

Executive Summary

Breeder Seed Regulation Review: Survey on Potential Changes

Introduction

CSGA's Breeder Seed Requirements (BSR) sets out the certification requirements and standards that a plant breeder and a Breeder seed crop must meet for the CSGA to approve seed as Breeder seed and issue Breeder seed crop certificates. Modernization of the BSR was identified as a priority in CSGA's Strategic Plan 2017-2023 and the CSGA 2.0 Business Plan 2021. In addition to reviewing the requirements for Breeder seed, the document has been reformatted and given a new name that better reflects its contents.

To conduct the review and to develop proposed revisions, CSGA's Plant Breeders Committee (PBC) was engaged to make recommendations for consideration by CSGA's Regulatory Services Committee (RSC) and the Board of Directors (BOD). The review started in March of 2021 and continued through 2022. This report summarizes the feedback received during the stakeholder consultation on the proposed revisions, including a stakeholder webinar and survey.

About the consultation

To obtain input from stakeholders, a consultation on the proposed revisions was formally launched with an announcement in CSGA's newsletter Seed Scoop on October 24, 2022. The consultation included a webinar, targeted emails, and meetings with seed companies at their request. CSGA also developed a stakeholder survey, which was open for twelve (12) weeks until the formal consultation period closed on January 15, 2023. The topics included:

- Approval of Breeder seed not certified by the CSGA
- Varietal purity of Breeder seed
- Breeder seed quality, including mechanical purity, germination, and disease
- Recognition of plant breeders, including the *CSGA Learn Plant Breeder Program*
- Breeders' quality management systems

Who we heard from

The webinar, held on December 12, 2022, was attended by approximately 50 stakeholders who received an explanation of the proposed revisions and the rationale for making the changes with the opportunity to provide feedback. Feedback was also received by direct email and meetings with seed companies, and approximately 40 stakeholders completed the survey.

Respondents included:

- Accredited plot growers
- Plant breeders
- Seed growers
- Seed companies, including crop certificate assignees
- Authorized Seed Crop Inspection Services (ASCIS)/Licensed Seed Crop Inspectors (LSCI)
- Breeder seed production personnel and seed company agronomists

Respondents represented:

- Private and public variety developers
- Variety distributors
- Individuals from across Canada
- Individuals working on a range of crop kinds, including cereals, flax, pulses, soybeans, canola, forage & turf, and hemp

What we heard

Overall, stakeholders were in support of the proposed revisions. While comments from survey respondents varied somewhat, the majority (ranging from 57% to 87 % but mostly around 80%) agreed with all proposed changes presented in the survey. In some cases, there was some level of disagreement, and there were indications that the respondent either didn't fully understand the rationale or the proposed change.

The area receiving the most feedback related to **CSGA approving Breeder status seed which had not been certified by the CSGA**. Most survey respondents agreed with the proposal, but some had questions about the process, how long the process would take, and fees related to the approval of Breeder seed. A few thought it unnecessary for CSGA to formally approve Breeder seed and that a plant breeder should be able to declare what they consider to be Breeder seed.

Most were also in favour of the proposal to adopt a minimum standard for **varietal purity of Breeder seed** equal to the Foundation standard. Supporters saw the benefit of having a standard for Breeder seed. In contrast, others cited varietal purity as the breeder's responsibility and some raised questions about who would do the testing and how it would be evaluated.

Clarification was required regarding **mechanical purity** because there is a minimum requirement equal to the Certified standard and a recommendation that the seed should meet Foundation standards. Support to continue without an actual standard for **germination** was lower in the surveys completed in French than in the English responses. Supporters saw the benefits of remaining flexible with germination to maintain access to the genetic material. Support was highest for allowing breeders to declare that the seed harvested from their Breeder plots had been tested for specified **diseases** (that may be transmitted by seed) observed in the plot during production. Some thought it should not be limited to a specific list of diseases, while others felt applying appropriate seed treatments would be sufficient.

There was very strong support for permitting changes related to the recognition of plant breeders to clarify the role of CSGA Recognized Plant Breeders and Associate Plant Breeders and make the *CSGA Learn Plant Breeder Program* mandatory for new applicants.

With the new requirements related to breeders' **quality management systems**, the audit frequency is simplified, with an audit only required once every five years. While some questioned the need for these requirements, others thought that an audit should be required more often, and some had questions about some of the details around auditing.

There were also questions about when the new requirements would be implemented, the impact they would have on their organization, and who could complete various forms related to Breeder seed production.

Next steps

CSGA would like to thank everyone who provided feedback during the consultation. The revised *Breeder Seed Requirements* will be posted to CSGA's website and come into effect on July 1, 2023. The *Application for Approval of Breeder Seed Not Certified by the CSGA* (Form 40) will be a pilot program during the 2023 seed crop production season, with full implementation of the new form in 2024.