



**Canadian Seed Growers' Association**  
**Association canadienne des producteurs de semences**

## **Alternative Service Delivery: Q&A**

**Many of our members have expressed concern with the upcoming changes in the seed industry being brought on by CFIA's announcement to pull out of seed crop inspections. To answer these concerns, we've invited our members to submit questions to the office to allow CSGA to address them directly. Here are the questions received and our replies:**

**Q. Will the number of inspectors be sufficient and will they be adequately trained for the 2014 crop year? In Quebec, there are just a few casual inspectors.**

A. One of the primary objectives of the 2013 seed production year is to train inspectors for 2014. CFIA usually hires about 120 casual inspectors on an annual basis to complement their permanent staff of about 100 inspectors that spend part of their time on the seed program. It is expected and hoped that most of the CFIA casual inspectors will return to work for authorized seed crop inspection services (ASCIS). With CFIA casual inspectors moving to the private sector, the addition of newly trained inspectors during 2013 and the realization that 2014 will be a transition period in which some crops are still inspected by CFIA, a likely goal or target for alternative service delivery in 2014 could be around 70 to 80% of the inspections. This will vary by region or province. For example, only a few casual inspectors are routinely used in Quebec and no casual inspectors have been used in the Maritimes. Therefore, it can be expected the transition to alternative delivery service will be slower in those regions where casual inspectors are not available to move to the private sector.

**Q. When will we know what CFIA intends to do? It is not easy to reassure us when you don't know what is happening.**

A. CFIA is currently moving forward on an alternative service delivery model that involves multiple 3<sup>rd</sup> party inspection services. It is likely regions will be established and any service provider operating in a region will need to service the entire region. The regions had not yet been established at the time of writing these responses to seed grower questions. CSGA will be posting the names of authorized service providers, the regions in which they operate and the crops they can inspect on the basis of the qualifications of the licensed inspectors they employ. This posting will be on [www.seedgrowers.ca](http://www.seedgrowers.ca) and seed growers will need to visit the site, select a service provider and arrange an inspection. The reality is uncertainty. Until we all know what service providers come forward, what regions they will operate in and what crops they can inspect, we really have no good idea of how much alternative service delivery will be achieved in 2014. CSGA, CSTA and CFIA will all have as a high priority the communication needed to inform all stakeholders once service providers begin to be identified and authorized.

**Q. When will we know who is going to provide the inspection services?**

A. CFIA expects to be authorizing service providers throughout 2013 and into 2014. As providers are authorized and provide indication of the scope of the inspection services they will provide (in terms of geographic region and crop kinds), their names will be posted to the CSGA web site.

**Q. Will the system ensure that all growers will have access to affordable and unbiased inspection services?**

A. That is the goal of moving forward with multiple 3<sup>rd</sup> party service providers across Canada. CFIA has also committed to provide seed crop inspection services in 2014 when, where and if alternative service providers are not available. Because current CFIA inspection fees of 75 cents per acre were established in the mid-1990's on the basis of being 50% cost recovery, it can realistically be expected inspection costs will increase. Although CFIA has indicated they will provide inspection services as needed during the transition to alternative service delivery, they have also indicated it will be at their full cost recovery. What that translates into is not known presently but 3 to 4 fold increases can be expected from CFIA.

**Q. When will there be a decision made as to what direction this is going?**

A. The decision has now been made to move forward with multiple 3<sup>rd</sup> party service providers. Decisions are still needed regarding the regions and their size and number. The degree to which multiple 3<sup>rd</sup> party service providers come forward and become authorized will determine how far alternative service delivery goes in 2014. It is anticipated the multiple 3<sup>rd</sup> party model will be continuously reviewed as we proceed through the first few years of alternative service delivery. If this multiple 3<sup>rd</sup> party service provider model proves ineffective or inefficient, there will be opportunity for a review and possible changes following the transition period.

**Q. Will there be more than one Alternate Service Delivery provider?**

A. The concept of multiple 3<sup>rd</sup> party service providers is to have more than one service provider. CFIA and some seed growers have expressed their concerns over exclusivity to one 3<sup>rd</sup> party provider (i.e. monopoly). The actual numbers will become apparent as service providers get authorized by CFIA.

**Q. If a provider becomes out of reach in the fees they charge, can the industry cancel their contract and hire someone new?**

A. It will be the responsibility of the seed grower to confirm the service provider that will inspect their crops. Part of that confirmation will likely be a negotiation between the seed grower on the cost of the inspection service. One flat inspection fee across the country, as we are experienced with under CFIA inspections, will no longer exist. The market will prevail so it is likely fees will vary from region to region, perhaps from crop kind to crop kind and perhaps between growers depending upon such factors as size of field, number of fields available for inspection, distance travelled to the fields, etc.

Seed growers should, when negotiating inspection arrangements with service providers, discuss service guarantees, response times, lead times, etc. CFIA may or may not be available if a contract was cancelled. In any case, the CFIA inspection fees would be at CFIA cost recovery levels for the inspection.

**Q. Could I become a provider and do my own fields?**

A. No, not under the multiple 3<sup>rd</sup> party service provider model that is moving forward.

**Q. What do I need to do as a seed grower to prepare for ASD?**

A. Everything possible to stay informed. It does not take place until 2014 and then only to the ability of authorized service providers that have come forward and been authorized. It will be extremely important for seed growers to access the CSGA web site and follow the listing of service providers as it develops and, in particular, for the region in which the seed grower resides. CSGA recommends that growers provide their email addresses to CSGA, which CSGA will use for seed crop certification purposes only.

**Q. Am I guaranteed to have an inspector available to inspect my crops?**

A. This is actually not the case with CFIA inspectors presently although we have had a very good record with CFIA inspections. Each year some crops get cut or harvested before inspection. It continues to be the grower's responsibility to ensure the field has been inspected before cutting or harvesting. Seed growers will be required to designate, on their CSGA application for inspection, the inspection service being used. If no alternative service delivery is available in the seed grower's region, CFIA is a back-up during the transition period, but at full cost recovery.

**Q. Will my fields get inspected?**

A. It will be the seed grower's responsibility to confirm and designate an inspection service that is operating in their region. When a seed grower makes application to CSGA for seed crop inspection, the seed grower will designate the crop inspection service provider they are using for inspection of their crops. CSGA will pass along to the inspection service the information related to the seed grower's crops and fields. If the service provider does not accept the designation by the seed grower, CSGA will notify the seed grower electronically and it will be the seed grower's responsibility to confirm a service provider willing to perform the inspections. If a service provider is not available in the seed grower's region, CFIA will, during the transition period, provide the seed crop inspection service at cost. Growers are strongly encouraged to provide CSGA with their email address or fax number. Failure to provide this information to CSGA may result in additional service fees and delays in receiving crop inspection reports, corrective action requests, notifications and crop certificates.

**Q. Are my fees changing?**

A. Yes. Seed growers will pay inspection fees directly to the inspection service they have arranged to inspect their crops. The actual level of inspection fee becomes an agreement between the seed grower and the inspection service. Because there are currently no alternative service providers authorized by CFIA, it is unknown how the service provider(s) will establish fees. There could be acreage fees, field fees, mileage fees, visit fees, etc. No longer will one flat fee, like the 75 cents per acre CFIA inspection fee of the past, exist.

CSGA fees (membership, acreage and Branch) are not changing as a result of alternative service delivery. The CSGA fees will, as is currently the case, be due for payment at the time of application for seed crop inspection.