

GREEN LIGHT: CFIA SRM Proposals CSGA Fully Supports

Throughout the CFIA's Seed Regulatory Modernization (SRM) process, CSGA has put forward a clear vision for a more responsive, efficient, and collaborative seed system based on three (3) core recommendations:

- 1. Make CSGA the Main Administrator of Canada's Seed Certification System**
- 2. Implement a Digital End-to-End Certification System**
- 3. Establish a Seed Sector Advisory Committee**

CSGA is pleased to see strong alignment between these recommendations and the policy proposals put forward by the CFIA.

Below we list these proposals - as well as other proposals outside our core recommendations that we support or support in principle - and provide comments when necessary.

Make CSGA the Main Administrator of Canada's Seed Certification System

CSGA is supportive of the following CFIA proposals that are aligned with CSGA becoming the main administrator of Canada's seed certification system.

3.1.4 CFIA Proposal: The CFIA no longer offers licensed seed crop inspector theory training for those wanting to become a licensed seed crop inspector (LSCI).

- **CSGA's Position:** CSGA agrees with this proposal and would be interested in partnering with the ASCIS Association to make this training available via CSGA Learn, its online learning platform.

3.1.8 CFIA Proposal: Expand alternative service delivery by having (a) a third-party issue seed tags instead of the CFIA, and (b) have a third-party review seed tag licence applications. To minimize the chance of fraud, the CFIA will have only one third-party issue seed tags. Seed tags are modernized within a specified timeframe by the third-party service provider. (Also detailed in subsection 2.1.4)

- **CSGA's Position:** CSGA agrees with this proposal, and as Canada's AOSCA agency, CSGA would be interested in delivering this service to the sector. CSGA currently provides Breeder and Select tags to the sector and has modernized them to include digital elements.

3.1.18. CFIA Proposal: The CFIA will explore, with the Canadian Seed Growers' Association, **digitalization and administration** of the Organisation for Economic Cooperation and Development (OECD) seed export certification system for Canada and ensure functionality with the new OECD electronic database that is under development.

- **CSGA's Position:** CSGA agrees with this proposal and sees it as an extension of its existing seed crop certification work. In the US, the day-to-day administration of the OECD Seed Scheme program is delivered by an AOSCA agency, and this would be very similar. CSGA routinely attends OECD Seed Schemes meetings and is an active and respected participant in its working groups and committees. CSGA was involved in the development of the OECD Seed Schemes digitalization framework and has the technical abilities to expand our SeedCert platform to connect into the OECD Seed Hub.

Implement a Digital End-to-End Certification System

CSGA is supportive of the following CFIA proposals that are aligned with Canada implementing a digital-end-to-end certification system.

3.1.8 (Cont.) CFIA Proposal: Seed tags are modernized within a specified timeframe by the third-party service provider.

- **CSGA's Position:** CSGA agrees with this proposal and sees it as an extension of its recent modernization of Breeder and Select tags to include QR codes and other fraud prevention technologies. CSGA's digital tag technology can be expanded to include all other pedigreed classes. CSGA is also working through the OECD Seed Schemes on its digital tag pilot to ensure international alignment. CSGA is ready, willing, and able to help modernize Canada's seed tags.

3.1.17. CFIA Proposal: Update the CFIA's Digital Service Delivery Platform to allow importers to apply for a notice of import conformity confirming import requirements are met, or, in the case of an authorized importer, provide required information on imported seed.

- **CSGA's Position:** All seed import conformity assessments should be entered into a searchable database that can create reports on seed quality for all seed imported into Canada.

3.1.21. CFIA Proposal: Explore opportunities to **further streamline the paperwork process** for OECD export certification by using a digital approach.

- **CSGA's Position:** CSGA agrees with this proposal and sees it as an extension of its existing seed crop certification work.

3.2.14. CFIA Proposal: The CFIA and the seed sector continues to **explore the use of Quick Response (QR) codes** and digital seed tags on pedigreed seed.

- **CSGA's Position:** CSGA agrees with this proposal and sees it as an extension of its recent modernization of Breeder and Select tags to include QR codes and other fraud prevention technologies. CSGA's digital tag technology can be expanded to include all other pedigreed classes. CSGA is also working through the OECD Seed Schemes on its digital tag pilot to ensure alignment.

Establish a Seed Sector Advisory Committee

CSGA is supportive of the following CFIA proposals that help establish a seed sector advisory committee.

