Republic of Ireland: Annual Non-Organic Seed Authorisation Report for 2021

Authorisations to use seed and seed potatoes and vegetative propagating material not produced by the organic production method in organic farming

According to European Commission Regulation (EC) No 889/2008 of 5 September 2008, each member state should ensure that a database, in which seed, seed potatoes and vegetative propagating material produced by organic production methods, and respecting the general criteria for production of seed and vegetative propagating material can be registered and made available to users.

Prepared by the Soil Association
On behalf of the Department of Agriculture, Food and the Marine

March 2022

Contents

Introduction

This is the sixth report produced by the Soil Association for the Department of Agriculture, Food and Marine, setting out the situation with regards to authorisations to use non–organic seeds issued by Irish organic control bodies to organic agricultural and horticultural operators in Ireland during the calendar year.

Purpose of the report

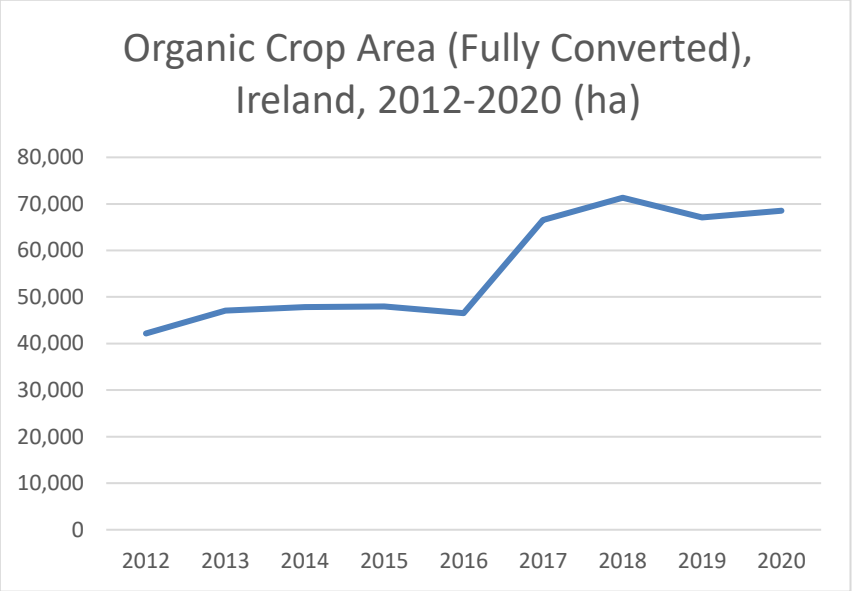
The non-organic annual seed authorisation report provides information on the quantities and varieties of non-organic seed used by organic farmers and growers in Ireland. This information is intended for use by the seed industry, producers, policy makers and organic control bodies (CBs) to increase use of organic seed and comply with EU regulatory requirements. The objective is to expand the diversity, quantity and quality of organic seed availability so that authorisations for the use of non-organic seed would only need to be given in extreme circumstances. The report also helps to make the sector transparent to buyers and suppliers of seed and consumers.

As a requirement of European Commission Regulation (EC) No 889/2008 of 5 September 2008, every Member State must produce an annual report publishing all authorisations (sometimes referred to as derogations) to use non-organic seed, non-organic seed potatoes and non-organic vegetative propagating material. For Ireland, the report is compiled by the Soil Association on behalf of the Department for Agriculture, Food and the Marine. It will then be sent to the European Commission and other Member States, and also made publicly available via the organic seed database (https://ie.organicxseeds.com/).

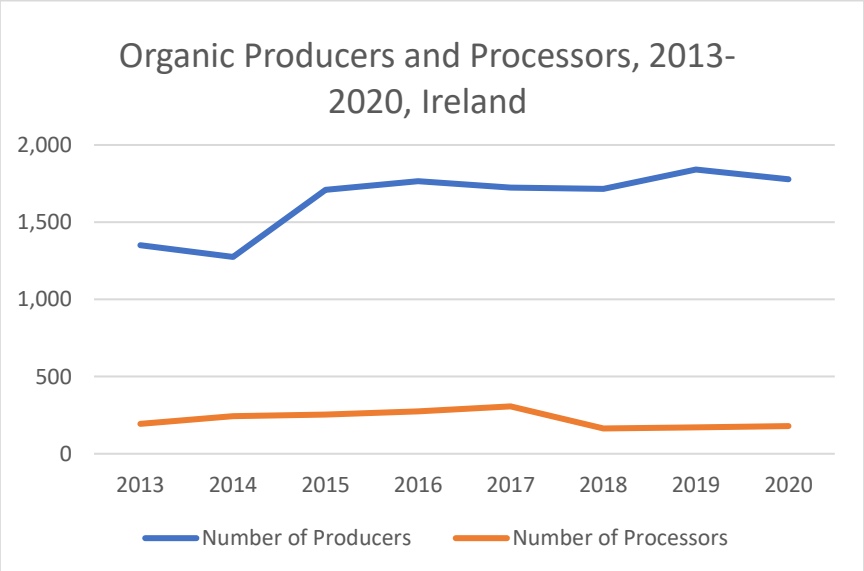
Context

Graphs 1 and 2 use data from *Eurostat*[1]. The 53% increase in organic land area between 2016 and 2018 is noteworthy and the overall trend over since 2012 is upwards. Data for 2021 is, at time of writing, unavailable.

