



Department
for Environment
Food & Rural Affairs



Animal &
Plant Health
Agency



Llywodraeth Cymru
Welsh Government

Stakeholder Engagement on Seed Certification Fees in England and Wales

An information paper and questionnaire on the
introduction of new fees for OECD certification
services and ISTA sampling carried out by APHA

August 2025

We are the Department for Environment, Food and Rural Affairs. We are responsible for improving and protecting the environment, growing the green economy, sustaining thriving rural communities and supporting our world-class food, farming and fishing industries.

We work closely with our 33 agencies and arm's length bodies on our ambition to make our air purer, our water cleaner, our land greener and our food more sustainable. Our mission is to restore and enhance the environment for the next generation, and to leave the environment in a better state than we found it.



© Crown copyright 2025

This information is licensed under the Open Government Licence v3.0. To view this licence, visit www.nationalarchives.gov.uk/doc/open-government-licence/

Where we have identified any third party copyright information you will need to obtain permission from the copyright holders concerned.

This publication is available at www.gov.uk/defra

Any enquiries regarding this publication should be sent to us at defra-plant-varieties-and-seeds@defra.gov.uk

Contents

Background	4
Seed Certification Process	4
OECD Certification.....	4
ISTA Testing and Sampling.....	4
Exporting seed from Great Britain to third countries, or moving seed from Great Britain to Northern Ireland	5
Overview of Seed Certification Fees	6
Power to charge fees in relation to OECD and ISTA	6
Proposals	7
Introduce new fees for OECD Certification.....	7
Introduce new fees for ISTA sampling	8
Stakeholder engagement.....	9
The scope and purpose of this stakeholder engagement.....	9
Outcomes of the stakeholder engagement.....	9
How to respond.....	9
Confidentiality and data protection information.....	9
Section 1: About you	10
Section 2: Questionnaire	12

Background

Seed Certification Process

Seed certification is a statutory quality assurance process which ensures that seeds are sufficiently pure, healthy, viable, and correctly labelled. Marketed seed must be:

- certified in line with legislative requirements¹,
- produced through a defined generation system, meeting specified quality standards,
- and correctly packaged, labelled and sealed.

In England and Wales, this service is administered by APHA on behalf of Defra and the Welsh Ministers. (N.B. Scottish Government and DAERA are responsible for delivering seed certification services and setting associated fees in Scotland and Northern Ireland respectively).

OECD Certification

The [OECD Schemes for the Varietal Certification of Seed](#) promote the use of certified agriculture seed that is of consistently high quality. These seeds are produced – and officially controlled – according to a set of harmonised procedures put in place in participating countries. The aim is to stimulate the production and use of high-quality seeds.

There are eight Organisation for Economic Co-operation and Development (OECD) schemes for the varietal certification or the control of seed moving in international trade:

- Grasses and legumes
- Crucifers and other oil or fibre species
- Cereals
- Maize
- Sorghum
- Sugar beet and fodder beet
- Subterranean clover and similar species
- Vegetables

In England and Wales fees are not currently charged for OECD certification.

ISTA Testing and Sampling

Seed tests provide farmers, seed traders and regulators with information on the quality of seed before it is sown. The primary purpose of the International Seed Testing Association (ISTA) is to develop and issue standard procedures for seed sampling and testing and to promote a uniform application of these procedures for the evaluation of seed intended for the market.

ISTA international certificates can only be issued by ISTA accredited laboratories. They guarantee:

- the identity of the seed lot with a single reference

¹ Seed Marketing Regulations 2011 and Seed Marketing (Wales) Regulations 2012

- the traceability of the analysis
- the competence of the laboratory that did the analysis
- the use of validated methods and standard units and the use of standard reporting languages

In England and Wales, fees are not currently charged for ISTA sampling carried out by APHA.

Exporting seed from Great Britain to third countries, or moving seed from Great Britain to Northern Ireland

For seed to be exported from Great Britain to third countries or moved from GB to Northern Ireland, it needs to comply with the requirements of the country that the seed is being exported/moved to.

