

## CSGA's Perspective on the CFIA's Seed Regulatory Policy Paper

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August 2025

After five years of collaborative work, eight task teams, two pre-consultations, and a new co-development model, the Canadian Food Inspection Agency (CFIA) has finally released its [Seed Regulatory Modernization \(SRM\) Policy Paper](#) and opened a **65-day consultation on 52 proposals** that could reshape Canada's seed system.

We are pleased to report that a **majority of the proposed changes closely align with CSGA's vision** for a more responsive, efficient, and collaborative seed system. Overall, the direction proposed by the CFIA is positive; however, there are key areas where adjustments are required to position Canada's seed sector for long-term success.

Throughout the SRM process, CSGA has presented a clear vision for a forward-looking, digitally enabled, and collaborative seed certification system—built on three core recommendations.

- ✓ Make **CSGA the Main Administrator** of Canada's Seed Certification System
- ✓ Implement a **Digital End-to-End Certification** System
- ✓ Establish a **Seed Sector Advisory Committee**

Of CFIA's 52 proposed changes, CSGA:

- **Supports 40 proposals** (Green Light)
- **Conditionally supports 7 proposals** with refinements (Yellow Light)
- Has strong concerns and **cannot support 5 proposals as written** (Red Light)

In the following pages, you'll find our detailed analysis. For each proposal that falls short, we will outline practical, alternative approaches for the CFIA to consider that achieve the intended outcome while protecting the integrity, efficiency, and credibility of Canada's seed certification system. You can click on each [Green Light](#), [Yellow Light](#), or [Red Light](#) heading to go directly to that section.

### Your Feedback is Needed

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As a seed sector stakeholder, we're asking you to:

- **Support the CFIA's overall direction**
- Urge the CFIA to **designate CSGA as the main administrator** of seed certification
- Advocate for **mandatory reporting of total certified seed quantities**
- Encourage the **CFIA to legislate only where necessary**

To make sharing your feedback easy, we created a **Letter Campaign you can complete quickly**. Simply enter your name, and a prepared letter will be emailed straight to government decision-makers, amplifying CSGA's positions and showing sector-wide alignment on these critical issues. You can also personalize the letter with your own comments.

The CFIA is **accepting feedback until October 3, 2025**. Don't miss the opportunity to support a seed system that is faster, fairer, and built for the future.

[\*\*SUBMIT YOUR FEEDBACK TO THE CFIA NOW\*\*](#)

## GREEN LIGHT: CFIA SRM Proposals CSGA Fully Supports

Throughout the CFIA's Seed Regulatory Modernization (SRM) process, CSGA has put forward a clear vision for a more responsive, efficient, and collaborative seed system based on three (3) core recommendations:

1. **Make CSGA the Main Administrator of Canada's Seed Certification System**
2. **Implement a Digital End-to-End Certification System**
3. **Establish a Seed Sector Advisory Committee**

CSGA is pleased to see strong alignment between these recommendations and the policy proposals put forward by the CFIA.

*Below we list these proposals - as well as other proposals outside our core recommendations that we support or support in principle - and provide comments when necessary.*

### **Make CSGA the Main Administrator of Canada's Seed Certification System**

CSGA is supportive of the following CFIA proposals that are aligned with CSGA becoming the main administrator of Canada's seed certification system.

**3.1.4 CFIA Proposal:** The CFIA no longer offers licensed seed crop inspector theory training for those wanting to become a licensed seed crop inspector (LSCI).

- **CSGA's Position:** CSGA agrees with this proposal and would be interested in partnering with the ASCIS Association to make this training available via CSGA Learn, its online learning platform.

**3.1.8 CFIA Proposal:** Expand alternative service delivery by having (a) a third-party issue seed tags instead of the CFIA, and (b) have a third-party review seed tag licence applications. To minimize the chance of fraud, the CFIA will have only one third-party issue seed tags. Seed tags are modernized within a specified timeframe by the third-party service provider. (Also detailed in subsection 2.1.4)

- **CSGA's Position:** CSGA agrees with this proposal, and as Canada's AOSCA agency, CSGA would be interested in delivering this service to the sector. CSGA currently provides Breeder and Select tags to the sector and has modernized them to include digital elements.

**3.1.18. CFIA Proposal:** The CFIA will explore, with the Canadian Seed Growers' Association, **digitalization and administration** of the Organisation for Economic Cooperation and Development (OECD) seed export certification system for Canada and ensure functionality with the new OECD electronic database that is under development.

- **CSGA's Position:** CSGA agrees with this proposal and sees it as an extension of its existing seed crop certification work. In the US, the day-to-day administration of the OECD Seed Scheme program is delivered by an AOSCA agency, and this would be very similar. CSGA routinely attends OECD Seed Schemes meetings and is an active and respected participant in its working groups and committees. CSGA was involved in the development of the OECD Seed Schemes digitalization framework and has the technical abilities to expand our SeedCert platform to connect into the OECD Seed Hub.

## Implement a Digital End-to-End Certification System

CSGA is supportive of the following CFIA proposals that are aligned with Canada implementing a digital-end-to-end certification system.

**3.1.8 (Cont.) CFIA Proposal:** Seed tags are modernized within a specified timeframe by the third-party service provider.