Graph 1: Fully converted organic crop area, Ireland (ha)



Graph 2: Organic producers and processors, Ireland 2013-2020



[1] https://ec.europa.eu/eurostat/data/database

Table 1: *Eurostat* data underlying graphs 1 & 2[2],[3]

	2012	2013	2014	2015	2016	2017	2018	2019	2020
Fully converted organic land, (ha)	42,160	47,078	47,817	47,951	46,517	66,503	71,323	67,063	68,497
Number of Producers	-	1,351	1,275	1,710	1,765	1,725	1,716	1,841	1,778
Number of Processors	-	193	243	255	275	307	164	170	179

Summary of authorisations

The total number of non-organic seed, seed potato, and vegetative propagating material authorisations issued to organic farmers and growers in the Republic of Ireland during 2021 was **2,181** a decrease of 487 from 2020's figure of 2,668. Previous years were: 2,020 (2019), 2,268 (2018), 2,063 (2017), and 2,096 (2016).

Varietal choice of seed is an ongoing concern; complying with the European Union's desire to reach 100% organic seed without compromising varietal choice, is likely to be very difficult. Increased levels of non-organic seed use are undesirable within the organic sector as it challenges a key intention of the new EU Organic regulation, which came into force 1st January 2022. It also risks creating two tiers of seed costs for farmers, potentially undermining public trust, despite the practical reasons that may be behind these differences. Continued progress in organic seed production and usage is important to allow the organic sector to comply with regulatory requirements, protect public integrity and trust in organic food, and support continued innovation in organic seed production.

The report is analysed in five main sectors: seed potatoes, arable/cereal crops, horticulture, fruit, and grass/forage/fodder crops.

[2] The corresponding section in the 2017 non-organic authorisations report contained an error for the number of processors. The actual position is healthier than reported.
[3] Producer and processor figures for 2018-20 obtained from DAFM, all other figures from *Eurostat*

Seed Potatoes

In total 42 authorisations were issued for non-organic seed potatoes in 2021 – an increase in number of derogations but accompanied by a decrease in total tonnage. The overall figures for the last three years are given in Table 2 below.

Table 2: Non-organic seed potato usage 2019-2021 – broad changes

	2019	2020	2021
No of varieties	18	16	16
No of auths	37	27	42
Total tonnes	70.84	59.27	32.75

Table 3 shows fuller details of the varieties authorised in 2021, compared with how those varieties fared in the previous two years.

Last year's report (2020) speculated that:

> *"The temporary prohibition on import of seed potatoes from GB into the EU means that we could see a shift in varieties available in the coming year."*

Table 4, showing the 16 varieties authorised in 2020 compared to 2021, suggests that this prediction has been borne out to some degree.

Some trends have remained similar though. *Orla* again dominates authorisations by weight, with *Pink Fir Apple* receiving the high number of authorisations. Along with *Charlotte* these three varieties exhibit poor resistance to blight, particularly foliar, which makes them potentially a risky choice for organic growers. Choice of these varieties is, however, likely to be a result of contracted requirements.

Table 3: non-organic seed potato varieties used in 2021, with amounts for these varieties compared 2018-2020

Variety	2018		2019		2020		2021	
	auths	kg	auths	kg	auths	kg	auths	kg
Orla	1	38	1	36,000	**1**	**56,000**	**1**	**25,000**
Sarpo Mira	**-**	**-**	**-**	**-**	**-**	**-**	**2**	**2,250**
Records	**-**	**-**	**-**	**-**	**-**	**-**	**1**	**1,000**
Mayan Gold	1	25	-	-	**4**	**479**	**4**	**720**
British Queens	**-**	**-**	-	-	**2**	**100**	**4**	**620**
Pink Fir Apple	5	490	6	917	**5**	**528**	**6**	**582**
Charlotte	**-**	**-**	-	-	**3**	**1,575**	**3**	**550**
Setanta	**-**	**-**	**-**	**-**	**-**	**-**	**1**	**400**
Sharpes Xpress	6	337	7	402	**2**	**150**	**6**	**354**
Vitabella	**-**	**-**	**-**	**-**	**-**	**-**	**1**	**300**
Rooster	-	-	2	4,000	**1**	**5**	**2**	**120**
Solist	**-**	**-**	**-**	**-**	**-**	**-**	**4**	**58**
Salad Blue	3	375	2	75	**1**	**75**	**2**	**45**
Duke of York	**-**	**-**	1	25	**1**	**2**	**2**	**29**
Homeguard	**-**	**-**	**-**	**-**	**-**	**-**	**1**	**25**
Premier	-	-	1	25	**-**	**-**	**2**	**23**

