

## CFIA's SRM Pre-Consultation Survey

We have reached the first major milestone in the Canadian Food Inspection Agency's (CFIA) Seed Regulatory Modernization (SRM) consultation process with the release of a [pre-consultation survey](#).

This survey is the first look at the various Task Team recommendations for potential changes to the seed system, and now is the perfect time to get up to speed before you have your say.

Getting to this point was no easy feat. CFIA's SRM process has been a co-development approach bringing the seed sector, stakeholders and end-users together to envision a next-generation seed system. Task team participants span the entire value chain, including seed growers, seed companies, plant breeders, producer groups, inspectors, commodity and value chain associations and other interest groups. CSGA, our regional Branches and many members have also played a significant role in the SRM process. We want to thank everyone involved for their time and dedication.

Through SRM, CSGA aspires to be the main administrator of Canada's seed certification system – building upon our unique public-private partnership with the Government of Canada – and to date, we have seen **strong alignment between the Task Team recommendations and CSGA's vision for a modern seed system.**

We encourage you to read the Task Team Executive Summaries and Final Reports linked below and learn more about CSGA's SRM recommendations [here](#).

**To help you separate the 'wheat from the chaff,' below is an overview of the key Task Team recommendations and their alignment with CSGA positions.**

### **1. Seed Certification Task Team**

*Primary Focus:* Seed crop certification, varietal purity

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## **Recommendations**

### **Alignment with Our Positions**

- Canada should continue to have a national seed certification system
- CSGA should remain the national body that issues pedigreed seed crop certificates and establishes seed crop certification requirements
- CSGA should continue expanding its standards development consultation process
- Seed crop inspection remains the primary assessment tool for certification but allows for flexibility in the future
- Maintain the current restrictions on the use of variety names for certified seed
- Explore options for delivering inspector training

### **Our Concerns**

- None
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## Key Take Aways

The Task Team recognizes the important role CSGA plays in a modern seed system and the importance of a national approach instead of a patchwork of regulation. The complete final report is available [here](#).

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**“Canada’s seed certification system is internationally recognized and respected for producing high quality seed. Task Team members agreed that the system works well but could be improved by increasing its ability to adapt standards and requirements quickly in an ever-evolving sector, and simplifying standards for sale of seed in Canada while strengthening some existing requirements. Incorporation by reference of administrative or technical requirements with CFIA oversight and extensive consultation with stakeholder groups, and CSGA’s continuing role as the national seed crop certification body, could both contribute to these outcomes.”**

*- Keith Degenhardt, Task Team Co-chair and seed grower*



**There is tremendous value in having CSGA as Canada's national organization responsible for seed certification services. The Task Team recommendations show confidence in CSGA’s strong track record as a modern, reliable regulatory partner in a rapidly evolving sector. Support CSGA as the national organization responsible for seed certification services.**

## 2. Variety Registration Task Team

*Primary Focus: Seed quality standards, the Grade Tables, seed mixtures*

**[CLICK HERE FOR THE EXECUTIVE SUMMARY](#)**

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## Recommendations

### Alignment with Our Positions

- Keep the 'one-variety-one-name' policy
- Use Incorporation by Reference (IBR) for updating the crop kinds subject to registration
- Movement of crop kinds within variety registration should be stakeholder driven
- CSGA should review varietal purity standards for soybeans
- Support for the use of biomolecular techniques in the variety registration system

### Our Concerns

- The Task Team did not reach consensus that Canada should have a variety registration system (16 out of 20 supported, including CSGA)
- No consensus around variety registration cancellation procedures

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## **Key Take Aways**

The Task Team recognizes the importance of a national variety registration system that provides unbiased recognition of the identity of a variety. The complete final report is available [here](#).

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**"As an oat breeder, I believe variety registration is an important component of Canada's entire seed system. No system is perfect, but the Canadian system provides opportunities for growth and changes as required. I am encouraged that a pathway will be found that works for all stakeholders desiring registration and commercial production of non-traditional cultivars and varieties in the Canadian seed system, including heterogenous and heirloom varieties."**

*- Jennifer Mitchell Fetch, Task Team member and seed grower*

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CSGA supports a national variety registration system that is flexible and meets the needs of Canada's agri-food sector. It enables Canada's quality advantage, supports access to foreign markets and provides enhanced transparency - enabling Canada's role as a global exporter. Support a national variety registration system in the CFIA's SRM consultation.

### 3. Seed Standards Task Team

*Primary Focus: Seed quality standards, the Grade Tables, seed mixtures*

[CLICK HERE FOR THE EXECUTIVE SUMMARY](#)

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## Recommendations

### Alignment with Our Positions

- The CFIA continues to be responsible for setting minimum standards for mechanical purity and germination
- Maintain Canada's high seed quality standards to ensure our international reputation
- Use Incorporation by Reference
- Maintain minimum germination requirements
- Use QR code technology on seed tags to access additional information

### Our Concerns

- None

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## **Key Take Aways**

The Task Team agreed that seed quality standards could be improved and that incorporation by reference would support timely revisions and Information Technology improvements. This includes QR codes on seed tags to help producers share seed quality information with customers, including minimum mandatory requirements and

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higher voluntary standards. The Information (Records and Labelling) Task Team will soon review this topic. The complete final report is available [here](#).

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**“Our grade tables for setting standards for seed quality are outdated. The Canadian agriculture Industry has advanced technology and the capability to inspect, process and grade to the highest standards, which has now long surpassed the minimum quality standards. It is evident that we can raise the bar. SRM meetings gave the seeds standards task team, led by industry experts, the opportunity to delve into meaningful and future-proofing discussions. Our end users deserve better than minimum standards.”**

*- Sarah Foster, President and Senior Seed Analyst, 20/20 Seed Labs*

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Canada’s seed and grain sectors rely on high-quality seed. Simplifying the grade tables and incorporating new technology are key for a next-generation seed system built upon trust and transparency. Support CSGA’s vision for a digital end-to-end seed certification system that is efficient, effective, science-based, and internationally harmonized.

### **Get Involved!**

**Participate** in CFIA’s consultation and express your views on seed regulations. Share what you value most in Canada’s seed system. The consultation is open for comments from February 15 until May 1, 2023.

**Reach out** to [us](#) or your Branch if you have questions on the recommendations or if you would like to discuss CSGA’s positions on SRM.

**Volunteer** on an upcoming CFIA SRM Task Team on Import, Export and Information (records and labelling). Reach out to [us](#) to express interest.

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