- **CSGA's Position:** CSGA agrees with this proposal and sees it as an extension of its recent modernization of Breeder and Select tags to include QR codes and other fraud prevention technologies. CSGA's digital tag technology can be expanded to include all other pedigreed classes. CSGA is also working through the OECD Seed Schemes on its digital tag pilot to ensure international alignment. CSGA is ready, willing, and able to help modernize Canada's seed tags.

**3.1.17. CFIA Proposal:** Update the CFIA's Digital Service Delivery Platform to allow importers to apply for a notice of import conformity confirming import requirements are met, or, in the case of an authorized importer, provide required information on imported seed.

- **CSGA's Position:** All seed import conformity assessments should be entered into a searchable database that can create reports on seed quality for all seed imported into Canada.

**3.1.21. CFIA Proposal:** Explore opportunities to further streamline the paperwork process for OECD export certification by using a digital approach.

- **CSGA's Position:** CSGA agrees with this proposal and sees it as an extension of its existing seed crop certification work.

**3.2.14. CFIA Proposal:** The CFIA and the seed sector continues to explore the use of Quick Response (QR) codes and digital seed tags on pedigreed seed.

- **CSGA's Position:** CSGA agrees with this proposal and sees it as an extension of its recent modernization of Breeder and Select tags to include QR codes and other fraud prevention technologies. CSGA's digital tag technology can be expanded to include all other pedigreed classes. CSGA is also working through the OECD Seed Schemes on its digital tag pilot to ensure alignment.

## Establish a Seed Sector Advisory Committee

CSGA is supportive of the following CFIA proposals that help establish a seed sector advisory committee.

**3.2.1. CFIA Proposal:** The CFIA establishes an external seed advisory committee with balanced representation from across the value chain to provide advice to the Seed Program. (Also detailed in subsection 2.2.1)

- **CSGA's Position:** CSGA and Seeds Canada issued a joint recommendation on the benefits of a seed sector advisory committee.

## Other Proposals

CSGA welcomes the following recommendations, which look to streamline and clarify existing regulations.

**3.1.5. CFIA Proposal:** The purity standards listed in the grade tables (i.e., Schedule I) for both the No. 1 and No. 2 grades will be aligned such that the No. 1 standards for purity will apply. Standards for germination remain as is. (Also detailed in subsection 2.1.2)

- **CSGA's Position:** Anything that can streamline the standards is welcome, especially given that the No. 2 designation is rarely used. Consideration should be given to allowing the No. 2 designation when the purity requirement for No. 1 has been met and the seed is labelled with the percentage germination, rather than establishing a germination standard for No. 2 seed.

**3.1.6. CFIA Proposal:** Remove the germination standards where one exists for seed mixtures (i.e., forage mixtures and lawn and turf mixtures) from the grade tables and meet the individual germination standards applicable to each crop type in the mixture. (Also detailed in subsection 2.1.2)

- **CSGA's Position:** Anything that can be done to streamline and simplify the standards is welcome.

**3.1.9. CFIA Proposal:** Incorporate by reference the crop-specific labelling requirements for seed listed in Sections 19 and 23 to 31. (Also detailed in subsection 2.1.1)

- **CSGA's Position:** CSGA agrees with this proposal and suggests there may be opportunities to combine the seed quality standards and the labelling requirements in one document.

**3.1.10. CFIA Proposal:** Eliminate varietal blend restrictions on non-Plant Pest Tolerance Management (PPTM) varietal blends so that they can be sold as certified seed. (Also detailed in subsection 2.1.5)

- **CSGA's Position:** CSGA agrees that allowing flexibility for innovative varietal blends is desirable, provided that strict controls are implemented and transparency requirements are met to ensure truth-in-labelling and prevent fraud.

**3.1.11. CFIA Proposal:** Allow Canada Certified No. 1 and No. 2 Cereal Mixtures to include different pedigreed seed varieties of the same crop type to be sold as certified seed. (Also detailed in subsection 2.1.5)

- **CSGA's Position:** CSGA agrees that allowing flexibility for innovative varietal blends is desirable, provided that strict controls are implemented and transparency requirements are met to ensure truth-in-labelling and prevent fraud.

**3.1.14. CFIA Proposal:** Expand third party alternative service delivery by authorizing third parties to (i) assess whether seed meets minimum import requirements, and (ii) issue a notice indicating that import requirements are met. (Also detailed in subsection 2.1.4)

- **CSGA's Position:** CSGA agrees and recommends that accredited seed laboratories, operating under an audited quality management system, be authorized to complete import conformity assessments (ICA) on seed lots intended for importation into Canada prior to the seed being imported. Measures to ensure that international standards for seed quality assessment are acceptable for Canadian seed imports are essential. Furthermore, the CFIA should ensure that all ICAs are entered into a database, that all seed contaminants are captured, and that search and reporting capabilities are enabled.

**3.1.15. CFIA Proposal:** Eliminate the need to meet a germination standard at the time of import. The requirement to provide the percent germination result on the seed analysis certificate still exists. (Also detailed in subsection 2.1.4)

- **CSGA's Position:** CSGA agrees and suggests that a germination test requirement for imported seed be eliminated.

**3.1.16. CFIA Proposal:** Eliminate the requirement to provide germination data at the time of import on seed lots of small-seeded crop types imported between 500 g and 5 kg.