Table 4: All non-organic seed potato varieties used in 2020, compared with 2021

Variety	2020		2021	
	auths	kg	auths	kg
Orla	1	56,000	1	25,000
Sarpo Mira	-	-	2	2,250
Records	-	-	1	1,000
Mayan Gold	4	479	4	720
British Queens	2	100	4	620
Pink Fir Apple	5	528	6	582
Charlotte	3	1,575	3	550
Setanta	-	-	1	400
Sharpes Xpress	2	150	6	354
Vitabella	-	-	1	300
Rooster	1	5	2	120
Solist	-	-	4	58
Salad Blue	1	75	2	45
Duke of York	1	2	2	29
Homeguard	-	-	1	25
Premier	-	-	2	23
Highland Burgundy	1	250	-	-
International Kidney	1	50	-	-
Kerr Pinks	1	25	-	-
Axona	1	20	-	-
Cara	1	5	-	-
Lady Christl	1	4	-	-
Red Duke of York	1	2	-	-

Arable and cereal crops

There was a decrease in the number of authorisations for organic farmers to use non-organic seed in 2021, but an increase in the number of tonnes of seed. The total number of authorisations fell from 282 to 217, and the total tonnage rose from 248 tonnes to 261 tonnes. (The slight discrepancy between the above figures and table 5 is because 2020 included 3 small authorisations for heritage wheats totalling 0.7 tonne which are not shown in table 5).

Oats continue to be the most popular cereal crop, and account for 80% of the total tonnage of non-organic seed supplied under authorisations. However, although authorisations have dropped slightly from 134 in 2020 to 109 in 2021, tonnages remained around 200 tonnes compared with 135 in 2019. This reflects the importance of Oats to Irish farmers and the strong demand for oats for the human consumption market. Authorisations for barley, wheat and triticale rose from 14.6 tonnes to 26.7 tonnes but remain lower than historic figures.

There was an increase in Barley derogations and tonnages, but both remain below historic values. The most popular varieties were two new varieties and one heritage variety with demand in the malting industry reflecting a demand for new or market driven varieties. Volumes of rye and triticale derogations were very low but there does seem some interest in rye and spelt reflecting value as milling cereals as well as some increase in quantity of Triticale.

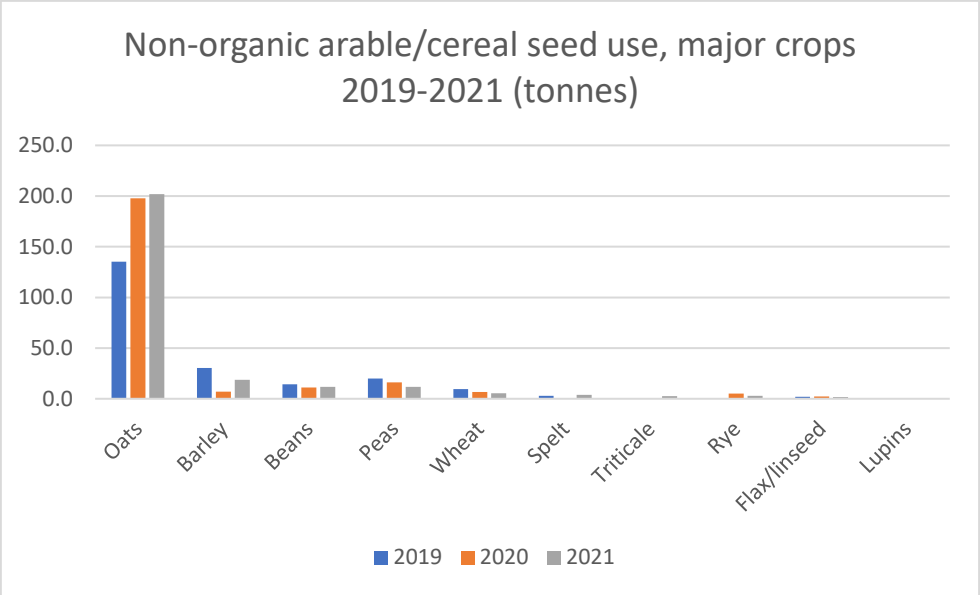
Total pulses have again fallen slightly in 2021, with pea tonnage and authorisations decreasing, following a trend since 2018. Bean authorisations and tonnages remain similar from 2020.

Authorisations for Flax/linseed have dropped slightly from a consistent demand for the last 2 years.

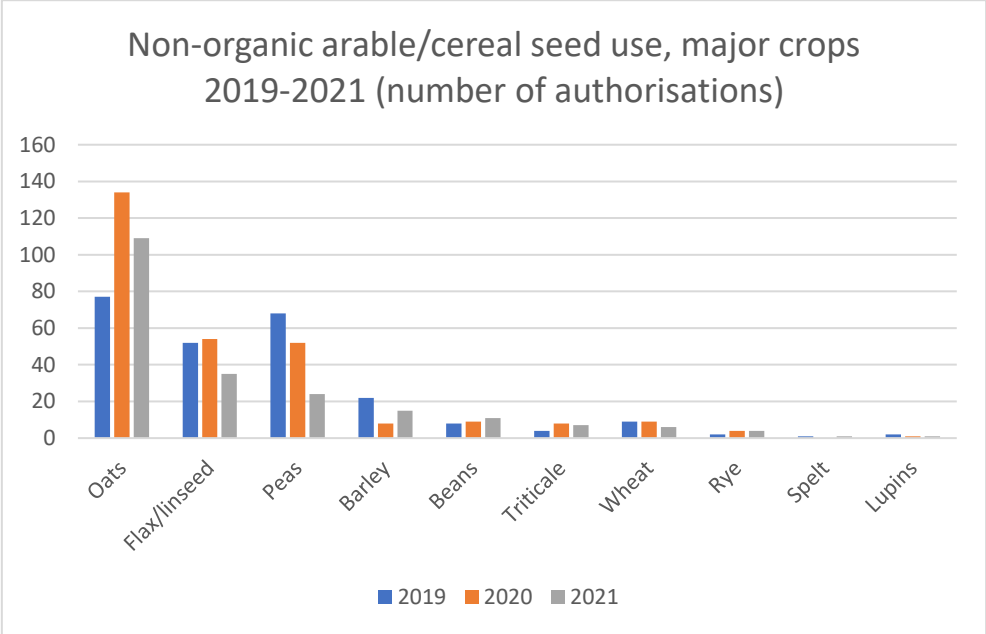
Table 5: Non-organic arable/cereal 2019-2021, comparison of selected species