3.2.1. CFIA Proposal: The CFIA establishes an **external seed advisory committee with balanced representation** from across the value chain to provide advice to the Seed Program. (Also detailed in subsection 2.2.1)

- **CSGA's Position:** CSGA and Seeds Canada issued a joint recommendation on the benefits of a seed sector advisory committee.

Other Proposals

CSGA welcomes the following recommendations, which look to streamline and clarify existing regulations.

3.1.5. CFIA Proposal: The purity standards listed in the grade tables (i.e., Schedule I) for both the No. 1 and No. 2 grades will be aligned such that the No. 1 standards for purity will apply. Standards for germination remain as is. (Also detailed in subsection 2.1.2)

- **CSGA's Position:** Anything that can streamline the standards is welcome, especially given that the No. 2 designation is rarely used. Consideration should be given to allowing the No. 2 designation when the purity requirement for No. 1 has been met and the seed is labelled with the percentage germination, rather than establishing a germination standard for No. 2 seed.

3.1.6. CFIA Proposal: Remove the germination standards where one exists for seed mixtures (i.e., forage mixtures and lawn and turf mixtures) from the grade tables and meet the individual germination standards applicable to each crop type in the mixture. (Also detailed in subsection 2.1.2)

- **CSGA's Position:** Anything that can be done to streamline and simplify the standards is welcome.

3.1.9. CFIA Proposal: Incorporate by reference the crop-specific labelling requirements for seed listed in Sections 19 and 23 to 31. (Also detailed in subsection 2.1.1)

- **CSGA's Position:** CSGA agrees with this proposal and suggests there may be opportunities to combine the seed quality standards and the labelling requirements in one document.

3.1.10. CFIA Proposal: Eliminate varietal blend restrictions on non-Plant Pest Tolerance Management (PPTM) varietal blends so that they can be sold as certified seed. (Also detailed in subsection 2.1.5)

- **CSGA's Position:** CSGA agrees that allowing flexibility for innovative varietal blends is desirable, provided that strict controls are implemented and transparency requirements are met to ensure truth-in-labelling and prevent fraud.

3.1.11. CFIA Proposal: Allow Canada Certified No. 1 and No. 2 Cereal Mixtures to include different pedigreed seed varieties of the same crop type to be sold as certified seed. (Also detailed in subsection 2.1.5)

- **CSGA's Position:** CSGA agrees that allowing flexibility for innovative varietal blends is desirable, provided that strict controls are implemented and transparency requirements are met to ensure truth-in-labelling and prevent fraud.

3.1.14. CFIA Proposal: Expand third party alternative service delivery by authorizing third parties to (i) assess whether seed meets minimum import requirements, and (ii) issue a notice indicating that import requirements are met. (Also detailed in subsection 2.1.4)

- **CSGA's Position:** CSGA agrees and recommends that accredited seed laboratories, operating under an audited quality management system, be authorized to complete import conformity assessments (ICA) on seed lots intended for importation into Canada prior to the seed being imported. Measures to ensure that international standards for seed quality assessment are acceptable for Canadian seed imports are essential. Furthermore, the CFIA should ensure that all ICAs are entered into a database, that all seed contaminants are captured, and that search and reporting capabilities are enabled.

3.1.15. CFIA Proposal: Eliminate the need to meet a germination standard at the time of import. The requirement to provide the percent germination result on the seed analysis certificate still exists. (Also detailed in subsection 2.1.4)

- **CSGA's Position:** CSGA agrees and suggests that a germination test requirement for imported seed be eliminated.

3.1.16. CFIA Proposal: Eliminate the requirement to provide germination data at the time of import on seed lots of small-seeded crop types imported between 500 g and 5 kg.

- **CSGA's Position:** CSGA agrees and suggests eliminating the germination test requirement for all imported seeds, regardless of weight, and focusing entirely on seed lot contaminants. To that end, all seed imports should be from a seed lot that has been tested according to recognized standard methods for other species and contaminants, including soil and disease bodies. Exemptions from the seed analysis certificate requirement for very small quantities of commercially packaged seed for own (garden) use should be considered.

3.2.3. CFIA Proposal: Develop a regulatory pathway for heritage and heirloom varieties to become registered. (Also detailed in subsection 2.2.3)

- **CSGA's Position:** CSGA agrees that a pathway for the commercialization of heritage and heirloom varieties of Schedule I, Part I varieties should be established. In addition, consideration should be given to the regulation of "population" or "heterogeneous" varieties of all crop kinds to ensure transparency and prevent fraud. CSGA has extensive experience in record keeping and "pedigreeing" seed lots and would be well-placed to be a co-regulator in this space. While regulatory changes are still a few years away, developing the digital platform that would facilitate alternative varieties – and native plant selections – should begin soon.

