







## A proven track record of delivering growth

The UK seed breeding sector has a proven track record of delivering increasing yields, improved quality, and more sustainable crops to UK growers and consumers over many decades. Whether that is helping to enable UK farmers to grow more high-value, and high-quality crops like milling wheat, or cereal and vegetable varieties that are resistant to many of the pests and diseases that would previously have been difficult to control. It might not always have been called this in the past, but UK plant breeders have been at the forefront of driving increased sustainability and productivity with better, more resilient and consistent crops. This is good for food security, economic growth, progress towards Net Zero, integrated farm management, and it reduces waste.

With the right policy environment and support it still has a vast amount to offer today. Plant breeders are already working hard to address many of the challenges supply chains face in growing crops profitably to feed the nation, in a changing climate, and under pressure to use fewer inputs, and to reduce food waste. Despite this, the sector often feels like it has been neglected when recent agricultural, environmental, and economic policy has been developed. Given that to some extent all farming and food production depends on seeds and plants, this document highlights some key barriers the sector faces which need to be urgently addressed, and how better policy can encourage investment and innovation. The drive for increased food security and sustainability should begin with plant breeding at the forefront of future policy development.

Perhaps more than almost any other sector, the potential the sector offers UK growth and sustainability can be unleashed at very little cost by removing trade barriers, simplifying the dramatically increased recent bureaucratic burden, and the right agricultural and precision breeding policies. .



# PRIORITY 1: IMPROVED TRADE AND THE GLOBAL MOVEMENT OF SEED FOR RESEARCH OR MULTIPLICATION

WHAT? Plant breeding is a truly global business, whether that is trading seed for crop production, multiplying stocks of new varieties, or for research and testing in different countries and climates. We need a consistent and comprehensive approach to domestic food security, trade, and agricultural policy which removes the trade barriers with the EU and beyond, which are currently impeding innovation, investment, and productivity. Doing so will lead to greater confidence in the sector, drive more investment in research and development work being undertaken in the UK and faster progress to more sustainable crops.

WHY? Research collaboration is fundamental to almost every breeder, and some seed is hard or impossible to produce in the UK due to the climate or economics of doing so. Significant volumes of seed are also multiplied in the Southern Hemisphere because this doubles the number of seasons each year, speeding up the arrival of new varieties on the market.

Trade barriers have made the movement of seed, whether for marketing or research, much more difficult, risky, and costly. It also takes much longer to import and export seed than it did prior to Brexit, which is especially problematic when weather, energy cost, or supply chain demands requires something that hasn't been well planned for. This doesn't just affect commercial seed. For crops like oil seed rape, the window between harvesting and sowing is very short, and the delays and barriers are damaging the ability of breeders to import and export seeds for research in time to plant them, further disincentivising investment in the UK.

We already have examples of crop varieties which UK seed breeders have ceased selling as a result of unnecessary trade barriers and costs. These have only worsened since the Border Target Operating Model (BTOM) changes on April 30th. This damages UK productivity and disadvantages UK businesses, growers and ultimately consumers, and it also detracts from stated policy aims of increasing integrated farm management (IFM) because the latest and best varieties have the most to offer IFM.

HOW? We must remove as many of these barriers to the movement of seed as possible to encourage innovation and the confidence to invest in the UK plant breeding sector. A priority should be to improve trade and the movement of seed for propagation and research which is currently treated in the same way as commercial material. This could be done with greater mutual recognition with the EU and countries with similar standards, a more targeted and risk assessment focussed approach to testing, and more earned recognition for businesses which already have incredibly rigorous procedures and reputations for high-quality, disease resistant seed. We also need a solution to the imminent barrier to importing organic seed when certificate of inspection requirements come in to effect in February 2025.

Since April 30th of this year seed selected for border checks under the BTOM has to remain at the border control post (BCP) until tests are taken and results are received. For the last three years, this seed has been tested, but then allowed to travel on to the point of destination to be held pending results. The sector urgently needs this ability to be restored by a new government before the peak period of seed movements for 2025. Having high-risk, high-value, and perishable stuck at the BCP for an unknown time, and in unknown conditions is damaging to the sector and grower confidence in that seed.



WHAT? We need faster, cost effective, reliable processes for national listing of varieties which ensure UK growers and supply chains have equivalent or better access to the latest and best varieties, as our neighbours and competitors do. This must also adapt to the particular problems some sectors face in the UK because of the size of that crop in the UK market. This can be very small for some fresh produce or novel crops, but these are also the varieties we'd all like to see more of in the UK as they bring the prospect of new break-crops, wider rotations, and enhanced profitability for farmers.

