



Centre for Sustainable Agriculture

12-13-568, Street no 14, Lane no 10, Nagarjuna Nagar, Tarnaka,
Secunderabad-500 017

www.csa-india.org ; csa@csa-india.org; 08500683300

Dr. G. V. Ramanjaneyulu
Executive Director

15th November, 2025

To
The Secretary,
Department of Agriculture and Farmers' Welfare
Ministry of Agriculture & Farmers' Welfare
Government of India
New Delhi

Subject: Submission of Comments and Demands for Amendments to the Draft Seeds Bill 2025

Dear Sir/Madam,

We appreciate the opportunity to submit feedback on the **Draft Seeds Bill 2025**, released for public comments after nearly two decades since the first draft in 2004. Over these twenty years, India has witnessed multiple seed-related failures, widespread farmer distress, and several unsuccessful attempts by states to frame their own seed laws due to regulatory gaps. The 2025 draft arrives at a critical moment when farmers face rising seed prices, unreliable seed quality, and increasing corporate consolidation in the seed sector.

While we acknowledge the Bill's attempt to improve traceability and enhance penalties, several provisions weaken farmer protection, erode state powers, and prioritise ease of doing business over public interest. To ensure the Bill genuinely safeguards farmers and strengthens India's seed sovereignty, we request the following amendments:

Key Amendments Requested

1. Establish a statutory, time-bound farmer compensation mechanism

Compensation must be guaranteed for losses caused by sub-standard, misbranded, spurious, or underperforming seeds.

- Create clear, district-level procedures for claims.
- Link compensation to actual crop loss and input costs.
- Set up a Seed Liability Fund financed by seed companies to ensure swift payment.

2. Provide permanent seed price and royalty regulation—not just during emergencies

Limiting price control to “emergent situations” is inadequate.

- Create an independent Seed Price & Royalty Regulatory Authority with representation from farmers, states, ICAR, SAUs and civil society.
- Cap monopolistic pricing and ensure transparent royalty structures.

3. Restore and strengthen state governments’ regulatory powers

Provisions such as Section 17(8), and overriding powers under Sections 38 and 41, centralise authority and curtail state autonomy.

- States must retain powers to approve, restrict, or ban varieties based on local agro-ecological needs.
- States should be free to frame or retain seed trade and price regulations where necessary.

4. Remove provisions allowing foreign trials and foreign certification agencies

Sections 16(3) and 27 undermine ICAR/SAU evaluations and pose long-term risks to India’s seed sovereignty.

- Local multi-location trials must remain mandatory.
- Certification should be rooted in India’s public institutions.

5. Protect seed-producing farmers and farmer-breeders

- Mandate fair contracts, assured payments, and grievance mechanisms for seed-producing farmers.
- Recognise and support farmers’ varieties, farmer-breeders, and community seed banks under the law.
- Prevent indirect restrictions on farmers’ rights to save, use, exchange, and sell seeds.

6. Reinstate licensing for seed dealers

Traceability alone is insufficient.

- Licensing ensures minimum infrastructure, accountability, and quality control.
- Create publicly accessible lists of violators and blacklisted entities.

7. Ensure farmer representation and participatory governance

- Include farmers’ organisations in district, state, and national-level committees.
- Mandate public hearings and greater transparency in approvals, penalties, and price decisions.

8. Strengthen seed testing and link traceability to accountability

- Improve capacity of seed testing labs with accreditation and staff.

- Use traceability data to trigger automatic recalls, penalties, and compensation—not just compliance reporting.

9. Mandate full transparency in seed information

Companies must disclose:

- Germination data by batch
- Parentage and production origins
- Royalty components
- All registration and certification details

10. Harmonise the Seeds Bill with the PPV&FR Act

Farmers' rights under the PPV&FR Act must not be diluted or bypassed.

- Ensure that the Seeds Bill reinforces, rather than undermines, India's commitment to seed sovereignty and farmer-breeders' protections.

Conclusion

The Seeds Bill must be a law that protects **farmers first**, not one that merely facilitates business operations. India's seed sector requires **strong regulation, transparent pricing, meaningful decentralisation, and guaranteed compensation**, so that farmers no longer bear the full burden of seed failure.

We request the Ministry to incorporate these changes before finalising the Bill and to hold wider consultations with farmers' organisations, civil society, state governments, and public research institutions.

We remain available for any clarification or discussion.

