

Fresh approach needed to secure UK organic seed supply

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Twenty years since a Government-funded database was established to help organic farmers source supplies of organically produced seed, and despite a long-term decline in the UK organic area, emergency derogations allowing organic growers to use non-organic seed are at a record high. This raises concerns over the need to maintain consumer confidence in the integrity of organic production, and to prevent unfair competition with conventional growers. In addition, the prospect of widespread uptake of new precision breeding techniques, which the organic industry prohibits, suggests alternative policy approaches are needed to ensure a reliable supply of certified organic seed in the future, argues BSPB head of policy Dr Anthony Hopkins.

The twentieth annual report detailing authorisations granted in 2023 for the use of non-organic seed by certified organic producers in Great Britain was recently <u>published</u> on the OrganicXSeeds website.

These exemptions, allowing certified organic farmers to use seed produced using synthetic pesticides and artificial fertilisers otherwise prohibited under organic rules, have been described variously by Government Ministers as 'exceptional', 'subject to thorough checks', and 'granted only under specific, prescribed circumstances'.

Defra Ministers have also underlined the importance of working with the organic sector to improve the availability of organically produced seeds and so reduce the need for these 'emergency derogations'.

In a written <u>statement</u> in October 2021, Defra Minister Lord Benyon insisted that these efforts were succeeding, and that 'over recent years the number of authorisations needed has on average decreased, due to increasing availability of organic seeds.'

This may be wishful thinking on the part of Defra, because in fact the use of nonorganic seed has reached record levels in the years since Lord Benyon made that statement.

The 2023 report, which was produced by the Soil Association on Defra's behalf, shows a marginal reduction in the number of authorisations from the all-time high set in 2022, but at almost 17,000 individual applications, covering just over 3,000 registered organic producers in Great Britain, it is clear that the derogated use of non-organic seed is not 'exceptional', but very much a routine part of organic crop production.

Despite a long-term decline in the UK organic area, which peaked in the late 2000's at around 750,000 hectares and has since reduced by a third to around 500,000 hectares, the long-term trend in British organic growers' use of non-organic seed is, if anything, increasing.

This raises concerns on a number of levels.

The most obvious is the need to safeguard the integrity of organic production and maintain the confidence of organic consumers. Shoppers paying a hefty premium for organic products would not expect those products to be grown from non-organic seed, and certainly not without labelling to that effect.

These concerns have also been acknowledged by the organic sector as a threat to the legal status of organic products. The <u>2020 report</u> stated that: "Increased levels of non-organic seed use are undesirable within the organic sector as it challenges a key intention of the EU regulation. It also risks creating two-tiers of seed costs for farmers risking undermining public trust…."

There is equally a need to prevent unfair competition with conventional growers. Concerns over this issue have previously been raised by the All-Party Parliamentary Group on Science and Technology in Agriculture, following reports that organic growers participating in OSR trials in Scotland using non-organic F1 hybrid seed were receiving premiums over conventional in excess of £500 per tonne. At the time, the Group's chair Julian Sturdy MP $\underline{\text{described}}$ the reports as "a kick in the teeth for conventional oil seed rape growers struggling with pest-ravaged crops following the loss of neonic seed treatments."

Importantly for BSPB members, the widespread use of non-organic seed also poses operational challenges for breeders and suppliers of certified organic seed. The domestic seed industry has the capacity to produce and supply organically grown seed in sufficient quantities, but the ready availability of derogations to use non-organic seed is stifling market demand and significantly reduces the incentive for increasing production.

Soundings from within the industry suggests that while there is a strong and consistent demand for organically grown seeds as 'small-packet' sales to garden centres and market gardeners, non-organic seed makes up the majority of sales to registered organic producers, in some crop species accounting for as much as 90% of seed sales.

Feedback from the plant breeding and seed supply sectors confirms their frustration that, rather than helping growers to source supplies of organically grown seed, the OrganicXSeeds database is being used as a means of confirming which varieties can be used under derogation as (much cheaper) non-organic seed.

In short, the routine use of these 'emergency' derogations not only risks undermining confidence in the integrity of the organic brand, it is also preventing the development of the sustainable market for organically produced seed which both Government and the organic sector aspire to.

The primary motivation for using non-organic seed appears to be price-related. For the same reasons that organic food costs more, organically grown seed is also more expensive to produce – and retails at 50% to 100% more than conventional, depending on crop type.

Delving into the BSPB archives, it is clear that the UK plant breeding and seeds sectors have previously held detailed discussions with the organic industry, dating back more than a decade, to help understand and address organic growers' seed requirements. While these talks seem to have made substantive progress on technical issues related to the seed certification process and protocols, the unavoidably higher cost of producing certified organic seed proved a deal-breaker.

There do also appear to be some concerns among organic producers regarding the comparative quality of organically produced seed, and whether the non-chemical seed treatment methods involved – which include hot water and steam treatment – can affect performance. However, feedback from seed suppliers indicates that they can and do produce very high-quality seed, and the overriding barrier to use of organic seed is price-related.

It would appear timely, therefore, for Defra to review arrangements for the authorisation of non-organic seed use, including whether, after 20 years of operation, the Defra-funded OrganicXSeeds database is delivering on its stated aim to 'help operators to find organic seed and seed potatoes', and whether alternative arrangements and incentives might prove more effective in supporting the development of a sustainable market for organically produced seed. This is made even more timely as the organic sector already has concerns that the introduction of additional requirements for Certificates of Inspection on imported organic seed from February 2025 could also affect the supply of organic seed.

The passing into law of the Genetic Technology (Precision Breeding) Act 2023 and the prospect, over the coming years, of an increasing number of new varieties being developed using techniques such as CRISPR genome editing, make the need for action to secure a reliable supply of organically produced seed even more relevant and pressing.

The organic industry has made clear that it prohibits the use of such techniques, and the seed industry is taking action to ensure organic growers will have access to the information they need to avoid the use of approved precision bred varieties. For example, BSPB has committed to maintain a public register of approved crop varieties developed using precision breeding (PB) techniques (including those with PB varieties in their heritage). In addition, because the current variety registration

and National Listing process is governed by UK legislation, Defra are developing arrangements for an England-only National List, which will include information about which listed varieties are PB.

If, however, as is widely expected, the use of precision breeding techniques becomes routine in commercial UK plant breeding programmes, the availability of varieties and seeds suitable for use on organic farms is likely to be significantly reduced unless effective measures are put in place to stimulate and secure a viable domestic supply of organically produced seed.

Alternative policy approaches are needed. In the short-term, Ministers should consider time-limited support for certified organic seed production to remove the current financial disincentives, alongside more rigorous enforcement of the derogation conditions. At the same time, targeted funding for applied research should be provided to drive further science-based improvements in organic seed production and non-chemical treatment.

A fresh approach is needed to ensure a reliable supply of certified organic seed, not only to safeguard the integrity of organic production and prevent unfair competition with conventional growers, but also to meet organic producers' future seed requirements in the context of new plant breeding innovations.

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