

Proposed Temporary Fee Increase for 2020-2021

Overview

The Canadian Seed Growers Association held a Special General Meeting of Members on November 20, 2019 in Saskatoon, Saskatchewan. The purpose of the meeting was to seek member feedback on proposed modernization initiatives as well as related resourcing strategies, including potential temporary fee increases. Three resolutions (link to Annex 1) were presented, debated and **passed** by the members in attendance at the meeting. They included:

1. A resolution of support for the policy objectives outlined in the Seed Synergy White Paper, including the creation of a new National Seed Organization (NSO).
2. A resolution of support for changes to the CSGA's membership structure that would create separate classes for businesses and individuals.
3. A resolution of support for temporary fee increases that would generate up to \$1,000,000.00 in additional revenue for CSGA in the 2020-2021 fiscal year, split between modernization and pension plan investments.

As a result of the passage of the resolutions and the feedback received from the members present, the CSGA Board of the Directors has elected to proceed with temporary fee increases for the 2020-21 fiscal year ending January 30th, 2021. Based upon preliminary budget estimates, \$600,000 in additional revenue would allow the CSGA to continue its current high level of effort in support of the Seed Synergy White Paper priorities, without having to draw as heavily on reserves as it will likely need to in 2019-20.

An important consideration in setting this lower target, is the health of the CSGA defined benefit pension plan and the absence of any clear evidence that a major cash infusion of the type proposed is necessary. Should a new National Seed Organization assume responsibility for the CSGA's legacy defined benefit plan, it would likely receive the same advice from pension plan experts as CSGA is receiving now (i.e. hold the current course).

The attached schedule outlines the planned temporary fee increases by fee category. The planned increases are designed to ensure an equitable distribution of costs among those benefitting from CSGA work. The guiding principles applied in formulating the fee increase proposal were:

1. Encourage membership retention and growth.
2. Distribute increases primarily across acreage and other service fees
3. Factor in ability to pay
4. Factor in the cost of providing the service

Incremental funds will be applied to three Seed Synergy White Paper priority areas, with emphasis on priorities 2 and 3. The areas are:

1. CSGA Seed Certification System Modernization and Capacity Building
2. Analysis, Option Development and Input into CFIA Seed Regulatory Modernization
3. Institutional Modernization/National Seed Organization

While the CSGA Board has elected not to move forward with the membership structure changes proposed in Resolution 2 at this time, it is proposing adjustments to the membership fee schedule that would, if implemented, reinstate the model in place prior to 2004. This model, if implemented, would provide the second and subsequent members on an CSGA enterprise account with a fee reduction.

Annex 1

Resolution 1

WHEREAS the CSGA Board of Directors has expressed its [position](#) on the Seed Synergy [White Paper](#) vision for a Next Generation Seed System in Canada including the proposed consolidation of the CSGA with the Canadian Seed Trade Association, the Canadian Plant Technology Agency, the Commercial Seed Analysts Association of Canada and the Canadian Seed Institute;

AND WHEREAS work on the structure and details of the consolidation is continuing;

AND WHEREAS once a detailed consolidation proposal has been finalized and approved by the CSGA Board and the boards of the other parties, it will be submitted to the CSGA members for ratification and final approval, which approval may be sought as early as July 2020;

Be It Resolved that the CSGA Members hereby support the direction proposed by the Board as set out in the recitals of this resolution.

Resolution 2

WHEREAS the CSGA Board is considering measures that would facilitate the establishment of a membership fee structure that includes separate categories for the individual member and for the business with which that individual is associated, with a view to removing current disincentives (high member fees) for individuals to participate in an ongoing manner in current and future seed grower professional development opportunities offered through CSGA or a future National Seed Organization (i.e. the consolidation referred to in Resolution #1 above);

AND WHEREAS it is noteworthy that these measures are proposed in the context of broader discussions on the relative merits of changes to the CSGA membership structure that could establish the business unit (with its associated quality management systems) as the entity to which a crop certificate is issued, to which certain voting rights are assigned and to which fees associated with crop certification are charged;

AND WHEREAS it is also noteworthy that these discussions include consideration of the merits of simultaneously recognizing the professional standing of individual seed growers for the purpose of seed certification and other functions, and to whom certain voting rights are assigned and to which professional fees associated with crop certification are charged; Be It Resolved that the CSGA Members hereby support the direction proposed by the Board as set out in the recitals of this resolution.

