



Winter 2024 SRM Consultation Survey CSGA's Complete Q&A Document

The Canadian Food Inspection Agency (CFIA) has recently released a survey seeking input on potential changes to Canada's seed regulations based on recommendations from Seed Regulatory Modernization (SRM) Task Teams and some very important questions on big-picture concepts (Section 4.)

This survey is an important milestone in a once-in-a-generation modernization of our seed systems and will impact your seed and your business.

While there was strong alignment between the Task Team recommendations and CSGA's vision for a next-generation seed system, we need to keep working together to ensure that the seed sector and Canadian agriculture will thrive and prosper.

Your participation is critical.

We encourage all CSGA members, clients, and supporters to respond to the [CFIA consultation survey](#). Before you respond, we wanted to share how we are responding to the survey and why, with brief summaries to help condense what has been months and years in the making. Thank you for sharing your voice and helping us chart a course for the future of CSGA.

Please find our responses to key questions below with brief explanations.

1. Variety Registration

Background:

These questions build upon the last pre-consultation survey, where 95% of respondents who expressed an opinion supported Canada maintaining a national variety registration system. Although most task team participants supported maintaining the status quo for cancelling varieties by the Registrant upon request, a qualified consensus was not reached. The complete Variety Registration task team final report is available [here](#).

Survey Q1: Do you support registrants being able to cancel varieties at their own request when there are no safety concerns with the variety?

CSGA Response: No

Here's Why: There is no cost or burden on the registrant of a variety they no longer wish to produce, but cancelling the registration would mean the sale of the seed variety is no longer permitted, and the CFIA would be responsible for enforcement action when such seed was sold. It is unlikely that the CFIA will have the resources or the inclination to allocate resources to such activity.

Cancelling the registration also means that grain derived from these varieties cannot be assigned an official grade higher than "Feed," which would impact producers and end-users who have selected a variety based on certain

traits for processing or value-added opportunities (e.g., Identify Preserved (IP) programs).

This doesn't mean that seed companies must maintain seed stock of these varieties into perpetuity. The purpose of Variety Registration, at its most basic form, is to recognize the identity of a variety. Varieties can be phased out by no longer maintaining Breeder seed and allowing pedigreed seed stocks to run out.

Task Team Recommendation: There was no qualified consensus on any options proposed/discussed in the Variety Registration Task Team.

* **NOTE:** In previous consultations, producer groups favoured a system where there are opportunities to transfer maintenance of a variety to another party once the original registrant is no longer interested in continued commercialization of the variety.

Survey Q2: Do you support CFIA taking over the responsibility of determining variety certification eligibility for crop kinds not subject to variety registration (e.g., CSGA's Form 300 process)?

CSGA Response: Yes, but!

Here's Why: We must eliminate redundancies in our parallel process (the CFIA's Variety Registration Office (VRO) and CSGA's Form 300) by getting back to basics – ensuring the formal recognition of the identity of a variety by one authority. As the national seed certifying authority, the CFIA is legally obligated to ensure that the seed lots it certifies are eligible for certification.

Keeping two separate variety recognition processes creates an inefficient, fragmented system that places undue risk and liability onto CSGA, especially for crop kinds where the CFIA's scientific expertise and laboratory support are essential to verify the unique identity of a variety.

We have concerns about the assumption made in the question, which implies that CFIA's current service standards and fees would likely be applied. Our proposed listing framework would offer a substantial reduction in administrative burden compared to the existing variety registration system. CSGA is open to providing administrative services to CFIA to ensure current Form 300 service standards are maintained or, even better, improved.

Task Team Recommendation: The Variety Registration Task Team recommended that CFIA and CSGA should harmonize the varietal eligibility determinations of Part III Variety Registration and Form 300. The Export Task Team recommended consolidating existing systems into one system to register a variety or list a variety as eligible for certification through CFIA.

* **NOTE:** CSGA's proposal includes the creation of a new Variety Certification Eligibility Listing, which would be a CFIA administrative process outside of the existing Variety Registration system. Initially, we had proposed a new tier within Schedule III of Variety Registration; however, a separate administrative process would likely be the most effective path forward. This new listing would continue to not subject these crop kinds to variety registration or reintroduce merit requirements. Such a 'crop listing' framework listing would be especially important to 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.

**VARIETY CERTIFICATION
ELIGIBILITY LISTING**

- [Learn more](#) about our proposal to streamline the Form 300 process.
- Applicable to corn, hemp, food grade soybeans and other crop kinds not subject to variety registration. (e.g., current Form 300 crop kinds)

2. Sampling, Testing and Grading of Seed

Background:

The Common Seed Task Team did a deep dive into common seed. CSGA supports many of these task teams' recommendations; however, we have concerns about applying certified quality management system approaches without the traceability and assurance systems that enable certified seed. The Common Seed Executive Summary report is available [here](#). The Seed Testing Executive Summary report is available [here](#).

