

Canadian Seed Growers' Association / February 13, 2018

Circular 6 Modernization

Results of Survey on Proposed Changes for 2018

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Executive Summary

Circular 6 Modernization: Survey on Proposed Changes for 2018

As part of CSGA's strategic plan for 2017-2023, the modernization of Circular 6 was identified as a priority. To help with the process, CSGA formed 6 crop specific working groups that provided recommendations for proposed changes to Circular 6 for implementation in 2018, and will identify priority issues for further work in 2018 with a view to implementation in 2019 and beyond.

The changes recommended by the Working Groups for 2018 implementation were compiled and brought forward to the Standards and Circular 6 Committee for discussion on December 14, 2017. In order to obtain input from stakeholders not involved in the working groups and consult more widely, CSGA commissioned Synthesis Agri-Food Network to conduct a survey requesting feedback from participants on each of the approximately 30 proposed changes. Stakeholders had the opportunity to take part in the survey from January 12-25, 2018. This Executive Summary is an overview of the survey responses collected.

General observations

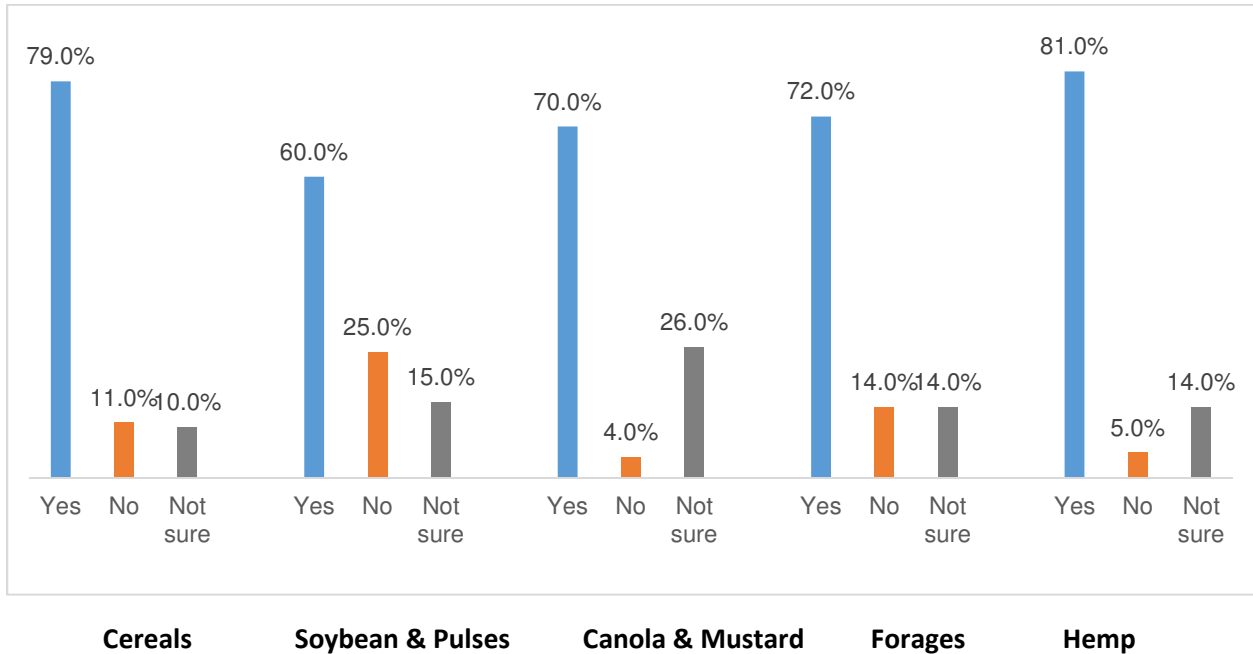
A total of 136 survey responses were received (114 English and 19 French). The majority of respondents identified themselves as seed growers (47%), and 39% identified themselves as seed crop inspectors. The remainder indicated they were plant breeders, seed companies or others (seed testing lab, retired inspector, retailer, etc.). Respondents had the option to skip sections of the survey related to specific crops if they were not familiar with that particular crop.

Stakeholders completing the survey had access to the background document on CSGA's website, detailing the rationale behind each proposed change. While the level of agreement varied, the majority of respondents indicated they were in favour with all the proposed changes as presented in the survey.

For each crop, respondents were asked how clear and easy to understand they found the related sections of Circular 6, with a scoring of 1-7 (1= very unclear and hard to understand, 7= very clear and easy to understand). The majority of responses for each crop was scored as either a 4 or 5 which shows that there is room for improvement and clarity in the standards. Comments on these questions included that the French sections need to be reviewed and may not always reflect the English, use of lots of "do nots" make certain sections hard to understand, and that understanding the standards gets easier with time.

When asked about standards for weedy crops, eighty-one percent (81%) were in favour of revisions across all crops to tighten up wording so that very weedy crops (where weeds prevent crop inspection as defined by CFIA) will be declined (instead of may be declined).

For proposed changes to increase maximum impurity standards, generally speaking respondents for all crop sections were in favour as shown in the chart below.



It should be noted that while increasing maximum impurity standards for the Soybean and Pulses standards were agreed on by the majority (60%), it was a lower level compared to responses for the other crops. The 'no' responses were also significantly higher than for the other crops. A few of the comments about the proposed change to impurity standards for Soybean and Pulses included:

- Concerns about variety impurity
- Increasing tolerances will allow “sloppy” varieties to enter the system
- Agreement with the changes for Certified, but not for Foundation and Registered

A further summary of responses for each crop section of the survey follows.

Cereals: 110 responses

Cereals isolation – seventy seven percent (77%) of respondents agreed with changing the isolation distance to crops of other kinds from 3m to 2m or a physical barrier and allowing staking between inspected crops of the same variety in lieu of the current 1m requirement. Comments included that 100m between stakes is not necessary. There were also comments that having both 3m (from plants considered a source of contamination and 2m (between crops) isolation requirements would be confusing and that it should be a blanket requirement of 3m. There was a question about why a physical barrier was acceptable in lieu of the proposed 2m isolation and not acceptable in place of the 3m isolation.

Soybean and Pulses: 110 responses

Respondents to the Soybean and Pulse section were in favour (78%) of simplifying wording to clarify requirements related to Certified Crops of Herbicide Tolerant Soybean Varieties. Of those who responded “No” or “Not sure”, comments included:

- Adding an example might make it more clear
- Clarification and/or additional information should be included

For soybean and pulses, changing the isolation distance to crops of other kinds from 3m to 2m or a physical barrier, allowing staking in lieu of 1m isolation and removing peanut from the crops requiring isolation for mechanical purity was agreed by 81% of respondents. As with comments to the corresponding cereals question, a mix of 2m and 3m was a concern as being overly complicated. Clarification on what constitutes a physical barrier was requested and that there needs to be a clear understanding between the grower and inspector.

Canola and Mustard: 29 responses

Revising the introduction of the Section 5 (Canola and Mustard) to include the definitions of Mustard and Rapeseed was agreed on by 88% of survey respondents. The 11% who indicated they were not sure did not provide comments.

The proposal to clarify the wording around land requirements by adding wording was agreed on by 96% of respondents.

Respondents were also in favour (86%) of the proposal to revise Isolation standards to a statement that is “reportable and auditable”.

Revisions to weeds standards for Canola and Mustard were agreed to, but at a lower level (61%) compared to other proposed changes. Comments included:

- No wild mustard should be allowed
- Wild mustard numbers are too high
- Wild mustard numbers are too high especially considering today’s crop protection products.

Forages: 36 responses

The proposal to revise Land Use Requirements to allow reseeded in an established stand was met with general agreement (89%). Questions included whether there would be another inspection required in these cases, and if there would be a specific code on the Inspection Report for “reseeded with permission from CSGA”. There was also a comment that some clarification may be needed to calculate the age of stand when reseeded has occurred.

Survey respondents were in favour of including a clear statement for extension of Age of Stand, with permission from CSGA. Eighty-three percent (83%) were in favour of this change, although there were comments related to how LSCI would be informed if age of stand had been extended, and communication with inspectors prior to inspection.

Changing the Isolation standards for Forages by adding - 3 plants per square meter *on average* of plants that may cross pollinate with the pedigree crop - was agreed on by respondents (73%). Of those who were 'not sure' or responded 'no', comments included that it should further clarify "3 heads per square meter" in the case where there are very large plants, and that the level of contamination permitted within the isolation should be tighter for Foundation (i.e. 1 plant /10m²).

Revisions to charts in Sections 6.5.5 and 7.5.4 to illustrate the 10% rule were favoured by 81% of those who responded to the question. A further question on applying the 10% rule to crops of Timothy was agreed on by 75%, although one respondent commented that the 10% rule was cumbersome and they were not in favour of extending it to additional crop kinds.