Resolution 3

WHEREAS the CSGA is considering a temporary fee increase designed to generate up to \$500,000 for modernization and consolidation initiatives and up to \$500,000 for employee "defined benefit" pension plan termination costs associated with the implementation of CSGA's Strategic Plan and the White Paper;

AND WHEREAS it is noteworthy that these measures, if implemented, would be for the 2020 crop year only, with the precise level of fee increases and their allocation across different fee categories to be determined by the CSGA Board;

AND WHEREAS requirements beyond the 2020-21 fiscal year will be assessed on an annual basis and communicated to members at and/or following the 2020 Annual General Meeting in Winnipeg, Manitoba;

Be It Resolved that the CSGA Members hereby support the direction proposed by the Board as set out in the recitals of this resolution.

Schedule of Proposed Temporary Fee Increases 2020-2021

FEE KIND	Number of Occurrences	Current fee	Projected Revenue (2019-2020) Current	Temporary Fee	Projected Revenue (2020-2021) Temporary	IMPACT
Detailed Crop Kind Breakouts						
High Value Crop Kinds (Tier I Crops)						
Hybrid Corn	16,697	1.00	16,697	2.00	33,394	16,697
Hybrid Canola	59,753	1.00	59,753	2.00	119,506	59,753
Medium Value Crop Kinds (Tier II Crops)						
Chickpea	3,009	0.98	2,949	1.20	3,611	662
Fababean	7,843	0.98	7,686	1.20	9,412	1,726
Hemp	8,226	0.98	8,061	1.20	9,871	1,810
Soybeans	354,968	1.00	354,968	1.20	425,962	70,994
Lower Value Crop Kinds (Tier III Crops)						
Alfalfa	71,561	0.98	70,130	1.10	78,717	8,587
Barley	110,875	0.98	108,658	1.10	121,963	13,305
Bean	3,946	0.98	3,867	1.10	4,341	474
Birdsfoot Trefoil	2,626	0.98	2,573	1.10	2,889	316
Bromegrass	8,500	0.98	8,330	1.10	9,350	1,020
Buckwheat	1,180	0.98	1,156	1.10	1,298	142
Canarygrass	950	0.98	931	1.10	1,045	114
Clover	5,452	0.98	5,343	1.10	5,997	654
Fescue	16,045	0.98	15,724	1.10	17,650	1,926
Flax	26,007	0.98	25,487	1.10	28,608	3,121
Lentil	31,585	0.98	30,953	1.10	34,744	3,791
Mustard	3,069	0.98	3,008	1.10	3,376	368
Oats	57,130	0.98	55,987	1.10	62,843	6,856
Peas	89,883	0.98	88,085	1.10	98,871	10,786
Rye	5,043	0.98	4,942	1.10	5,547	605
Ryegrass	22,043	0.98	21,602	1.10	24,247	2,645
Timothy	34,977	0.98	34,277	1.10	38,475	4,198
Triticale	3,897	0.98	3,819	1.10	4,287	468
Wheat	373,553	0.98	366,082	1.10	410,908	44,826
Wheatgrass	6,134	0.98	6,011	1.10	6,747	736
Minor crop	3,839	0.98	3,762	1.10	4,223	461
Fee Category Totals			1,310,841		1,567,882	\$257,041
Plot Fees	2,803	30.00	84,090	60.00	168,180	84,090
Fee Category Totals			84,090		168,180	84,090
Membership Fee (current) – includes Canola Contract Growers	3,452	200.00	690,400	n/a	n/a	
Account Fee (New Membership Fee Model)	2600			240.00	624,000	
Canola Contract Growers (New Membership Fee Model)	200			240.00	48,000	
Additional Growers on Account (New Membership Fee Model)	750			25.00	18,750	
Fee Category Totals			690,400		690,750	350
Variety Certification Eligibility						
Form 300s	90	500.00	45,000	600.00	54,000	9,000
Variety Onboarding	500			200.00	100,000	100,000
Fee Category Totals			45,000		154,000	109,000
Other Certification Fees						
Appeal Fees	7	100.00	700	150.00	1,050.00	350
Recertification Fees	5	2000.00	10,000	2,500.00	12,500.00	2,500
Varietal ACR Assessment	767	25.00	19,175	50.00	38,350.00	19,175
Midge Tolerant Wheat Testing Validation	8	1200.00	9,600	1,200.00	9,600.00	-
Land Use Inspection Assessment	31	25.00	775	50.00	1,550.00	775
Re-inspection Assessment	450	25.00	11,250	50.00	22,500.00	11,250
Bulk Application Processing (per field)	4,585	5.00	22,925	5.00	22,925.00	-
Breeder Seed Demotion (Form 45) Assessment	16	16.00	256	160	2,560.00	2,304
Foreign Canola Support Document Assessment	61	30.00	1,830	60.00	3,660.00	1,830
Hybrid Canola Support Document Assessment	375	25.00	9,375	50.00	18,750.00	9,375
Hybrid Corn Crop Inspection Report Assessment	469	25.00	11,725	50.00	23,450.00	11,725
Carry Over Seed Listing Fee (per variety/class)	73	25.00	1,825	50.00	3,650.00	1,825