HOW? Bio-security and varietal quality is fundamental, but greater equivalence and mutual recognition between the EU and UK would reduce the burden of post-Brexit administration which adds little value to the grower or supply chains. Seeds which have already been clearly tested by comparable EU authorities should not need to be retested, or should only be retested when the risk has been assessed as justifying this and should be at the appropriate rate for re-testing. For some highvalue crops like tomatoes, the cost of additional testing can be many thousands of pounds per consignment - costs which just add to food inflation. We often hear claims that 'we should reciprocate requirements the EU place on seed entering the EU'. However, doing so without a riskbased justification, which prevents an EU test being accepted as sufficient, only adds costs to the breeder and farmers and reduces the money to invest in improving varieties and productivity.

Before seed can be national listed and therefore marketed in the UK, it has to pass DUS testing to show it is distinct, uniform, and stable and it's important we have the ability to undertake this work in the UK. However, as has been the case, where DUS reports can be purchased from comparable EU countries because the variety has already been through the process, this should be done quickly and efficiently to avoid unnecessary additional costs and delays. Some plans are already in the pipeline to improve things, for example a much more modern computer system, but this should be in place as quickly as possible to allow the national listing process to meet the challenges UK breeders and growers face now face.

## PRIORITY 2: NATIONAL LISTING

WHY? This is especially the case for fresh produce, new and niche crops. The BSPB already has examples where the cost and time taken relative to the returns breeders might expect is deterring UK breeders from entering varieties for national listing which are being listed in other countries. The national listing process has also been beset with problems since Brexit. There are many examples where national listing has encountered extraordinary delays of two or three years – several times longer than it should take – and some of these remain outstanding. The BSPB knows Defra and APHA have been trying to resolve this, but a better system and process should be a priority for the new government.

The burdensome and costly process, combined with the delays breeders have experienced is already leading to examples of crop varieties which offer IFM benefits and are already available to EU growers being denied or delayed in arriving for UK growers. This damages farm profitability, innovation, productivity, and crop sustainability. It also disadvantages UK plant breeders where we see examples of live plants being imported from EU because the seed is listed there, but UK growers are not allowed to plant the seed of those varieties here to grow those plants themselves. The result is value is stripped from the UK plant breeding sector with no justification or benefit.

There are also many strange aspects of national listing, such as the way some crops are referenced against and compared to varieties grown for a very different purpose in order to test their suitability for national listing. Whether that is crops like forage oats being compared to oats grown for milling, flax for fibre being compared to linseed grown for grain, or the swedes we eat being compared to those grown for animal feed. This leads to the additional demands such as the need to submit burdensome appeals being placed on breeders who are just trying to get better varieties on the market. Delays can be very costly given the narrow windows for growing seed each year, if this is missed it can mean a whole year of returns is lost.

## PRIORITY 3: POLICY AND COMMERCIAL REALITY NEED TO BE JOINED-UP AND LONG-TERM

WHY? If policy is set which unintentionally means the desired plant breeding solutions or crops are not commercially viable then this leads to entirely counterproductive results. It can sometimes seem like farm policy has been set without due regard to food security, farm productivity and profitability, or the sustainability of seed breeding research and innovation in the UK.

Many UK seed breeders are working across sectors including multiple cereals, horticulture, fodder and forage crops, grasses, root crops, oilseed, wildflowers and SFI mixes, fibre, biofuel, and amenity. However, crops to feed people and animals remain central to most businesses, and crucially the most of the revenue from royalties and plant breeders' rights which pays for research and development work. This must be factored into farm and environmental policy which has seen many adhoc or unplanned changes in recent years with little notice or understanding of the implications it has for breeders undertaking long-term and expensive breeding programs which might take 10 or 15 years to come to fruition.

WHAT? The sector needs a joined-up Plant Varieties Strategy which recognises the interaction of the commercial reality seed breeders face, and the policy objectives the Government has set. The Government's agricultural and environmental policy must be built on a better understanding of the role and potential of plant breeding to drive innovation, the benefits it can offer, and the risks of getting things wrong. Greater account must be taken of the implications policy has on food security, how we deal with a changing climate, global disruption, and supply chain or consumer demands. Completing the work already started on precision breeding should also be a priority, to allow the UK to benefit from its potential to boost productivity and sustainability.

HOW? Longer-term policy, and much greater consideration should be given to the role of plant breeding in achieving the desired results. Sustainability is crucial, but it is best delivered by policy which also encourages profitable and productive plant breeding and farming sectors.

A future National Action Plan, and plant health policy should drive genuinely integrated approaches to farming which both encourage and support breeding solutions to plant health problems with the widest possible safe and effective grower toolkit. One of the best ways to encourage investment in breeding solutions is to ensure that crops can be grown profitably and productively while those solutions are worked on – this is what funds and justifies investment.

The necessary secondary legislation to accompany the Precision Breeding Act should be completed as soon as possible. This should be designed to facilitate the ability of the technology to deliver food security and environmental benefits, not add additional and unnecessary barriers to the adoption of something which is already widely accepted around the world.

## Conclusion

To create more sustainable food supply chains and drive the move to net zero, the new Government must recognise the importance and role of plant breeding in addressing many of the policy challenges we face, and deliver on these three areas to give breeders the confidence to invest in research and innovation in the UK.



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