Crop	2019		2020		2021	
	auths	tonnes	auths	tonnes	Auths	tonnes
Oats	77	135.3	134	197.9	**109**	**202.0**
Barley	22	30.2	8	7.0	**15**	**18.6**
Beans	8	14.3	9	11.0	**11**	**11.7**
Peas	68	20.0	52	16.3	**24**	**11.6**
Wheat	9	9.6	9	6.7	**6**	**5.5**
Spelt	1	3.0	-	-	**1**	**4.0**
Triticale	4	0.4	8	0.9	**7**	**2.6**
Rye	2	0.2	4	5.0	**4**	**3.0**
Flax/linseed	52	2.1	54	2.3	**39**	**1.7**
Lupins	2	0.5	1	0.4	**1**	**0.5**

Graph 3: Non-organic arable /cereal seed (tonnes) – major crops



Graph 4: Non-organic arable /cereal seed (authorisations) – major crops



Horticulture

It is almost impossible to show a simple comparison and analysis of authorisations for the horticultural sector due to the huge range of different crops and varieties, which are sold and recorded using different units of measurement (by weight, number of seeds/plants). Table 6 shows comparisons for the major vegetable crops.

The number of authorisations for the species listed in table 6 was 235 – the figure for 2020 was 400. Looking at individual crops there is a mixed picture with authorisations for some crops reducing and for others increasing.

There is no clear picture when it comes to trends in individual crops. The overall horticultural market in Ireland is still small, and therefore individual decisions on one or two farms can have a large impact on the overall picture. As one example, a single authorisation of 200 celeriac seeds in 2020, turns into a single authorisation for 20,000 seeds in 2021 – this looks exactly like an order-of-magnitude error, but they are authorisations given by different certification bodies and so from different producers.

Table 6: Non-organic vegetable seed authorisations in Ireland, 2020-2021: top crops by number of authorisations

Crop	2020			2021		
	auths	seeds	kg	auths	seeds	kg
Asia greens	11	10,350	33.83	7	-	6.60
Beetroot	21	3,974,495	1.00	17	110,613	3.45
Broad bean	12	240	1,015.50	5	100	13.00
Broccoli	33	665,892	-	14	967,400	0.01
Brussels sprouts	5	29,250	-	4	10,045	0.01
Cabbage	12	63,166	-	8	38,910	-
Carrot	37	102,496,094	-	18	41,146,000	0.10
Cauliflower	22	88,943	-	10	42,500	-
Celeriac	1	200	-	1	20,000	-
Celery	6	12,700	1.00	-	-	-
Courgette	10	2,398	0.05	1	1,000	-
Cucumber	4	77	0.00	2	15	0.00
French Bean	8	265	3.00	5	400	-
Kale	32	165,010	25.00	25	133,280	6.70
Kohl Rabi	-	-	-	2	500	-
Lettuce	39	94,137	4.54	33	4,114,128	0.02
Onion	10	2,950.000	284.95	6	12,200	20.45
Pak choi	8	5,125	0.50	11	22,500	0.26
Parsnip	14	5,402,800	5.85	12	1,246,000	0.18
Pea	16	167	53.70	4	600	1.00
Pepper, Chilli	1	12	-	2	70	-
Pepper, Sweet	5	245	-	2	16	-
Squash	34	6,852	0.05	26	5,930	-
Tomato	59	3,786	0.01	20	1,074	-

