

## Translation

### **BDG Bundesverband Deutscher Gartenfreunde e.V.**

Bundesministerium für Ernährung, Landwirtschaft  
und Verbraucherschutz  
Minister Ilse Aigner

8 July 2013 fra/thw  
Reform of the European Law on seeds

Dear Minister Aigner

On 6th May 2013 the European Commission submitted the draft for the new regulation of the European Law on seeds. First information about the amendment of the regulation led to consternation amongst hobby gardeners all over Europe. Various articles in the press stated that in addition to farmers, home and allotment gardeners would in the future also only be able to use approved seeds and that the exchange of reconstructed seeds among each other, unlawful.

Upon this the EU Commission rejected the regulation plans for the hobby garden. As is confirmed now by the document, the new rules should exclusively apply to professional actors, producing vegetable seeds. Nevertheless the Bundesverband Deutscher Gartenfreunde (BDG) is worried about this evolution. Allotment gardeners buying seeds in specialized shops will feel the consequences as they can only sell seeds for private use which have gone through an expensive approval procedure.

Many smaller seed producers can no longer afford the approval. This could make it difficult in the future for hobby gardeners to acquire old and rare or regional species. As a consequence of this regulation the market will be increasingly dominated by a few larger producers. This does not only have an impact on the prices of seeds but does also restrict the diversity. More and more hybrid species, which cannot be reproduced, dominate the market.

The allotment garden movement provides quite a significant contribution to maintaining the diversity of cultivated plants. Over 2000 species of cultivated plants grow in our allotment gardens. This was the result of a BDG study in the year 2008. Together with the scientists of Kassel University about 50 hectares of land in 83 allotment garden sites in 62 regions of Germany were analysed.

86 per cent of all listed species were ornamental plants, but a total of 253 species were cultivated for eating. The study moreover showed that allotment gardens also have a significantly larger diversity than other urban green areas, for instance parks.

“Maintaining by using” is obvious and an important contribution of the allotment gardeners to the maintenance of the diversity of cultivated plants and the biodiversity in Germany. In order for this to continue in the future, we are asking you, Mrs Minister, to commit yourself in Brussels to further reduce the bureaucracy of the access to the market for seeds and reproductive goods concerning fruit and vegetables as well as ancient agricultural species. For this purpose the board of directors of the BDG has adopted a paper at the meeting in April 2013 in Hamburg which we are submitting to you for information.

Together with you the BDG is ready to work for more diversity and participation of farmers, gardeners, growers and many small and middle sized undertakings and interest representatives in Europe to maintain the genetic diversity of our plants. This is the only way for farmers, professional and hobby gardeners to adapt to the changed environmental conditions and consumer requirements

Yours Sincerely

Dr Norbert Franke

Jürgen Sheldon

President

Member of the Board

Appendix

Position  
BDG Study “Diversity of Species”