

May 1, 2023

RE: 2023 Seed Regulatory Modernization Consultation

Keystone Agricultural Producers (KAP) is Manitoba's general farm policy organization, providing a unified voice for producers on issues that affect agriculture. KAP represents and promotes the interests of 4,400 producers and 19 commodity associations. KAP is pleased to provide comments to the Canadian Food Inspection Agency (CFIA) regarding its consultation on modernizing the Seeds Regulations.

Variety Registration

Should Canada continue to have a national variety registration system?

Yes. There is definite value in the current national variety registration system. The system plays an important role in providing transparency and valuable data that assists farmers in making sound decisions when purchasing seed. The system ensures customer confidence and fosters trust among local and global buyers that recognize quality seed produced in Canada. KAP supports a single national system for variety registration, but our organization recognizes the importance of continuous improvement within the single national body to ensure it meets the needs of producers.

Should CFIA seek a regulatory pathway for heritage and heirloom varieties in Canada?

Yes. Creating a regulatory pathway for these varieties would increase market selection while maintaining the high standards offered within the registration system. The CFIA must ensure that the introduction of new varieties does not lead to an increase in plant disease and that mechanisms are in place that would maintain the trust within the system.

Should Schedule III be removed from the Seeds Regulations and instead rely on 'Incorporation by Reference'?

Yes. KAP supports measures that would create efficiencies and reduce red tape within the regulations. This change would improve timeliness within the system and allow new varieties to be brought to market that could address emerging issues in an effective manner. CFIA must ensure clear guidelines are set during this process while striving to gain consensus among stakeholders impacted by a specific crop kind.

Do you support Regional Recommending Committees having the authority to recommend placing a regional restriction on a variety registration in their specific region?

Yes. A one size fits all approach may not be effective in all situations. These committees are best suited to understand and determine how a new variety will impact a specific geographical area. Yet, despite their expertise, regional restrictions should be applied sparingly and consider the cost/benefits when making a decision.

Should CFIA lead a consultation to modernize the stakeholder-driven process for applying regional restrictions on the sale of seed?

Yes. The CFIA needs to apply a balanced and transparent approach when applying regional restrictions on seed sales. The agency is in best position to lead this consultation to ensure a wide consultation takes place.

Seed Certification

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

KAP strongly agrees that there should be one national body for seed certification and standards. The Canadian Seed Growers Association (CSGA) has shown high competence in seed certification and has highlighted the importance of combining standards and service delivery under one umbrella. Producers value the ability for the CSGA to administer a cost-effective program that ensures consistencies across the country.

To provide additional training options for licenced seed crop inspectors (LSCI), do you support the delivery of training by a non-CFIA party?

Yes. Across Canada there currently exists a training shortage. These additional training options need to focus on areas of low supply such as in hemp, forages and niche crop kinds. Additional training options may alleviate this shortage, however it is vital that CFIA maintain their role in licensing and oversight of Authorized Seed Crop Inspection Services, and licensing of Seed Crop Inspectors.

Once tools and standards are developed for the use of Biochemical and molecular Techniques (BMTs), do you have any concerns with their use in supporting seed certification in the future?

No. BMTs are not new and have been part of the agriculture industry for many years. There are concerns about adopting new technology/techniques nationally that may not be conducive to the international marketplace. Agreement among international trade partners through common guidelines and standards (e.g., Codex Alimentarius) will be key in ensuring the adoption of these techniques are advantageous to producers.

Seed Harvesting, Cleaning, and Conditioning

Do you support removing the prescriptive portion of Part IV of the Seeds Regulations and Incorporating by Reference this information?

Yes. Removing the prescriptive portion of Part IV and applying incorporation by reference would improve efficiencies and lead to an outcome that is more user-friendly and flexible for the end user.

Seed Standards

Should the purity standards for No.1 and No.2 grades be the same?

No. Further discussion is required to determine how such changes would impact certain areas of the seed industry. There are concerns among organic and forage seed producers about making this change and the impact it would have on their production. The CFIA should further consult with these groups on this matter to further understand market access barriers if forages do not meet the No. 1 standard.

Which recommendation for purity and germination testing of seed mixtures do you most support moving forward?

KAP is supportive of the option that would require all components be tested for purity and germination separately before mixing. Certification before mixing and blending would ensure quality and transparency and assurance to the producer that specifications are being met.

Do you support removing the text found in the grade tables from the Seed Regulations and Incorporating by Reference this information?

Yes. KAP supports measure that would create efficiencies and reduce red tape within the regulations. Changes to the grade tables require significant time and resources through the Gazette process, and applying incorporation by reference would result in noticeable improvements while reacting timely to emerging weed pests thereby meeting the needs of primary producers and enshrining Canada's export reputation.

In an effort to allow more flexibility to promote sustainability and address environmental pressures, do you support eliminating the varietal blend standards?

If varietal blend standards are eliminated producers will still have the expectation that arrangements are still in place to ensure previous seed lot certification as well as proper record management takes place. KAP believes varietal blend standards should still exist, but eliminated from the plant pest tolerance management (PPTM) standards. The CFIA must ensure that producers have trust in the quality standards for varietal blends while ensuring current and future sustainability and risk management tools are options that are accessible for farming operations.

Thank you for the opportunity to provide feedback on the 2023 Seed Regulatory Modernization Consultation. If you have any questions about this submission, please contact KAP Policy Manager, Neil Van Overloop, at neil.vanoverloop@kap.ca.

Sincerely,

A handwritten signature in black ink, appearing to read "Jill Verwey". The signature is fluid and cursive, with the first name "Jill" being more prominent than the last name "Verwey".

Jill Verwey
President, Keystone Agricultural Producers Inc.