Sincerely,



(GV Ramanjaneyulu)



Ease of Doing Business, Hardship for Farmers: A Critique of the Seeds Bill 2025

After nearly 20 years of debate, court battles, seed failures, and rising input costs, India's seed legislation is once again at a crossroads with the release of the Draft Seeds Bill 2025. The first national draft appeared in 2004, resurfaced in 2019, and now—two decades later—the government has opened yet another version for public feedback. **In the meantime, several states, frustrated with regulatory gaps and repeated seed-related disasters, attempted to craft their own seed laws—efforts that were ultimately stalled or blocked due to lack of central approval and constitutional constraints.** Today, as farmers struggle with unreliable seeds, volatile prices, and growing corporate control, this long-awaited Bill was expected to strengthen protections and empower states. Instead, its emphasis on centralisation and “ease of doing business” raises urgent questions about whose interests the law is designed to serve.

<https://www.pib.gov.in/PressReleasePage.aspx?PRID=2189600>

1. Overall framing: “facilitation” over regulation

The very first line of the Bill is telling: it is “to provide for regulating the quality of seeds... **to facilitate production and supply of quality seeds...**” – with no mention of farmer rights, compensation, or price regulation in the object clause itself.

The government's public messaging mirrors this: quality regulation + better traceability + “ease of doing business” are highlighted as core objectives.

Impact

- The Bill is written primarily as an industry and trade law, not as a farmers' rights law.
- “Ease of doing business” becomes a statutory objective, while farmers' entitlements (price, compensation, information, choice) are implicit at best and absent at worst.

2. Farmers' autonomy and rights: protected in theory, unprotected in practice

2.1 Right to save and exchange vs. right to safe, good quality and affordable seed

The Bill re-states the standard proviso: nothing in the Act shall restrict a farmer's right to save, use, exchange or sell farm seed, except when sold under a brand name.

But:

- There is **no section at all** on farmer compensation if a registered seed underperforms, is misbranded, sub-standard or spurious.
- Penalties in Chapter IX (up to ₹30 lakh and imprisonment for repeat “major” offences) are payable to the State, not to affected farmers.

This repeats the central flaw that Centre for Sustainable Agriculture and others flagged in the 2019 Bill: farmers must still go to consumer courts for compensation, with no built-in compensation mechanism in the seed law itself, and no linkage between extent of crop damage and compensation.

Impact

- The farmer’s “right to save seed” is preserved on paper but **the right to be made whole when seed fails is missing**.
- In practice, the burden of proof, litigation costs and delays (cases often stretching over years) will continue to deter small and marginal farmers from seeking redress.

2.2 Farmers’ varieties and community seed systems: invisible

Farmers’ varieties are exempted from mandatory registration, and farmers themselves are explicitly excluded from the definition of “producer”. This may end up preventing farmers varieties coming into the market and also unnecessary harassment to the local seed enterprises managed by individuals or FPOs to promote indigenous seeds.

But the Bill:

- Provides no support or recognition for farmer-breeders, community seed banks or local seed networks.
- Does not integrate the Protection of Plant Varieties and Farmers’ Rights (PPV&FR) Act’s farmer-breeder provisions with seed regulation, despite long-standing demands that both laws be harmonised.

Impact

- Farmer seed systems remain legally marginal and financially unsupported, even though they still supply a substantial share of seed in many crops.
- The regulatory architecture is built around corporate and institutional varieties; farmers’ varieties are treated as an “exception” to be left outside the system instead of a pillar to be strengthened.

3. Price regulation: narrow emergency valve, not structural protection

Section 22 allows the Central Government to regulate seed prices only in an “emergent situation” such as scarcity, abnormal price rise or monopolistic pricing which is very subjective.

Meanwhile, the Bill **repeals the Seeds Act 1966** and effectively displaces the Seeds (Control) Order under the Essential Commodities Act, which states had used to cap Bt cotton prices and royalties in the past.

Farmers’ and experts’ long-standing demands were:

- a **permanent price and royalty regulation mechanism** for seeds, and
- an official body to regularly fix or approve seed prices and royalty components.

The 2025 draft instead offers only a narrow “emergency” price control clause.

Impact

- Seed remains a largely deregulated market commodity, even though it is the most critical input.
- States lose their most effective legal lever (ECA + Seeds Control Order) for day-to-day price and royalty discipline.
- Farmers will face higher and more volatile seed prices in a market already dominated by a small oligopoly of companies.

4. No statutory compensation: penalties for the State, losses for the farmer

The Bill has **detailed penalty slabs** for “trivial”, “minor” and “major” offences in the Second Schedule, going up to ₹30 lakh and jail for repeat major offences.

