

RED LIGHT: CFIA SRM Proposals CSGA Does Not Support As Written

CSGA has significant concerns with the following CFIA proposals and recommends practical alternatives that achieve CFIA's goals without adding regulatory burden, unnecessary costs, or risks to efficiency, affordability, and seed quality.

3.1.12 CFIA Proposal: Amend the definition of the Pedigreed Seed Declaration to remove reference to a specific CFIA form.

- **CSGA's Position:** Not supportive as written. Remove the form reference, but require electronic submission of the dataset to the CFIA. Flexibility is fine, but without a common data strategy and framework, this will create data silos and weaken oversight. The full dataset must be digitally reported to regulators to enable effective program management, oversight, and enforcement.

Why it Matters

- Every credible certification program monitors output. Canada previously collected this information; however, the capability was lost over time. The authority to enable reporting was reintroduced in 2015 but has not been used to date.
- Recent tariff issues highlighted how little data we have on our sector's production, including total quantity of seed certified. An anonymized national dataset would be a key strategic data source and allow better decision-making and resource allocation across seed growers, distributors, and government. Other jurisdictions that have this national dataset consider it a critical tool for informed decisions and for maximizing productivity.
- CSGA is unaware of any other seed certification system that does not track how much seed it is certifying, potentially making Canada an international outlier. The CFIA does track this information to comply with exports under the OECD Seed Schemes. The gap comes from both domestic production and exports moving on non-OECD seed tags.
- Fragmented records reduce data quality, increase fraud risk, and make audit and oversight slower and more expensive.
- Poor data limits automation, risk-based oversight, and evidence-based program design.
- Not knowing how much seed we certify undermines system integrity and market confidence, and weakens our ability to measure, benchmark, and maximize productivity and to respond to calls for greater transparency.

How it Can be Improved

- Prioritize reporting total quantity of seed certified as a core enabler of a modern, responsive system. An anonymized national dataset would support monitoring, benchmarking, resource allocation, and provide actionable insight to measure, benchmark, and maximize sector productivity.
- Keep the flexibility. Remove the form reference but require electronic submission of the dataset to the CFIA through CSGA's SeedCert platforms, with integrations available for third party tools (e.g., SeedTrakr) and corporate software systems.
- Work with CSGA to publish a standard data schema, validation rules, and retention timelines for data handled through SeedCert and enable role-based regulator access. This supports automation, risk-based oversight, and evidence-based program design.

- Make reporting mandatory for every pedigreed seed lot, including domestic sales and non-OECD-tagged exports, so regulators can produce a complete national roll-up of certified seed volumes and close the current gap.
- Commit to regular anonymized national roll-ups (for example, quarterly and annual) and dashboards to inform productivity benchmarking, transparency, and market confidence with industry and trading partners.
- Add automated reconciliation and anomaly detection (for example, cross-checking reported volumes against tag issuance and inspection data) to deter fraud and speed up and improve audit and oversight.

Suggested Feedback:

- A national anonymized dataset of certified seed volumes is a strategic tool for our sector. It would enable stronger oversight, better benchmarking and forecasting, help measure and maximize productivity, and strengthen transparency and market confidence. I support removing the pedigreed seed declaration form reference only with a clear data plan: electronic submission of the full dataset to CFIA via CSGA's SeedCert platform; a published data schema, validation rules, and retention timelines; integrations with third-party tools; and mandatory reporting for every pedigreed lot. This will close the domestic data gap, prevent silos, improve data quality, and protect program integrity while equipping regulators and industry with the evidence needed for risk-based oversight, analytics, and continuous improvement.

3.1.19 CFIA Proposal: Explore expanding the policy on alternative seed crop inspection services to enable additional companies and seed growers to inspect their own pedigreed seed crops where appropriate and oversight exists.

- **CSGA's Position:** What problem are we trying to solve? Supportive of efficiencies, but no meaningful savings. Inspections are a critical part of our seed certification system, and unbiased third-party inspections are foundational. We have not heard a broad desire to move away from third-party inspection – in fact, we've heard the opposite. Once people understand what is required of an inspector and an inspection service, any idea of "saving a quick buck" disappears. Our existing framework for approving and overseeing inspection services works well and we have full confidence in current inspectors and ASCIS providers.

Why it is Important

- Independent third-party inspections underpin confidence, consistency, and market acceptance in pedigreed seed.
- Shifting to self-inspection risks undermining our resilient third-party model and could make inspections more expensive over time. The CFIA would also need to commit additional resources to properly oversee self-inspection programs, which could carry a higher risk profile than independent, third-party inspectors.
- Inspecting your own fields is not "just walking the field"—it requires training, licensing, oversight, administration, and fees.
- Large seed companies operating in closed-loop models (e.g., hybrid corn and canola) already conduct their own inspections under CFIA oversight. This program has worked well for 20+ years; there's no reason it shouldn't continue.

How it Can be Improved:

- Maintain the current framework, which works well (not a single field went uninspected throughout the whole COVID pandemic).
- Complete a full cost-benefit, risk assessment, and stakeholder consultation before expanding non-third-party inspections outside of the current framework.