3.2.4. CFIA Proposal: The CFIA works with Recommending Committees to **develop appropriate testing conditions and performance standards** for varieties that have been bred specifically for alternative crop production systems (for example, organic, low carbon, farmer-selected material, etc.). (Also detailed in subsection 2.2.3)

- **CSGA's Position:** CSGA agrees that greater flexibility in farmers' seed choices would be good, provided there is transparency, consistency, and trust in the products placed on the market. As noted above, CSGA has extensive experience in seed production record keeping and would be interested in facilitating information sharing for these kinds of products.

3.2.5. CFIA Proposal: The CFIA works with Recommending Committees to **develop criteria and a standard process to enable regional restrictions** on variety registrations to be applied consistently across recommending committees.

- **CSGA's Position:** CSGA agrees that the CFIA should work with variety registration stakeholders to clarify, develop and implement policies to address regional registration issues.

3.2.6. CFIA Proposal: Allow for the submission of biomolecular data in the future to support variety registration.

- **CSGA's Position:** CSGA agrees that biomolecular data (DNA sequencing/markers) can be a useful tool to identify and/or distinguish varieties. It will be important that variety registration and seed certification authorities work closely with plant breeders and international counterparts to ensure that such tools are applied in a transparent fashion and for the broad benefit of agriculture, not narrow private interests.

3.2.7. CFIA Proposal: Incorporate by reference the list of recognized standard methods so that future standards can be recognized as technology improves and science advances. (Also detailed in subsection 2.2.2)

- **CSGA's Position:** CSGA agrees that this would provide flexibility to respond to developments in seed science and technology in a timely manner.

3.2.9. CFIA Proposal: The **Canadian Methods and Procedures for Testing Seed (M&P)** is reviewed and harmonized, where appropriate, with rules established by the International Seed Testing Association (ISTA) or the Association of Official Seed Analysts (AOSA).

- **CSGA's Position:** CSGA agrees that the M&P should be aligned with the ISTA and AOSA rules for seed testing as much as possible. The M&P were developed with the expressed purpose of grading seed lots, i.e., determination whether seed lots met the grading standards established in Schedule I to the Seeds Regulations. As such, changes to the M&P are inextricably linked to the standards, and any review of the M&P should be done in conjunction with a review of the standards.

3.2.10. CFIA Proposal: The CFIA to **provide industry guidance to clarify the process for a Bulk Storage Facility (BSF)** to downgrade pedigreed seed meeting a Foundation or Registered standard to a Certified standard.

- **CSGA's Position:** CSGA agrees and believes that it should be a very simple process to label and sell a certified seed lot of Foundation or Registered seed as Certified class seed; the intervention of an accredited grader should not be necessary. A digital end-to-end seed certification system would facilitate the process and ensure that all certified seed remains traceable.

3.3.1. CFIA Proposal: The **CFIA will take over from the Canadian Seed Growers' Association (CSGA) assessments to determine varietal eligibility** (i.e., whether a specific crop breeding line meets the definition of a variety) and amend the Regulations to provide authority to the CFIA for these assessments. (Also detailed in subsection 2.3.2)

- **CSGA's Position:** CSGA welcomes the CFIA's proposal to assume responsibility for assessing the eligibility for certification of varieties of crops not subject to variety registration. CSGA has been performing this activity for nearly 30 years, ever since corn and food-type soybeans were exempted from variety registration and hemp was legalized but never made subject to variety registration.

3.3.5. CFIA Proposal: Clarify that pedigreed seed conditioned by the seed grower on their own premises cannot be sold in Canada as pedigreed seed to a farmer or another seed grower, but can be used by the seed grower for pedigreed seed production.

- **CSGA's Position:** CSGA agrees that all seed sold as pedigreed seed/labelled with a Canada pedigreed grade name must be processed by an approved conditioner but that individual seed growers can use their own seed for pedigreed seed production.

3.3.6. CFIA Proposal: Clarify that seed loses its pedigreed status when conditioned (for example, cleaned, bagged, treated, etc.) by a facility that is not an approved conditioner.

- **CSGA's Position:** CSGA agrees that additional clarity as to seed losing its pedigreed status if conditioned by an establishment that is not an approved conditioner would be useful.