Fruit

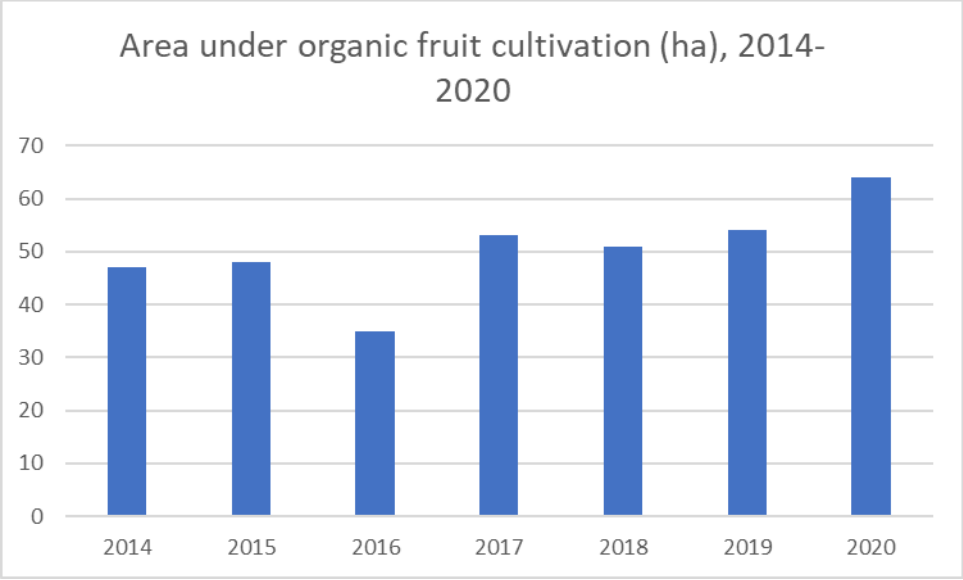
Similar remarks apply to fruit as to horticulture: the market is small, individual decisions can result in big fluctuations year-on-year.

Table 7 shows the main 18 fruit species compared with 2020. The number of authorisations for those species was 106 compared with 113 for 2020 and 131 for 2019. The change in land area devoted to organic fruit (graph 5) suggests no recent decrease.

Table 7: Non-organic fruit authorisations in Ireland, selected crops, 2019-2021

Crop	2019			2020			2021	
	auths	amount plants	amount kg seed	auths	amount plants	amount kg seed	auths	amount plants
Apple	37	138	-	37	379	-	18	206
Bilberry	-	-	-	-	-	-	1	25
Blackberry	2	15	-	1	3	-	2	15
Blackcurrant	3	125	-	4	258	-	14	164
Blueberry	25	950	-	3	7	-	3	2,070
Cherry	3	16	-	4	269	-	1	730
Crab apple	1	1	-	-	-	-	2	36
Elderberry	1	2	-	1	50	-	1	5
Fig	-	-	-	3	6	-	2	2
Gooseberry	6	32	-	2	7	-	5	70
Peach	2	2	-	1	3	-	2	2
Pear	6	68	-	6	18	-	5	21
Plum/Damson/Greengage	9	15	-	9	112	-	4	8
Raspberry	8	681	-	14	644	-	12	979
Redcurrant/Whitecurrant	2	6	-	2	6	-	4	35
Rhubarb	9	160	0.03	3	100	0.03	9	1,420
Strawberry	16	3,020	-	22	19,245	-	17	4,854
Tayberry	1	2	-	1	2	-	4	35

Graph 5: Area under organic fruit cultivation, 2014-2020[4]