- **CSGA's Position:** CSGA agrees and suggests eliminating the germination test requirement for all imported seeds, regardless of weight, and focusing entirely on seed lot contaminants. To that end, all seed imports should be from a seed lot that has been tested according to recognized standard methods for other species and contaminants, including soil and disease bodies. Exemptions from the seed analysis certificate requirement for very small quantities of commercially packaged seed for own (garden) use should be considered.

**3.2.3. CFIA Proposal:** Develop a regulatory pathway for heritage and heirloom varieties to become registered. (Also detailed in subsection 2.2.3)

- **CSGA's Position:** CSGA agrees that a pathway for the commercialization of heritage and heirloom varieties of Schedule I, Part I varieties should be established. In addition, consideration should be given to the regulation of "population" or "heterogeneous" varieties of all crop kinds to ensure transparency and prevent fraud. CSGA has extensive experience in record keeping and "pedigreeing" seed lots and would be well-placed to be a co-regulator in this space. While regulatory changes are still a few years away, developing the digital platform that would facilitate alternative varieties – and native plant selections – should begin soon.

**3.2.4. CFIA Proposal:** The CFIA works with Recommending Committees to **develop appropriate testing conditions and performance standards** for varieties that have been bred specifically for alternative crop production systems (for example, organic, low carbon, farmer-selected material, etc.). (Also detailed in subsection 2.2.3)

- **CSGA's Position:** CSGA agrees that greater flexibility in farmers' seed choices would be good, provided there is transparency, consistency, and trust in the products placed on the market. As noted above, CSGA has extensive experience in seed production record keeping and would be interested in facilitating information sharing for these kinds of products.

**3.2.5. CFIA Proposal:** The CFIA works with Recommending Committees to **develop criteria and a standard process to enable regional restrictions** on variety registrations to be applied consistently across recommending committees.

- **CSGA's Position:** CSGA agrees that the CFIA should work with variety registration stakeholders to clarify, develop and implement policies to address regional registration issues.

**3.2.6. CFIA Proposal:** Allow for the submission of biomolecular data in the future to support variety registration.

- **CSGA's Position:** CSGA agrees that biomolecular data (DNA sequencing/markers) can be a useful tool to identify and/or distinguish varieties. It will be important that variety registration and seed certification authorities work closely with plant breeders and international counterparts to ensure that such tools are applied in a transparent fashion and for the broad benefit of agriculture, not narrow private interests.



**3.2.7. CFIA Proposal:** Incorporate by reference the list of recognized standard methods so that future standards can be recognized as technology improves and science advances. (Also detailed in subsection 2.2.2)

- **CSGA's Position:** CSGA agrees that this would provide flexibility to respond to developments in seed science and technology in a timely manner.

**3.2.9. CFIA Proposal:** The **Canadian Methods and Procedures for Testing Seed (M&P)** is reviewed and harmonized, where appropriate, with rules established by the International Seed Testing Association (ISTA) or the Association of Official Seed Analysts (AOSA).

- **CSGA's Position:** CSGA agrees that the M&P should be aligned with the ISTA and AOSA rules for seed testing as much as possible. The M&P were developed with the expressed purpose of grading seed lots, i.e., determination whether seed lots met the grading standards established in Schedule I to the Seeds Regulations. As such, changes to the M&P are inextricably linked to the standards, and any review of the M&P should be done in conjunction with a review of the standards.

**3.2.10. CFIA Proposal:** The CFIA to **provide industry guidance to clarify the process for a Bulk Storage Facility (BSF)** to downgrade pedigreed seed meeting a Foundation or Registered standard to a Certified standard.

- **CSGA's Position:** CSGA agrees and believes that it should be a very simple process to label and sell a certified seed lot of Foundation or Registered seed as Certified class seed; the intervention of an accredited grader should not be necessary. A digital end-to-end seed certification system would facilitate the process and ensure that all certified seed remains traceable.

**3.3.1. CFIA Proposal:** The **CFIA will take over from the Canadian Seed Growers' Association (CSGA) assessments to determine varietal eligibility** (i.e., whether a specific crop breeding line meets the definition of a variety) and amend the Regulations to provide authority to the CFIA for these assessments. (Also detailed in subsection 2.3.2)

- **CSGA's Position:** CSGA welcomes the CFIA's proposal to assume responsibility for assessing the eligibility for certification of varieties of crops not subject to variety registration. CSGA has been performing this activity for nearly 30 years, ever since corn and food-type soybeans were exempted from variety registration and hemp was legalized but never made subject to variety registration.

**3.3.5. CFIA Proposal:** Clarify that pedigreed seed conditioned by the seed grower on their own premises cannot be sold in Canada as pedigreed seed to a farmer or another seed grower, but can be used by the seed grower for pedigreed seed production.

- **CSGA's Position:** CSGA agrees that all seed sold as pedigreed seed/labelled with a Canada pedigreed grade name must be processed by an approved conditioner but that individual seed growers can use their own seed for pedigreed seed production.

**3.3.6. CFIA Proposal:** Clarify that seed loses its pedigreed status when conditioned (for example, cleaned, bagged, treated, etc.) by a facility that is not an approved conditioner.

- **CSGA's Position:** CSGA agrees that additional clarity as to seed losing its pedigreed status if conditioned by an establishment that is not an approved conditioner would be useful.

