



**P. PRASAD**

**MINISTER FOR AGRICULTURE  
GOVERNMENT OF KERALA**

**D.O.Lr.384/Agri/Min/2025 dated 05/07/2025**

**Respected Sri. Narendra Modiji,**

I write to you to express serious concerns regarding the proposed package of measures being considered by the Co-Chairs of the Ad Hoc Open-Ended Working Group to enhance the Multilateral System (MLS) under the International Treaty on Plant Genetic Resources for Food and Agriculture (Plant Treaty). The meeting of the Working Group is scheduled from 7-11 July 2025, and the proposals are now available on the Treaty website.

A major concern is the proposal to amend Annex I of the Treaty. The proposed change would replace the current list of 64 specified crops with a broad inclusion of "all plant genetic resources for food and agriculture (PGRFA)" within the MLS. The new wording suggests that any plant under the management of contracting parties and in the public domain may be included in the MLS – not just food crops but potentially even non-edible plants. This raises several critical concerns for India:

- 1. Erosion of National and Seed Sovereignty:** The amendment would significantly reduce India's control over its plant genetic resources. The original Treaty was meant to facilitate access to select crops that are vital for food security. Expanding it to "all PGRFA" dilutes national sovereignty and may even affect the role of State Biodiversity Boards, especially when there has been no consultation with State Governments. It must be remembered that Agriculture and Agricultural Research fall under the State List (Schedule VII) of our Constitution.
- 2. Conflict with the Nagoya Protocol:** The proposed change appears to violate the principles of the Convention on Biological Diversity (CBD) and its Nagoya Protocol, which India has ratified. The Protocol permits international access only to specific resources and for clearly defined purposes. Including all PGRFA without clarity and using vague benefit-sharing language contradicts the core principles of the Protocol.
- 3. Lack of Accountability and Transparency:** The MLS system currently lacks effective tracking and monitoring mechanisms. Article 10 of the Plant Treaty requires transparency and accountability – but the current package of measures fails to address these. Without these safeguards, farmers and indigenous communities cannot ensure informed participation or protect against biopiracy.

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**4. Threat to India's Food and Seed Security:** Opening up India's rich germplasm to an inadequately governed system risks corporate monopolization of seeds. The MLS does not mandate prior informed consent or fair and equitable benefit-sharing, which may lead to higher costs for seeds and affect long-term food security.

**5. Omission of Digital Sequence Information (DSI):** Another critical omission is the failure to address the use and regulation of Digital Sequence Information (DSI) derived from genetic resources. This contradicts India's strong stance at the 16th Conference of Parties (COP16) and the WHO Pandemic Treaty negotiations. Ignoring DSI also threatens India's data sovereignty and creates loopholes for commercial exploitation without accountability.

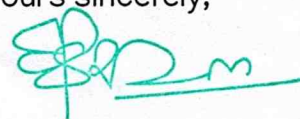
In light of these serious issues, I request urgent intervention from your office. I humbly request the following actions:

1. Kindly ensure that India's position in the Plant Treaty negotiations is clearly defined and communicated, independent of the working group's proposals. This is critical to prevent any misrepresentation of India's stance and to safeguard our ability to negotiate effectively at the global level.
2. Convene two urgent consultations: A national meeting with farmers' organisations, state biodiversity authorities, and officials from agriculture departments. An inter-ministerial meeting involving the Ministries of Agriculture, Environment, and representatives from national security institutions.
3. Ensure that no endorsement is given to the current package until a unified national position is arrived at through proper consultations.

We must act decisively to protect the rights of our farmers, uphold our constitutional values, and safeguard India's biodiversity and seed sovereignty for future generations.

With respectful regards,

Yours sincerely,



P. Prasad

To

Sri. Narendra Modi  
Hon'ble Prime Minister of India