[4] https://ec.europa.eu/eurostat/data/database Data only available to 2020

Grass, forage and fodder crops

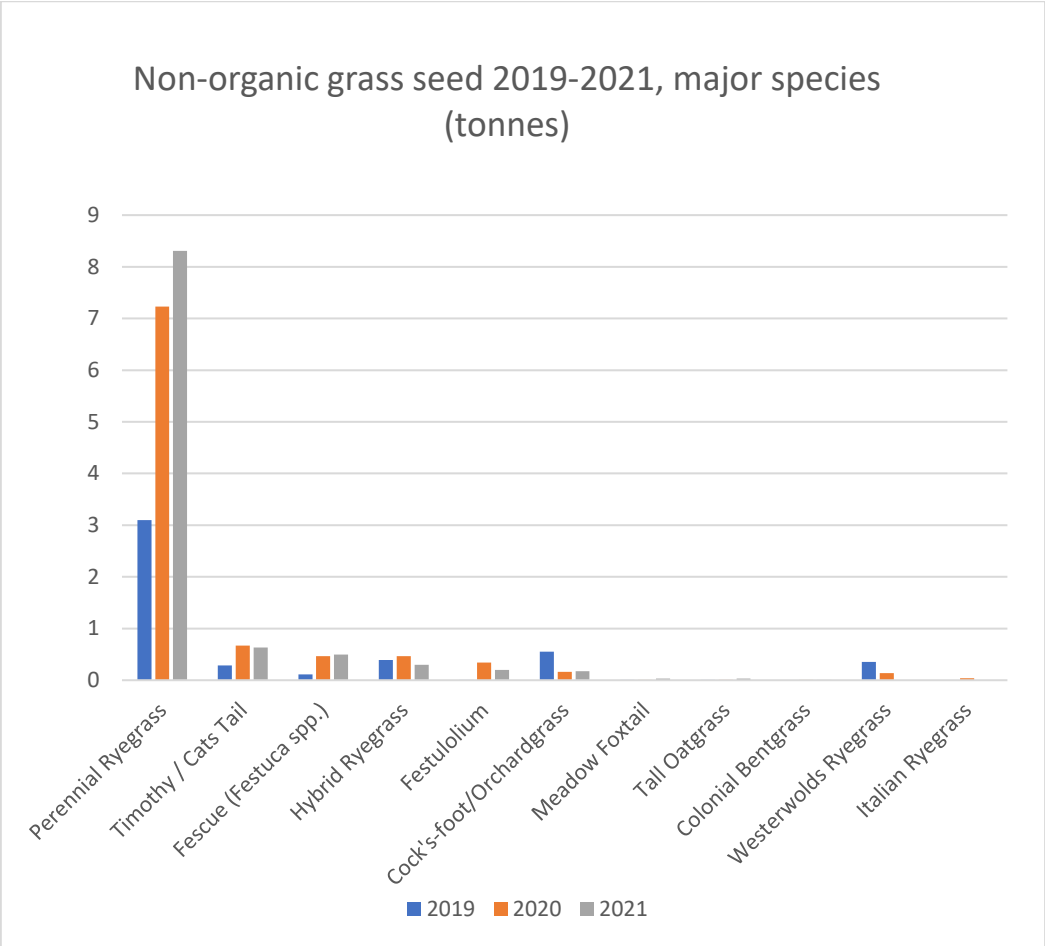
Grass

Although tonnages remain similar to 2020, the number of derogations was lower. Perennial Ryegrass remains the dominant grass species making up half the applications and 85% of tonnages. Timothy and Fescue species remain the highest of the alternative species. But most species remain at fairly consistent but low levels.

Table 8: Summary of non-organic grass seed authorisations in Ireland, 2019-2021

Crop	2019		2020		2021	
	auths	tonnes	auths	tonnes	auths	tonnes
Perennial Ryegrass	142	3.098	273	7.229	**214**	**8.309**
Timothy / Cats Tail	53	0.288	73	0.669	**89**	**0.630**
Fescue (*Festuca spp.*)	28	0.111	48	0.464	**29**	**0.496**
Hybrid Ryegrass	8	0.393	9	0.465	**7**	**0.295**
Festulolium	10	0.002	28	0.340	**14**	**0.201**
Cock's-foot/Orchardgrass	14	0.55	19	0.162	**18**	**0.176**
Meadow Foxtail	2	0.002	1	0.006	**16**	**0.034**
Tall Oatgrass	8	0.004	14	0.009	**26**	**0.034**
Colonial Bentgrass	-	-	1	0.004	**4**	**0.004**
Westerwolds Ryegrass	3	0.353	3	0.136	**-**	**-**
Italian Ryegrass	-	-	3	0.037	**-**	**-**

Graph 6: Non-organic grass seed authorisations 2019-2021 (tonnes)



Fodder and forage

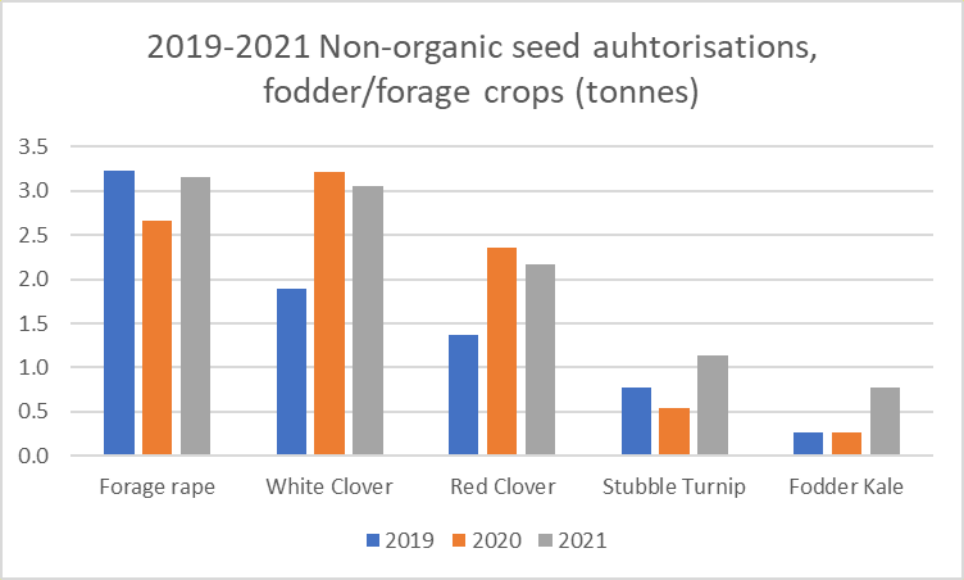
Authorisation of fodder crops were 15% higher but with fewer authorisations. This was due to an increase of Brassica species of 1,700 tonnes. All brassica species showed an increase. This could be explained by alternative forage crops for livestock or increased interest in cover crops in arable rotations.

White and red clover remain the principal source of authorisations, and both remain at similar levels to 2020. There was an increase, in both authorisations and tonnages in annual clovers Alsike, Crimson and Subterranean which reflects their role in arable cover crops and as fertility builders and mulches in Horticulture. Vetch use continues to increase.