**3.3.7. CFIA Proposal: Common seed must be graded by an accredited grader to be sold or advertised with a Common grade name.** Otherwise, it can be sold and advertised without a Common grade name if it meets minimum standards for common seed, and the germination and purity data are provided on the label. (Also detailed in subsection 2.3.2)

- **CSGA's Position:** CSGA agrees with the intent of this proposal and hopes that the CFIA is prepared to enforce the new regulation when it comes into force. Clarification as to what constitutes "labelling" would be welcomed. Specifically, if the CFIA is proposing that seed quality information be provided on a label attached to the package or printed directly on the package (similar to pest control product requirements), clarity is needed on whether it would also be sufficient for the information to accompany the seed..

**3.3.11. CFIA Proposal: No longer allow Canadian graders to conduct purity analyses on large-seeded crop types** for the purpose of clearing seed under the authorized importer program. (Also detailed in subsection 2.3.3)

- **CSGA's Position:** CSGA agrees with this proposal as it will ensure that fully trained and competent seed analysts are responsible for purity analysis of imported seed lots. It may mean shipping samples and delays for analysis or getting an accredited foreign seed test prior to import, but that is a small price to pay for protecting the Canadian environment.

**3.3.14. CFIA Proposal: Clarify the definition of "research".**

- **CSGA's Position:** CFIA should work with sector stakeholders to ensure it understands the types and extent of research in the sector before it finalizes a definition.

**3.3.15. CFIA Proposal: Require that accurate and truthful information** be used when advertising seed for sale.

- **CSGA's Position:** CSGA agrees that CFIA should have the regulatory authority to ensure that seed advertising is truthful and accurate.

## Other Stakeholder Proposals

CSGA is also supportive of the following recommendations in principle; however, impacted stakeholders should be consulted to determine if the proposed path forward is optimal or feasible.

**3.1.1. CFIA Proposal: Amend the Regulations to remove Part 2 of the list of varieties subject to variety registration** (i.e., Schedule III) or use Part 2 to accommodate heritage and heirloom varieties listed in Part 1 (TBD). Move safflower from Part 2 to Part 3 of Schedule III.

- **CSGA's Position:** CSGA would suggest that organizations like SeedChange are better equipped to determine if Part 2 is the best path forward to accommodate the registration of heritage or heirloom varieties or if a more agile process is required.

**3.1.7. CFIA Proposal: Incorporate by reference the grade tables** (i.e., Schedule I) listing the standards that must be met for a particular grade of seed and the crop-specific seed grading standards listed in Sections 6 and 7 of the Seeds Regulations. (Also detailed in subsection 2.1.1)

- **CSGA's Position:** CSGA would recommend that CFIA initiate this consultation sooner versus later with stakeholders, especially seed laboratories and seed analysts, to clearly articulate the linkages between the seed standards and the Canadian Methods and Procedures for Testing Seed in an effort to harmonize Canadian seed testing requirements with international standards for seed quality assurance.

**3.3.2. CFIA Proposal:** Provide a pathway for registrants to transfer their registration to another capable entity when they no longer wish to maintain and sell the variety. (Also detailed in subsection 2.3.1)

- **CSGA's Position:** CSGA agrees with the proposal in principle but is unsure if it will actually be used. Also, CSGA questions why this needs to be a regulation versus a policy.

**3.3.10. CFIA Proposal:** Reduce the small lot exemption from 5 kg to 500 g for large-seeded crop types. Only require purity analysis for seed imported between 500 g and 5 kg, regardless of size. (Also detailed in subsection 2.3.3)

- **CSGA's Position:** CSGA recommends that purity analysis be required for all seed imports other than very small amounts of commercially packaged seeds for personal, home garden use. However, through our discussions with stakeholders, there is concern that limiting the sample size may negatively impact their operations. CSGA also recommends that the CFIA clarify that samples of seed for testing by an accredited seed testing lab are not considered seed as defined by the *Seeds Act*, as they are not “represented, sold or used to grow a plant”.



## YELLOW LIGHT: CFIA SRM Proposals CSGA Conditionally Supports

CSGA is supportive of the following CFIA proposals but recommends refinements to ensure they deliver benefits without adding costs, complexity, or risks.

**3.1.3 CFIA Proposal:** The CFIA may **expedite variety registration decisions** for crop types listed in Part 3 of Schedule III when the variety has already been recognized in a foreign jurisdiction.

- **CSGA's Position:** Supportive, but unsure what is gained. Part III is already streamlined, and any expedited processing must still require a legal reference sample, a variety name check, a Canadian Representative, and a description of variety that uses Canadian descriptors. Acceptance of foreign varieties should occur only where standards and descriptors are demonstrably equivalent to Canadian requirements and there is clear market demand in Canada. There must also be a safeguard for market acceptance in Canada, since a variety's traits or characteristics may not be accepted by the value chain.

### Why it Matters:

- Not all foreign jurisdictions should be treated as equal. Prioritization should be given to AOSCA agencies and OECD Seed Schemes countries.
- Canadian descriptors must be used consistently. What is "tawny" in one country may be interpreted differently elsewhere.
- Accepting foreign documentation without clear equivalency mapping and proper checks and balances, such as one variety and one name, risks misalignment with Canadian testing, labelling, and enforcement.
- Fast-tracking a variety that Canadian farmers and processors will not accept can trigger stewardship and market-access issues.

