



KEYSTONE AGRICULTURAL PRODUCERS

October 3, 2025

Seed Regulatory Modernization Consultation

Keystone Agricultural Producers (KAP) is Manitoba's general farm policy organization, providing a unified voice for farmers on issues that affect agriculture. KAP represents and promotes the interests of all Manitoba farmers and 20 commodity associations. KAP is pleased to provide comments to the Canadian Food Inspection Agency (CFIA) regarding its consultation on modernizing the Seeds Regulations.

The Seeds Regulations play an important role in establishing quality standards while maintaining trust and confidence in seed production. Meeting farmers' needs requires a modern regulatory framework. Improvements to consistency, predictability, standard-setting, and decision-making within the regulations can assist farmers in adapting to an ever-changing sector. The CFIA's changes are extensive. Rather than commenting on each proposed amendment, we have included comments for changes that we do not support or require further clarity.

3.1.3 – Variety Registration

KAP supports changes that would improve the variety registration process. But the CFIA needs to provide more clarity about how the changes would improve an already efficient process under Part III. And not all countries have equivalent standards to Canadian requirements. Variations do exist. Market access issues can also occur if a fast-tracked variety is rejected among processors. To address these variations, the CFIA should restrict expedited decisions to OECD seed scheme countries and AOSCA agencies. Also, a variety name check, a legal reference sample, a variety description with Canadian descriptors, and a Canadian representative should also be required.

3.1.13 – New Crop Certificate

Although the proposed change would reduce redundancies, the CSGA should still maintain the requirement in Circular 6. Keeping this requirement manages traceability, risk, and liability. An auditable trail helps with full visibility of parent seed lots, which benefits both growers and the CSGA.

3.2.2 – Variety Registration Incorporation by Reference

Adding incorporation by reference can assist the variety registration process. Since unintended consequences could occur with incorporation by reference, the CFIA should have clear guidelines involving seeds entering or leaving variety registration. Guidelines can be simple—e.g., a clearly defined intake window and any changes requiring a minimum lead time. Another option involves requiring seed that leaves variety registration to be pedigreed status. Doing so can safeguard Canada seeds' competitiveness.

3.3.3 – Variety Registration Cancellation

Variety registration cancellation in this context may create unintended consequences. KAP supports suspending varieties, not cancelling. Currently, growers can phase out certain varieties through reducing breeder seed and pedigree seed stocks. Cancelled varieties mean seed sales become illegal. CFIA has neither the enforcement nor the resources available to manage illegal seed sales. Plus, farmers who own a cancelled variety could only receive a feed grade, not a #1, or #2. Suspended varieties would affect seed supply. But suspended varieties would not negatively affect farmers' marketing decisions.

3.3.4 – Record Keeping

A main principle in the CFIA's proposed amendments involves reducing red tape. The proposed record-keeping does not uphold this principle. If common-seed-producing facilities require additional record keeping under the proposed change, why not other seed vendors. What policy needs addressing? Are common-seed quality and consumer protection a concern? The CFIA can address these concerns. And improvements can occur without additional regulatory burdens. Additional discussions with industry partners can provide possible solutions.

3.3.9 – Imported Seed Purity Standards

KAP supports the proposed changes that would improve the seed import process. The CFIA can adopt several measures to ensure the changes are effective. E.g., a single-digital window can simplify pre-import submissions and decisions along with allowing digital uploads of contaminant data and seed analysis certificates. And the CFIA needs to restrict acceptable seed analysis certificates to accredited labs. These measures along with service standards, online help guides, and training will improve successful implementation.

3.3.13 Purity and Germination Information Timeframe

Most seed vendors use digital test results. This means that purity and germination information is readily available. Shrinking the timeframe from 30 to 5 days works, but the CFIA can go further and require the information upon request. Digital seed technology is here. And the amended regulations should reflect current practices.

3.1.12 Pedigreed Seed Declaration

Data matter for pedigreed production. The proposed change neither improves data collection nor benefits the seed sector. Removing the form reference works but the CFIA must request a dataset from growers. Despite all the existing data, we lack a basic understanding of our annual certified production. Other countries know their production numbers. Canada does not. Gaps exist and silos occur. Having a better dataset would benefit seed growers, distributors, and government. Productivity benchmarking, market confidence, and transparency would improve with a better dataset. The CFIA must reconsider this amendment and make changes that would benefit the sector.

3.1.19 Alternative Seed Crop Inspection Services

KAP does not understand the reason for changing the existing practice. We remain doubtful that this change would create savings. Third-party inspectors exist for a reason. Third-party inspectors connote confidence, consistency, and trust. And changing the current structure could create higher costs since the CFIA would need to allocate more resources to oversee self-inspection programs. Non-third-party inspectors exist in the corn and canola sector, but their presence works since it is in a closed-loop model. Farmers see value in third-party inspectors, and the current system should remain.

3.2.8 Weed Seeds Order

KAP supports the minister's discretion to add noxious weed species to the Weed Seed Order. But we do not support changing to incorporation by reference. Today, the minister can make an order and add a new weed species. The Weed Seed Order requires amendments, but the last amendment occurred in 2016. We have doubts that incorporation by reference would increase amendments to the Weed Seed Order considering that nine years have lapsed since the last amendment.

3.2.12 Foreign-Grader Program

The proposed change may create more administrative costs without improving outcomes. More audits and more parallel systems will occur. Does the CFIA have the resources for this change? Are the benefits clear? Perhaps a more practical solution involves using existing frameworks—e.g., ISTA or AOSA seed analysis results meeting Canadian methods and procedures equivalency. This approach is simple and clear while addressing buyers' and regulators' concerns.

3.3.8 Country of Origin Labelling

How do producers benefit from this proposed change? Imported seed already has a tag indicating its foreign origin. Aside from certain seed species (e.g., alfalfa), no benefit exists from knowing the seed's origin. Requiring a country specific label adds an administrative burden. The import platform can include a digital country of origin without added costs.

Thank you for providing the opportunity to provide feedback on proposed amendments to the Seeds Regulations. 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 "Colin Hornby". The signature is stylized with a large loop at the end.

Colin Hornby

General Manager, Keystone Agricultural Producers Inc.