Hemp: 23 responses

Proposed changes to Land Use Requirements were agreed on by the majority of respondents (76%). Clarifying timing and number of inspections for dioecious and monoecious received strong agreement, with 90% responding yes to the proposed change. Similarly, separating Section 10 into monoecious and dioecious subsections was agreed on by 90% of respondents. The proposal to revise plot standards in Section 11.5 to allow the inspector to properly view and inspect the crop was agreed on by 82%, although one comment was that the comment seemed vague. Another comment was that this should be a standard across all crop kinds.

Changing the isolation distance for Dioecious type in Table 10.4.2 received majority agreement (81%) as did revising statements for Dioecious type for Registered and Certified in the same table.

Conclusion

The goal of this survey was to consult more widely with seed growers and other seed sector stakeholders on specific changes to Circular 6 proposed by the Working Groups. Respondents had access to the rationale and reasoning behind each change, although it is not known how many accessed that information. While comments from participants varied somewhat, the majority of respondents agreed with all proposed changes that were presented in the survey.

Responses to Survey Questions

Q1. Which of the following categories best describes you or your business?

Seed grower – (57) 45%

Seed crop inspector – (49) 39%

Plant breeder – (2) 2%

Seed company (assignee of crop certificates) – (1) 1%

Other – (17) 13%

Total responses: 126

Q2. Proposal: Remove (b) from the weeds portion of each section and change (c) to “will be declined”. Do you agree with the proposed changes?

Yes – (102) 81%

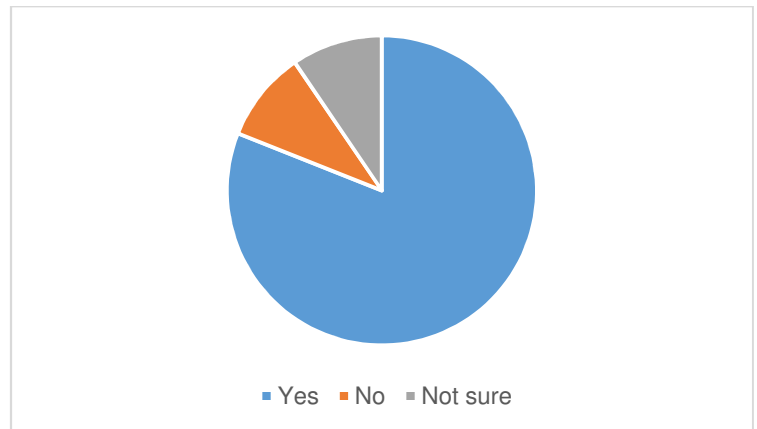
No – (12) 9.5%

Not sure – (12) 9.5%

Total responses: 126

Comments include:

- The word Primary should be included after Prohibited
- Some inspectors may put numerous when it should be very weedy so as not to decline status
- Monitoring of LSCI and picture examples of very weedy
- Seed cleaning equipment can clean out the weed seeds, but if proper inspection cannot be performed that should not be inspected and granted pedigree status.
- Inspector could use this to decline a field simply because one of the areas in a predefined pattern used by the inspector was weedy. Present regulations are correct.



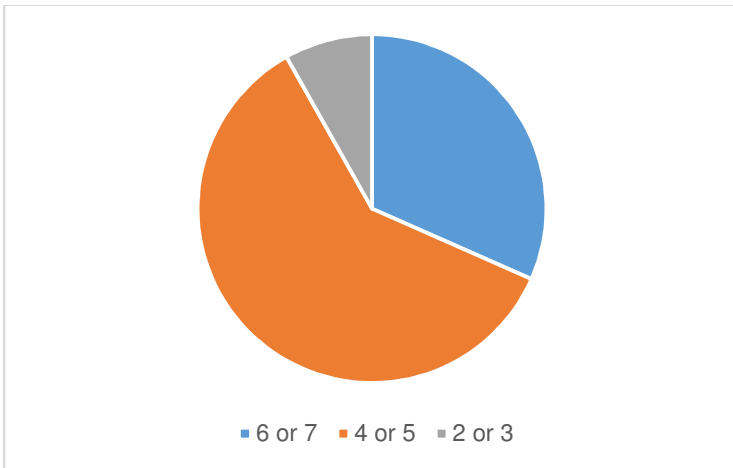
Q3: Are you interested in answering questions related to Cereals?

Yes – (110) 85%

No – (19) 15%

Total responses: 129

Q4. How clear and easy to understand are the Cereals sections of Circular 6? [scale of 1-7, 7= very clear and understandable, 1= very unclear and hard to understand]



6 or 7 – (30) 31%

4 or 5 – (59) 61%

2 or 3 – (7) 8%

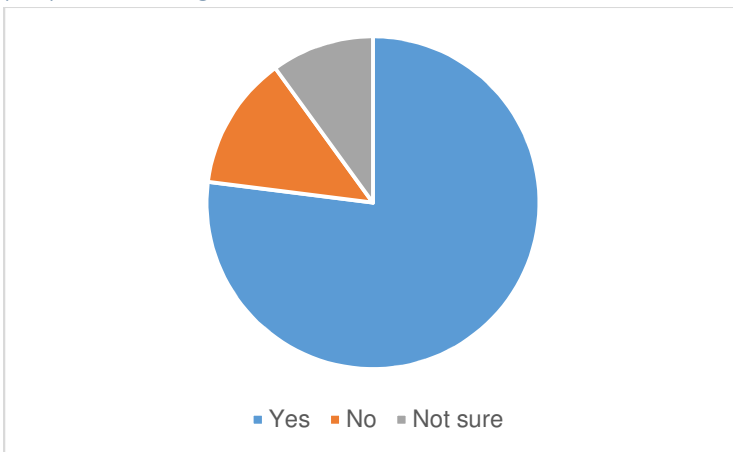
Total responses: 96

Comments include:

- Understanding previous land history table takes concentration.
- Not clear as to optimum timing for field inspection.
- Phrasing can cause confusion.
- Some sections could be updated to reflect modern practices.

Q5. Isolation

Proposal: Change the isolation distance to crops of other kinds from 3m to 2m and allow staking between inspected crops of the same variety in lieu of the current 1m isolation requirement. Do you agree with the proposed changes?



Yes – (79) 77%

No – (13) 13%

Not sure – (11) 10%

Total responses: 103

Comments include:

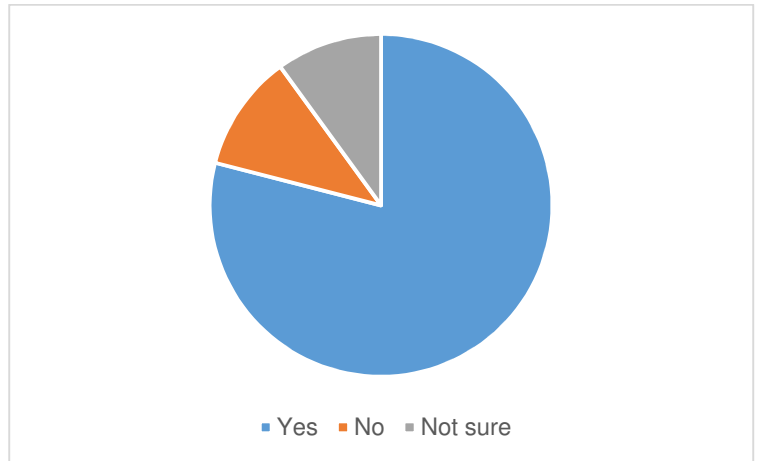
- 100 m is too many stakes.
- 3m isolation ridiculous when there is a physical barrier.
- CFIA may not take time to determine if a field is clearly staked.
- Prefer to stay at 3m if standard has both 2m and 3m.
- Concern with 2m if crop becomes lodged and is close to adjacent fields.
- Definition of physical barrier needed.

Q6. Maximum Impurity Standards

Proposal: Increase the Maximum Impurity Standards for off-types or other varieties of the same crop kind from 1 to 3/10,000 in Registered and 5 to 8/10,000 in Certified for all the crop kinds in Table 2.4.4, to be the same as wheat. Do you agree with the proposed changes?

Yes – (81) 79%
No – (11) 11%
Not sure – (10) 10%
Total responses: 102
Comments include:

- Further study needed on possible separation of wild oats with colour sorters.
- Impurity standards could be tightened up for some crops.
- 8/10,000 plants of an off-type is unacceptable.
- There will be a domino effect for Certified status if tolerance is increased at Foundation and Registered status.