### How it Can be Improved:

- Clarify what will be gained beyond what is already possible under Part III.
- Limit foreign jurisdictions to AOSCA agencies or OECD Seed Schemes participating countries in good standing.
- Require, without exception, a Canadian Representative, a variety name check, a Canadian-format description of variety, and a legal reference sample.
- Add a short, objective market-fit screen focused on stewardship, coexistence, and end-use quality concerns. If credible issues are raised, the CFIA should be able to condition or pause expedited status.

### Suggested Feedback:

- *I support bringing varieties to market faster, but it is not clear what this adds beyond what Part III already allows. If this proceeds, safeguards are essential: limit eligibility to jurisdictions with documented equivalency (for example, AOSCA agencies and OECD Seed Schemes countries), require a Canadian Representative, a legal reference sample, one variety/one name, and a description of variety using Canadian descriptors. Include a short market-fit screen to confirm stewardship, coexistence, and end-use acceptance in Canada. This could improve service without creating market-access or confidence issues.*

**3.1.13 CFIA Proposal: Remove the regulatory requirement for CSGA to issue a new crop certificate** when two or more lots of the same variety are mixed and still meet Canada Foundation or Canada Registered grade.

- **CSGA's Position:** Supportive of reducing redundancy, but keep the requirement in Circular 6. A similar control point already exists in Circular 6, which is the right place for it. CSGA must keep this requirement to preserve traceability and manage risk and liability for lots that may re-enter seed crop certification. If the CFIA removes the regulatory reference, CSGA would continue to require it under Circular 6.

#### Why it Matters

- The current Circular 6 requirement preserves an audit trail for approximately 30-50 blends per year that return to CSGA's seed crop certification program.
- Without this requirement, CSGA risks certifying seed crops without full complete visibility of the parent seed lots, increasing CSGA's risk and liability, and slowing certification appraisals.

#### How it Can be Improved

- Keep the requirement in Circular 6 rather than in the Seeds Regulations.
- CSGA will work on creating a digital tool that would allow users to receive a blended crop certificate in real-time, without the need for manual intervention.

#### Suggested Feedback:

- *I support removing this regulation, but CSGA must keep its similar requirement in Circular 6 to ensure traceability and protect the integrity of its certification program. If the CFIA removes the clause from regulation, please confirm in guidance that CSGA will continue to require a digital blend declaration. I support CSGA in developing a digital tool to speed up the issuance of a blended crop certificate number through SeedCert. Keeping this requirement in Circular 6 preserves an auditable trail for Foundation and Registered blends that may re-enter certification, while avoiding red tape and delays.*

**3.2.2 CFIA Proposal: Incorporate by reference the list of crop types subject to variety registration.**

- **CSGA's Position:** Supportive, provided unintended consequences are clear and mitigated. Once a crop kind leaves Variety Registration, it also leaves behind the protection that system provides. This could leave certain Canadian crop sectors more vulnerable to foreign imports and could place Canadian breeders and SMEs at a competitive disadvantage.

#### Why it Matters

- We need to make decisions that are in the best interest of Canadian agriculture, not next quarter's profit.
- When a crop kind exits registration, maintaining a pedigreed-seed requirement helps protect transparency, identity, and innovation, and keeps Canada competitive.

#### How it Can be Improved

- Publish clear guidelines and thresholds for how a crop kind enters or leaves Variety Registration, with a defined intake window and a minimum 24-month lead time for material changes.
- If a crop kind leaves Variety Registration, give the value chain the option to require that seed sold in Canada be of pedigreed status (hybrid corn and hemp models) and apply the proposed Form 300 changes to support variety certification eligibility and traceability.
- The requirement for pedigreed status should be incorporated by reference to allow greater flexibility.

#### Suggested Feedback:

- *I support using incorporation by reference for Schedule III, provided change management is clear and predictable. Please publish decision thresholds, consult the sector, and provide at least 24 months' lead time. If a crop kind exits registration, the CFIA should have the option, at the request of the value chain, to require pedigreed seed (as with hybrid corn and hemp) and apply the updated Form 300 process to determine its eligibility for seed certification.*

**3.3.3 CFIA Proposal: Clarify that a variety's registration status can be cancelled** if a reference sample is no longer available.

- **CSGA's Position:** Suspend, don't cancel. A reference sample is key to the CFIA's Variety Registration process and monitoring, but cancellation is too blunt. CSGA proposes suspending seed certification eligibility instead, keeping the registration active to avoid unintended market and grading impacts for farmers.

#### Why it Matters

- Variety registration's core purpose is the official recognition of the identity of a variety.
- There are multiple reasons why a sample may no longer be available, including being used up or requiring replacement due to age or damage.
- Cancelling registration would make seed sales illegal and shift enforcement responsibility to the CFIA, which is unlikely to prioritize or resource these cases.
- Cancellation would mean that grain derived from these varieties cannot be assigned an official grade higher than "Feed", which would harm producers and end-users who selected a variety based on certain traits for processing or value-added opportunities (e.g., Identify Preserved (IP) programs).
- Varieties can be responsibly phased out without cancellation by ceasing Breeder seed production and letting pedigreed stocks run out.