But:

- There is **zero mention** of compensation to farmers anywhere: not in Chapter IX, not in miscellaneous provisions.
- While the Bill stresses pre-emptive penalties and traceability, it “remains silent on compensating farmers” for losses due to sub-standard or spurious seeds.

We already know from recent experience that without a clear statutory framework, compensation happens only in exceptional, highly contested cases (e.g., the Mulugu, Telangana case where 671 farmers secured ₹3.8 crore from seed companies after a massive effort by farmers and the state).

Impact

- The Bill prioritises **punishing companies** over **compensating farmers for losses**.
- There is no automatic trigger for compensation when germination or promised performance fails, no time-bound process, and no dedicated authority.

5. Section 17(8): a red carpet for big corporations, a blow to states' powers

Section 17(8) is perhaps the most blatant “ease of doing business” provision:

The Central Government may establish a merit-based and transparent **Central Accreditation System** for companies operating in multiple States. Companies accredited under such a system **shall be deemed to be registered** in all States from the date of accreditation...

State authorities must “forthwith” record such companies, and **“no application for registration submitted by an accredited unit shall be rejected on technical, financial, or infrastructural grounds”**; any such rejection is ultra vires.

Impact

- State governments lose their core regulatory lever: the ability to **refuse or condition entry** of companies that lack infrastructure, have poor track records, or are unsuitable for specific crops or regions.
- For large multi-state corporations, a single central accreditation now unlocks the entire national market; for states, the role is reduced to **rubber-stamping** central decisions.
- This directly contradicts earlier demands that **states must have the power to decide which seeds are allowed or disallowed in their territory and to run local registration systems**.

In effect, Section 17(8) is a statutory guarantee of “ease of doing business” for big companies, not for farmers or state regulators.

6. Centralisation and overriding effect: erosion of federal seed governance

The centralising thrust is reinforced by:

- **Section 38** – power of the Central Government to give directions to any state government and to the Central Seed Committee, and to decide what counts as “policy”;
- **Section 41** – the Act has overriding effect over all other laws and instruments, except where they’re consistent.

Coupled with central accreditation and recognition of foreign agencies, this means:

- State seed laws and orders (including those that currently regulate seed trade, prices, and licensing) are likely to be overridden.
- State seed corporations and seed development corporations will operate under a tighter central framework, with much less room for independent policy (e.g., Telangana's proactive stance on price caps and compensation).

Impact

- States' autonomy to protect their farmers and agro-ecologies is severely curtailed.
- This goes against the grain of cooperative federalism and ignores the agro-climatic and socio-economic diversity of Indian agriculture.

7. Traceability and tech: surveillance of seed flow, but not accountability

The Bill creates a **Centralised Seed Traceability Portal**, and mandates that:

- Every seed container of a registered variety must carry a QR code or similar mark generated through this portal.
- All producers, dealers, distributors, ICAR institutions and SAUs must “onboard” and comply with traceability norms.

Yet:

- There is no obligation to use traceability data to automatically recall defective batches, blacklist repeat offenders, or compute compensation.
- The architecture is **top-down**: companies and regulators upload and access data; farmers neither control nor clearly benefit from it.

Traceability only helps if it is tied to strong, enforceable accountability. Otherwise it simply becomes a compliance cost and a surveillance tool that still leaves the farmer carrying the risk.

Impact

- Large integrated seed companies will find it easier to comply; smaller local companies and farmer collectives may be pushed out.
- The system can improve evidence collection against small offenders, but without farmer-facing rights it does little to change the **power imbalance** between farmers and seed firms.

8. Foreign trials and certification: undercutting ICAR/SAUs and national seed sovereignty

Two provisions are particularly troubling:

- **Section 16(3)** – Central Government may recognise any organisation outside India for conducting VCU (Value for Cultivation and Use) trials.
- **Section 27** – Central Government may recognise seed certification agencies established in territories outside India.

The draft “deregulates the power of ICAR and SAUs to approve variety trials”.

This is exactly what earlier critiques of Seed Bill 2019 warned against: allowing foreign agencies and foreign trial data to substitute for **local, public** evaluation of varieties and hybrids in India’s diverse agro-climatic conditions.

Impact

- ICAR and SAUs risk being reduced from **gatekeepers** to **one more accredited option** alongside foreign organisations.
- Imported varieties could be fast-tracked into Indian markets on the strength of foreign trial or certification data, with limited scope for local scientists or states to question their performance or ecological impact.
- This undermines seed sovereignty and opens the door wider for GM and proprietary hybrids without robust, independent scrutiny.