Table 9: Summary of non-organic forage and fodder seeds 2019-2021

Crop	2019		2020		2021	
	Auths	kg	Auths	kg	Auths	kg
Alfalfa (Lucerne)	3	6.1	6	20.2	9	83.1
Alsike Clover	27	70.5	52	154.7	93	411.5
Birds Foot Trefoil	6	4.6	20	56.0	14	72.2
Black Medic (Yellow tre	20	111.3	31	103.0	54	81.7
Burnet	15	15.4	31	124.6	14	57.6
Chicory	26	60.9	70	304.1	45	221.4
Crimson Clover	6	153.5	3	13.5	15	139.2
Egyptian clover	2	5.4	1	4.5	1	24.0
Plantain	22	23.8	60	228.5	24	172.5
Red Clover	47	1,373.1	81	2,363.4	49	2,166.7
Sainfoin	7	76.8	5	194.0	1	105.0
Squarrose Clover	-	-	-	-	1	25.0
Subterranean clover	1	40.0	1	1.0	3	101.0
Sweet Clover	-	-	19	62.8	7	12.1
Vetch spp	3	188.5	7	511.5	12	6,614.4
White Clover	235	1,887.4	307	3,217.1	323	3,046.6
Yellow Clover	-	-	-	-	-	-
Brassica & other Species:						
Fodder Beet	2	750,000 (seeds)	1	4.0	3	28.5
Fodder Kale	21	269.8	26	270.3	27	770.8
Fodder Radish	7	539.3	13	168.8	11	209.4
Forage rape	86	3,224.2	86	2,663.1	63	3,149.6
Stubble Turnip	18	772.2	31	547.2	29	1,141.0
White Mustard	2	27.5	2	56.0	9	173.8

Graph 7: Non-organic seed authorisations, forage/fodder, top 5 species (over 0.5 tonne), 2019-2021



The Irish organic seed database: ie.organicxseeds.com

This database is a requirement of EU Regulation (EC) No. 834/2007 and 889/2008 which regulates the use of seeds and seed potatoes in organic farming. The database is funded by The Department of Agriculture, Food and the Marine and managed by the Soil Association, working in partnership with FiBL.

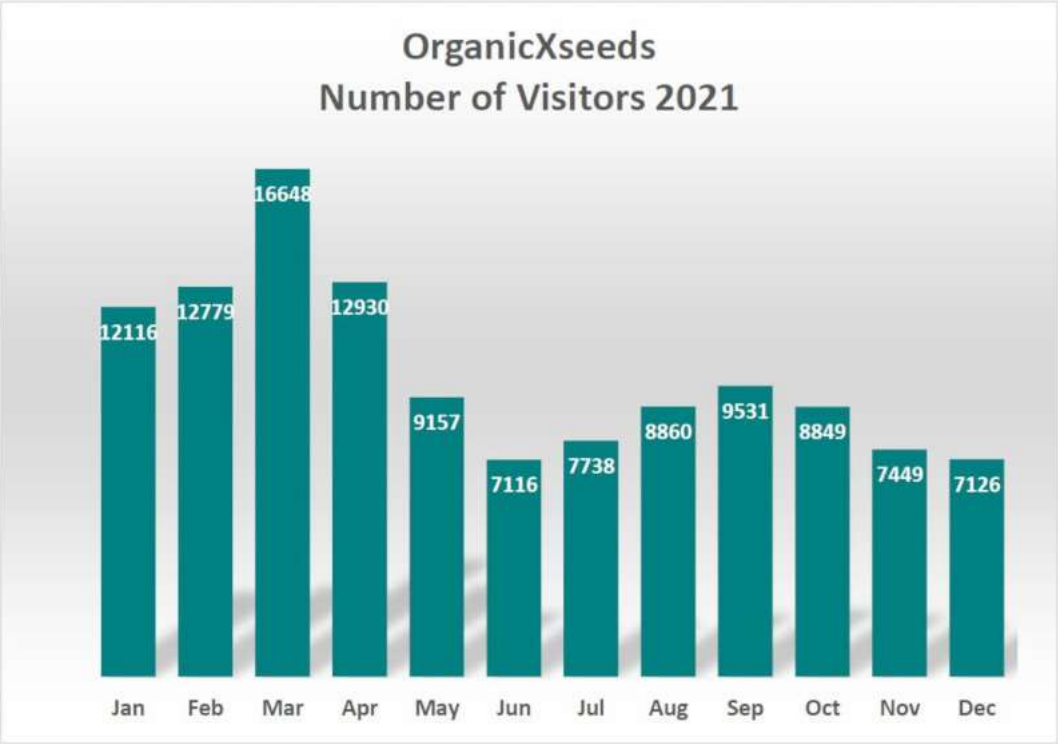
There are currently 16 seed companies registered in the database who are able to supply organic seed and/or organic seed potatoes to organic farmers and growers in Ireland.