#### How it Can Be Improved

- Instead of cancelling registration, suspend its eligibility for seed certification. This would limit future seed supplies, while not impacting marketing or grading options for farmers.
- Provide clear communication and a remediation plan: notice to registrants and seed growers, a defined remediation window, and options for replenishing the reference sample.
- Once the suspension is lifted, CSGA would resume issuing crop certificates so affected seed crops can continue through certification. Existing compliant inventories remain marketable because the variety remains registered.

#### Suggested Feedback:

- *I support the CFIA's need to maintain a reference sample. However, cancelling a registration when the sample has been used up or damaged is too blunt a tool. Please keep the registration active and instead suspend eligibility for seed certification until the reference sample is restored. This preserves markets and grading opportunities for farmers and end-users who rely on these varieties. Once the reference sample is restored, seed certification can resume without disrupting the market.*

### 3.3.4 CFIA Proposal: Require records to be kept by facilities that produce common seed mixtures.

- **CSGA's Position:** Support the intent, but why only common seed mixtures? All seed vendors, not only those making common seed mixtures, should keep auditable records that support seed quality and labelling requirements. However, monitoring and enforcing this consistently would be very onerous for the CFIA.

#### Why it Matters

- This proposal's intent suggests concerns with common seed quality and consumer protection in the common seed market. Using certified seed addresses these concerns.
- It would be difficult for the CFIA to enforce common seed sales consistently or identify all vendors reliably. If feasible, better records could also support intellectual property protection.

#### How it Can be Improved

- Further discussion with the CFIA, our members, and sector partners would be required before CSGA can propose potential improvements to the recommendation.

#### Suggested Feedback:

- *I support requiring all seed vendors to keep auditable records that verify seed quality and labelling requirements. However, consistent monitoring and enforcement would be challenging for the CFIA. Further discussion with sector partners is needed to design an approach that improves traceability and consumer protection without creating unmanageable oversight burdens.*

### 3.3.9 CFIA Proposal: Require seed imported into Canada to be assessed to determine that it meets minimum purity standards before import. Exemptions: authorized importers, in-transit seed, and seed exempt from providing a seed analysis certificate at the time of import.

- **CSGA's Position:** Supportive, but we can likely go further. Pre-import purity assessment can strengthen biosecurity and buyer confidence, but success depends on clear communication, accredited labs, and a single digital workflow that avoids bottlenecks and duplicative testing.

#### Why it Matters

- Up-front purity checks help keep noxious weeds and unknown contaminants out of Canada.
- Without clear rules, data standards, and digital tools, importers could face delays, inconsistent decisions, and higher costs.

#### How it Can be Improved

- Use a single digital window for pre-import submissions and decisions; require electronic upload of seed analysis certificates and contaminants data.
- Limit assessments to accredited seed labs operating under audited QMS; publish accepted methods (M&P aligned with ISTA/AOSA) and a standard data schema.
- Set service standards (turnaround targets), a help guide for brokers/importers, and risk-based sampling rules; enable API integrations to importer systems.
- Phase in with outreach and training; provide dashboards and reporting so the sector can see trends and compliance.

### Suggested Feedback

- *I support pre-import purity assessment, provided it's delivered through a single digital window with clear standards and timelines. Please require electronic submission of the seed analysis certificate and contaminants data from accredited labs (methods aligned with M&P/ISTA/AOSA), setting turnaround targets, and publishing a simple guide for importers and brokers. API integrations into importer systems will reduce errors and delays. With these elements in place, the policy will improve biosecurity and buyer confidence without creating bottlenecks.*

### 3.3.13 CFIA Proposal: Reduce the timeframe for a vendor to provide purity and germination information

requested by a purchaser from 30 to five (5) days.

- **CSGA's Position:** Supportive, but we can likely go further. Most purity and germination results exist digitally and should be provided upon request. CSGA has been piloting digital seed tags for two years, which allow the seller to share purity and germination results (and more) directly via a QR-enabled seed tag and validation page, creating instant data validation.

### Why it Matters

- Planting, treatment, and storage decisions are time-sensitive; five days is better than 30, but same-day access is often feasible where records are digital.
- Most vendors already have digital test results. Providing these results in near real-time improves transparency, reduces disputes, and will likely become the norm through digital tag technology.

### How it Can be Improved

- Require the vendor to provide the information upon request.
- Embrace digital seed tag technology, which will make these results and others accessible via the seed tag.

### Suggested Feedback:

- *I support reducing the response time and recommend going further: purity and germination information should be provided upon request. By adopting digital seed tags, these test results and others can be made available by the seller in near real-time. This will make on-farm decisions timelier and improve transparency without adding undue burden for vendors who are already using digital records.*

## RED LIGHT: CFIA SRM Proposals CSGA Does Not Support As Written

CSGA has significant concerns with the following CFIA proposals and recommends practical alternatives that achieve CFIA's goals without adding regulatory burden, unnecessary costs, or risks to efficiency, affordability, and seed quality.

**3.1.12 CFIA Proposal: Amend the definition of the Pedigreed Seed Declaration** to remove reference to a specific CFIA form.

- **CSGA's Position:** Not supportive as written. Remove the form reference, but require electronic submission of the dataset to the CFIA. Flexibility is fine, but without a common data strategy and framework, this will create data silos and weaken oversight. The full dataset must be digitally reported to regulators to enable effective program management, oversight, and enforcement.