Fee Category Totals			99,436		160,545.00	61,109
Seed Cert System Access Fees – Non-Members						
ASCIS Annual Software Licensing Fee (per license)	40	400	16,000	500.00	20,000	4,000.00
ASCIS Initial Software Licensing Fee (per license)	1	2,000	2,000	2,000	2,000	-
ASCIS System Access Fee non hybrids (per acre)	1,202,625	.12	144,315	0.12	144,315	-
ASCIS System Access Fee (Hybrid)	68,994	.22	15,179	0.22	15,179	-
Other Third-Party System Access Fees – Non-Member						
Base fee (per account number)	204	n/a	n/a	250.00	51,000	51,000.00
Per Acre Assignment Fee	600,000	n/a	n/a	n/a	n/a	n/a
Fee Category Totals			177,494		232,494.00	55,000.00
Penalties Assessed						
15-21 Days After Deadline	100	25.00	2,500.00	50.00	5,000.00	2,500
22-60 Days After Deadline	200	50.00	10,000.00	100.00	20,000.00	10,000
60+ Days After Deadline	50	100.00	5,000.00	200.00	10,000.00	5,000
Late Variety Onboarding Submission	200	n/a	n/a	100.00	20,000.00	20,000
Incomplete Application Penalty	n/a	25.00	n/a	50.00	n/a	n/a
No Valid Email	10	10.00	100.00	10.00	100.00	n/a
Inspection Cancelled Base Fee Model	342	n/a	n/a	50.00	17,100.00	17,100
Inspection Cancelled	21930	.50	10,965.00	n/a	10,965.00	n/a
Inspection Cancelled Hybrid	100	.50	50.00	n/a	50.00	n/a
Fee Category Totals			28,615.00		83,215.00	54,600
Aggregate totals			\$2,435,876		\$3,057,066	\$621,190

