

Canadian Grain Commission
600 – 303 Main Street
Winnipeg, MB R3C 3G8
discussions@grainscanada.gc.ca

RE: 'Subject to' Proposal Comments

Keystone Agricultural Producers (KAP) welcomes this opportunity to provide feedback to the Canadian Grain Commission's consultation on its proposed changes to the Canada Grain Regulations. KAP is Manitoba's general farm policy organization, providing a unified voice for farmers on issues that affect agriculture.

KAP is conditionally supportive of the proposed changes to Section 34 and 36(1) of the Canada Grain Regulations. These proposed changes are intended to limit the burden on producers and transport companies if 'subject to' is initiated. However, it is important for the Canadian Grain Commission to recognize that the current wording of Section 36 does allow for an individual, other than the owner of the commodity, to initiate 'subject to'.

KAP suggests that the Canadian Grain Commission consider reducing the maximum time to hold a sample to three business days from the time of each delivery. This would reduce the burden on elevators and potentially the financial costs that farmers may bear with the implementation of these proposed changes.

KAP recommends that since the CGC currently allows any person delivering grain to ask for 'subject to' that the Canadian Grain Commission provide a detailed cost/benefit analysis of various 'subject to' scenarios of the potential costs incurred by the Commission, elevators and farmers during the first Gazetting process. This will allow industry to have a better idea of the implications of these proposals.

Thank you for your consideration. Please contact KAP policy analyst Neil Van Overloop at neil.vanoverloop@kap.ca should you have any questions.

Sincerely,



Brenna Mahoney
General Manager, Keystone Agricultural Producers