Survey Q3: Should all seed types be required to be tested by officially recognized, accredited, or supervised laboratories?

CSGA Response: Yes

Here's Why: Seed, whether Pedigreed or Common, is a critical input for crop production but may be a vector for noxious weed seeds, which is why all seed imported or sold in Canada should be tested by competent individuals to ensure that minimum standards have been met.

Task Team Recommendation: Yes, both the Seed Testing and Common Seed Task Teams recommended that Common grade seed should be held to a higher standard for seed testing than it has been.

* **NOTE:** Some producers want farmer-to-farmer sales of unadvertised, ungraded seed to continue without over-regulation. CSGA agrees there is no need to regulate farmer-to-farmer sales of unadvertised, ungraded seed. However, to ensure reliable test results for producers, all seed testing should be done by officially recognized, accredited, or supervised laboratories.

Survey Q4: Do you support allowing only accredited graders to apply a Common seed grade name to all crop kinds of common seed, excluding horticulture seeds?

CSGA Response: Yes, but!

Here's Why: CSGA supports measures that ensure producers can trust the seed they buy and Grade names signal that seed quality standards have been met. That's the rationale for having only officially accredited graders apply Common seed grade names. However, producers buying Common grade seed are often interested in seed test results, and providing this information could exempt seed from being graded by an officially accredited grader. The seed would still have to meet minimum seed standards (usually Common No. 2.) Requiring an accredited grader to label Common grade seed adds cost and complexity and, for many producers, contradicts the SRM principle of reducing complexity.

Task Team Recommendation: Yes, the Common Seed Task Team reached a qualified consensus that Common seed should be graded by an accredited grader.

Survey Q5: Do you have any additional feedback for the CFIA to consider regarding the sampling, testing, and grading of seed?

CSGA Response: It is important that seed imported into or sold in Canada be tested by competent individuals/facilities due to the risks presented by sub-standard seed, and in particular, risks to the public and the environment from the spread of noxious weed seeds, and the technical difficulties in properly identifying seed of species of concern.

3. Import, Export and Sale of Seed

Background:

The Import and Export Task Teams did a deep dive into the frameworks for seed that is imported into or exported from Canada. CSGA supports many of these task team's recommendations. The Import Executive Summary report is available [here](#). The Export Executive Summary report is available [here](#).

Survey Q6: Do you support continuing to allow imported seed to either be pre-cleared or post-cleared by an Authorized Importer but require all other seed imported into Canada to be pre-cleared only?

CSGA Response: Yes

Here's Why: Seed imported into Canada must be assessed and meet minimum standards before its release for sale or planting in Canada. The CFIA has accredited Authorized Importers (AI) to make that assessment, but the CFIA must assess all other seed imports. Requiring all non-AI seed imports to be cleared prior to import would streamline the importation process while saving CFIA resources, especially in the spring when many seed lots must be assessed over a very short period.

Task Team Recommendation: Yes, the Import Task Team reached a qualified consensus that all imported seed should be pre-cleared, apart from seed imported by an AI. The Task Team also recommended further exploration of digitalizing the import process for all seed imported into Canada.

* **NOTE:** For this to work well, significant investments in digital systems, education, and monitoring would be required. In addition, regulatory changes are needed to permit seed import conformity assessors (SICA) to approve seed lots prior to importation into Canada.

Survey Q7: Do you support purity testing of small lots of seed for personal use to verify that seed purity standards are met prior to import?

CSGA Response: Yes

Here's Why: Imported seed could be contaminated with weed seeds not currently present in Canada.

Task Team Recommendation: Yes, the Import Task Team agreed that small lots of seed imports must meet the purity standards at the time of importation.

Survey Q8: Provide any additional information you would like CFIA to consider related to the import, export, and sale of seed.

CSGA Response: Seed import conformity assessors (SICA) should be allowed to pre-clear imported seed without having to be an authorized importer. Digitalization is essential to make such a system efficient and effective.

4. Big Picture Concepts

Background: CSGA and other seed sector stakeholders had the opportunity to introduce ‘big picture’ concepts into the SRM discussions. CSGA had the opportunity to submit four (4) proposals, covering CSGA becoming the main administrator of Canada’s seed certification system, expanding SeedCert to provide a digital end-to-end single window, streamlining CSGA’s Form 300 process, and introducing a Multi-Stakeholder Advisory Committee. [Click here](#) to learn more about CSGA’s Big Picture proposals.

