



Seed Regulatory Modernization

A Roadmap for the Canadian Seed System

About CSGA

We certify:

+1.25

Million Acres

64

Different Crop Kinds

+2,000

Different Varieties

We are:

- ▶ A respected, science-based, global leader in seed crop certification
- ▶ Supporting innovation, new technologies, and the growth of the Canadian Seed Sector
- ▶ Canada's largest seed organization, representing over 3,100 seed growers and 2,500 seed growing businesses in 8 provinces across Canada
- ▶ Governed by a Board of seed grower Directors, provincial government Advisors and other sector experts to ensure transparency and stakeholder engagement



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CSGA is Canada's national seed crop certification authority. We are a non-partisan, non-political, and non-profit organization. We are not an advocacy or lobby group.

CSGA administers one of the world's largest seed crop certification systems, certifying over 1.2 million acres annually of over sixty different crop kinds.

We are a member-based organization with over 3,100 seed grower members and 2,500 seed growing businesses. Pedigreed, or certified, seed is grown in eight different provinces across Canada.

We are governed by a board of seed grower directors, provincial government advisors, and other seed sector experts. We also work closely with seven regional and provincial branches, who help ensure strong grassroots participation in our organization.



Seed crop certification does not fully capture the true breadth of CSGA's role in the sector.

First, as Canada's national seed crop certification authority, we partner with Government to deliver Canada's seed certification system. CSGA has delegated authority under the federal Seeds Act and Regulations. Canada's national seed certification system provides trust, traceability, and transparency as seed is multiplied from Breeder seed through to Certified.

CSGA develops and maintains seed crop certification standards and sets variety purity standards. We work

with industry continuously to ensure these standards are up to date, internationally harmonized, and incorporate new technology.

We provide professional development services to increase the knowledge and skillset of the sector, accredit seed growers, and provide a professional recognition system for plant breeders. These functions help ensure that the seed sector is equipped with the people, skillset, and knowledge required for a next-generation seed system.

As a country that relies heavily on global trade, CSGA represents and supports Canada's interests at the Association of Official Seed Certification Agencies, commonly referred to as AOSCA, which is North American centric and at the OECD Seed Schemes, which is more globally focused.

CSGA also promotes Canada's seed certification system and the importance of our seed sector – while upholding our organization's core values of integrity, accountability, transparency, collaboration, and respect.

Did You Know?



bites of food
consumed around the
world **begin with seed**

Why We Do It?

For the Benefit of All Canadians!

Seed growers are the heart of the seed sector. Seed quality and innovative varieties are essential to a sustainable and thriving agriculture and agri-food sector.

We partner with the government for the greater good of Canada — ensuring Canada's food is **safe**, our agricultural supply chain is **secure**, and our farmers have the utmost **confidence** in the seed they purchase and plant.



Seed is the foundation of food systems globally. There is a saying that nine out of ten bites of food start with seed. Our seed growers are the heart of the Canadian seed sector and are producing quality seed of innovative varieties that are essential to a sustainable and thriving agri-food sector.

As an organization, we partner with the government to provide a public good for all Canadians. It is all about ensuring Canada's food is safe, our agriculture supply chain is secure, and farmers have the utmost confidence in the seed they purchase and plant.



What is Seed Certification?

Seed certification delivers plant breeding innovation to farmers and the food industry

- ▶ Independent third-party Quality Assurance system that ensures that the identity, varietal and mechanical purity, and germination are maintained
- ▶ A strong, value-added foundation for Canada's agri-food sector



Seed certification is:

- 1. Genetic Identity Assurance:**
The varietal identity and purity of a seed crop is assessed by CSGA based on an inspection by a CFIA-authorized seed crop inspector
- 2. Quality Assurance:**
Seed lots are sampled and tested by CFIA-authorized parties to ensure the germination and mechanical purity of the seed

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Seed certification is a system that ensures plant breeding innovation is delivered from the plant breeder to farmers and the food industry. Seed certification provides globally trusted, third-party verification of the identity and purity of varieties.

Canada's seed certification system, like all others globally, is an independent, third-party quality and identity assurance program that provides a strong, value-added foundation for agricultural production and the agri-food sector.

The goal of seed certification is to produce high-quality

seed of known genetic identity, while ensuring that varietal and mechanical purity is maintained and accessible to farmers. Simply put, when you buy pedigreed seed, you know the variety and that it meets standards for varietal and mechanical purity and germination.

In Canada, seed crops are inspected by CFIA-authorized inspectors who report to CSGA. CSGA appraises these reports and certifies crops that meet CSGA requirements. Seed that receives CSGA certification can be sampled and tested by CFIA-authorized parties to ensure the germination and mechanical purity of the seed.

