

Draft

National Seed Policy of Pakistan 2024



Government of Pakistan
Ministry of National Food Security & Research

CONTENTS

Sr. No.	CHAPTER	Page No.
1	Introduction	3
2	Objectives of the Policy	4
3	Variety Development & Plant Breeders' Rights	6
4	Seed Production and Distribution	8
5	Quality Assurance and Monitoring	9
6	Infrastructure & Human Resource Development	10
7	Genetically Modified Plant Varieties	11
8	Import of Seed and Planting Material	12
9	Export of Seed and Planting Material	13
10	Strengthening of Domestic Seed Industry	14
11	Conservation of Plant Genetic Resources for Food and Agriculture	15
14	Harmonization of Variety Evaluation and Approval	16
15	Conclusion	17

INTRODUCTION

Over the past 40 years, Pakistan has made significant strides in the agricultural sector, increasing the production of food grains and industrial crops by 3-4 times. Despite this progress, the country remains a net importer of edible oils, pulses, vegetables, and dairy products, leading to a persistent food deficit. The policy is aimed to achieve food and nutritional security at the national and household level.

The growth in agricultural and food production varies across regions, crops, and different segments of the farming community. In the nineties, there was a noticeable slowdown in the pace of growth, which resurged in 2006 and beyond, underscoring the necessity of revitalizing the agricultural sector.

Seeds play a pivotal role in determining the production of food crops. It is essential to have seeds with appropriate characteristics to accommodate the diverse agro-climatic conditions and intensive cropping systems, as well as to meet the varying demands of consumers. A sustained increase in agricultural production and productivity relies significantly on the development of improved crop varieties and an efficient system for the timely supply of high-quality seeds to farmers.

The framework for promoting and regulating the seed industry in Pakistan is established through key legislative measures, including the Seed Act of 1976, amended by the Seed (Amendment) Act of 2015, along with the Seed (Business Regulation) Rules of 2016 (amended in 2021) and the Seed (Truth-in-Labeling Rules) of 1991. Additionally, the introduction of the Plant Breeders' Rights Act of 2016 further contributes to this regulatory foundation. As the demand and supply of seeds are subject to various factors, this process remains dynamic, necessitating continuous improvements in regulations and facilitation. Adapting to changing scenarios is crucial to ensure the effectiveness and relevance of the regulatory framework in addressing the evolving needs of the seed industry.

1. Objectives of the Policy

The main objective of the National Seeds Policy is to facilitate the availability and encourage the adoption of high-quality seeds of improved varieties. This initiative aims to elevate and maintain crop productivity, bolster food security, create supplementary sources of farm income and employment, lay the groundwork for value-added agricultural exports, and alleviate poverty in rural areas across Pakistan. By prioritizing the dissemination of superior seeds, the policy aims to equip farmers with the necessary resources to cultivate more resilient and high-yielding crops, ensuring a steady food supply while economically empowering rural communities.

Detailed objectives:

- 1.1. Major increase in production of quality seeds of approved varieties and enhancement of seed replacement rates.
- 1.2. Provision of level playing grounds to national and multinational seed companies to create a healthy competition for improved availability of quality seed at reasonable prices to the farmers.
- 1.3. Emphasis will be given on improvement of planting material of crops.
- 1.4. Production of certified nursery fruit plants for sustainable growth of horticulture sector and establishment of registered nurseries for vegetables will be encouraged.
- 1.5. Creation of congenial environment for mobilization of domestic and direct foreign investment and joint ventures in seed industry and protection of Breeder's Rights to bring in new technologies and elite genetic resources to expand variety development and seed production programs.
- 1.6. Encouraging domestic production of high-tech and hybrid seeds to improve crop productivity and dilute over-dependence on seed imports to ensure seed and food security.
- 1.7. Promotion of biotechnology for developing crop varieties with a higher level of tolerance to biotic and a-biotic factors, with improved nutritional qualities.
- 1.8. Increasing participation of private sector in variety development, variety evaluation, early generation pedigreed seed production, accredited seed quality testing, production of seed processing machinery and biotechnology research through appropriate incentives.
- 1.9. Promotion of seed exports through participation in regional seed schemes like OECD seed scheme and other initiatives under SAARC, ECO or bilateral arrangements.

- 1.10. Endorsing the imperative role of farm-saved seeds in meeting planting needs, in traditional genetic advance, in preserving land races and farmers' varieties and in conserving crop biodiversity.
- 1.11. Research base response to mitigate the impacts of 'Climate Change'..

