

CSGA and SRM



The CFIA Releases the Results of its SRM Pre-Consultation Survey

The Canadian Food Inspection Agency (CFIA) has just released the results of its Seed Regulatory Modernization (SRM) pre-consultation survey through a “What We Heard Report,” a summary of stakeholder feedback to the SRM Task Team recommendations.

CSGA is encouraged by the feedback, which includes strong support for maintaining a national variety registration system and CSGA’s role as Canada’s national seed crop certification authority.

While there is strong alignment between the survey results and CSGA’s vision for a next-generation seed system, we must keep working together to ensure that the seed sector and Canadian agriculture will continue to thrive and prosper.

Please read below to see how CSGA’s vision aligns with the responses the CFIA received and the common themes identified.

CSGA appreciates the work done by the SRM Task Team participants, the CFIA, and those who took the time to provide feedback on this pre-consultation survey.

Doug Miller
Executive Director

CSGA's Vision Compared to the CFIA Answers Received by Key Themes

1. Variety Registration

Should Canada continue to have a national variety registration system?

CSGA Response: Yes!

What We Heard Report: Our recommendation was supported - 95% of those expressing an opinion supported maintaining a national variety registration system.

Themes as Per Comments Received: Variety registration creates a high level of trust as the quality of traits is consistent in the seed and crops grown in Canada, which equips farmers to make decisions about what they grow while maintaining end-user confidence for products to be in a competitive market.

There are marketing, branding and reputational benefits when using registered varieties of seed in Canada's grain variety registration and classification system.

The variety registration system should be made available to those crops and value chains which see value in this process, allowing them to decide on participation or placement within a national variety registration system.

2. Seed Certification

Should Canada continue to have one national body establishing and determining seed crop varietal purity standards to issue a seed crop certificate?

CSGA's Response: Strongly agree

What We Heard Report: Our recommendation was supported

Themes as Per Comments Received:

- Having a single national body has built trust in Canada's seed system in both domestic and international markets.
- The Canadian Seed Growers' Association (CSGA) should remain as the one national body. National consistency is important; one body is more straightforward and more transparent.
- Multiple bodies will create confusion in the marketplace as well as with Canada's international partners. The entire value chain needs to be involved in setting field standards.

3. Incorporation by Reference

The CFIA pre-consultation had a series of questions seeking feedback on Incorporation by Reference, specifically around [Part IV](#) (Registration of Registered Seed Establishments), the [Grade Tables](#), and Schedule III (Crop Kinds Subject to Variety Registration).

CSGA supports the use of Incorporation by Reference provided that the whole value chain is engaged and there are clear guidelines around how a change can be made and what protocols must be followed.

Through the 'What We Heard Report,' it was clear that the stakeholders had reservations about using Incorporation by Reference, with all the recommendations having mixed reactions.

The following themes were identified through the written submissions:

- Support for Incorporation by Reference as long as the CFIA continues to have oversight.
- Changes must be upfront and open for all stakeholders.
- The CFIA must 'hold the pen' and consult with all value chain members before changes are implemented.

CSGA appreciates these concerns and feels they are adequately captured in CFIA's current Incorporation by Reference guidelines.

[Click for the Full CFIA Report & What Stakeholders Said](#)



21 Florence Street

Ottawa, Ontario, Canada K2P 0W6

(613) 236-0497 | communications@seedgrowers.ca | seedgrowers.ca



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