Survey Q9: Would you find value in the establishment of an Advisory Committee with balanced representation from across the value chain for the purpose of making recommendations and providing input and advice targeted towards the continuous improvement of Canada’s seed system?

CSGA Response: Yes, but!

Here’s Why: CSGA has proposed the creation of a multi-stakeholder advisory committee to strengthen connections along the value chain, ensure key stakeholder groups are engaged, monitor the effective implementation of SRM recommendations, promote continuous improvement, and provide a high-level forum for discussion. However, CSGA does not support or see value in any advisory framework that duplicates existing standard-setting functions, relies on Ministerial appointments, and does not embrace an organization-based membership model.

GOVERNANCE AND STANDARDS DEVELOPMENT

- We want to build an inclusive seed certification system that works for all. [Learn more](#) about our proposal.

CSGA’s proposed multi-stakeholder advisory committee would have no governing power, no standards-setting authority, no fiduciary responsibility, and no organizational budget or personnel. This would be an advisory committee to the government – it would not be a CSGA committee, nor would it report to CSGA’s Board of Directors.

Task Team Recommendation: Yes, the Seed Certification Task Team agreed that Canada should continue to have one national body establishing seed crop standards and issuing crop certificates and that one organization should be CSGA. CSGA should also continue to expand its standard development consultation process. For more information, read the [Seed Certification](#) Executive Summary report.

* **Note:** CSGA currently invests thousands of hours annually in standards development, modernization, and international harmonization, while other proposals seek to shift the responsibility to government or individuals appointed by the Minister. We would see this as a significant step backward and introduce significant costs and delays in ensuring our regulatory framework is agile and responsive to the sector’s needs. CSGA and its standard-setting process is a 100-year-old example of how effective delegation of authority and incorporation by reference can be.

Survey Q10: What role should this Advisory Committee have with respect to standard setting?

CSGA Response: Option A. The Advisory Committee should not be involved in standard setting but rather provide advice on standards and their prioritization.

Here’s Why: Canada’s seed standards are developed by the seed sector for the seed sector.

As Canada's national seed crop certification authority, CSGA is currently responsible for [Canada's seed crop certification standards](#). We are proud to say they are developed through an efficient process that encourages broad stakeholder participation and is agile enough to respond to the sector's needs.

Task Team Recommendation: The Seed Certification Task Team agreed that Canada should continue to have one national body establishing seed crop standards and issuing crop certificates, and that organization should be CSGA. CSGA should also continue to expand its standard development consultation process. For more information, read the [Seed Certification](#) Executive Summary report.

**STANDARDS
FOR THE SEED SECTOR
BY THE SEED SECTOR**

- [Learn more](#) about CSGA's inclusive standard-setting process.

***Note:** We encourage anyone who wants to be involved in the existing standard-setting process to do so. Your seat at the table is waiting for you.

Survey Q11: Provide any feedback you would like CFIA to consider on the establishment of an Advisory Committee and its role.

CSGA Response: CSGA's proposed advisory committee is similar to those used by many federal, provincial, and municipal governments, which have no governing power, no standards-setting authority, no fiduciary responsibility, organizational budget, or full-time personnel.

This structure is successful for good reasons and would ensure that future policies, operations, and standards developed by the CFIA, and other non-governmental organizations continue to be well-balanced and reflect the diverse perspectives of all stakeholders in the seed sector.

Survey Q12a: Do you support CSGA's SeedCert platform being expanded to collect information regarding pedigreed seed declarations, seed grading reports, and quantity of seed certified?

CSGA Response: Yes!

Here's Why: CSGA's SeedCert platform has enabled Canada's seed crop certification system for more than 10 years now – providing a digital end-to-end seed crop certification framework that includes applications for crop certification, inspection reports, seed crop certificates, CFIA oversight, and most recently digital seed tags. Expanding SeedCert to provide a digital 'single window' for all seed certification services would expedite data access, provide value-added traceability opportunities for the seed sector and its customers, and improve monitoring and regulatory oversight of the sector.

Task Team Recommendation: The Seed Certification Task Team recommended that information requirements, including a single digital platform, oversight, transparency, labelling, traceability, and accessibility, should be further explored by the Information (records and labelling) Task Team. For more information, read the [Seed Certification](#) Executive Summary report.

Survey Q12b: What concerns would you have with the development and use of a digital end-to-end seed certification information management system?