2. Variety Development & Plant Breeder's Rights

- 2.1. The development of new and improved varieties of plants and availability of seed of such varieties to the farmers is crucial for a sustained increase in agricultural productivity. The new varieties should match with the market trends, tolerant to biotic and abiotic stresses, adaptable and meet farmers' needs.
- 2.2. Plant breeder's rights will be protected to stimulate investment in research and development of new plant varieties and to facilitate the growth of the Seed Industry in the country.
- 2.3. The rights of farmers to save, use, exchange, share or sell farm-saved produce of all varieties will be protected, with the provision that farmers shall not commercialize sale of his farm produce as seed under the brand name.
- 2.4. The researcher will have free access to the protected varieties without authorization of initial breeder for research purpose.
- 2.5. Already developed varieties donated by any International or foreign research institution will not be considered for plant breeder rights.
- 2.6. The varieties merely selected from land races without any breeding effort will be treated as collective property of the farmers of a specific community, province or national property, as the case may be.
- 2.7. Farmers/groups of farmers/village communities will be rewarded suitably for their significant contribution in evolution of a plant variety subject to registration. The contribution of traditional knowledge related with such genetic resources needs to be addressed through suitable mechanisms and incentives.
- 2.8. A National Gene Fund will be established for payment of compensation to village communities for their contribution to the development and conservation of plant genetic resources and also to promote conservation and sustainable use of genetic resources.
- 2.9. Plant Genetic Resources for Food and Agriculture will be permitted to be accessed by Research Organizations and Seed Companies from public collections as per the provisions of the 'Material Transfer Agreement' of the International Treaty on Plant Genetic Resources and the legislation on Biological Diversity. Complete information in respect of Plant Breeders' Rights, details of applications, description of protected varieties, available genetic resources with public collections and details related with such resources will be disseminated for the benefit of the stakeholders.

- 2.10. Regular interaction amongst the Private and Public Researchers, Seed Companies/Organizations and Development Agencies will be fostered to develop and promote growth of a healthy seed industry in the country.
- 2.11. Private sector Research and Development initiatives in respect of variety development and seed production of vegetable, pulses, fodder and oilseed crops and in respect of development of hybrid seed technology will be encouraged and liberally considered for financial assistance under development projects.
- 2.12. The public sector Research Institutes will be encouraged to enter into joint venture with private sector for commercialization of hybrids developed by them through a standard 'Material Transfer Agreement'.
- 2.13. Biotechnology Institutes and Biotechnology Faculties of Universities will be encouraged to carry on research assignments sponsored by the private sector on mutually agreed terms; for incorporation of useful traits in commercial varieties.
- 2.14. Arrangements will be made to make available useful gene constructs, developed by the national and international institutes, freely available to national breeding programs for incorporation in commercial varieties through standard material transfer agreement
- 2.15. Special research initiatives will be taken for development of plant varieties tolerant to biotic and a biotic stress and responsive to low nutrient availability.

3. Seed Production and Distribution

- 3.1. To meet the Food Security needs, it is important to ensure timely availability of adequate quantity and quality of seed of superior varieties to the farmers. Public and Private Sector Seed Institutions will be encouraged to enhance production of seed to meet objective of food and nutritional security.
- 3.2. Pakistan's seed program adheres to the limited four generation system of seed multiplication, namely, Pre-basic, Basic, Certified and Approved seed. The Breeders will have the primary responsibility for production of pre-basic seed as per the requirements of the public and private seed sectors and shall be encouraged to contribute in Basic Seed Production.
- 3.3. Arrangements will be made in consultation with Research Institutes and Provinces, to prepare a National Seed Map to identify potential, alternative and non-traditional areas for seed production of specific crops i.e. vegetable, fodder, pulses and oilseed crops.
- 3.4. Seed replacement rates will be raised progressively with the objective of expanding the use of quality seeds.
- 3.5. The Seed Crop Insurance Scheme will be encouraged to provide effective risk cover to seed producers and will be extended to all traditional and non-traditional areas covered under the seed production program. Seed growers will be encouraged to avail Seed Crop Insurance to cover risk factors involved in production of seeds.
- 3.6. Private sector will be facilitated to establish internal quality control and accredited seed testing laboratories.
- 3.7. Special emphasis will be given on clonally propagated crops such as potato, banana, oranges, pistachio etc. through establishment and strengthening of tissue culture laboratories

