

YELLOW LIGHT: CFIA SRM Proposals CSGA Conditionally Supports

CSGA is supportive of the following CFIA proposals but recommends refinements to ensure they deliver benefits without adding costs, complexity, or risks.

3.1.3 CFIA Proposal: The CFIA may **expedite variety registration decisions** for crop types listed in Part 3 of Schedule III when the variety has already been recognized in a foreign jurisdiction.

- **CSGA's Position:** Supportive, but unsure what is gained. Part III is already streamlined, and any expedited processing must still require a legal reference sample, a variety name check, a Canadian Representative, and a description of variety that uses Canadian descriptors. Acceptance of foreign varieties should occur only where standards and descriptors are demonstrably equivalent to Canadian requirements and there is clear market demand in Canada. There must also be a safeguard for market acceptance in Canada, since a variety's traits or characteristics may not be accepted by the value chain.

Why it Matters:

- Not all foreign jurisdictions should be treated as equal. Prioritization should be given to AOSCA agencies and OECD Seed Schemes countries.
- Canadian descriptors must be used consistently. What is "tawny" in one country may be interpreted differently elsewhere.
- Accepting foreign documentation without clear equivalency mapping and proper checks and balances, such as one variety and one name, risks misalignment with Canadian testing, labelling, and enforcement.
- Fast-tracking a variety that Canadian farmers and processors will not accept can trigger stewardship and market-access issues.

How it Can be Improved:

- Clarify what will be gained beyond what is already possible under Part III.
- Limit foreign jurisdictions to AOSCA agencies or OECD Seed Schemes participating countries in good standing.
- Require, without exception, a Canadian Representative, a variety name check, a Canadian-format description of variety, and a legal reference sample.
- Add a short, objective market-fit screen focused on stewardship, coexistence, and end-use quality concerns. If credible issues are raised, the CFIA should be able to condition or pause expedited status.

Suggested Feedback:

- *I support bringing varieties to market faster, but it is not clear what this adds beyond what Part III already allows. If this proceeds, safeguards are essential: limit eligibility to jurisdictions with documented equivalency (for example, AOSCA agencies and OECD Seed Schemes countries), require a Canadian Representative, a legal reference sample, one variety/one name, and a description of variety using Canadian descriptors. Include a short market-fit screen to confirm stewardship, coexistence, and end-use acceptance in Canada. This could improve service without creating market-access or confidence issues.*

3.1.13 CFIA Proposal: Remove the regulatory requirement for CSGA to issue a new crop certificate when two or more lots of the same variety are mixed and still meet Canada Foundation or Canada Registered grade.

- **CSGA's Position:** Supportive of reducing redundancy, but keep the requirement in Circular 6. A similar control point already exists in Circular 6, which is the right place for it. CSGA must keep this requirement to preserve traceability and manage risk and liability for lots that may re-enter seed crop certification. If the CFIA removes the regulatory reference, CSGA would continue to require it under Circular 6.

Why it Matters

- The current Circular 6 requirement preserves an audit trail for approximately 30-50 blends per year that return to CSGA's seed crop certification program.
- Without this requirement, CSGA risks certifying seed crops without full complete visibility of the parent seed lots, increasing CSGA's risk and liability, and slowing certification appraisals.

How it Can be Improved

- Keep the requirement in Circular 6 rather than in the Seeds Regulations.
- CSGA will work on creating a digital tool that would allow users to receive a blended crop certificate in real-time, without the need for manual intervention.

Suggested Feedback:

- *I support removing this regulation, but CSGA must keep its similar requirement in Circular 6 to ensure traceability and protect the integrity of its certification program. If the CFIA removes the clause from regulation, please confirm in guidance that CSGA will continue to require a digital blend declaration. I support CSGA in developing a digital tool to speed up the issuance of a blended crop certificate number through SeedCert. Keeping this requirement in Circular 6 preserves an auditable trail for Foundation and Registered blends that may re-enter certification, while avoiding red tape and delays.*

3.2.2 CFIA Proposal: Incorporate by reference the list of crop types subject to variety registration.

- **CSGA's Position:** Supportive, provided unintended consequences are clear and mitigated. Once a crop kind leaves Variety Registration, it also leaves behind the protection that system provides. This could leave certain Canadian crop sectors more vulnerable to foreign imports and could place Canadian breeders and SMEs at a competitive disadvantage.

Why it Matters

- We need to make decisions that are in the best interest of Canadian agriculture, not next quarter's profit.
- When a crop kind exits registration, maintaining a pedigreed-seed requirement helps protect transparency, identity, and innovation, and keeps Canada competitive.

How it Can be Improved

- Publish clear guidelines and thresholds for how a crop kind enters or leaves Variety Registration, with a defined intake window and a minimum 24-month lead time for material changes.
- If a crop kind leaves Variety Registration, give the value chain the option to require that seed sold in Canada be of pedigreed status (hybrid corn and hemp models) and apply the proposed Form 300 changes to support variety certification eligibility and traceability.
- The requirement for pedigreed status should be incorporated by reference to allow greater flexibility.

Suggested Feedback:

- *I support using incorporation by reference for Schedule III, provided change management is clear and predictable. Please publish decision thresholds, consult the sector, and provide at least 24 months' lead time. If a crop kind exits registration, the CFIA should have the option, at the request of the value chain, to require pedigreed seed (as with hybrid corn and hemp) and apply the updated Form 300 process to determine its eligibility for seed certification.*

3.3.3 CFIA Proposal: Clarify that a variety's registration status can be cancelled if a reference sample is no longer available.