For exports to the EU, the requirements are:

- A variety that is on the EU Common Catalogue
- Certified under OECD rules if there is a relevant OECD scheme (OECD labels must contain the statement 'EU rules and standards')
- Have an ISTA Orange International Certificate (OIC)

For movements to Northern Ireland, the requirements are:

- A variety that is on the NI Variety List or EU Common Catalogue
- Certified under OECD rules if there is a relevant OECD scheme (OECD labels must contain the statement 'EU rules and standards')
- Have an ISTA Orange International Certificate (OIC)

For exports to other third countries which are a member of the OECD seed schemes, the requirements are:

- A variety that is on the OECD List
- Certified under OECD rules if there is a relevant OECD scheme
- Have an ISTA OIC

For non-OECD members, exports would be per the country's own requirements, however it is rare that movements are made from GB to non-OECD members.

The OECD labelling and certificate, together with the ISTA OIC, show that seed meets standards for varietal identity, varietal purity and seed quality.

A full guide on the steps to certifying seed in England and Wales for movement to Northern Ireland, or export to the EU and all other countries that are members of the OECD Seed Schemes is available [here](#).

Overview of Seed Certification Fees

The cost of testing seed for the issuing of OICs for seed lots intended for movement to Northern Ireland, carried out by NIAB's Official Seed Testing Station (OSTS), is charged directly to the applicant. Costs associated with ISTA sampling and OECD certification are not currently recovered from users of these services and are subsidised by APHA at a cost to the taxpayer, therefore requiring government intervention to achieve full cost recovery in line with HMT guidance.

It is UK Government policy to charge for many publicly provided goods and services. The standard approach is to set fees to recover the full costs of service delivery and to review these fees on a regular basis (either annually or bi-annually as required) to relieve the general taxpayer of costs, so that they are properly borne by users who benefit from a service. This allows for a more equitable distribution of public resources and enables lower public expenditure and borrowing.

Power to charge fees in relation to OECD and ISTA

The marketing of seeds of the main agricultural and vegetable species in England is regulated by the [Seed Marketing Regulations 2011](#) (England) and in Wales by the [Seed Marketing \(Wales\) Regulations 2012](#), where it is provided at [Regulation 29](#) – “The Secretary of State may charge a reasonable fee for anything done under these Regulations” and “The Welsh Ministers may charge a reasonable fee for anything done under these Regulations” respectively.

Proposals

Introduce new fees for OECD Certification

The proposal is to introduce new fees for OECD certification.

The fees for OECD certification will apply to both primary certification under the OECD scheme and for re-certification of seed already certified under the England and Wales service.

The introduction of these fees in England and Wales will enable APHA to recover the costs of OECD certification to operate in line with the principle of full cost recovery (Managing Public Money, HM Treasury (HMT), June 2025). The objective of introducing a new fee for OECD certification is more efficient use of public resources by transferring the full cost of service provision from the general taxpayer to the direct beneficiaries of the service.

The proposed new fees² are:

Service	Proposed New Fee (£)
Issuing of an OECD Certificate (per certified seed lot)	146.28
Imported seed to be entered into UK certification system	61.05
Multiplication abroad agreement* (per crop)	213.30

* There are three types of multiplication abroad.

1. Seed from the UK is sent to another country for multiplication (the UK is the requestor).
2. Seed is sent to the UK for multiplication (the UK is the producer).
3. The variety to be multiplied is on either the GB or NI list, but neither the requestor nor the producing country are the UK.

² These proposed new fees are estimates and may be subject to inflationary increases

Introduce new fees for ISTA sampling

The proposal is to introduce new fees for ISTA sampling³ carried out by APHA in England and Wales.

The proposed fees do not apply to ISTA sampling carried out by Licenced Seed Samplers (LSSs)⁴. The proposed fees will be paid on top of the current existing fees for seed testing and issuing the ISTA OIC, recovered directly by NIAB.