CFIA or CSGA: Who Does What?

Canadian Food Inspection Agency (CFIA)

- ▶ Administers and enforces the Seeds Act and the Seeds Regulations
- ▶ Registers varieties
- ▶ Oversees pedigreed seed crop inspection
- ▶ Registers seed establishments
- ▶ Accredits seed testing labs
- ▶ Authorizes samplers, analysts and graders

Canadian Seed Growers' Association (CSGA)

- ▶ Canada's seed crop certification body
- ▶ Sets standards for varietal purity
- ▶ Recognizes Plant Breeders and accredits Plot Growers
- ▶ Approves Breeder and Select seed
- ▶ Provides a pedigreed seed traceability system
- ▶ Provides a digital platform, SeedCert, used by all seed crop sector stakeholders



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Canada's seed certification system relies on a special public-private relationship between the CFIA and CSGA, which is made possible through CSGA's delegated authority. This delegated authority provides clear roles and responsibilities for both CSGA and the CFIA.

At a high level, the CFIA is Canada's national designated authority for seed certification.

At a more granular level, CFIA:

- Administers and enforces the Seeds Act and Regulations,
- Registers varieties,

- Oversees pedigreed seed crop inspection,
- Registers seed establishments,
- Accredits seed testing labs, and
- Authorizes samplers, analysts, and graders.

While at CSGA, as Canada's seed crop certification body, we:

- Certify seed crops,
- Set standards for varietal purity,
- Recognize plant breeders and accredit plot producers,
- Approve Breeder and Select seed, the role the CFIA plays for the official certification classes, which are Foundation, Registered, and Certified,
- Provide a national pedigreed seed traceability system, and
- Provide a digital platform called SeedCert, which is used by all seed crop sector stakeholders.

What is Seed Regulatory Modernization?

Seed Regulatory Modernization (SRM) is a comprehensive review of the *Seeds Regulations*, to:

- ▶ Be adaptable and flexible to address future technical advances and scientific innovation
- ▶ Make the system simpler, easier to use, and better aligned with modern practices
- ▶ Maintain quality, trust and reliability
- ▶ Strengthen consumer protection
- ▶ Lay the foundation for a strong Canadian seed system for years to come

SRM is led by the Canadian Food Inspection Agency, with the support of Agriculture and Agri-Food Canada.

The entire Canadian agri-food sector depends on a reliable supply of high-quality, identity-assured seed.

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CSGA has been and will continue to be active within the SRM-Working Group and Task Team framework. We are encouraged by the broad stakeholder representation and participation within this SRM framework and look forward to seeing the task teams' final reports.

What does SRM Look Like?



A modernized seed certification system should:

- ▶ Adapt quickly to technology changes and market demands
- ▶ Ensure transparent, science-based seed certification regulations
- ▶ Allow a simple and efficient user experience
- ▶ Leverage technology to create an efficient and effective system that easily integrates into global markets and supply chains



A modernized seed certification system should NOT:

- ▶ Increase administrative burden
- ▶ Minimize the role of growers and small-medium businesses in the system
- ▶ Create roadblocks to innovation
- ▶ Erode public trust and reputation of the Canadian seed system
- ▶ Put private interests ahead of public good

As CSGA approaches SRM, we are guided by what a modernized seed certification program should look like.

A modern seed certification program should adapt quickly to changes, create a level-playing field for all stakeholders, be transparent and science-based, be simple to navigate, and leverage new technology.

A modern seed certification program should not increase administrative burden, create barriers for small and medium size business and innovation, erode public trust, and put private interests ahead of the public good.

And while the SRM process involves more than just seed certification, these principles are equally applicable to the other areas covered under SRM.

Why SRM Matters To You

Seed Regulation impacts your:

- ▶ Access to new seed genetics
- ▶ Ability to influence future changes in the system
- ▶ Administrative burden
- ▶ R&D investments in the seed sector

▶ Certified Seed *IS* Your Business

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Seed regulations can impact your access to new seed genetics, your role in the system, your administrative burden, and the investments you have made in the seed sector. At the end of the day, for most of you, Certified seed *IS* your business. Over the next few slides, we will outline how CSGA is building a future that will have a positive impact on your business.

CSGA's Vision for Seed Certification

- ▶ We are **proud** of our **track record** as a reliable regulatory **partner**, and we want to do more on behalf of Canadian agriculture
- ▶ We see a future that embraces digitalization through a **Single-Window** for seed certification services and is focused on strengthening governance and partnerships
- ▶ SRM policies should **strengthen** Canada's national seed certification system and encourage innovation

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As an organization, CSGA is proud of our track record as a reliable regulatory partner and wants to do more on behalf of Canadian agriculture.