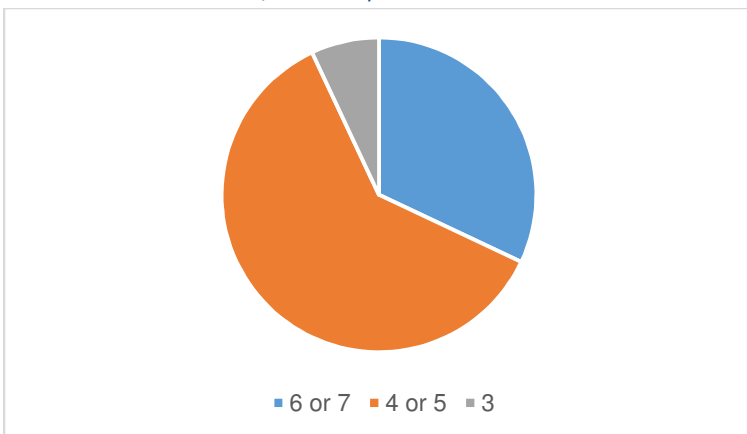
Q7: Are you interested in answering questions related to Soybean and Pulses?

Yes – (100) 83%

No – (20) 17%

Total responses: 120

Q8: How clear and easy to understand are the Soybean/Pulse sections of Circular 6? [scale of 1-7, 7 = very clear and understandable, 1 = very unclear and hard to understand]



6 or 7 – (31) 32%

4 or 5 – (6) 61%

3 – (7) 7%

Total responses: 44

Comments include:

- French versions do not always reflect English version.
- Section 12 needs to be reviewed and translated.
- Confusion with Fababeans optimal stage for inspection contradicts SWI.

Q9. Land Requirements

Proposal: Simplify the wording of Section 3.2.6 on Certified Crops of Herbicide Tolerant Soybean Varieties. Do you agree with the proposed changes?

Yes – (76) 78%

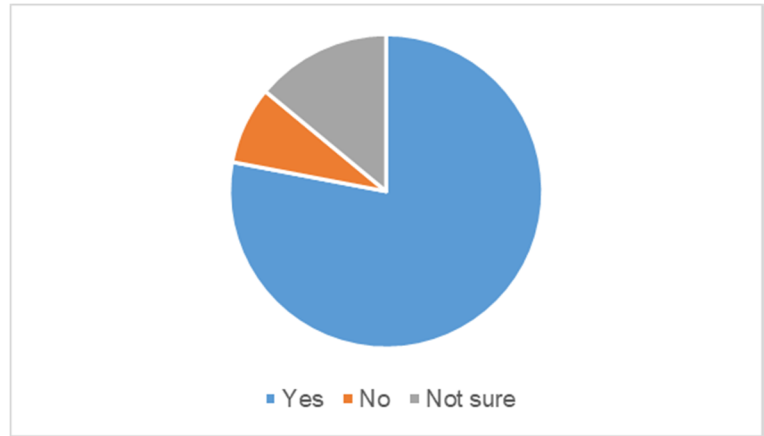
No – (8) 8%

Not sure – (15) 14%

Total responses: 99

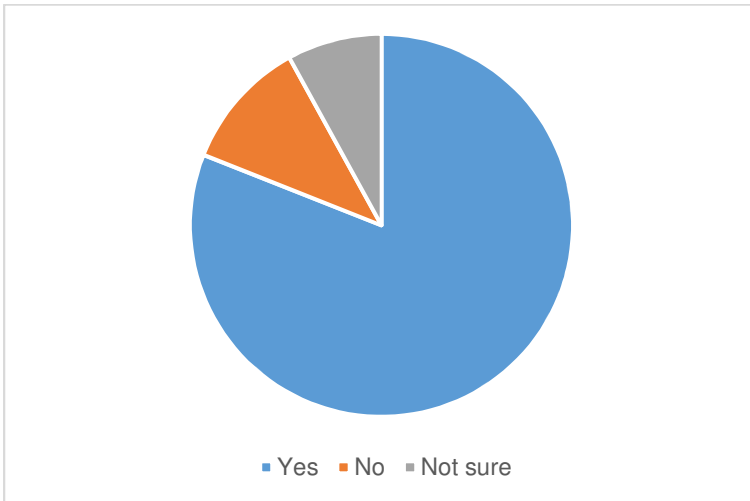
Comments include:

- Adding an example or additional clarification is needed.
- Scrap the idea of certified soybeans of different varieties back to back altogether.
- Would be easier to say that the previous variety must be exposed to chemical application in the current growing season that it is not resistant to.



Q10. Isolation

Proposal: Change the isolation distance to crops of other kinds from 3m to 2m, allow staking between inspected pedigreed crops of the same variety in lieu of the 1m isolation and remove peanut from the crops requiring isolation for mechanical purity purposes. Do you agree with the proposed changes?



Yes – (68) 81%

No – (9) 11%

Not sure – (7) 8%

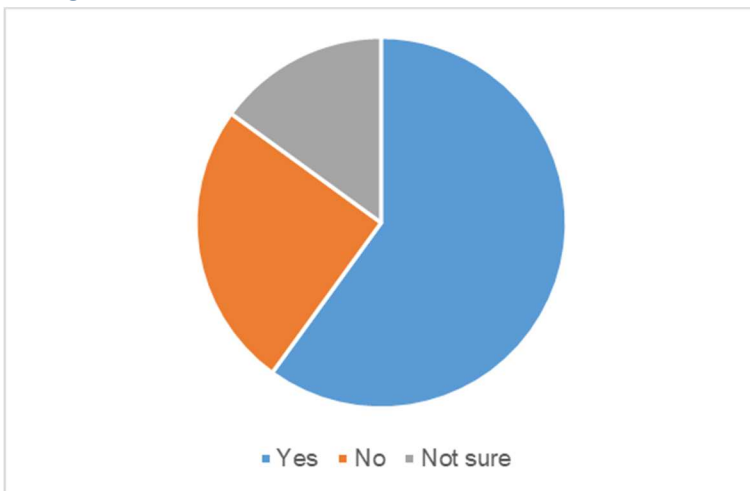
Total responses: 84

Comments include:

- Agree with staking and physical barriers, prefer to keep 3m isolation.
- There will be problems allowing staking in lieu of 1m strip. As an inspector fallen stakes makes it difficult to find borders.
- Not sure if CFIA will have patience to find stakes.
- We were always told 3m barrier was because of cross pollination.
- A mix of 2m and 3m overly complicated.
- Slightly irrelevant because bean, fababean, lentil and pea are harvested well prior to soybean inspection.

Q11. Maximum Impurity Standards

Proposal: Increase the maximum impurity standards for off-types and other varieties of the same crop kind in Fababeans from 1 to 5/10,000 in Foundation, 2 to 10/10,000 in Registered, and 5 to 20/10,000 in Certified and in Soybeans from 2 to 10/20,000 in Select, 2 to 10/10,000 in Foundation, 4 to 20/10,000 in Registered, and 20 to 30/10,000 in Certified. Do you agree with the proposed changes?



Yes – (60) 60%

No – (25) 25%

Not sure – (15) 15%

Total responses: 100

Comments include:

- Concerned about varietal impurity.
- History of fababean off-types indicates the need for increased numbers.
- Increasing tolerances enables poor performing varieties a greater chance of producing seed.

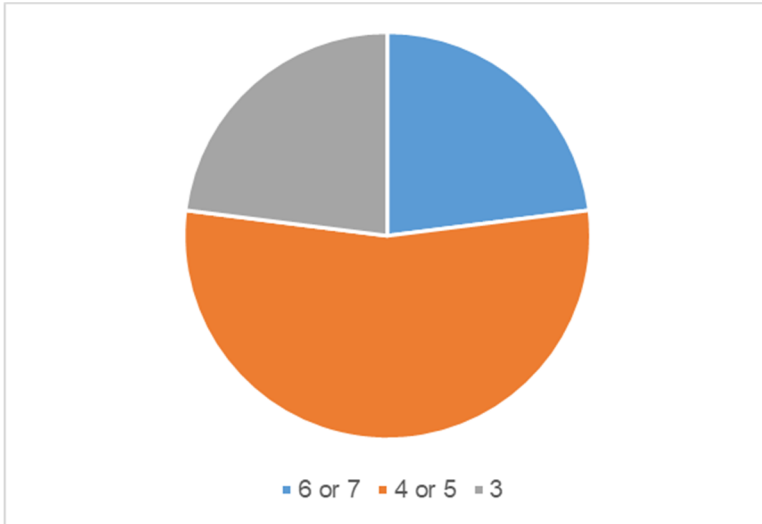
Q12 Are you interested in answering questions related to Canola and Mustard?