4. Quality Assurance and Monitoring

- 4.1. The National Seed Council (NSC) will be strengthened and will have permanent existence with the responsibility of executing and implementing the provisions of the Seeds Act and advising the Government on all matters relating to seed planning and development.
- 4.2. To meet quality assurance requirements for export of seeds, Seed Testing facilities will be established in conformity with ISTA and OECD seed certification programs. Scope of the already existing ISTA accredited laboratory at FSC&RD shall get enhanced.
- 4.3. Appropriate package of incentives will be provided to the Seed Industry (Public & Private) to encourage development of new varieties, hybrid seed production, production of seed processing machinery, establishment of seed testing labs and export of seeds. The incentives will be in terms of concessions in import duty, income tax, sales tax, duty drawback on exports, low interest credit line
- 4.4. A mechanism will be established for collection and dissemination of market intelligence regarding preference of farmers.
- 4.5. National Digitized Data Base will be strengthened for monitoring of information on requirement of seed, its production, distribution and preference of farmers on a district-wise basis; as well in international markets to facilitate seed industry.
- 4.6. Private sector will be strengthened to participate in Basic Seed production of public sector varieties through providing unhindered access to Pre-basic Seed by following the Seed Act.
- 4.7. A national DNA finger printing database will be established for national varieties

5. Infrastructure and Human Resources Development

- 5.1. To meet the enhanced requirement of quality/certified seeds, creation of new infrastructure facilities along with strengthening of existing facilities, will be promoted.
- 5.2. Seed Research and Training Centers will be set up to impart training and build a knowledge base in various disciplines of the seed sector at federal and provincial level.
- 5.3. The Central Seed Testing Laboratory will be part of the National Seed Research and Training Center to perform referral and other functions as required under the Seed Act.
- 5.4. Existing seed processing facilities will be upgraded in terms of modern equipment and latest techniques, such as seed treatment for enhancement of performance of seed, etc.
- 5.5. Controlled condition storage for BNS and Pre-basic seed and aerated storage in PPP mode for basic and certified seeds would be created in different regions
- 5.6. Private sector will be facilitated to establish infrastructure for production of high-tech and hybrid seeds of agronomic crops and vegetables; and for production of certified seeds of various crops/plants.
- 5.7. Arrangements will be made for development of human resources in the fields of vegetable seed production, hybrid seed production, early generation seed production, development & maintenance of inbred lines, constitution of hybrids & commercial seed production, seed processing, seed storage and seed conditioning.

6. Genetically Modified Plant Varieties

- 6.1. Biotechnology will play a vital role in the development of the agriculture sector. This technology can be used not only to develop new crops/varieties, which are tolerant to disease, pests and abiotic stresses, but also to improve productivity and nutritional quality of food.
- 6.2. All genetically modified crops/varieties will be tested for environment and bio-safety before their commercial release, as per the Biosafety Rules, 2005 and Biosafety Guidelines, 2005.
- 6.3. Transgenic crops/varieties will be tested to determine their agronomic value for at least two seasons under the confined trials of PARC/PCCC after Biosafety clearance given by NBC for permission of field trials.
- 6.4. After the transgenic plant variety is cleared by NBC, its seed will be registered and marketed in the country according to the provisions of the Seeds Act for commercial release
- 6.5. All seeds imported into the country will be required to be accompanied by a certificate from the Competent Authority of the exporting country regarding their transgenic character or otherwise. For cultivation in the country, complete bio-safety risk assessment related to health and environment will be carried out for such seeds
- 6.6. If the seed or planting material is a product of transgenic manipulation, it will be allowed to be imported only with the approval of the National Biosafety Center under the provision of Cartagena Protocol on Biosafety to Biodiversity.
- 6.7. Packages containing transgenic seeds/planting materials, if and when placed for sale, will carry a label clearly indicating their transgenic nature. The specific information like characteristics of the variety, name and nature of the transgenes, precautions in its utilization and any relevant information shall also be indicated on the label.
- 6.8. Development of infrastructure for the testing, identification and evaluation of transgenic planting materials will be accelerated. Relevant GM Labelling Laws and regulations will be developed.
- 6.9. Termination technology shall not be permitted.
- 6.10. Gene edited crops will be regulated with different Standard Operating Procedures; SDN-I & SDN-II will be considered and regulated under existing National Biosafety Rules-2005