- **CSGA's Position:** Suspend, don't cancel. A reference sample is key to the CFIA's Variety Registration process and monitoring, but cancellation is too blunt. CSGA proposes suspending seed certification eligibility instead, keeping the registration active to avoid unintended market and grading impacts for farmers.

Why it Matters

- Variety registration's core purpose is the official recognition of the identity of a variety.
- There are multiple reasons why a sample may no longer be available, including being used up or requiring replacement due to age or damage.
- Cancelling registration would make seed sales illegal and shift enforcement responsibility to the CFIA, which is unlikely to prioritize or resource these cases.
- Cancellation would mean that grain derived from these varieties cannot be assigned an official grade higher than "Feed", which would harm producers and end-users who selected a variety based on certain traits for processing or value-added opportunities (e.g., Identify Preserved (IP) programs).
- Varieties can be responsibly phased out without cancellation by ceasing Breeder seed production and letting pedigreed stocks run out.

How it Can Be Improved

- Instead of cancelling registration, suspend its eligibility for seed certification. This would limit future seed supplies, while not impacting marketing or grading options for farmers.
- Provide clear communication and a remediation plan: notice to registrants and seed growers, a defined remediation window, and options for replenishing the reference sample.
- Once the suspension is lifted, CSGA would resume issuing crop certificates so affected seed crops can continue through certification. Existing compliant inventories remain marketable because the variety remains registered.

Suggested Feedback:

- *I support the CFIA's need to maintain a reference sample. However, cancelling a registration when the sample has been used up or damaged is too blunt a tool. Please keep the registration active and instead suspend eligibility for seed certification until the reference sample is restored. This preserves markets and grading opportunities for farmers and end-users who rely on these varieties. Once the reference sample is restored, seed certification can resume without disrupting the market.*

3.3.4 CFIA Proposal: Require records to be kept by facilities that produce common seed mixtures.

- **CSGA's Position:** Support the intent, but why only common seed mixtures? All seed vendors, not only those making common seed mixtures, should keep auditable records that support seed quality and labelling requirements. However, monitoring and enforcing this consistently would be very onerous for the CFIA.

Why it Matters

- This proposal's intent suggests concerns with common seed quality and consumer protection in the common seed market. Using certified seed addresses these concerns.
- It would be difficult for the CFIA to enforce common seed sales consistently or identify all vendors reliably. If feasible, better records could also support intellectual property protection.

How it Can be Improved

- Further discussion with the CFIA, our members, and sector partners would be required before CSGA can propose potential improvements to the recommendation.

Suggested Feedback:

- *I support requiring all seed vendors to keep auditable records that verify seed quality and labelling requirements. However, consistent monitoring and enforcement would be challenging for the CFIA. Further discussion with sector partners is needed to design an approach that improves traceability and consumer protection without creating unmanageable oversight burdens.*

3.3.9 CFIA Proposal: Require seed imported into Canada to be assessed to determine that it meets minimum purity standards before import. Exemptions: authorized importers, in-transit seed, and seed exempt from providing a seed analysis certificate at the time of import.

- **CSGA's Position:** Supportive, but we can likely go further. Pre-import purity assessment can strengthen biosecurity and buyer confidence, but success depends on clear communication, accredited labs, and a single digital workflow that avoids bottlenecks and duplicative testing.

Why it Matters

- Up-front purity checks help keep noxious weeds and unknown contaminants out of Canada.
- Without clear rules, data standards, and digital tools, importers could face delays, inconsistent decisions, and higher costs.

How it Can be Improved

- Use a single digital window for pre-import submissions and decisions; require electronic upload of seed analysis certificates and contaminants data.
- Limit assessments to accredited seed labs operating under audited QMS; publish accepted methods (M&P aligned with ISTA/AOSA) and a standard data schema.
- Set service standards (turnaround targets), a help guide for brokers/importers, and risk-based sampling rules; enable API integrations to importer systems.
- Phase in with outreach and training; provide dashboards and reporting so the sector can see trends and compliance.

Suggested Feedback

- *I support pre-import purity assessment, provided it's delivered through a single digital window with clear standards and timelines. Please require electronic submission of the seed analysis certificate and contaminants data from accredited labs (methods aligned with M&P/ISTA/AOSA), setting turnaround targets, and publishing a simple guide for importers and brokers. API integrations into importer systems will reduce errors and delays. With these elements in place, the policy will improve biosecurity and buyer confidence without creating bottlenecks.*

3.3.13 CFIA Proposal: Reduce the timeframe for a vendor to provide purity and germination information

requested by a purchaser from 30 to five (5) days.

- **CSGA's Position:** Supportive, but we can likely go further. Most purity and germination results exist digitally and should be provided upon request. CSGA has been piloting digital seed tags for two years, which allow the seller to share purity and germination results (and more) directly via a QR-enabled seed tag and validation page, creating instant data validation.

Why it Matters

- Planting, treatment, and storage decisions are time-sensitive; five days is better than 30, but same-day access is often feasible where records are digital.
- Most vendors already have digital test results. Providing these results in near real-time improves transparency, reduces disputes, and will likely become the norm through digital tag technology.

How it Can be Improved

- Require the vendor to provide the information upon request.
- Embrace digital seed tag technology, which will make these results and others accessible via the seed tag.

Suggested Feedback:

- *I support reducing the response time and recommend going further: purity and germination information should be provided upon request. By adopting digital seed tags, these test results and others can be made available by the seller in near real-time. This will make on-farm decisions timelier and improve transparency without adding undue burden for vendors who are already using digital records.*

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](#)