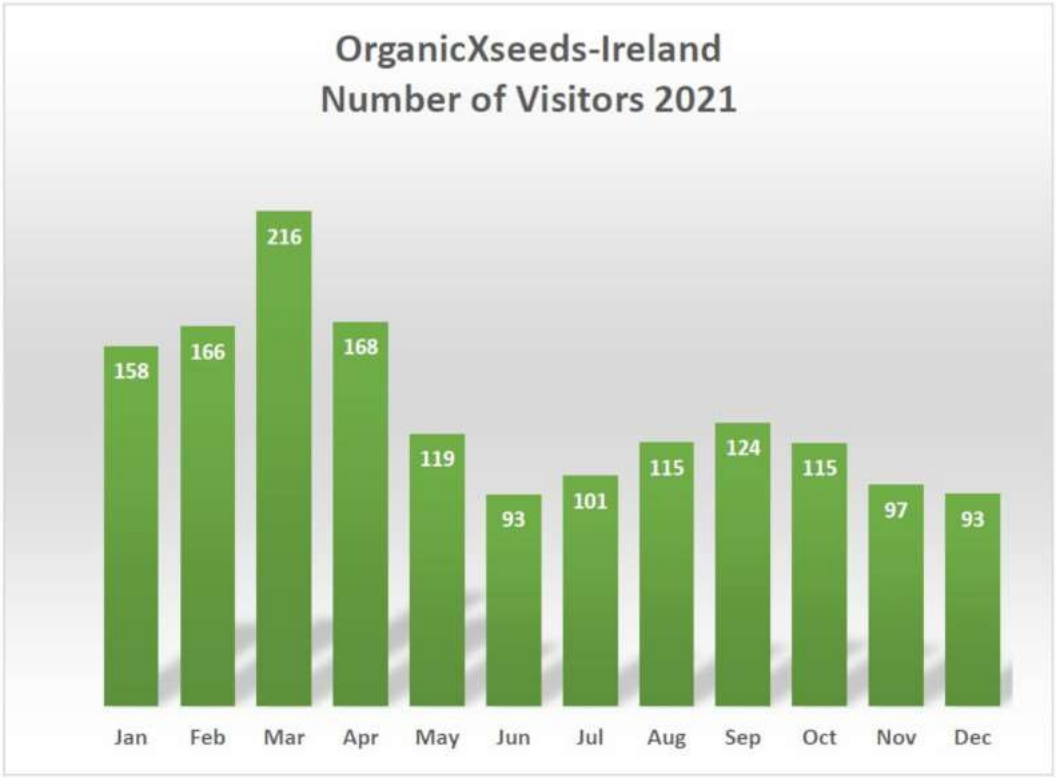
Seed suppliers can register species of organic seed and/or organic seed potatoes by variety via a login and password. They are required to update their seed listings in accordance with current availability.

Organic producers are legally obliged to use organic seed that is registered in the database. Registered control bodies are legally obliged to check the database for organic seed availability before issuing authorisations to use non-organic seed.

Statistics provided by FiBL relating to the Organic X Seeds website (which operates across several EU member states) can be viewed below:

Graphs 8 & 9: 2021 visitors to the OrganicXseeds website total, and from the Republic of Ireland





Explanation of authorisation data

In accordance with Article 12 of Commission Regulation (EC) No 1452/2003 the report shall contain, for each species concerned by an authorisation according to Article 5(1), the following information:

- The scientific name of the species and the variety denomination
- The English or common name of the species and the variety denomination
- The justification for the authorisation indicated by a reference to Article 5(1)
- The total number of authorisations
- The total quantity of seed or seed potatoes involved
- The chemical treatment for phytosanitary purposes as referred to in Article 3(a)

Authorisation according to Article 5(1) for seed (agricultural crop)

Column 1
Scientific name of the species

Column 2
English or common name of the species

Column 3
Variety name

Column 4
Justification / Reason for authorisation

The justification for the authorisation is indicated by a reference to Article 5(1) (a), (b), (c) or (d)

(a) If no variety of the species, which the user wants to obtain is registered in the database provided for in article 6;
(b) If no supplier is able to deliver the seed or seed potatoes before sowing or planting in situations where the user has ordered the seed or seed potatoes in reasonable time;
(c) If the variety which the user wants to obtain is not registered in the database, and the user is able to demonstrate that none of the registered alternatives of the same species are appropriate and that the authorisation therefore is significant for his production;
(d) If it is justified for use in research, test in small-scale field trials or for variety conservation purposes agreed by the competent authority of the Member State;

Column 5
The chemical treatment for phytosanitary purposes
There are currently no chemical treatments allowed for phytosanitary purposes in Ireland.

Column 6
The total number of authorisations for each variety

Column 7
The total number of authorisations for each species

Column 8
The total quantity of seed, plants or seed potatoes (by variety)

For each variety it is stated, how many units of seed or vegetative propagating material have been authorised. Where two or more authorisations have been granted, the amounts have been added.

Column 9
The total quantity of seed or seed potatoes (by species)

Seed authorisation data

The accompanying document - "Ireland Non-Organic Seed Authorisation Report for 2019 Data" - summarises the authorisations granted in 2020 by all of the Irish organic control bodies.

There are some anomalies in the way that the data is collected by the control bodies. For example, the same variety of a particular crop may have some entries recorded by the number of seeds or plants and others by the weight of the seed. Where this has occurred, the entries have been added to give a total by each unit of measurement. Although the control bodies are aware of this, they often receive the request for authorisations in various units from the producer who in turn reads the information as provided by the seed company.

In addition, the A-E "reason/justification" codes which are assigned to each authorisation have been recorded as presented by the control bodies, even though it is evident that these are often assigned incorrectly.

Acknowledgements

Report compiled by Martin Parkinson, Jerry Alford, Carolyn Coxe and Ben Raskin. Data compiled by Martin Parkinson. Seed working groups chaired by Ben Raskin and Adrian Steele.