7. Import of Seed and Planting Material

- 7.1. The objective of the import policy is to provide the best planting material available anywhere in the world to Pakistani farmers, to increase productivity, farm income and export earnings, while ensuring that there is no deleterious effect on environment, health and bio-safety.
- 7.2. All imports of seeds will require a permit granted by the Department of Plant Protection and Phytosanitary Certificate and Non-GMO certificate issued by official agency of the exporting country so as to prevent entry into the country of exotic pests, diseases, weeds and invasive species detrimental to agriculture and environment.
- 7.3. For import of GMO crop seeds prior permission of NBC will be mandatory in addition to the existing regulatory requirements
- 7.4. Seeds and planting materials imported for sale into the country will have to meet minimum seed standards of seed health, germination, genetic and physical purity as well as prior registration for genetic suitability as prescribed.
- 7.5. Exotic germplasm intended for research purposes shall be exempted from any fee charges and condition of post-quarantine facility.
- 7.6. All importers will make available a small sample of the imported seed to the FSC&RD Depository and Gene Bank of PARC.
- 7.7. Only registered seed importers for the purpose will be allowed to import seed.
- 7.8. Seed sample of new imported varieties intended for experimental trials shall be allowed for 5 acres. A schedule of seed quantities for five acres in respect of different crops based on seeding rate shall be circulated.
- 7.9. Seed quality test certificate issued by OECD/official agency/ISTA lab of exporting country will be acceptable for imported seed consignments to avoid delays in custom clearance and demurrages.
- 7.10. Seed importer will be required to file an affidavit to the effect that the imported seed consignment is "true-to-type" and at any stage of growth the seed is found not true-to-type, he will pay compensation to the affected farmers.
- 7.11. The government will encourage the local production of high yielding, high-tech seeds in the country through capacity building exiting institutes and JVs through international collaboration in order to minimize depend on seed import.

8. Export of Seed and Planting Material

- 8.1. Given the diversity of agro-climatic conditions, strong seed production infrastructure, efficient seed certification system and market opportunities, Pakistan holds significant promise for export of seeds.
- 8.2. The export policy will specifically encourage production of seeds for export and will be based on long term perspective, dispensing with case-to-case consideration of proposals.
- 8.3. Establishment and strengthening of Seeds Export Promotion Zones with special incentives from the Government will be facilitated.
- 8.4. A data bank will be created to provide information on the International Market and on export potential of seed from Pakistan in different parts of the world.
- 8.5. Joint ventures for seed production under export agreements will be encouraged and facilitated.
- 8.6. Pakistan will consider joining multilateral arrangements like CWANA, ECO or OECD seed schemes to facilitate seed exports.
- 8.7. Scope of the ISTA accredited laboratory of FSC&RD shall be enhanced to support the seed export.

9. Strengthening of Domestic Seed Industry

- 9.1. Incentives will be provided to the domestic seed industry to enable it to produce seeds of high yielding varieties and hybrids at a faster pace to meet domestic requirements. Seed Industry will be provided with a congenial and liberalized climate for increasing seed production and marketing.
- 9.2. Membership to International Organizations and Seed Associations like ISTA, OECD, UPOV, WIPO, at the National level or at the level of individual seed producing agencies, will be encouraged.
- 9.3. Financial support for capital investment, working capital and infrastructure strengthening will be encouraged through BOI / SMEDA / Commercial Banks / Cooperative Banks.
- 9.4. Tax rebate/concessions will be considered on the expenditure incurred on in-house research and development of new varieties and other seed related research aspects.
- 9.5. Reduction of import duty will be considered on machines and equipment used for seed production and processing, for production of plug nurseries; and for import of greenhouse equipment which are otherwise not manufactured in the country.
- 9.6. Effective implementation of the PBR Act shall be ensured to stimulate and protect investment in R&D activities for development of promising varieties. This will ensure availability of diverse and elite germplasm to support the business of the seed industry and sustainable enhancement of farm productivity.