Yes – (29) 23%

No – (92) 77%

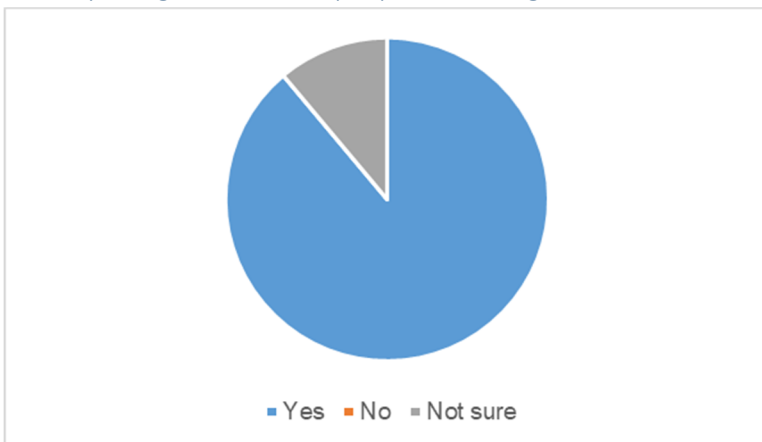
Total responses: 121

Q13. How clear and easy to understand are the Canola sections of Circular 6? [scale of 1-7, 7 = very clear and understandable, 1 = very unclear and hard to understand]



6 or 7 – (6) 23%
4 or 5 – (16) 54%
3 – (6) 23%
Total responses: 28

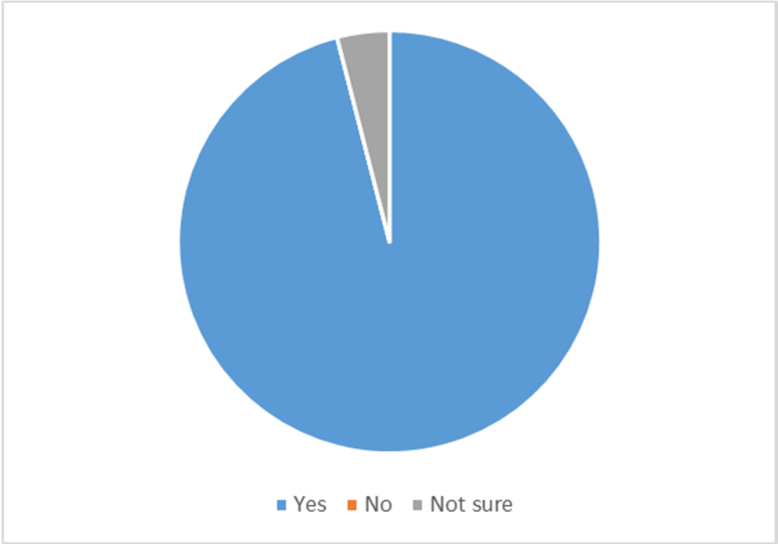
Q14. Proposal: Revise introduction of Section 5 to contain definitions of Mustard and Radish as seen in Section 4. Do you agree with the proposed changes?



Yes – (24) 89%
No – 0%
Not sure – (3) 11%
Total responses: 27

Q15. Land Requirements

Proposal: Revise Section 5.3.1, 4.2.2 and 13.4.2 “Crops of Brassica rapa or winter Brassica napus for Certified status must not be planted on land which has produced:” to “planted on land which has been planted with or produced”. Do you agree with the proposed changes?



Yes – (27) 96%

No – 0%

Not sure – (1) 4%

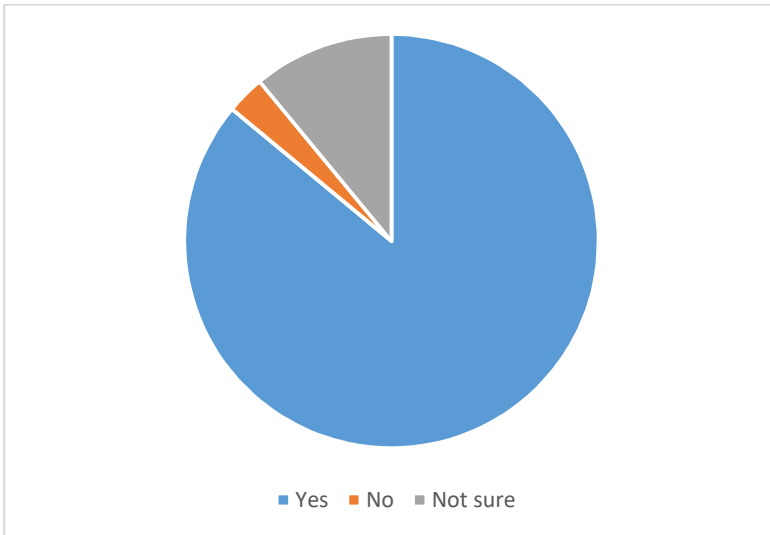
Total responses: 28

Comments include:

- Winter Brassica napus – consider herbicide tolerance – same issue that applies to Soybeans, etc.

Q16. Isolation

Proposal: Revise point (a) of Section 5.5.1, 4.4.1 and 13.6.1 to an alternate statement that is reportable and auditable and adding “stage of maturity” to point (b) while also taking out the last sentence. Do you agree with the proposed changes?



Yes – (24) 86%

No – (1) 3%

Not sure – (3) 11%

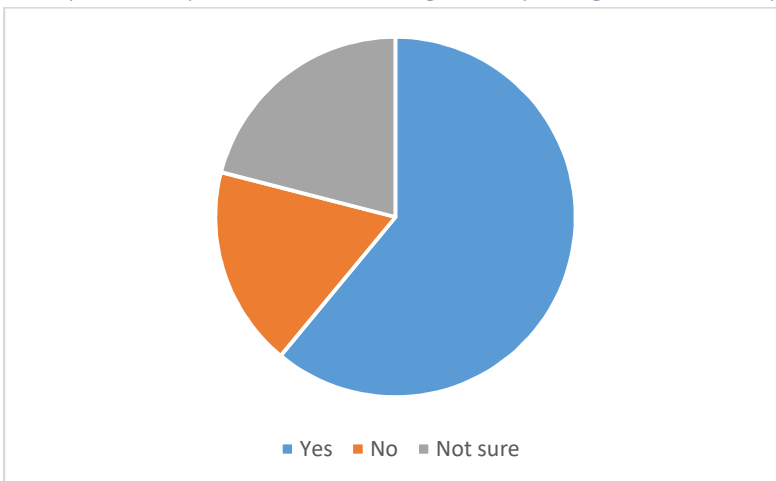
Total responses: 28

Comments include:

- Agreement as likelihood of contamination is reduced past 50m.
- Change is more indicative of real world where weather affects volunteer contamination.
- Prefer a consistent isolation distance for the full amount.
- Average number of contaminants allows pockets of high contamination.

Q17. Weeds

Proposal: Revise Section 4.4.3 (c) and Section 5.5.4 (c) to remove Wild Mustard from the statements, along with previously listed weed change. Do you agree with the proposed changes?



Yes – (17) 61%

No – (5) 18%

Not sure – (6) 21%

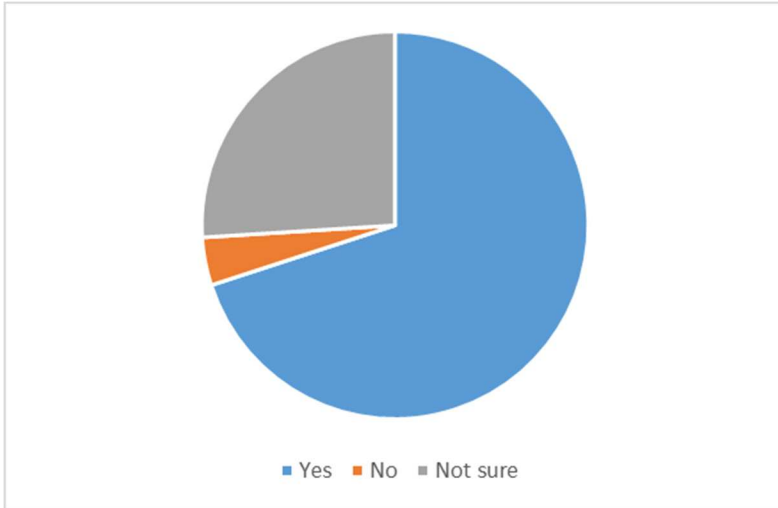
Total responses: 28

Comments include:

- No Wild mustard should be allowed.
- Leave current regulation except for (d)
- Don't need another vector for herbicide resistant mustard to spread.

Q18. Maximum Impurity Standards

Proposal: Revise Section 4.5.4, 5.6.2 and 13.8.3 to remove *R. raphanistrum*, *R. sativus*, and *S. alba* and to add *B. carinata*. Do you agree with the proposed changes?



Yes – (19) 70%

No – (1) 4%

Not sure – (7) 26%

Total responses: 27

Comments include:

- Agree with change if CFIA is recommending change based on *Brassica* spp that cross pollinate.
- Question whether science confirms there is no longer an issue with radishes and white or yellow mustard.
- Add *B. carinata* but do not remove the others.

