Member States, microenterprises produce and market on average 152 different varieties of 41 different crop species each year<sup>2</sup> – a huge diversity! The majority of the survey respondents were “nano-enterprises”, with an annual revenue from their PRM activities below 100.000 Euro.

What do we need?

**We need exemptions from rules written for industry giants, in order for our businesses to survive.** The proposed PRM Regulation is primarily written for large, industrial seed companies. Applied to microenterprises, these rules threaten our economic survival – and, with it, Europe’s cultivated biodiversity.

**We urgently call for an exemption from all new administrative burden for microenterprises to be introduced into the new EU PRM.**

Yours sincerely,

The undersigning organisations

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<sup>2</sup> ARCHE NOAH, Bureaucracy Against Biodiversity, May 2025, [https://www.arche-noah.at/media/bureaucracy\\_against\\_biodiversity\\_report\\_may\\_2025\\_2.pdf](https://www.arche-noah.at/media/bureaucracy_against_biodiversity_report_may_2025_2.pdf)

Annex: Overview of the new administrative burden in the proposed EU PRM Regulation affecting microenterprises

	<b>New administrative burden</b>
Registration requirement	Obligatory registration of all operators engaged in the production and marketing of PRM
Reporting requirements	<p>Annual notification of species and quantities of PRM marketed to final users (home gardeners)</p> <p>Annual notification of activity of marketing of registered conservation varieties</p> <p>Annual notification of the quantities per species that was produced each year of conservation varieties (standard seed)</p>
Record keeping requirements	<p>Identification, monitoring and record keeping in relation to “critical points” in the marketing and production processes</p> <p>Record keeping on (i) operators who have supplied them with PRM and (ii) operators to whom they supply PRM – both for 3 years post-transfer</p> <p>Record keeping on the premises of locations used for production</p> <p>Record keeping on the identity of mother plants (standard seed)</p> <p>Record keeping on the maintenance of registered varieties covering all stages of production</p>

Name of undersigning microenterprises