10. Conservation of Plant Genetic Resources for Food and Agriculture

- 10.1. Pakistan is rich in genetic diversity of many crops. There is a long list of land races and farmers' varieties in various crops.. This wealth of plant genetic resources for food and agriculture will be properly documented and protected for effective utilization by future breeding programs.
- 10.2. The plant genetic resources for food and agriculture will be protected through diverse legal instruments including international conventions like ITPGRFA, WIPO and CBD and through national legislation of Seed Act, Plant Breeder's Rights Act, Biodiversity Act and Protection of Geographical Indicators Act.
- 10.3. PARC, PCCC, Universities and Research Institutes will be facilitated to strengthen documentation and conservation activities related to plant genetic resources in their relevant fields. The concerned institutions will in addition provide genetic material to National Germplasm Resource Centre i.e. PGRI, NARC for conservation and future breeding programs.
- 10.4. Farmers will be facilitated for in situ maintenance of land races and farmers' varieties through extension service, training programs and other incentives.

11. HARMONIZATION OF VARIETY EVALUATION AND APPROVAL

- 11.1. Evaluation of local and imported varieties under the umbrella of Variety Evaluation Committee (VEC) will be made at national level only.
- 11.2. A harmonized procedure for evaluation and recommendation of varieties shall be approved/amended by VEC from time to time as per requirement
- 11.3. VEC as evaluation and recommending body shall be made truly representative by including new members from private and public sector
- 11.4. DNA profile will be made mandatory to be submitted by the concerned public/ private breeders during the evaluation/ NUYT trial to stop leakage of germplasm and give confidence to the developers of new technology
- 11.5. Fruit plant varieties, once evaluated and recommended by VEC shall be released on national level. However, the provinces may opt for additional evaluation if deem necessary.

12. CONCLUSION

The Government of Pakistan is confident that the National Seeds Policy will receive strong support from Provincial Governments, Agricultural Universities, plant breeders, seed producers, the seed industry, and all other stakeholders. It is anticipated that this policy will act as a catalyst in achieving the objectives of sustainable agricultural development, ensuring food and nutritional security for the population, and raising living standards for farming communities.

The implementation of the National Seeds Policy is poised to play a pivotal role in boosting food production and striving towards a hunger-free Pakistan. By establishing an efficient system for the supply of high-quality seeds to farmers, this policy is expected to inject new momentum into agricultural production.

Furthermore, the National Seeds Policy is set to lay the groundwork for liberalizing the seed sector and initiating necessary legal reforms to modernize the seed system in accordance with WTO agreements on TRIPS, TBT, SPS, and AOA. This strategic move will cater to the evolving needs of the rapidly expanding seed industry.

With a focus on broadening the scope of the domestic seed industry, enhancing its technological capabilities, and promoting investment in research and development programs, the National Seeds Policy aims to facilitate the production of hybrid seeds and certified vegetative planting material. By fostering an environment conducive to seed exports, this policy will contribute significantly to national agricultural production and create employment opportunities for professionals, skilled workers, and small farmers in the competitive global seed trade landscape.

End of the document

Comments of Provinces and Response on Draft National Seed Policy:

Comments	Response and Status
Punjab	
<p>Since this is a National Seed Policy drafted mostly under the guidelines given under Seed Act 1976 amended 2021, Seeds Rules 2016, Plant Breeder Act 2016, Seed (Truth in Labelling rules 1991), therefore, in addition to effective implementation of these laws through a traceable and paperless tool, the support of provinces may also be taken as well to strengthen the aura of participation from the provinces and under no case the role of provinces may be further diluted at all.</p>	<p>The role of the provinces will remain intact and in future province will be taken onboard for any policy intervention</p>
<p>National seed policy must have certain milestones and targets to accomplish with a timeline for import of germplasm, development and approval of varieties of major minor crops, fruit and vegetable etc., seed production, distribution, replacement etc. as seed is the determining factor for production and existing seed regulating regime has not so far meet the aspirations of farmers and policy makers</p>	<p>This is action plan matter not the policy</p>
<p>Provinces are trying to get memberships from international organizations for import of climate smart and high yielding germplasm. Facilitation through this policy may be extended to the provinces for import of germplasm as well. Similar treatment at quarantine level may be given to the provinces for such imports. Likewise, accreditation of seed testing labs (ISTA/OECD) may also be allowed to private sector and provinces as well for regulated and non-regulated actions</p>	<p>Agreed and incorporated</p>
<p>Testing of transgenic varieties under confined conditions has been mentioned in draft policy before approval. However, provincial research institutes may also be added in this list to increase such facilities in diverse ecological conditions like provincial labs for biotechnology testing etc</p>	<p>Agreed and incorporated</p>
<p>Sections related to protect farmers right, seed barter, development of varieties by farmers, maintenance of land races, village seed banks like such other issues needs more explanation to avoid any legal problems and contain alarming spread of unapproved seeds</p>	<p>Agreed and incorporated</p>
<p>Harmonization of procedure of variety evaluation committee (VEC) in policy has been agreed with the participation of public and private sector. This effort shall be carefully drafted to ensure introduction of high</p>	<p>VEC is statutory body for evaluation of candidate varieties and no other committee or procedure is recognized under the seed act 1976</p>