Explanatory Notes

FEE KIND	Description
Crops by acreage [paid by member or client]	
Tier I Crops	Higher value crop kinds – (hybrid corn, hybrid canola, tobacco); Greater than \$10,000 per acre, gross revenue
Tier II Crops	Medium value crop kinds (soybeans, chickpeas, fababeans, hemp) Greater than \$1000 per acre, gross revenue
Tier III Crops	Lower value crop kinds (All other crop kinds, including but not limited to: alfalfa, barley, bean, birdsfoot trefoil, bromegrass, canary grass, clover, fescue, flax, lentil, mustard, oats, peas, rye, ryegrass, timothy, triticale, wheat, wheatgrass, other minor crops.). Greater than \$500 per acre, gross revenue. .
Plot Fees	Small scale high generation seed production where large scale acreage fee model does not apply
Membership fees	
Membership Fees	Current fee applies to each individual seed grower associated with an enterprise account
Canola Contract Growers Fee	Canola Seed Production is currently subject to a production and certification model where the seed company is the primary interface with CSGA and submits a member fee equivalent for each of its contract grower.
Membership Account Fee	Model similar to that used by CSGA prior to 2004. An initial fee for the first individual member on an enterprise account.
Additional Growers (per account) Fee	A lower fee for each membership added to the account
Variety Certification Eligibility	
Form 300 fee	This fee applies to varieties that are not subject to variety registration or are not yet registered.
Variety Onboarding	This fee applies to new varieties.
Other Certification Fees	
Appeal Fees	A base fee to cover basic appeal process costs.
Recertification Fees	Recertification decisions require consultation with other AOSCA agencies. In addition, they may require significant staff time to gather supporting data for a decision. Consequently, CSGA uses a base fee plus costs approach.
Varietal ACR Assessment	ACR = additional certification requirements. Additional staff time is required relative to standard assessments and this fee represents an average cost for CSGA
Midge Tolerant Wheat Testing Validation	Fee represents an average cost for CSGA to validate testing methodology per midge tolerant blend.
Land Use Inspection Assessment	Member or their client to pay a fixed fee for a land use inspection assessment, instead of a per acre fee.
Re-inspection Assessment	Represents an average cost for CSGA to assess a re-inspection report.
Bulk Application Processing (per field)	Represents an average cost for CSGA to process each field on a bulk application. Online applications are made available at no additional costs.
Breeder Seed Demotion (Form 45) Assessment	Represents an average cost for CSGA to process breeder seed demotion Form 45 and related assessment.
Foreign Canola Support Document Assessment	Represents an average cost for CSGA to process a foreign canola support document assessment; includes crop inspection report, transfer declarations, hybridity test results, and erucic acid results

Hybrid Canola Support Document Assessment	Represents an average cost for CSGA to process hybrid canola support document and related assessment.
Hybrid Corn Crop Inspection Report Assessment	Represents an average cost for CSGA to process hybrid corn crop support document and related assessment.
Carry Over Seed Listing Fee (per variety/class)	Represents an average cost for CSGA to process request for carry over seed listing per variety or class
SeedCert Access Fees (non members) and Other Third Party System Access Fees (non Member)	
ASCIS Annual Software Licensing Fee (per license)	ASCIS annual software license. Some ASCIS may have more than one license.
ASCIS Initial Software Licensing Fee (per license)	ASCIS initial licensing of software – onboarding new ASCIS
ASCIS System Access Fee non hybrids (per acre)	ASCIS System Access Fee – contribution to SeedCert System costs.
ASCIS System Access Fee (Hybrid)	ASCIS System Access Fee – contribution to SeedCert System costs.
Base fee (per account number)	Non-Member Client Fee for access to Members’ Area - contribution to SeedCert System costs.
Penalties	
15-21 Days After Deadline	To offset CSGA costs associated with late application and to incentivize timely submissions of applications 15 – 21 days after the deadline
22-60 Days After Deadline	To offset CSGA costs associated with late application and to incentivize timely submissions of applications 22 – 60 days after the deadline
60+ Days After Deadline	To offset CSGA costs associated with late application and to incentivize timely submissions of applications in excess of 60 days after the deadline
Late Variety Onboarding Submission	To offset CSGA costs associated with late submission of variety onboarding
Incomplete Application Penalty	To offset CSGA costs associated with incomplete applications. Applied to applications received without an inspection service listed.
No Valid Email	To offset CSGA costs associated with incomplete application. Fee applied on a per field basis when no email has been provided for the account receiving certification services.
Inspection Cancelled Base Fee	To offset CSGA and other system costs associated with inspection cancellation. Switch to a per field fee from an acreage.