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CONTRIBUTION

From:	General Secretariat of the Council
To:	Working Party on Genetic Resources and Innovation in Agriculture (Seeds, Propagating and Planting Materials)
Subject:	Meeting of the Working Party on Genetic Resources and Innovation in Agriculture (Seeds, Propagating and Planting Materials; PRM) on 1 and 2 October 2025 - Agenda item 1 - Comments from Czechia on Article 80 (official controls)

Delegations will find in the annex comments from Czechia on official controls, including drafting suggestions on Article 80 of the proposal on the production and marketing of plant reproductive materials, in view of the discussion at the Working Party on Genetic Resources and Innovation in Agriculture (Seeds, Propagating and Planting Materials; PRM) on 1 and 2 October 2025.

CZ proposal for amendment of Article 80 regarding the position of the PRM under Regulation (EU) 2017/625 (OCR)

Czechia would like to share a written proposal amending Article 80 of PRM with the aim of reaching a compromise.

PRM certification and variety registration are processes that are fundamentally different from official control. Unlike official control, these processes take place at the request of the operator and, if non-compliance with the requirements is detected, there is no need to take measures or impose a sanction. At the same time, it should be noted that variety registration and PRM certification, as well as production of PRM that does not need to be certified, are processes that take place before the PRM is placed on the market, therefore these processes cannot be subject to official controls under the OCR.

Czechia proposes the following amendment:

"Article 80

Amendments of Regulation (EU) 2017/625

Regulation (EU) 2017/625 is amended as follows:

(1) In Article 1, paragraph 2, the following point is added:

'(k) ~~production and~~ marketing of plant reproductive material.');

..."

The suggested wording of recitals (62) and (63) is:

“(62) Regulation (EU) 2017/625 of the European Parliament and of the Council should be amended to include in its scope the ~~production and~~ marketing of PRM in line with this Regulation. This is important in order to guarantee a uniform approach as regards official controls for the entire plant production and food chain, since Regulation (EU) 2017/625 also applies to the scope of Regulation (EU) 2016/2031, and Regulation (EU) 2018/848 of the European Parliament and of the Council.

(63) In this respect, the Commission should be empowered to adopt specific rules on official controls and on actions taken by the competent authorities in relation to PRM, in particular for laying down rules for the performance of official controls on PRM for verifying compliance with Union rules, for the import into, and marketing within, the Union of PRM, ~~and on the activities of operators during the production of PRM.~~