The introduction of these fees will enable APHA to recover the costs of ISTA sampling to operate in line with the principle of full cost recovery (Managing Public Money, HM Treasury (HMT), June 2025). The objective of introducing a new fee for ISTA sampling is more efficient use of public resources by transferring the full cost of service provision from the general taxpayer to the direct beneficiaries of the service.

The proposed new fees⁵ are:

Service	Proposed New Fee (£)
Minimum charge for each visit to take an OIC sample/s (up to 30 minutes)	127.60 for the first 30 minutes
Additional charge for every 15 minutes of an inspector's time spent on: <ul style="list-style-type: none">• carrying out the inspection on site• associated on site activities	63.80 per each additional 15 minutes
<i>Payment will be required in full for every 15 minutes, even if it takes less time. For example, if it takes 42 minutes to complete the visit, payment will be required for 45 minutes.</i> <i>The time it takes for the inspector to travel to and from the site to conduct the inspection is already included in the fees.</i>	

The proposed ISTA fees are based on the export hourly charge derived from the last Plant Health fees refresh. This is a time-based charge for inspectors to carry out services during on-site visits. The charge applies per visit, rather than per service meaning that if more than one service is carried out e.g., taking an OIC sample AND an export inspection during the same visit, only one fee will be applicable.

³ ISTA sampling refers to the official sampling and overseeing of sealing of seed carried out by APHA in accordance with the Seed Marketing Regulations 2011 (in England) and the Seed Marketing (Wales) Regulations 2012 (in Wales) using the techniques laid down in the ISTA rules for issuing an ISTA certificate.

⁴ LSS means a person who has been granted a license under the Seed Marketing Regulations 2011 (in England) and the Seed Marketing (Wales) Regulations 2012 (in Wales) to carry out functions in relation to seed sampling. When taking a sample for certification the LSS is acting on behalf of the Certifying Authority.

⁵ These proposed new fees are estimates and may be subject to inflationary increases

Stakeholder engagement

The scope and purpose of this stakeholder engagement

The purpose of this stakeholder engagement is to gather feedback on the proposed new fees for ISTA sampling and OECD certification.

Defra, APHA, and Welsh Government want to understand how the new fees will impact businesses.

The following questionnaire will be of most interest to:

- the plant breeding industry
- seed merchants and processors
- growers and farmers
- research institutes
- membership bodies and other organisations representing plant breeders and growers.

Outcomes of the stakeholder engagement

This stakeholder engagement is an opportunity for a range of views to be gathered. The responses we receive will inform the proposed new fees for ISTA sampling and OECD certification services and their implementation, as well as help to assess the potential impact on businesses. If following this engagement, the decision is taken to proceed with the proposals and introduce these new fees, you will receive a letter from the APHA via email giving 4 weeks notice of the upcoming change.

Comments provided in response to this letter, including personal information, may be made available to the public on request, in accordance with the requirements of the Freedom of Information Act 2000 and the Environmental information Regulations 2004.

How to respond

Please respond by returning the questionnaire via email to Defra-Plant-Varieties-and-Seeds@defra.gov.uk before 26/09/2025.

Responses received after this date will not be analysed.

Confidentiality and data protection information

Using and sharing your information

How we use your personal data is set out in the consultation and call for evidence exercise privacy notice which can be found here:

<https://www.gov.uk/government/publications/defras-consultations-and-call-for-evidence-exercises-privacy-notice>

Section 1: About you

1. Please tell us who you are responding on behalf of (required)? (Please select one option only)

- ☐ An individual – You are responding with your personal views, rather than as an official representative of a business / business association / other organisation.
- ☐ Non-governmental organisation – In an official capacity as the representative of a non-governmental organisation / trade union / other organisation.
- ☐ Business – In an official capacity representing the views of an individual business.
- ☐ Public sector body – In an official capacity as a representative of a local government organisation / public service provider / other public sector body in the UK or elsewhere.
- ☐ Academia – In an official capacity as a representative of an academic institution.
- ☐ Other please specify (please state)

2. Please tell us where you, your business, or organisation are based?

- ☐ England
- ☐ Wales
- ☐ Scotland
- ☐ Northern Ireland
- ☐ Other (please state)

3. Which of the following areas do you, your business, or organisation operate in (required)? (Please select all that apply)

- ☐ Plant breeding
- ☐ Cultivation of crops for the production of seed
- ☐ Seed merchant/processing
- ☐ Research and Development
- ☐ Other sectors/activities (please state)

4. If responding as an organisation, business, public body, or academic institution in Question 2, which of the following best describes the size of your business or organisation (required)?