Our vision for the future is a strong, national seed certification system that:

- Encourages innovation,
- Provides a digital single-window for all seed certification services and
- Is focused on strong governance and partnerships.

Current Seed Certification Process



Seed Crop Certification:

CSGA	CFIA
Authority for varietal purity standards and seed crop	Authority for seed crop inspection

Seed Certification:

CFIA
Authority for seed certification, including agreement with Seeds Canada (formerly CSI) to audit RSEs and labs



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One of CSGA's key SRM positions is that we are ready for more delegated authority from the Government of Canada in the seed certification system. To understand what this means, we should take a few minutes to explain how the current seed certification system is designed and delivered.

Canada's current seed certification program is fragmented into two distinct areas: seed crop certification for assuring varietal identity and purity and seed certification for assuring seed quality.

As explained earlier, CSGA has authority for seed crop

certification, and CFIA has authority for seed certification.

Within the seed crop certification framework, CSGA is already delivering a digital, end-to-end system, which includes the application and inspection processes, and seed crop certification.

Within the seed certification framework, CFIA has authority over processing, sampling, testing, and tagging and has agreements in place with Seeds Canada, formerly CSI, to audit registered seed establishments and seed testing labs.

The last major revision to the Seeds Regulations was made more than 25 years ago and we know changes can lead to a more efficient and effective seed certification system.

Future Seed Certification Process



Seed Certification:

CFIA	CSGA		
Ultimate authority and oversight of seed certification	Retains authority for varietal purity standards and seed crop certification	Expanded authority for seed crop inspection and seed certification	Continues agreement with Seeds Canada to audit RSEs and labs

CSGA as the national designated authority to manage all functions for seed certification on behalf of government.

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When we look to the future, we see a seed certification process that is streamlined, efficient, and transparent – with CSGA serving as the national designated authority to manage all functions of seed certification on behalf of government.

Before we continue, it is important to clarify that we do not see the independent third-party oversight of the seed certification process drastically changing. Yes, there will be opportunities to incorporate new technology and future proof through mechanisms like incorporation by reference, but as for the FUNDAMENTAL value of seed certification, we don't foresee drastic change –

especially given our commitments to international organizations like AOSCA and OECD. The major difference here is with respect to HOW the system is administered.

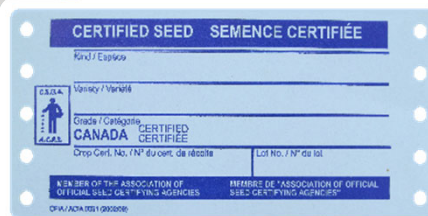
In this future model, we maintain that the CFIA needs to be the ultimate authority and provide oversight of seed certification. However, when it comes to the business of seed certification, CSGA would be the main point of contact for the seed sector. CSGA would remain the authority for varietal purity standards and seed crop certification and have our authority expanded to include seed crop inspection and seed certification. Under this future model, agreements would continue to be in place with Seeds Canada to audit RSEs and labs.

Expanded Delegated Authority

We aspire to be the national delegated authority that manages all seed certification functions on behalf of government.

Mature seed sectors such as the Netherlands (NAK), France (SEMAE), England (NIAB), and South Africa (SANSOR) have all delegated seed certification functions to a single industry body.

No country in the world has competing seed certification bodies.



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In summary, CSGA aspires to be the national delegated authority that manages all seed certification functions on behalf of the government.

Looking globally, similar models are currently in place with mature seed sectors like the Netherlands, France, England, and South Africa. In these examples, the government has designated a single body as the national delegated authority for seed certification.

Single-Window for Seed Certification Services

The future is digital. Our vision for the future includes a digital Single-Window for seed certification and a Variety Profile Platform.

Intended To:

- ▶ Simplify Processes
- ▶ Reduce Burden & Cost
- ▶ Eliminate Duplicate/Redundant Data Requirements
- ▶ Breakdown Information Silos
- ▶ Expedite Information Flow & Decision Making

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One of the key value-added systems that CSGA plans to develop as part of the transition to being the national delegated authority for seed certification is a single window for seed certification services.

Currently, information/documentation within the seed sector is fragmented, and a user must navigate multiple sites to complete seed certification. It's like going into a bank and having to go to three different tellers to pay your credit card, mortgage, and car payment. It's an inefficient system right now and under the digital single window, we want to provide access to all seed regulatory documentation in a single, easy to use

platform.