Suggested Feedback:

- *The current inspection framework works well, and independent third-party inspections should remain the default. I support finding efficiencies, but there is not a strong desire within our sector to move to self-inspections. Self-inspections would require significant training, licensing, oversight, and administration. They could also undermine our existing third-party model, potentially making crop inspections more expensive in the future.*

3.2.8 CFIA Proposal: Incorporate the Weed Seeds Order (WSO) by reference, with a delayed coming-into-force to align with *Seeds Act* amendments.

- **CSGA's Position:** Not supportive. The WSO can already be amended by Ministerial order; what's missing is a trusted, regular review process. Moving to Incorporation by Reference (IBR) adds unnecessary complexity and could be a slower process. CSGA does not support the opening of the *Seeds Act* at this time.

Why it Matters:

- Weed species don't wait for regulatory reviews. Canada needs an agile, science-based review process that makes recommendations to update weed species that present a threat to Canada's biosecurity and farms.
- IBR adds process complexity without solving the real problem: governance and cadence.
- Opening the *Seeds Act* is a major undertaking with much uncertainty and potential for unintended consequences.

How it Can be Improved:

- Keep the WSO under the existing Ministerial Order authority; don't move it to IBR.
- Establish a Weed Seeds Working Group under the new Seed Sector Advisory Committee or CSGA's Regulatory Services Committee, commit to an annual review cycle and make recommendations to the Minister of Agriculture.
- Publish a change criteria policy and specify transition timelines.

Suggested Feedback:

- *I do not support moving the Weed Seeds Order to Incorporation by Reference. The current Ministerial Order already enables timely updates. What is needed is a credible, regular review process. Please establish a Weed Seed Working Group under the Seed Sector Advisory Committee or CSGA's Regulatory Services Committee to annually review the Weeds Seed Order and make recommendations for change. Opening the Seeds Act is unnecessary and risks delays and unintended consequences.*

3.2.12 CFIA Proposal: Expand recognition of foreign grader programs to include graders outside the United States.

- **CSGA's Position:** Not supportive as written. This adds complexity and administrative burden without improving outcomes. A better path is to allow imported seed to be labelled with internationally accredited lab results from ISTA or AOSA as an alternative to grading the seed.

Why it Matters:

- Multiple foreign grader programs with more countries introduce parallel systems, more audits, and potentially inconsistent outcomes.
- Using ISTA or AOSA test results leverages internationally recognized quality assurance programs, which would simplify imports, and keep rules clear and more streamlined for foreign suppliers, Canadian importers and regulators.

How it Can be Improved:

- Do not expand foreign grader recognition outside of the United States.
- Instead, allow imported seed to be sold/labelled using ISTA or AOSA seed analysis results that meet Canadian Method and Procedures (M&P) equivalency, rather than assigning a Canada grade name.
- Maintain Canadian grading only where a Canada grade name is expressly required.

Suggested Feedback:

- *I do not support expanding recognition of foreign grader programs outside of the United States. This would add complexity and workload for the CFIA without clear benefits. Instead, please allow imported seed to be labelled with ISTA or AOSA seed analysis results that meet Canadian M&P equivalency, and require electronic submission of the seed analysis certificate through the import platform. This approach uses internationally recognized QA systems, simplifies compliance, and provides clear, verifiable information for buyers and regulators.*

3.3.8 CFIA Proposal: Require all imported seed lots, including mixtures, to be labelled with the country of origin of production (where the seed was grown).

- **CSGA's Position:** Not supportive as a universal, on-package rule. Country of origin is most valuable at the time of import for a biosecurity risk assessment, and pedigree seed generally already carries origin information. For common seed and mixtures, mandatory on-package country of origin labelling adds cost and complexity with limited buyer benefit.

Why it Matters:

- Universal on-package origin for common seed and mixtures increases burden with minimal benefit for most buyers.
- We should not let short-term 'elbows-up' thinking introduce long-term regulatory requirements that provide limited buyer benefit.
- Regulators and analysts need origin data at import to assess noxious weed/species risks, and specific on-package origin only makes agronomic sense for certain species (e.g., alfalfa, red clover) tied to winter hardiness.

How it Can be Improved:

- Digitally capture country of origin at import for all lots (and mixture components) in the import platform and make records available to CFIA on request.
- Retain/define targeted on-package origin requirements only where agronomically relevant (e.g., alfalfa, red clover) and publish the species list and rationale.
- Provide clear definitions (what constitutes “country of origin of production”), treatment for multi-origin blends, seed moving across borders for processing, and record-keeping expectations for importers.

Suggested Feedback:

- *I do not support a universal, on-package country of origin labelling requirement for all imported seed and mixtures. Pedigreed seed typically already includes origin, and for other seed, this adds cost with limited buyer value. Instead, country of origin should be digitally captured in the import system (including mixture components), with on-package labelling reserved only for species where origin informs agronomic decisions (e.g., alfalfa, red clover). This should be accompanied by clear criteria, definitions, and record-keeping rules so compliance is consistent and enforceable. This approach prioritizes biosecurity at import, avoids unnecessary costs, and ensures compliance through clear criteria, definitions, and record-keeping rules.*

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](#)