



**KEYSTONE  
AGRICULTURAL  
PRODUCERS**  
1984 - 2024

April 30, 2024

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**RE: Seed Regulatory Modernization Consultation – Winter 2024**

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 all producers and 19 commodity associations. KAP supports the Canadian Food Inspection Agency's (CFIA) ongoing consultation in modernizing the Seeds Regulations.

The Seeds Regulations play an important role in establishing quality standards while maintaining trust and confidence in the system. Both the CFIA and the Canadian Seed Growers' Association (CSGA) act as co-regulators of a highly regarded seed sector. This consultation is an ideal way to provide feedback to the CFIA that would improve flexibility, responsiveness, and consistency within the Seeds Regulations. KAP is pleased to provide responses to the CFIA's online consultation questions on modernizing the Seeds Regulations.

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

No, allowing registrants to cancel varieties raises a number of concerns. The first concern is that producers who sell a cancelled variety would receive, at maximum, a "feed" grade for their grain based on the Canada Grain Act. The second concern revolves around the resources available at the CFIA in tracking down individuals who sell a cancelled variety. Registered varieties can simply be phased out over time. KAP supports the current system where the CFIA has the responsibility to register and cancel varieties.

**Do you support CFIA taking over the responsibility of determining variety certification eligibility for crop kinds not subject to variety registration?**

KAP supports measures that would reduce redundancies and create efficiencies within the variety registration process. Harmonizing Part III Variety Registration and Form 300 is a positive step towards creating a simpler system. To achieve this KAP recommends the adoption of the Canadian Seed Growers' Association proposed Variety Certification Eligibility Listing. This would allow the CFIA to oversee variety recognition and seed certification eligibility while the CSGA certifies seed varieties.

**Do you support the requirement for all seed types to be tested by officially recognized, accredited, or supervised laboratories only?**

Yes, KAP agrees with the Seed Testing Task Team's recommendation that any seed sold in Canada undergoes testing by an accredited organization. An accredited organization ensures that minimum standards are met as it relates to seed purity and noxious weed seeds.

**Do you support allowing individuals to apply a common seed grade name only if they are an accredited grader?**

Trust in the seed certification system is partly due to the presence of an accredited grader who is knowledgeable of the regulatory requirements and can ensure minimum standards are met. However, producers are aware of the standards associated with common seed and are diligent in ensuring the common seed they use meets minimum standards for germination percentage and is free from noxious weed seeds. There are also questions how this potential change will impact seed costs and whether there may be unintended consequences as a result. KAP is skeptical whether changes to this area would result in outcomes that would benefit the seed sector as a whole.

**Please provide any additional feedback you would like the CFIA to consider regarding the sampling, testing, and grading of seed?**

KAP recommends that the CFIA implement the recommendations made by the Import Task Team regarding imported seeds. These recommendations center around reducing the complexity of the import process and increasing the timeliness and flexibility within the current system. Improvements can be made to the import process while minimizing the risk of importing sub-standard seed and noxious weed seeds.

**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?**

Yes, KAP supports the recommendation made by the Import Task Team that all seed lots must be pre-cleared unless they go through an authorized importer. The continued availability of an authorized importer to pre-clear or post-clear provides additional flexibility to seed buyers across Canada.

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

Yes, there has been a steady increase of small lots being imported into Canada and it is important that these quantities meet the same requirements as domestic small lots. This change would reduce prohibited noxious weeds and other crop kinds while improving biosecurity.

**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?**

Yes, the creation of an advisory committee would allow for continuous dialogue and for various organizations to stay informed of current issues within the sector. KAP believes such an advisory committee must be grounded in a collaborative governance structure. This structure would allow for consensus-based decision making where real results can be driven by the committee. A collaborative governance structure still provides ministerial responsibility while allows for decisions to be made based on the consensus of the seed value chain.

**What role should this Advisory Committee have with respect to standard setting?**

KAP believes the advisory committee should deal with issues that are outside the scope of standard setting. KAP supports the role of the CSGA and believes the organization should continue to set seed crop and seed certification standards.

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

KAP recommends a collaborative governance structure that would allow all members of the seed value chain to participate. The scope of the committee must be clear while leaving out areas that not the committee's responsibility (e.g., standards-setting authority). A co-production and co-assessment approach to public policy design can assist with achieving favourable objectives while moving beyond bounded perspectives that may be present within government. The interplay of various actors at the table allows for a variety of perspectives with the goal of generating consensus while fostering public value. This structure creates an environment focused on outcomes where each party sees benefit.

**Are you supportive of the following additional information being collected: information contained in a pedigreed seed declaration, seed grading reports and quantity of seed certified?**

Yes, SeedCert plays an important role in providing seed data thereby assisting users in the sector to make informed decisions. The functionality and usefulness of SeedCert has been established and the platform is well suited to collect additional data. The increased data collection would be beneficial for users as it relates to regulatory oversight, traceability and data access. Particularly, the knowledge of quantity of seed certified would be beneficial in the context of seed exports and to align Canada with other exporting nations. The changes would also limit the likelihood of seed fraud by ensuring checks and balances are incorporated within the system. Expanding the current data collection is another step towards improving transparency and reducing administrative burden within the system.

**What would be your concerns with the development and use of a digital end-to-end seed certification information management system?**

While we do not have any concerns with the creation of a seed certification information management system, we do recommend that the designers of the system ensure that users' data remains secure and confidential. Addressing privacy and cybersecurity concerns would be key for the success of a digital end-to-end system. Both the CSGA and CFIA can play a role in explaining the system to users on how their information is stored, transferred and protected.

**What do you see as the most important advantage of a digital end-to-end seed certification information management system?**

This new system would generate beneficial information about Canada's seed system. By improving on traceability and monitoring, the changes would further increase confidence in the national seed certification system. This confidence could be generated through providing awareness of emerging weed species or through a better understanding of possible seed supply shortages. The change would allow for producers to access additional information (e.g., germ and purity figures) about a seed variety thereby assisting their decision-making process when purchasing seed. The system would also help in transferring data to the the Organisation for Economic Co-Operation and Development Seed Schemes.

**Are you of the opinion that the seed certification process would be improved if the CSGA took on additional tasks?**

Yes, since 1904 the CSGA has been responsible for administering the national seed crop certification program. The organization has generated trust within the sector, and it well respected for its seed crop varietal purity standards. This track record illustrates the organization's competence in taking on additional tasks that would improve the current system. This presents an opportunity for both the CFIA

and the CSGA to continue working together towards additional ways in simplifying and streamlining the certification process.

**If consolidating a number of seed crop certification and seed certification activities were to happen, which activities would you support CSGA taking on?**

KAP is supportive of the CSGA taking on all five CSGA activities: field inspection training, variety verification program, administering official seed tags & licensing agreements, OECD certification and answering seed certification questions. We recommend that both the CFIA and CSGA work together to ensure the transition of activities is smooth. Allowing for the shifting of responsibilities creates additional opportunities to modernize the seed certification system. A balanced approach will be required to ensure the CFIA and the CSGA effectively and efficiently manage this system to meet the expectations of producers across the country.

Thank you for providing the opportunity to comment on the seed regulatory modernization. If you have any questions about this submission, please contact KAP policy manager Neil Van Overloop at [neil.vanoverloop@kap.ca](mailto:neil.vanoverloop@kap.ca).

Sincerely,

A handwritten signature in cursive script that reads "Brenna Mahoney".

Brenna Mahoney

General Manager, Keystone Agricultural Producers Inc.