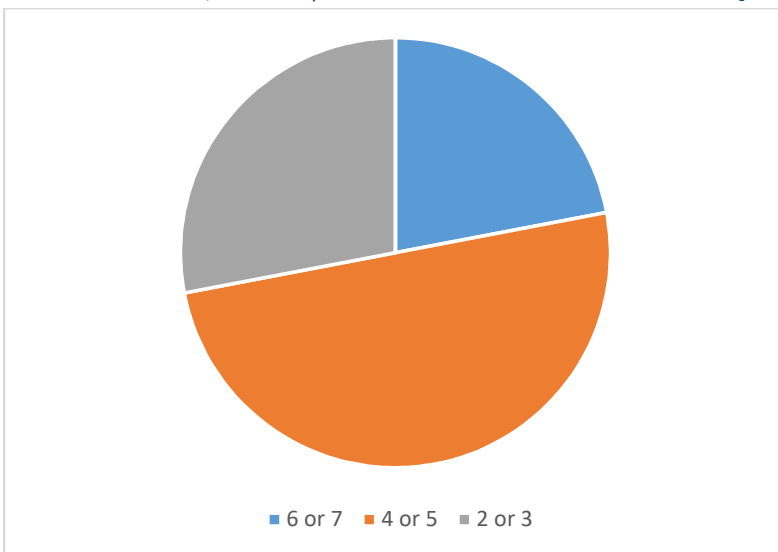
Q19. Are you interested in answering questions related to Forages?

Yes – (36) 31%

No – (82) 69%

Total responses: 118

Q20. How clear and easy to understand are the Forages sections of Circular 6? [scale of 1-7, 7 = very clear and understandable, 1 = very unclear and hard to understand]



6 or 7 – (8) 22%

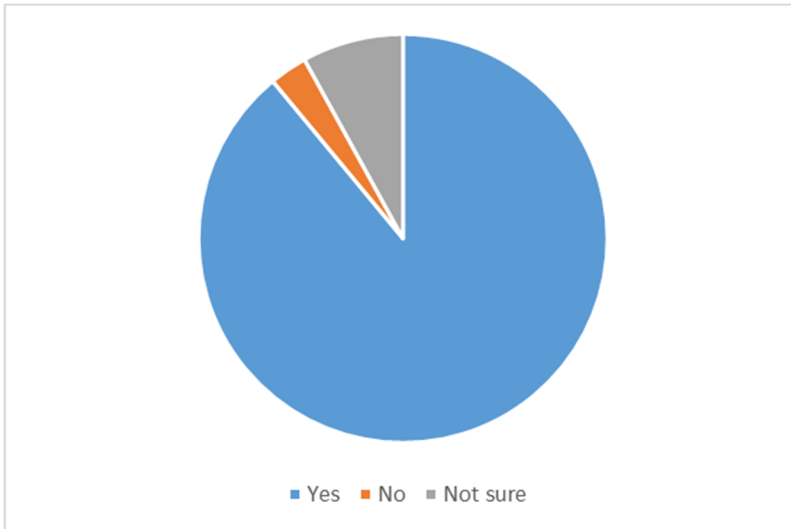
4 or 5 – (20) 50%

2 or 3 – (10) 28%

Total responses: 38

Q21. Land Use Requirements

Proposal: Revise Section 6.2 to add 6.2.5 to allow the ability to reseed in areas that need it if stand is established. Do you agree with the proposed change?



Yes – (32) 89%

No – (1) 3%

Not sure – (3) 8%

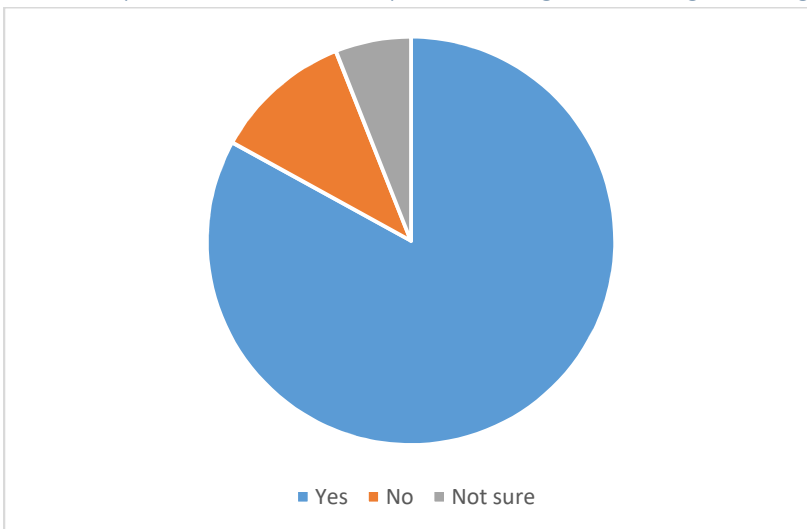
Total responses: 36

Comments include:

- Question if there will be specific code on crop inspection report for this.
- Many fields exhibit areas of poor establishment due to weather extremes.
- Question whether another inspection will be required.

Q22. Age of Stand

Proposal: Include a clear statement to Section 6.4.4 and Section 7.4.3 about the potential for extension of some crops with a formalized process for growers to go through. Do you agree with the proposed change?



Yes – (30) 83%

No – (4) 11%

Not sure – (2) 6%

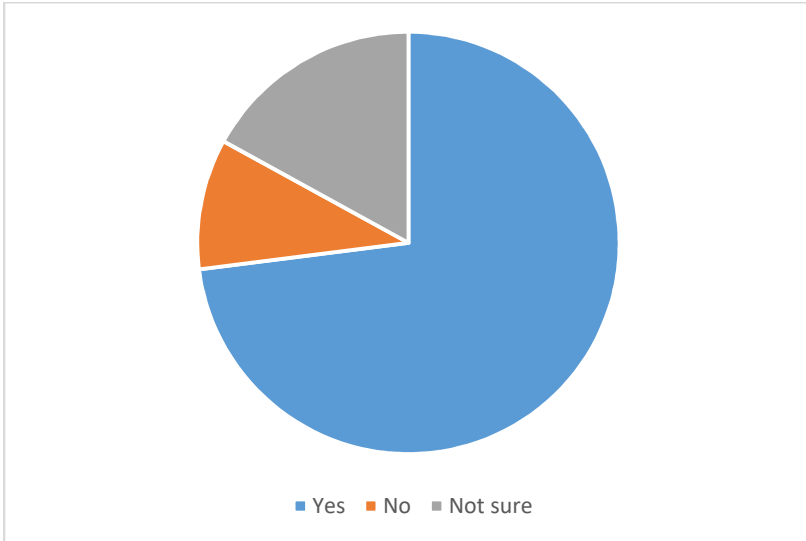
Total responses: 36

Comments include:

- Questions about how LSCI will be informed and how clear it will be for LSCI's and inspectors to know if age of stand has been extended.
- Should be communicated to inspectors before inspection.

Q23. Isolations

Proposal: Add “on average” to plant counts in Section 6.5.1(b) and change “harmful contaminants” to an alternate statement. Do you agree with the proposed changes?



Yes – (22) 73%

No – (3) 10%

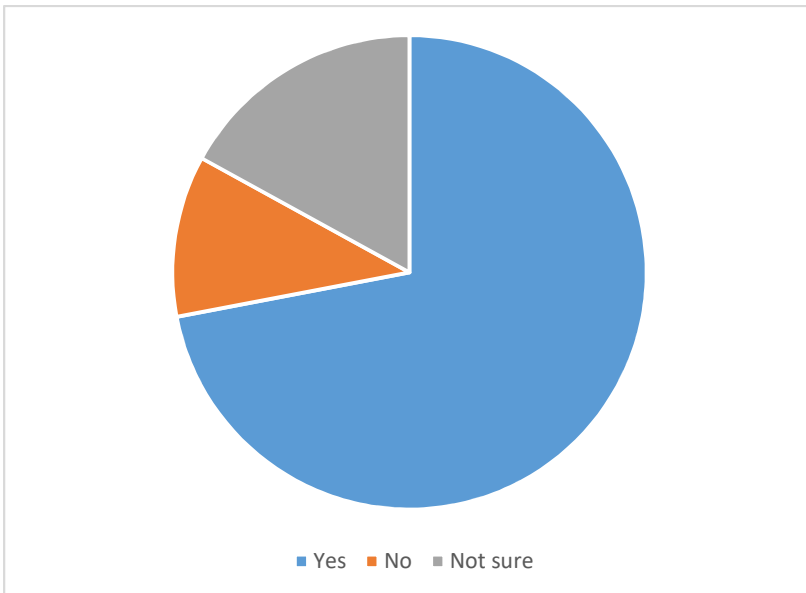
Not sure – (5) 17%

Total responses: 30

Comments include:

- Should be allowed as long as source is less than 10% of the field being certified.
- Further clarify “3 heads per square meter”.

Q24. Proposal: Revise Section 7.5.1 (b) to include stage of maturity and add revised statement from 6.5.1 (b) to the end of 7.5.1 (b). Do you agree with the proposed changes?