9. Seed-producing farmers: registered, but not protected

The Bill mandates registration for seed producers and processing units (Chapter IV) and allows their registrations to be suspended or cancelled for misrepresentation or violation of rules.

However, as the Business Standard piece highlights:

- Here Seed Industry is seen as the seed producers and in reality seed industry is engaging farmers through 'seed organisers'. So how seed farmers and seed organizers are also registered, traced and protected is the big challenge.
- There is **no recognition of the rights of seed-producing farmers** who produce seed under contract for companies – often underpaid, pressured and left with unsold stock.

This repeats an old pattern: seed bills have historically ignored seed producing farmers rights and seed consuming farmers heavily, while keeping corporate accountability minimal.

Impact

- Contract seed-producing farmers need to be fully within the regulatory net (registration, traceability, sanctions) and have **no statutory protection** regarding contract terms, prices, or timely payment.
- The Bill misses an opportunity to create fair-contract norms, floor prices or tripartite agreements among companies, state agencies and seed-producing farmers.

10. Penalties without participation: farmers are spectators, not regulators

While the Bill strengthens penalties, it does not democratise regulation:

- Farmers get a few rotating seats on the Central Seed Committee, as earlier drafts did, but with no structural role in enforcement or grievance redressal.
- There is no mandated representation of farmers' organisations or panchayats in state committees, adjudicating authorities, or in the design of traceability and certification norms.

Impact

- Farmers remain **objects** of regulation, not participants in governing the seed system.
- Without organised farmer oversight, enforcement will tend to focus on easy targets (small dealers, small companies) while larger players, with better legal and lobbying power, navigate the system comfortably.

11. What a farmer- and state-centred Seeds Act should look like

Based on 20+ years of debates, seed disasters and court cases, and on positions already articulated in your earlier writings, an alternative approach would include:

1. **Robust price & royalty regulation**
2. **Statutory farmer compensation**
3. **State autonomy and local registration**
4. **Strengthening public and community seed systems**
5. **Dealers and companies: licensing plus traceability, not traceability alone**
6. **Participatory governance**

Annexure-2

About CSA

The Centre for Sustainable Agriculture (CSA), established in 2004 in Hyderabad, India, is a national leader in advancing ecological and economically sustainable farming. CSA works with farmers, FPOs, communities, and governments to promote agroecological transitions, strengthen rural livelihoods, build farmer-owned enterprises, and influence public policy.

Vision

To steer India's transition toward ecological and economically sustainable agriculture.

What We Do

- Agroecology & Natural Farming: Pioneering Non-Pesticidal Management (NPM), organic and natural farming, community-managed seed systems, and climate-resilient agriculture.
- Livelihoods: Diversified on-farm and off-farm livelihoods including seed production, bio-input enterprises, value addition, processing units, solar drying, and rural micro-enterprises.
- FPO Development: Formation, strengthening, and business development support for 214+ Farmer Producer Organisations across AP, Telangana, Maharashtra, and Karnataka.
- Markets & Value Chains: India's first farmer-owned organic retail chain—Sahaja Aharam—ensuring fair prices and transparent supply chains.
- Public Policy & Research: Evidence building, advocacy, and support to government programs; farmer grievance redressal through the Kisan Mitra Helpline.
- Education & Capacity Building: Through the Grameen Academy offering practical, field-based agroecology and enterprise training.

Scale & Impact

- 2.59 lakh acres certified under PGS Organic Certification
- 60,882 farmers organized into 5,462 groups
- 214 FPOs supported; 60+ FPOs federated under Sahaja Aharam Producer Company
- Over 100,000 farmers directly reached
- 35 lakh acres under NPM scale-up in Andhra Pradesh
- 200+ farmer-owned organic products retailed through Sahaja Aharam
- Multi-state presence: AP, Telangana, Maharashtra, Karnataka, Chhattisgarh, Sikkim, Tripura

Our Strength

- Demonstrated scalable models influencing national and state programs
- Integrated ecosystem covering production, livelihoods, markets, institutions, and policy
- Robust community-led certification and market integrity systems
- Strong partnerships with governments, multilaterals, and leading development agencies

Contact

Centre for Sustainable Agriculture, Tarnaka, Secunderabad, Telangana

Email: csa@csa-india.org | Phone: +91 8500 68 3300

www.csa-india.org