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Variety Certification Eligibility

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BACKGROUND

CSGA supports a national variety recognition system that is flexible and meets the needs of modern agriculture. Currently, varieties are recognized as unique and 'eligible for certification' through two main pathways, depending on the crop kind (species):

- **The CFIA's Variety Registration process** for crop kinds 'subject to' registration listed in Schedule III of the Seed Regulations.
- **CSGA's Variety Certification Eligibility process** (commonly referred to as **Form 300**) for crop kinds that are 'exempt from' Variety Registration.

Crop kinds 'subject to' registration are listed in [Schedule III of the Seeds Regulations](#) and comprise over 95% of the acres in certification. Crop kinds 'exempt from' registration include corn, hemp, and non-oilseed soybeans.

WHAT'S NEXT

CSGA believes in a sector-led and government-enabled seed system that is agile, efficient and prioritizes stakeholders to reduce the gap between the sector's needs and the services we provide.

The formal recognition of the identity of a variety is a prerequisite for seed certification, but running two parallel variety recognition processes creates an inefficient, fragmented system that places undue risk and liability onto the CSGA, especially for crop kinds where the CFIA's scientific expertise and laboratory support is essential to verify the unique identity of a variety.

We must eliminate redundancies in our parallel process (VRO and Form 300) by getting back to basics – ensuring the formal recognition of the identity of a variety by one authority.

OUR PLAN

We propose a new Variety Certification Eligibility Listing, which would be a CFIA administrative process outside of the existing Variety Registration system.

This would mean the CFIA would be responsible for recognizing a variety and assessing its eligibility for seed certification, which we believe is the appropriate role of government. CSGA would assume responsibility for certifying the seed crop of these varieties. In essence, the government recognizes the identity and eligibility of a variety, and CSGA would handle the certification of those varieties.

Initially, we had proposed that this listing be a new tier within Schedule III; however, an administrative process outside of Variety Registration appears to be the most effective pathway for this proposal.

FORM 300 vs SCHEDULE III

The Form 300 process was introduced by CSGA in 1997 at the request of industry to ensure that varieties of crop kinds that were being exempt from the variety registration (e.g., hybrid corn) still had a pathway to seed certification.

At the time, Schedule III was essentially a one-size-fits-all model, as there were no tiers or different parts. Schedule III also specified that only certain types within a crop kind would be subject to variety registration (e.g., oilseed vs. non-oilseed soybeans).

In 2009, a new flexible Variety Registration system was introduced with the different tiers we have today.

VARIETY CERTIFICATION ELIGIBILITY LISTING

CSGA is now proposing a new CFIA administrative process, the Variety Certification Eligibility Listing, to recognize the eligibility of varieties for seed certification. With this new listing, it will be necessary to reiterate with CFIA the importance of:

- adequate service standards like approval times
- business process modernization (i.e., CFIA's new digital application process)
- lower fees than variety registration

Again, the premise is that the CFIA should be ultimately responsible for recognizing the unique identity and eligibility of varieties entering certification. This new listing would **not** require these crop kinds to be subject to variety registration or reintroduce any merit requirements.

ALTERNATIVE PLANNING

CSGA understands that users of CSGA's Form 300 process are satisfied with the current framework and have reservations about bringing these crop kinds back to the CFIA, even with the same process requirements.

However, for CSGA, this discussion is about a whole system approach to modernization and the appropriate role of Government in our seed system and to simplify and reduce administrative burden overall.

If our plan does not move forward, CSGA will continue providing this service and seek clear authority from the Government of Canada to determine the eligibility of varieties for seed crop certification.

BROADER BENEFITS

Clarifying this authority of the CFIA and creating this new 'crop listing' framework within our seed certification system will be especially important if we move forward with Schedule III using Incorporation By Reference – where crop kinds will have the ability to opt out of variety registration, resulting in undue risk and liability for CSGA's Form 300 process.

FORM 300 BY THE NUMBERS

- Most of the Form 300s are for Corn and Hemp
 - (62% and 18% of Form 300s processed in the last three (3) years)
- Other Form 300 crop kinds include food-grade soybeans and chickpeas
- The current Form 300 fee is \$600 per application