yielding varieties from local or imported sources by carefully defining the Distinctness, Uniformity and Stability (DUS) & Value of Cultivation and Use (VCU). Focus on VCU may be given to allow best of the best variety be imported as earlier experience of annual approval of hundreds of varieties is unable to properly break the stagnation in yields. Spot examination shall be taken into account for all varieties for field testing of varieties to allow only best variety stamped through apex committee. Onus of responsibility of seed approval after removal of provincial expert committee will be squarely lies to FSC&RD/PARC in future	
An apex working committee may be constituted to review the seed management system under this policy and enactments already present to regulate the assed business in Pakistan	Agreed but at action plan on need basis
Sindh	
The seed requirement of respective provinces would be met first and then excess seed would be allowed to export. Inter Provincial movement of poor-quality seed specially in stress period should strictly be monitored and controlled by NSC	Implementation matter not policy
New varieties developed by National R&D Institutes and imported from other countries shall be evaluated by National Evaluation Committee (NVEC)	Agreed and incorporated
New varieties developed by Provincial R&D Institutes shall be evaluated by Provincial Variety Evaluation Committee (PVEC) and submitted to respective Provincial Seed Council for final approval	Already decided by NSC that a harmonised national level evaluation shall be conducted through VEC. Whereas, role of provincial seed council shall remain intact
Thus, the varieties evaluated by National Variety Evaluation Committee (NVEC) shall be submitted to respective Provincial Seed Council of the Province for approval; whereas, the varieties evaluated by PVEC shall be submitted in respective Provincial Seed Council of Province concerned for approval	Already decided by NSC that a harmonised national level evaluation shall be conducted through VEC. Whereas, role of provincial seed council shall remain intact
Khyber Pakhtunkhwa	
Import of germplasm specifically fruits, vegetables and cereals may be exempted	Agreed and incorporated
Land races are important biodiversity resources, they need to be preserved. For preservation of land races, the procedure of varietal evaluation and selection shall be followed and after approval from the respective seed councils, they may be registered as Geographic Indicators and a system of seed maintenance may be	Agreed and incorporated

developed. The above suggestion may need to be incorporated in the policy with appropriate wording	
Any amendment in the VEC composition or its TORs may be made after the approval of the NSC beside our earlier assertions about appropriate representation from all provinces may be ensured.	Agreed as provincial reorientation is already in the VEC
Fruits varieties approval/release should be subject to approval from respective seed council	A national level evaluation and approval/release forum in the form of VEC (having representation of all provinces) is appropriate to release fruit plant varieties
Seed monitoring system may need to be devolved to provinces. As the provinces have well-developed Agric. Extension Wings which will ensure proper monitoring which will ensure quality seed.	A digital portal in the form of MIS seed Track and Trace system has been developed and deployed, which has minimized the seed quality monitoring challenges.
Balochistan	
The of role of Provincial Seed Corporations are not considered in the policy and neither any policy guide line has been provided in Section 4 “Seed Production and Distribution”	Already Addressed
No policy guideline has been included for distribution and production of plant nurseries, especially fruit plant Nurseries	Already addressed
It would be appreciated if provinces are given proper representation in the National Seed Council (5.1) and additionally, it would be more prudent to include some policy thrust on strengthening of Provincial Seed Councils and their role in monitoring and quality assurance	NSC already abolished
How will varieties developed in provinces shall be included in the National DNA finger printing (5-13)? An area which needs emphasis.	Agreed and incorporated
The policy lines regarding establishment of Provincial Seed Research Centres (6.2) and Provincial Seed Testing Facility (6.3) may be included in the policy	FSCRD has sufficient number of seed testing labs to cater the needs through out the country
While there is a provision made for GMO varieties yet nothing has been mentioned for non-GMO Seed production in the policy (7): Emphases needs to be given as Balochistan is moving towards finalizing a Organic Agriculture Production Policy.	Except Chapter 7 the whole of the policy concern with non-GMO
Provincial authority needs to be defined in evaluating Fruit Plant varieties suitable for cultivation in the provinces.	Agreed and incorporated