Yes – (26) 72%

No – (4) 11%

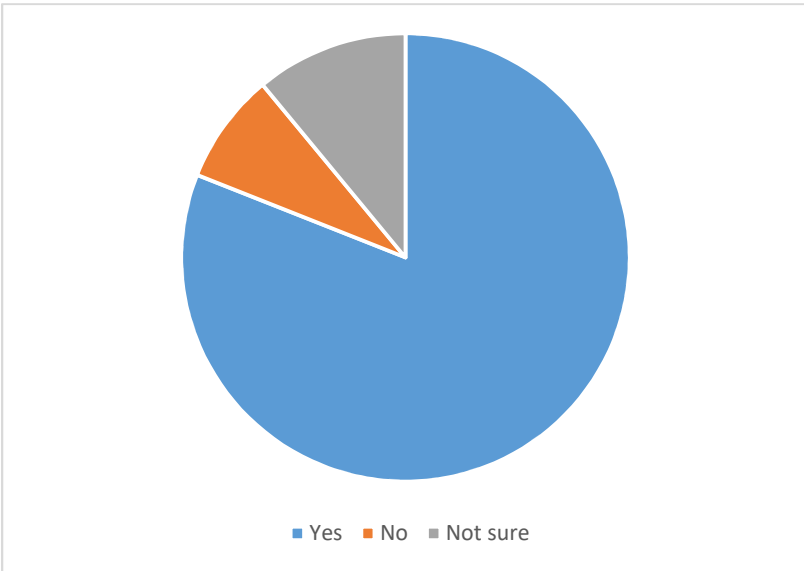
Not sure – (6) 17%

Total responses: 36

Comments include:

- Consider adding 3 blooming plants for easier understanding.
- Stage of maturity is acceptable because if stages vary enough low chance of cross pollination.
- Allowance of 3 plants per square meter is too high, ridiculously high if it includes Foundation.

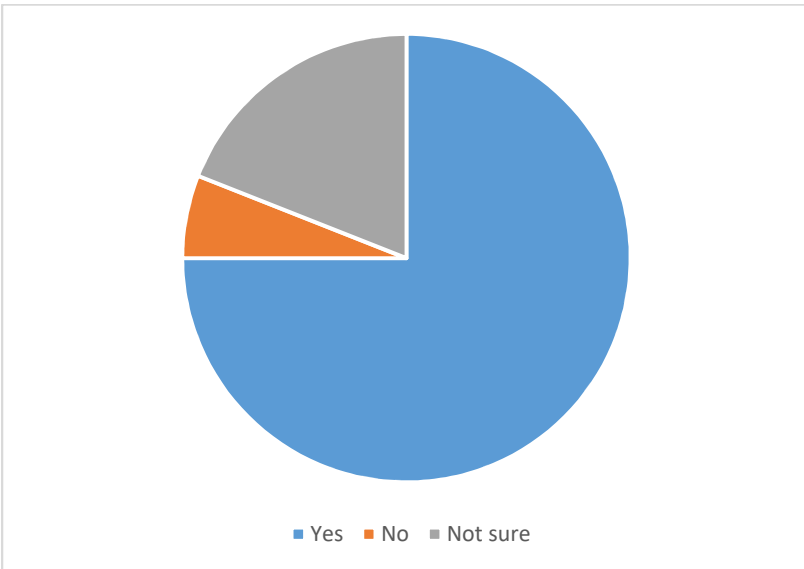
Q25. **Proposal:** Revise the charts in Section 6.5.5 and 7.5.4 for the 10% rule to be simpler and provide better clarity. Does the explanation improve the clarity of the 10% rule?



Yes – (29) 81%
No – (3) 8%
Not sure – (4) 11%
Total responses: 36
Comments include:

- Very clear
- Calculation should be included in C6 since growers may not have access to SWIs.
- Diagrams alone are not enough, need explanation of how calculated.

Q26. **Proposal:** Permit the application of the 10% rule to crops of Timothy. Do you agree with the proposed change?

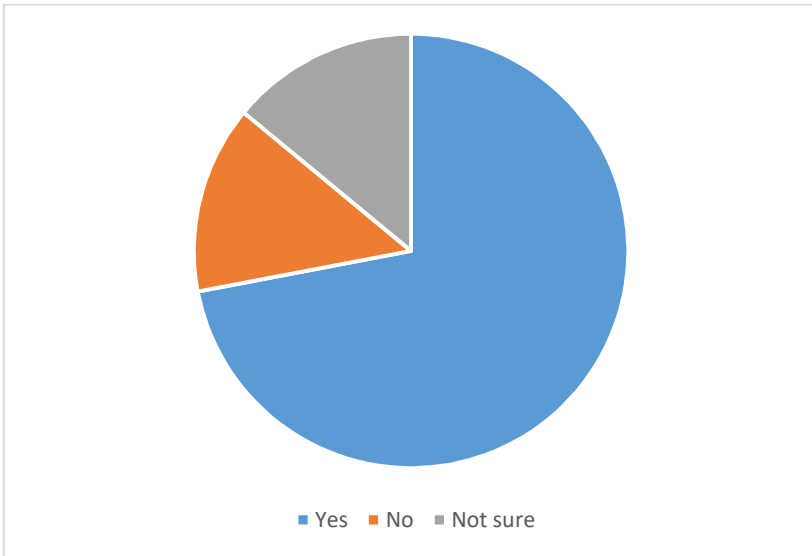


Yes – (27) 75%
No – (2) 6%
Not sure – (7) 19%
Total responses: 36
Comments include:

- In favour given 10% rule is cumbersome, not in favour extending to additional crop kinds.
- Should be simplifying isolations, not making them more complicated.

Q27. Maximum Impurity Standards

Proposal: Revise standard in Section 6.5.7 (a) and Section 7.5.6 (a) to allow for 3/100m² of other crop kinds in crops for Foundation status (change from 1/100m² or 0.1 percent). Do you agree with the proposed changes?



Yes – (26) 72%

No – (5) 14%

Not sure – (5) 14%

Total responses: 36

Comments include:

- In agreement but standard seems lax.

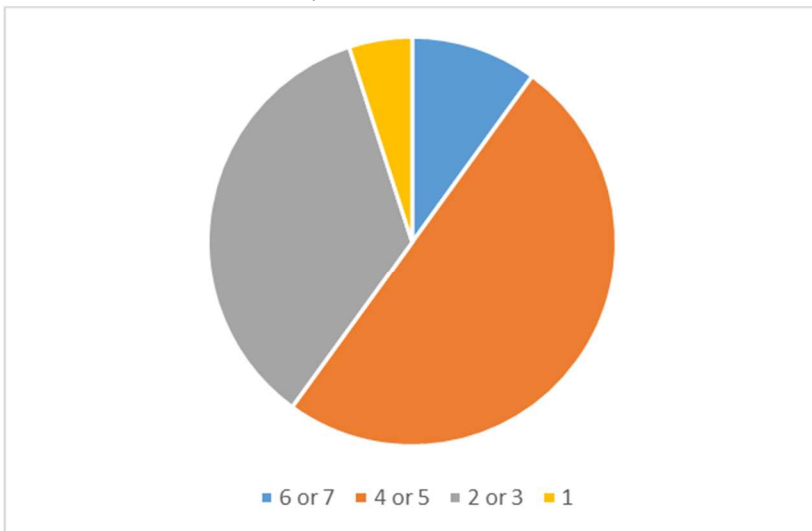
Q28. Are you interested in answering questions related to Hemp?

Yes – (23) 19%

No – (95) 81%

Total responses: 118

Q29. How clear and easy to understand are the Hemp section of Circular 6? [scale of 1-7, 7 = very clear and understandable, 1 = very unclear and hard to understand]



6 or 7 – (2) 10%

4 or 5 – (10) 50%

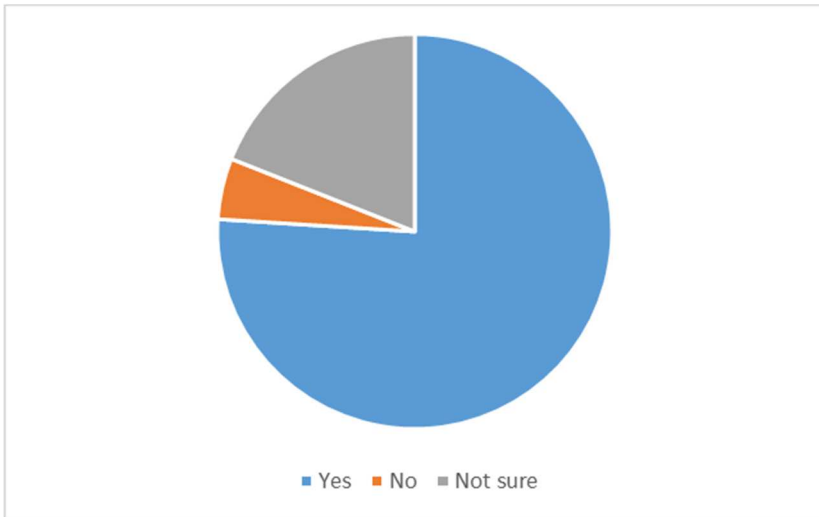
2 or 3 – (7) 35%

1 – (1) 5%

Total responses: 20

Q30. Land Use Requirements

Proposal: Revise “Table 10.2.2: Specific Crop Land Requirements” from 3 years to 2 years and 2 years to 1 year in the case of Certified. Do you agree with the proposed changes?