3.3.7. CFIA Proposal: Common seed must be graded by an accredited grader to be sold or advertised with a Common grade name. Otherwise, it can be sold and advertised without a Common grade name if it meets minimum standards for common seed, and the germination and purity data are provided on the label. (Also detailed in subsection 2.3.2)

- **CSGA's Position:** CSGA agrees with the intent of this proposal and hopes that the CFIA is prepared to enforce the new regulation when it comes into force. Clarification as to what constitutes "labelling" would be welcomed. Specifically, if the CFIA is proposing that seed quality information be provided on a label attached to the package or printed directly on the package (similar to pest control product requirements), clarity is needed on whether it would also be sufficient for the information to accompany the seed..

3.3.11. CFIA Proposal: No longer allow Canadian graders to conduct purity analyses on large-seeded crop types for the purpose of clearing seed under the authorized importer program. (Also detailed in subsection 2.3.3)

- **CSGA's Position:** CSGA agrees with this proposal as it will ensure that fully trained and competent seed analysts are responsible for purity analysis of imported seed lots. It may mean shipping samples and delays for analysis or getting an accredited foreign seed test prior to import, but that is a small price to pay for protecting the Canadian environment.

3.3.14. CFIA Proposal: Clarify the definition of "research".

- **CSGA's Position:** CFIA should work with sector stakeholders to ensure it understands the types and extent of research in the sector before it finalizes a definition.

3.3.15. CFIA Proposal: Require that accurate and truthful information be used when advertising seed for sale.

- **CSGA's Position:** CSGA agrees that CFIA should have the regulatory authority to ensure that seed advertising is truthful and accurate.

Other Stakeholder Proposals

CSGA is also supportive of the following recommendations in principle; however, impacted stakeholders should be consulted to determine if the proposed path forward is optimal or feasible.

3.1.1. CFIA Proposal: Amend the Regulations to remove Part 2 of the list of varieties subject to variety registration (i.e., Schedule III) or use Part 2 to accommodate heritage and heirloom varieties listed in Part 1 (TBD). Move safflower from Part 2 to Part 3 of Schedule III.

- **CSGA's Position:** CSGA would suggest that organizations like SeedChange are better equipped to determine if Part 2 is the best path forward to accommodate the registration of heritage or heirloom varieties or if a more agile process is required.

3.1.7. CFIA Proposal: Incorporate by reference the grade tables (i.e., Schedule I) listing the standards that must be met for a particular grade of seed and the crop-specific seed grading standards listed in Sections 6 and 7 of the Seeds Regulations. (Also detailed in subsection 2.1.1)

- **CSGA's Position:** CSGA would recommend that CFIA initiate this consultation sooner versus later with stakeholders, especially seed laboratories and seed analysts, to clearly articulate the linkages between the seed standards and the Canadian Methods and Procedures for Testing Seed in an effort to harmonize Canadian seed testing requirements with international standards for seed quality assurance.

3.3.2. CFIA Proposal: Provide a pathway for registrants to transfer their registration to another capable entity when they no longer wish to maintain and sell the variety. (Also detailed in subsection 2.3.1)

- **CSGA's Position:** CSGA agrees with the proposal in principle but is unsure if it will actually be used. Also, CSGA questions why this needs to be a regulation versus a policy.

3.3.10. CFIA Proposal: Reduce the small lot exemption from 5 kg to 500 g for large-seeded crop types. Only require purity analysis for seed imported between 500 g and 5 kg, regardless of size. (Also detailed in subsection 2.3.3)

- **CSGA's Position:** CSGA recommends that purity analysis be required for all seed imports other than very small amounts of commercially packaged seeds for personal, home garden use. However, through our discussions with stakeholders, there is concern that limiting the sample size may negatively impact their operations. CSGA also recommends that the CFIA clarify that samples of seed for testing by an accredited seed testing lab are not considered seed as defined by the *Seeds Act*, as they are not "represented, sold or used to grow a plant".

Your Feedback is Needed

As a seed sector stakeholder, we're asking you to:

- **Support the CFIA's overall direction**
- Urge the CFIA to **designate CSGA as the main administrator** of seed certification
- Advocate for **mandatory reporting of total certified seed quantities**
- Encourage the **CFIA to legislate only where necessary**

To make sharing your feedback easy, we created a **Letter Campaign you can complete quickly**. Simply enter your name, and a prepared letter will be emailed straight to government decision-makers, amplifying CSGA's positions and showing sector-wide alignment on these critical issues. You can also personalize the letter with your own comments.

The CFIA is **accepting feedback until October 3, 2025**. Don't miss the opportunity to support a seed system that is faster, fairer, and built for the future.

[SUBMIT YOUR FEEDBACK TO THE CFIA NOW](#)