

M PRABHKAR RAO
PRESIDENT



Ref. NSAI/2020/003

February 19, 2020

Shri Sanjay Agarwal
Secretary (Agriculture)
DAC&FW, Government of India
New Delhi

Respected Sir,

Sub: Important suggestion of NSAI regarding Seed Bill and other departmental issues

We are grateful to you for your graceful participation in 10th Indian Seed Congress 2020. It catalyzed the deliberations and we hereby are submitting the industry issues for your kind consideration:

1. IPR in Seed Sector:

- No NOC is required for registration of Bt cotton varieties as per PPVFR Authority.
- The Project Coordinator of ICAR for cotton is asking for NOC from the trait developer for release of identified Bt cotton varieties after two years trial. This violates the provisions of the PPVFR Act and is contrary to circulated protocol therefore needs to be immediately removed.

2. The production and supply of breeder seeds released 15 years ago:

- The popular varieties like Pusa Basmati 1121, Swarna, 1010 etc., which are released more than 15 years ago need to be continued recognizing the farmers requirements which are to be met by small and medium seed companies.
- The subsidy on distribution of such seeds may be removed.

3. The New Seed Bill

(i) **A Central Licensing for National Level Integrated Seed Companies:** Central registration for companies with in-house research and development facility for evaluation of new plant varieties and production in multiple States will improve ease of doing business leading to better quality seed availability to the farmers.

(ii) **Certain addition and modification of definitions.**

- Definition of central licensing
- Gene expression
- Gene purity
- Transgene
- Transgenic event

(iii) **Compounding of minor offences:**

- Categorize the unintended and minor quality issues as minor offences: to save the precious time of the courts.

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- Compounding of offences: For minor offences, the seed inspectors should be empowered to compound the offence or initiate a fine as per the relevant rules.
 - For the major offences due judicial process should be followed.
4. **Stagnant Seed prices** especially in cotton seed.
- There is a need to create a rational framework for increase in seed prices for enabling seed sector to cope with the ever-increasing factors costs and also declining profitability, which further impacts investments in R&D and supply chain. Annual increase to first be considered for 2020 and MSP may be enhanced by Rs 70/- per packet.
5. **Certification:** All seeds produced and labelled by licensed seed producers having NABL accredited (or any other authorized body) seed testing facilities may be treated as certified seeds. Towards this the licensing of seed producers and processors shall be strictly regulated.
6. **Supporting the R&D in the private sector:**
- Collaborative research shall be encouraged in variety development by S&ME seed companies by ICAR to be funded by the Govt. of India.
 - The government should engage and provide assistance to the Indian seed sector to invest more in R&D. By doing this, the government will give stimulus to the seed sector and increase the ease of doing business even for small and medium companies.
7. **Traceability System:** NSAI supports the government in this. The government may provide assistance to the small medium companies in the implementation of the system. However, the system must be robust and developed on blockchain platform to handle enormous data.

Thanking you,

Yours sincerely,

M Prabhakar Rao