- ☐ Micro (0-9 employees)
- ☐ Small (10-49 employees)
- ☐ Medium (50-249 employees)
- ☐ Large (250+ employees)
- ☐ Don't know
- ☐ Not applicable

5. On average, how many applications for seed certification under the Organisation for Economic Co-operation and Development (OECD) schemes do you, your business, or organisation make per year?

- ☐ 0-25
- ☐ 26-50
- ☐ 51-100
- ☐ 101-150
- ☐ 150+

6. On average, how many applications for International Seed Testing Association (ISTA) Orange International Certificates (OIC) does your business or organisation make per year?

- ☐ 0-25
- ☐ 26-50
- ☐ 51-100
- ☐ 101-150
- ☐ 150+

Section 2: Questionnaire

This section contains questions on the proposed new fees for ISTA sampling and OECD certification services. Please ensure that you have read the supporting information in the background section before answering the following questions.

1a. Based on the explanation in the supporting information, do you understand the proposed new fees for ISTA sampling and OECD certification services?

☐ Yes

☐ No

☐ Other

1b. If you answered 'no' or 'other' to the previous question, please explain your answer.

Your answer: _____

2a. Do you think the proposed new fees for ISTA sampling and OECD certification services will impact your business?

☐ Yes

☐ No

☐ Unsure

2b. If you answered yes to the previous question, what changes do you anticipate your business will have to make due to the proposed new fees? (Please select all that apply)

☐ Administration changes

☐ System changes

☐ Financial changes

☐ Other changes

2c. Please provide further details of any changes your business may have to make due to the proposed new fees.

Your answer: _____

3a. Do you think the proposed new fees for ISTA sampling and OECD certification services will impact the UK and/or international seed market?

☐Yes

☐No

☐Unsure

3b. Please explain your answer to the previous question.

Your answer: _____

4a. Do you move seed from Great Britain to Northern Ireland?

☐Yes

☐No

☐Unsure

4b. Do you think the proposed new fees for ISTA sampling and OECD certification services will impact the movement of your seed from Great Britain to Northern Ireland?

☐Yes

☐No

☐Unsure

4c. Please explain your answer to the previous question.

Your answer: _____

5a. Do you export seed from Great Britain to the EU and/or other countries that are members of the OECD Seed Schemes?

☐Yes

☐No

☐Unsure

5b. Do you think the proposed new fees for ISTA sampling and OECD certification services will impact the export of your seed from Great Britain to the EU and/or other countries that are members of the OECD Seed Schemes?

☐Yes

☐No

☐Unsure

5c. Please explain your answer to the previous question.

Your answer: _____

6a. Using a scale of 0 = Not at all significant to 5 = Very significant, please rate how significant the proposed revision of fees will be as an additional running cost of your business (please tick one category)

[0 not at all significant / 1 / 2 / 3 / 4 / 5 very significant / Unsure]

Your answer: _____

6b. Please explain your answer to the previous question.

Your answer: _____

7a. To what extent do you agree with the following statement? “My business will be able to plan and adjust to the introduction of a new fee for ISTA sampling and OECD certification” (Please select all that apply)

☐Strongly disagree

☐Disagree

☐Neither agree nor disagree

☐Agree

☐Strongly agree

7b. Please explain your answer to the previous question.

Your answer: _____

8. Please provide any recommendations for how the ISTA sampling fee could be introduced in a way to minimise impacts on your business.

Your answer: _____

9. Please provide any recommendations for how the OECD certification fee could be introduced in a way that minimises impacts on your business

Your answer: _____

10. What additional information, if any, on the proposed seed certification fees might be needed to support your business?

Your answer: _____