Yes – (16) 76%

No – (1) 5%

Not sure - (4) 19%

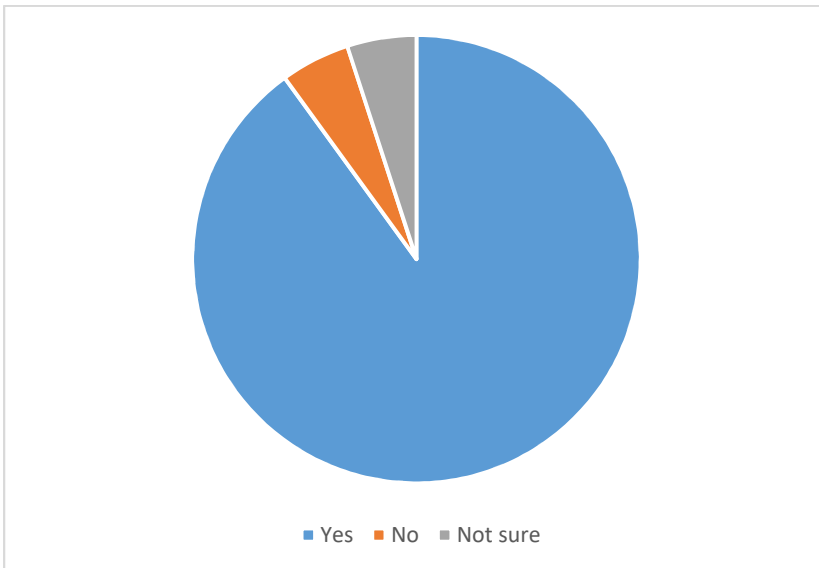
Total responses: 21

Comments include:

- Question about how 2 years would be verified.

Q31. Crop Inspection

Proposal: Clarify timing and number of inspection for dioecious and monoecious in Section 10.3, by modifying 10.3.4 and adding 10.3.5. Do you agree with the proposed changes?



Yes – (18) 90%

No – (1) 5%

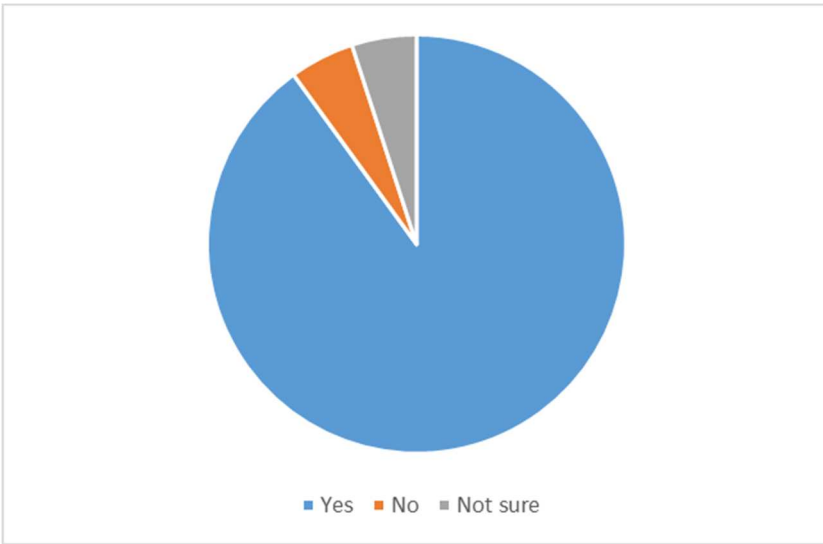
Not sure – (1) 5%

Total responses: 20

Comments include:

- Visual of Dioecious and Monoecious plants so growers can let inspectors know when ready for inspection.
- Monoecious should only require one inspection.
- Could be a step backwards given that inspection frequency was reduced from 2 inspections to 1 (for lower status).
- Would like to see more explanation why different number of inspections needed for monoecious vs. dioecious.

Q32. Proposal: Separate Section 10 into monoecious and dioecious parts. Do you agree with the proposed change?



Yes – (19) 90%

No – (1) 5%

Not sure – (1) 5%

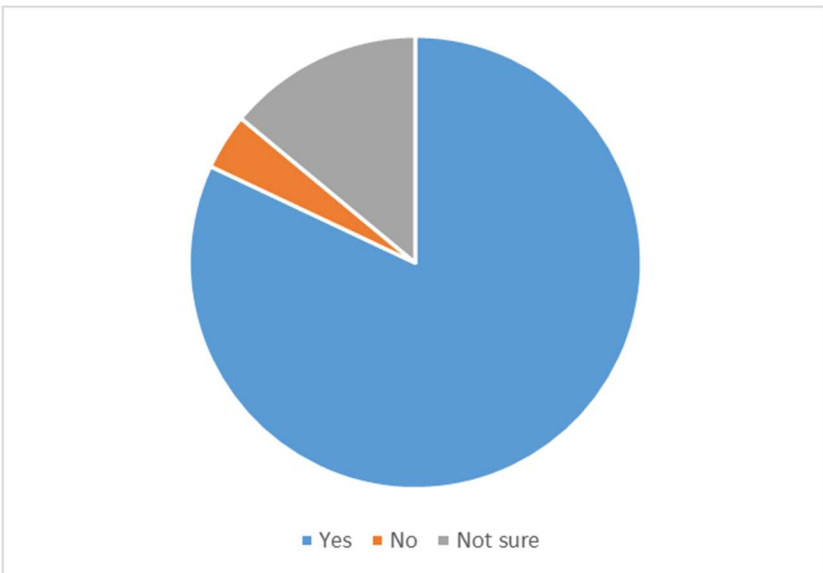
Total responses: 21

Comments include:

- Could deal with hybrids in the monoecious section or create a new section for hybrids.

Q33. Isolations

Proposal: Revise plot standards in Section 11.5, to have a general statement that the inspector must be able to properly view and inspect the crop. Do you agree with the proposed change?



Yes – (18) 82%

No – (1) 4%

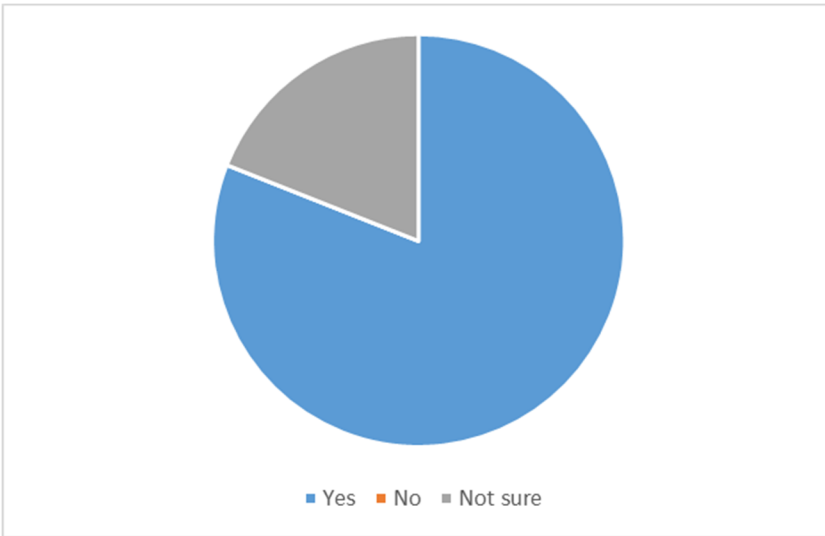
Not sure – (3) 14%

Total responses: 22

Comments include:

- Question about whether this is necessary, and the purpose.
- Statement seems very vague.
- Question about consequences if plot is not presented this way.