### Why it Matters

- Every credible certification program monitors output. Canada previously collected this information; however, the capability was lost over time. The authority to enable reporting was reintroduced in 2015 but has not been used to date.
- Recent tariff issues highlighted how little data we have on our sector's production, including total quantity of seed certified. An anonymized national dataset would be a key strategic data source and allow better decision-making and resource allocation across seed growers, distributors, and government. Other jurisdictions that have this national dataset consider it a critical tool for informed decisions and for maximizing productivity.
- CSGA is unaware of any other seed certification system that does not track how much seed it is certifying, potentially making Canada an international outlier. The CFIA does track this information to comply with exports under the OECD Seed Schemes. The gap comes from both domestic production and exports moving on non-OECD seed tags.
- Fragmented records reduce data quality, increase fraud risk, and make audit and oversight slower and more expensive.
- Poor data limits automation, risk-based oversight, and evidence-based program design.
- Not knowing how much seed we certify undermines system integrity and market confidence, and weakens our ability to measure, benchmark, and maximize productivity and to respond to calls for greater transparency.

### How it Can be Improved

- Prioritize reporting total quantity of seed certified as a core enabler of a modern, responsive system. An anonymized national dataset would support monitoring, benchmarking, resource allocation, and provide actionable insight to measure, benchmark, and maximize sector productivity.
- Keep the flexibility. Remove the form reference but require electronic submission of the dataset to the CFIA through CSGA's SeedCert platforms, with integrations available for third party tools (e.g., SeedTrakr) and corporate software systems.
- Work with CSGA to publish a standard data schema, validation rules, and retention timelines for data handled through SeedCert and enable role-based regulator access. This supports automation, risk-based oversight, and evidence-based program design.



- Make reporting mandatory for every pedigreed seed lot, including domestic sales and non-OECD-tagged exports, so regulators can produce a complete national roll-up of certified seed volumes and close the current gap.
- Commit to regular anonymized national roll-ups (for example, quarterly and annual) and dashboards to inform productivity benchmarking, transparency, and market confidence with industry and trading partners.
- Add automated reconciliation and anomaly detection (for example, cross-checking reported volumes against tag issuance and inspection data) to deter fraud and speed up and improve audit and oversight.

#### **Suggested Feedback:**

- A national anonymized dataset of certified seed volumes is a strategic tool for our sector. It would enable stronger oversight, better benchmarking and forecasting, help measure and maximize productivity, and strengthen transparency and market confidence. I support removing the pedigreed seed declaration form reference only with a clear data plan: electronic submission of the full dataset to CFIA via CSGA's SeedCert platform; a published data schema, validation rules, and retention timelines; integrations with third-party tools; and mandatory reporting for every pedigreed lot. This will close the domestic data gap, prevent silos, improve data quality, and protect program integrity while equipping regulators and industry with the evidence needed for risk-based oversight, analytics, and continuous improvement.

**3.1.19 CFIA Proposal: Explore expanding the policy on alternative seed crop inspection services** to enable additional companies and seed growers to inspect their own pedigreed seed crops where appropriate and oversight exists.

- **CSGA's Position:** What problem are we trying to solve? Supportive of efficiencies, but no meaningful savings. Inspections are a critical part of our seed certification system, and unbiased third-party inspections are foundational. We have not heard a broad desire to move away from third-party inspection – in fact, we've heard the opposite. Once people understand what is required of an inspector and an inspection service, any idea of "saving a quick buck" disappears. Our existing framework for approving and overseeing inspection services works well and we have full confidence in current inspectors and ASCIS providers.

#### **Why it is Important**

- Independent third-party inspections underpin confidence, consistency, and market acceptance in pedigreed seed.
- Shifting to self-inspection risks undermining our resilient third-party model and could make inspections more expensive over time. The CFIA would also need to commit additional resources to properly oversee self-inspection programs, which could carry a higher risk profile than independent, third-party inspectors.
- Inspecting your own fields is not "just walking the field"—it requires training, licensing, oversight, administration, and fees.
- Large seed companies operating in closed-loop models (e.g., hybrid corn and canola) already conduct their own inspections under CFIA oversight. This program has worked well for 20+ years; there's no reason it shouldn't continue.

#### How it Can be Improved:

- Maintain the current framework, which works well (not a single field went uninspected throughout the whole COVID pandemic).
- Complete a full cost-benefit, risk assessment, and stakeholder consultation before expanding non-third-party inspections outside of the current framework.

#### Suggested Feedback:

- *The current inspection framework works well, and independent third-party inspections should remain the default. I support finding efficiencies, but there is not a strong desire within our sector to move to self-inspections. Self-inspections would require significant training, licensing, oversight, and administration. They could also undermine our existing third-party model, potentially making crop inspections more expensive in the future.*

**3.2.8 CFIA Proposal: Incorporate the Weed Seeds Order (WSO) by reference**, with a delayed coming-into-force to align with *Seeds Act* amendments.

- **CSGA's Position:** Not supportive. The WSO can already be amended by Ministerial order; what's missing is a trusted, regular review process. Moving to Incorporation by Reference (IBR) adds unnecessary complexity and could be a slower process. CSGA does not support the opening of the *Seeds Act* at this time.

