What We Heard Report: Fall 2023 Consultation
Mechanical Purity in Forage and Turf Grasses and Forage Legumes

Introduction

Annual review of existing seed crop certification requirements (standards) is one of the core functions of the CSGA. Over the past two years, CSGA has undertaken a review of the isolation requirements and maximum impurity standards for mechanical purity in forage and turf grasses and forage legumes. This review has been led by the Forage and Turf Working Group (FTWG) and CSGA's Regulatory Services Committee (RSC). Initially, the focus of the review was around species with seeds considered difficult-to-separate (DTS) from seeds of the inspected crop. As the work progressed, the focus became species which may readily cross-pollinate (CP) and species with seeds considered difficult-to-distinguish (DTD) from one another in a lab test.

Consultation overview

The initial consultation on this subject was conducted in the fall of 2022, where it was initially proposed that CSGA remove the mechanical purity isolation requirement for forage and turf species and two options were presented regarding the maximum impurity standards within seed crops of forage and turf species. The first option related to having inspectors report other kinds with seeds considered DTS from seeds of the inspected crop by frequency (e.g., numerous, few, trace as they do for weeds). The second option related to no longer reporting other crop kinds in forage and turf species.

During that consultation, many stakeholders were in favour of no longer having maximum impurity standards for other crop kinds in forage and turf species, while others were in favour of reporting other kinds by frequency. However, we also heard that not all standards could or should be removed for various reasons, especially where a change in the standard could jeopardize the varietal purity of forage and turf seed crops. Which standards need to remain in place and the rationale for doing so became the subject of further meetings of the FTWG and a second consultation, which CSGA conducted from September 20, 2023, to November 15, 2023.

The second consultation was to obtain feedback on proposed revisions to the standards that sought to categorize as contaminants those kinds: 1) that will readily cross-pollinate (CP) with one another; 2) where seeds of the contaminant are considered difficult-to-distinguish (DTD) in a lab test from seed of the inspected crop; and 3) where seeds of the contaminant are considered difficult-to-separate (DTS) from seed of the inspected crop. Where the other kind would CP, a greater isolation distance would be required to maintain varietal purity. And where the other kind was considered CP or DTD a maximum impurity standard would remain in place. Where the other kind was only DTS, the other kind would be reported by frequency and not factor into the seed crop certification decision, unless they were so numerous as to impede the seed crop inspection.

Who Contributed to the Proposal and Consultation

Approximately twenty-five (25) individuals and organizations contributed to the development of the proposal through the FTWG, and feedback received during the consultation, including a webinar held on November 2, 2023. For some organizations, the response was on behalf of the membership of the organization. Contributors included:

- Seed growers
- Crop certificate assignees and seed companies contracting pedigreed forage and turf seed production
- Registered seed establishments (RSEs) that process pedigreed forage and turf seed
- Plant breeders
- Seed analysts
- Authorized seed crop inspection services (ASCIS) and licensed seed crop inspectors (LSCI)
- Forage seed associations and commissions
- Canadian Food Inspection Agency

What We Heard

Over the course of the fall 2023 consultation period on proposed amendments to the certification requirements for forage and turf grass seed crops and forage legume seed crops, several improvements to the proposed amendments have been identified. The first involves a correction regarding the classification of other crop kinds/species, and the others are editorial in nature for clarity and transparency.

Correction

1) Other crop kinds/species that may cross-pollinate with the seed crop were originally classified as "varietal impurities" because they do pose a risk to the varietal purity of the seed crop. However, they should be listed as "mechanical impurities" because they are still a different crop kind/species. This is in keeping with the approach taken by the OECD Seed Schemes, which uses the term "species purity" instead of "mechanical purity."

   Based on the revised proposal, plants of other crop kinds which may cross pollinate with plants of the inspected crop will be counted with plants of other kinds which are difficult to distinguish (i.e., contributing to the mechanical purity standard like the OECD Seed Schemes) instead of being counted with plants of off-types/other varieties (i.e., contributing to the varietal purity standard, as originally proposed).

Edits for clarity and transparency

1) The isolation requirements and maximum impurity standards sections of the document reference tables that follow further along in the document. To clarify which table is being referenced, the tables will be called the isolation table and the contaminants table.
2) To clarify the isolation requirements for a variety of the same kind but a different ploidy level, the footnote regarding ploidy level has been revised to indicate that the mechanical isolation requirement would still apply.

3) To clarify that it is the sum (total) of other kinds/species that will cross-pollinate and other kinds/species that are difficult to distinguish that must not exceed the standard, they will be combined in one sentence joined by the word “and” rather than listing them separately as points “a” and “b.” It will be further clarified by explicitly stating that it is “the combined total number of contaminant plants” that “must not exceed” the standard.
4) To clarify how the difficult to separate species will be handled, the text that was originally a footnote under the contaminants table will become a stand-alone point under the “maximum impurity standards” heading, following the “mechanical purity” sub-heading. The reference to the *Seeds Regulations* will be removed as the seed standards are not applicable to seed crop certification.

Next steps

Feedback from the consultation was considered at the Regulatory Services Committee (RSC) during their meeting on December 13, 2023, where they made a final recommendation to the Board of Directors. The RSC recommendation will be presented to the Board at their next meeting in late January. If approved, the amended standards will be posted to CSGA’s website on February 1st and will become effective for the 2024 crop production season.