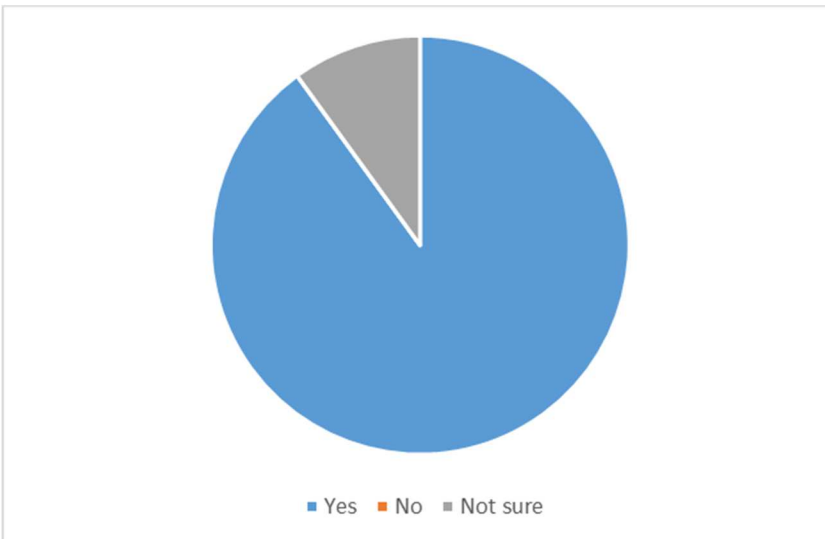
Q34. Proposal: Change isolation distance from 2000m to 1600 for Dioecious type – Registered in Table 10.4.2. Do you agree with the proposed changes?



Yes – (17) 81%
No – 0%
Not sure – (4) 19%
Total responses: 21
Comments include:

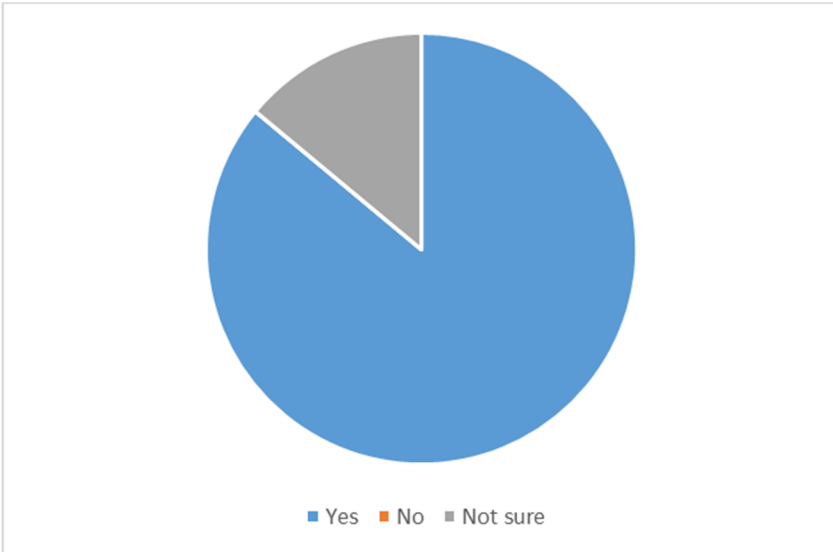
- Question about whether there is scientific backing.
- Will need to wait and see if this will affect varietal purity.

Q35. Proposal: Revise the last two statements for Dioecious type – Registered in Table 10.4.2. Do you agree with the proposed changes?



Yes – (18) 90%
No – 0%
Not sure – (2) 10%
Total responses: 20

Q36. Proposal: Revise the third statement for Dioecious type – Certified in Table 10.4.2. Do you agree with the proposed changes?



Yes – (18) 86%

No – 0%

Not sure – (3) 14%

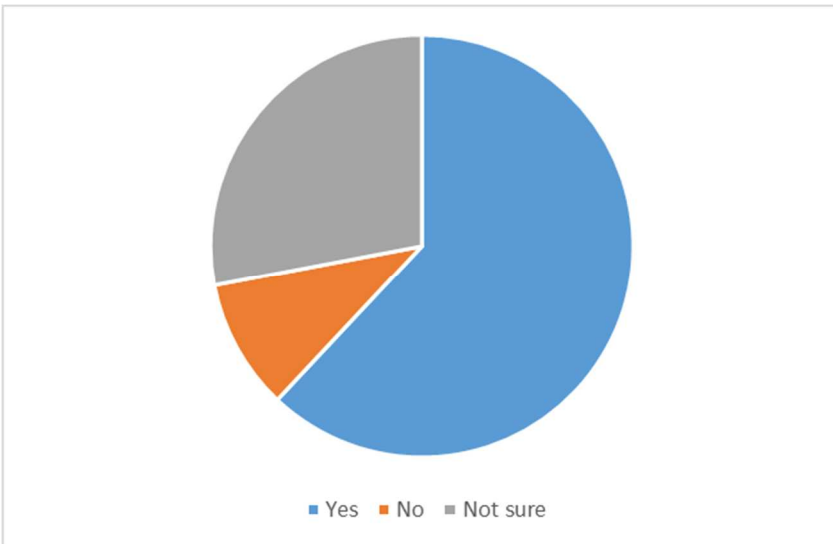
Total responses: 21

Comments include:

- Hope that intention is to allow Certified seed to be planted and then inspected to assure that it does not contaminate the actual inspected field. Agreement if this is the case, otherwise section isn't needed.

Q37. Maximum Impurity Standards

Proposal: Remove Section 10.4.4(c) and replace with (d), as well in Section 11.6.4. Do you agree with the proposed changes?



Yes – (13) 62%

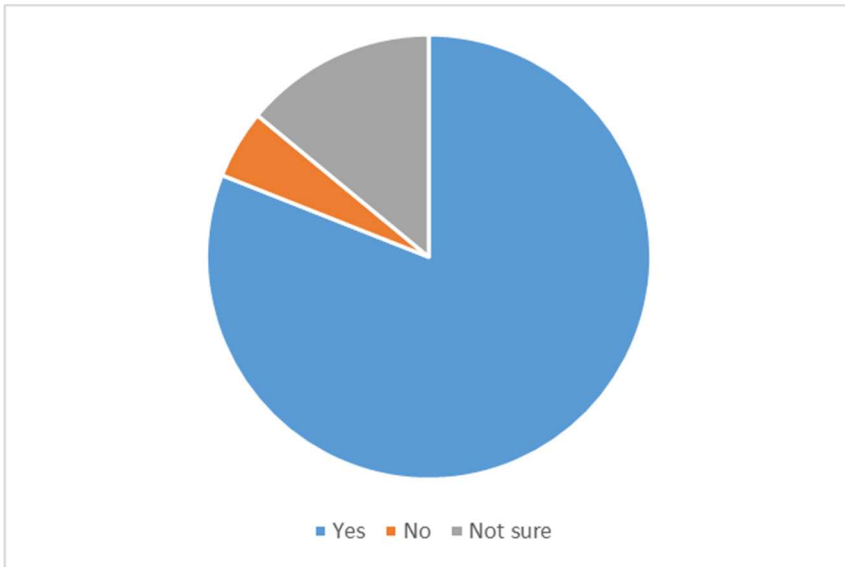
No – (2) 10%

Not sure – (6) 28%

Total responses: 21

Note: Level of agreement with proposed change was lower for this question. This may be due to the fact that there was an error in the survey. The current regulation was also presented as the proposed regulation.

Q38. Proposal: Revise the impurity standards for Dioecious type, Certified in “Table 10.4.4: Maximum Impurity Standards” to 20/10,000. Do you agree with the proposed changes?



Yes – (17) 81%

No – (1) 5%

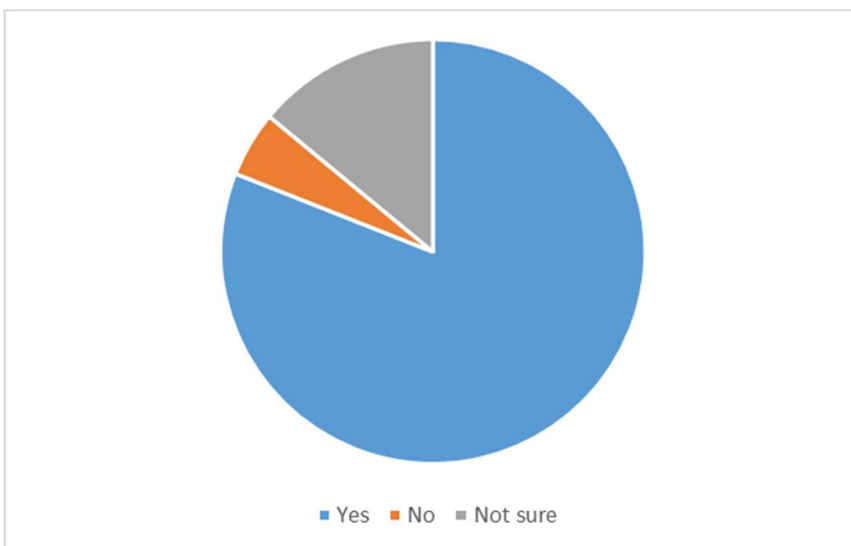
Not sure – (3) 14%

Total responses: 21

Comments include:

- Much too high of a standard.

Q39. Proposal: Revise “Maximum Number of Other Impurities” statement in “Table 10.4.4: Maximum Impurity Standards”. Do you agree with the proposed changes?



Yes – (17) 81%

No – (1) 5%

Not sure – (3) 14%

Total responses: 21

Comments include:

- Much too high of a standard.