CSGA Response: None. A key component of CSGA's digital vision is security, data privacy, and process transparency. Moving forward, the multi-stakeholder advisory committee could provide input to CSGA as it completes its Ag Data Transparency Certification, which would provide end users and government with enhanced transparency into how CSGA handles, uses, and stores its data.

Survey Q12c: What advantages do you see with the development and use of a digital end-to-end seed certification information management system?

CSGA Response: Many. A digital end-to-end seed certification system would enhance traceability, facilitate tracebacks, enable reporting, streamline processes, improve monitoring, and instill confidence in the reliability of Canada’s seed certification system. It would also boost confidence in the CFIA’s effective oversight of certification when it can readily audit quantities of seed certified by the CFIA against the number of acres of seed crops certified by CSGA.

Survey Q13: Provide any additional feedback you would like the CFIA to consider on the establishment of a digital end-to-end seed certification information management system.

CSGA Response: This is an essential step in modernizing Canada’s seed system. Digitalization of seed certification information, including quantities certified, weed species present, and germination rates, would provide invaluable insights into the state of seed in Canada. It could provide an early warning system for the introduction and/or spread of weed species, for example, or enable the determination of potential seed supply shortages in emergency situations.

Digitalization of seed certification information would also facilitate CFIA’s required reporting to the OECD Seed Schemes on OECD-certified seed in Canada and enable the CFIA to report to Canadians more effectively on the effectiveness of Canada’s seed certification system.

Survey Q14: Do you support CSGA providing more seed certification services to the sector?

CSGA Response: Yes!

Here’s Why: CSGA has reliably delivered a national seed crop certification system through a longstanding public-private partnership with government for 120 years. However, this division of administration between seed crop certification (field standards) and seed certification (seed standards) is an international outlier and needlessly complicates the certification process.

As we modernize our seed system, we need to prioritize a simpler certification process from consolidating and streamlining our current multi-layered, complicated system. CSGA is committed to delivering a national seed certification system for the benefit of Canadian agriculture and assuming more responsibility to make this a reality.

CSGA AS THE MAIN ADMINISTRATOR

- [Learn about](#) our proposal to become the main administrator of Canada’s seed certification system.

Survey Q15: What additional seed certification related activities would you support CSGA taking on?

CSGA Response: All of the above!

Here’s Why: As we work to modernize our seed system, we need to prioritize a simpler certification process that comes from consolidation and streamlining our current multi-layered, complicated system.

Field Inspection Training: CSGA will work with the ASCIS Association to develop crop inspector training tools and administer online training for seed crop inspectors through our CSGA Learn platform. The CFIA would still be responsible for licensing these inspectors and conducting in-field practical examinations.

Variety Verification Program: CSGA will work with the CFIA to annually review Variety Verification test results, ensure seed growers and seed companies are notified of their results, provide CFIA with recommendations on corrective actions (if applicable), and ensure OECD post-control results are uploaded to the new OECD Seed Lot Hub.

Administering Official Seed Tags & Licensing Agreements: CSGA would take on the day-to-day administration of seed tags, which would allow its digital seed tag technology to be applied to all classes of seed. CSGA would also leverage its digital capabilities to streamline tag licensing agreements and reporting and provide opportunities for new risk-based oversight models.

OECD Certification: CSGA will manage the day-to-day administration of the OECD Seed Schemes, including assigning the OECD reference number, coordinating sample submission and testing, and the issuance of varietal certifications. This agreement would be similar to the agreement the USDA has with AOSCA agencies. The CFIA would retain its role as the National Designated Authority for the purposes of the OECD Seed Schemes.

Answering Seed Certification Questions: Building on our digital single window concept, CSGA is proposing that CSGA become the primary point of contact for the sector for questions related to seed certification. We are looking to eliminate the frustrations of having to contact multiple parties that exist in our current fragmented seed certification system.

Survey Q16: Provide any additional feedback you would like the CFIA to consider related to the establishment of an alternative service delivery arrangement with CSGA for certain seed certification tasks currently done by CFIA (not including the CFIA's responsibilities for regulatory compliance and enforcement.)

Our Response: CSGA has a strong track record of being an effective and modern co-regulator of Canada's seed certification system. CSGA is ready to take on more administrative duties on behalf of the CFIA to achieve an industry-led, government-enabled seed certification system that is modern, agile and meets the needs of Canadian agriculture.

Shifting certain functions to the CSGA does not mean the CFIA can walk away from seed certification in Canada. Still, the CFIA would have more efficient tools to effectively oversee the seed sector and reprioritize where its regulatory efforts would have the biggest positive impact.

YOUR PARTICIPATION IS CRITICAL

SRM will change how the system is regulated and possibly governed.
Help us chart a successful course for the future of our seed sector.