#### Why it Matters:

- Weed species don't wait for regulatory reviews. Canada needs an agile, science-based review process that makes recommendations to update weed species that present a threat to Canada's biosecurity and farms.
- IBR adds process complexity without solving the real problem: governance and cadence.
- Opening the *Seeds Act* is a major undertaking with much uncertainty and potential for unintended consequences.

#### How it Can be Improved:

- Keep the WSO under the existing Ministerial Order authority; don't move it to IBR.
- Establish a Weed Seeds Working Group under the new Seed Sector Advisory Committee or CSGA's Regulatory Services Committee, commit to an annual review cycle and make recommendations to the Minister of Agriculture.
- Publish a change criteria policy and specify transition timelines.

#### Suggested Feedback:

- *I do not support moving the Weed Seeds Order to Incorporation by Reference. The current Ministerial Order already enables timely updates. What is needed is a credible, regular review process. Please establish a Weed Seed Working Group under the Seed Sector Advisory Committee or CSGA's Regulatory Services Committee to annually review the Weeds Seed Order and make recommendations for change. Opening the Seeds Act is unnecessary and risks delays and unintended consequences.*

### 3.2.12 CFIA Proposal: Expand recognition of foreign grader programs to include graders outside the United States.

- **CSGA's Position:** Not supportive as written. This adds complexity and administrative burden without improving outcomes. A better path is to allow imported seed to be labelled with internationally accredited lab results from ISTA or AOSA as an alternative to grading the seed.

#### Why it Matters:

- Multiple foreign grader programs with more countries introduce parallel systems, more audits, and potentially inconsistent outcomes.
- Using ISTA or AOSA test results leverages internationally recognized quality assurance programs, which would simplify imports, and keep rules clear and more streamlined for foreign suppliers, Canadian importers and regulators.

#### How it Can be Improved:

- Do not expand foreign grader recognition outside of the United States.
- Instead, allow imported seed to be sold/labelled using ISTA or AOSA seed analysis results that meet Canadian Method and Procedures (M&P) equivalency, rather than assigning a Canada grade name.
- Maintain Canadian grading only where a Canada grade name is expressly required.

#### Suggested Feedback:

- *I do not support expanding recognition of foreign grader programs outside of the United States. This would add complexity and workload for the CFIA without clear benefits. Instead, please allow imported seed to be labelled with ISTA or AOSA seed analysis results that meet Canadian M&P equivalency, and require electronic submission of the seed analysis certificate through the import platform. This approach uses internationally recognized QA systems, simplifies compliance, and provides clear, verifiable information for buyers and regulators.*

### 3.3.8 CFIA Proposal: Require all imported seed lots, including mixtures, to be labelled with the country of origin of production (where the seed was grown).

- **CSGA's Position:** Not supportive as a universal, on-package rule. Country of origin is most valuable at the time of import for a biosecurity risk assessment, and pedigree seed generally already carries origin information. For common seed and mixtures, mandatory on-package country of origin labelling adds cost and complexity with limited buyer benefit.

#### Why it Matters:

- Universal on-package origin for common seed and mixtures increases burden with minimal benefit for most buyers.
- We should not let short-term 'elbows-up' thinking introduce long-term regulatory requirements that provide limited buyer benefit.
- Regulators and analysts need origin data at import to assess noxious weed/species risks, and specific on-package origin only makes agronomic sense for certain species (e.g., alfalfa, red clover) tied to winter hardiness.

### How it Can be Improved:

- Digitally capture country of origin at import for all lots (and mixture components) in the import platform and make records available to CFIA on request.
- Retain/define targeted on-package origin requirements only where agronomically relevant (e.g., alfalfa, red clover) and publish the species list and rationale.
- Provide clear definitions (what constitutes “country of origin of production”), treatment for multi-origin blends, seed moving across borders for processing, and record-keeping expectations for importers.

### Suggested Feedback:

- *I do not support a universal, on-package country of origin labelling requirement for all imported seed and mixtures. Pedigreed seed typically already includes origin, and for other seed, this adds cost with limited buyer value. Instead, country of origin should be digitally captured in the import system (including mixture components), with on-package labelling reserved only for species where origin informs agronomic decisions (e.g., alfalfa, red clover). This should be accompanied by clear criteria, definitions, and record-keeping rules so compliance is consistent and enforceable. This approach prioritizes biosecurity at import, avoids unnecessary costs, and ensures compliance through clear criteria, definitions, and record-keeping rules.*

## Your Feedback is Needed

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As a seed sector stakeholder, we’re asking you to:

- **Support the CFIA’s overall direction**
- Urge the CFIA to **designate CSGA as the main administrator** of seed certification
- Advocate for **mandatory reporting of total certified seed quantities**
- Encourage the **CFIA to legislate only where necessary**

To make sharing your feedback easy, we created a **Letter Campaign you can complete quickly**. Simply enter your name, and a prepared letter will be emailed straight to government decision-makers, amplifying CSGA’s positions and showing sector-wide alignment on these critical issues. You can also personalize the letter with your own comments.

The CFIA is **accepting feedback until October 3, 2025**. Don’t miss the opportunity to support a seed system that is faster, fairer, and built for the future.

**[SUBMIT YOUR FEEDBACK TO THE CFIA NOW](#)**