As part of the single window, we intend to:

- Simplify processes
- Reduce burden and cost
- Eliminate duplicate/redundant data requirements
- Breakdown information silos
- And expedite information flow and decision making

Single-Window for Seed Certification Services

To Provide:

- ▶ Secure access based on user profiles
- ▶ Actionable & Timely Insights
- ▶ Variety Specific Information
- ▶ Forms, Applications, Standards, Regulations, etc.
- ▶ Supporting Documentation and Test Results

Industry cost and time savings associated with adopting a single window and variety profile platform are estimated to be \$1.5-2.5 million annually.

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At CSGA, we are well-positioned to deliver this digital single window due to our existing SeedCert platform. As mentioned earlier, SeedCert is the digital platform developed by CSGA and currently used by 4,000 seed crop certification stakeholders. Current users on the platform include plant breeders, seed growers, seed companies, inspectors, and the CFIA. The platform can be expanded to incorporate other seed sector stakeholders and business processes.

Through the single window, we are aiming to provide:

- Secure access based on user profiles
- Access to forms, applications, standards,

regulations, supporting documents

- Variety specific information and
- Actionable and timely insights.

By adopting a digital single window and a variety profile platform, it is expected to save industry between 1.5-2.5 million dollars annually in time and search costs.

CSGA's Positions on Variety Registration & Use of Variety Names

We support an official **Variety Registration** system that is flexible and meets the needs of modern agriculture

- ▶ CFIA should continue to administer Variety Registration
- ▶ List of Crop Kinds Subject to Variety Registration Should be **Incorporated By Reference**, which enables:
 - New crop kinds and types to enter variety registration and seed certification;
 - CSGA's parallel Form 300 process to be discontinued
- ▶ Use of variety names should continue to be restricted to certified seed
 - Provides trust and transparency in the marketplace and follows international best practices
 - 'One-Variety-One Name' Policy



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Switching gears, a bit, we want to take this opportunity to share our thoughts and our positions on other important policy discussions currently underway as part of SRM - beginning with Variety Registration & the use of variety names.

At a high level, we support an official Variety Registration system that is flexible, meets the needs of modern agriculture, and is administered by the CFIA.

Variety Registration provides a unique value proposition for Canadian agriculture, so it is important it is maintained. That doesn't mean the status quo. We know

that it can be improved. We're going to be pushing for that under SRM.

One area of the existing Variety Registration process that we would like to see changed has to do with the list of crop kinds that are subject to Variety Registration. Right now, the list is hardwired into the regulations, which makes adding new crop kinds very difficult. Over the last 20 years, CSGA has had to develop a parallel variety recognition system, called the Form 300 process, to provide a framework for varieties of new crop kinds coming into certification. Industrial hemp and food-grade soybeans are examples of crop kinds that haven't been eligible for variety registration to this point. We would like to see incorporation by reference used to update the list of crop kinds subject to variety registration moving forward.

CSGA strongly recommends that the requirements around the use of variety names should remain and be restricted to certified seed. The current requirements around the use of variety names provides trust and transparency in the marketplace and follows international best practices. Another issue is the 'one-variety-one name' policy which prevents a variety from being sold under multiple different names – again promoting trust and transparency in the Canadian seed system.



With respect to common seed, CSGA supports an improved approach to common seed regulation and management.

It is important to note, that when CSGA talks about common seed, we are referring to the commercial sale of common seed, not farm-saved seed.

CSGA understands that a one-size-fits all approach will not work for common seed, which is why we have two recommendations based on crop kind. For common seed of cereals, pulses, and oilseeds, there should be greater

oversight and the need to meet minimum standards for purity and germination.

For common seed of small-seeded agricultural crop kinds, we feel they should be sampled, tested, and graded by people authorized to do so, like what is currently done for pedigreed seed.

CFIA Remains The Ultimate Authority

CFIA remains the ultimate authority of the seed system to:

- ▶ Maintain Canada's international credibility and reputation
- ▶ Invest in science support, compliance and international relations
- ▶ Develop strategic policy initiatives and integrate "whole of government" priorities into the Seed Program
- ▶ Maintain and improve variety registration
- ▶ Enforce the continued restriction of variety names to pedigreed seed
- ▶ Provide foreign country assurances, third party oversight, trust in quality Canadian seed, and predictability for investments by variety developers, including producer organizations

Government oversight provides buyer assurances, international confidence in Canada's seed and crop systems, and increased consumer trust in plant breeding innovation.

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When it comes to the positions outlined today, it is important to reiterate that we believe that the CFIA still needs to remain the ultimate authority for seed and seed certification in Canada. While the private sector may perform much of the day-to-day work, government responsibility and accountability guarantees trust in the entire system. This is especially relevant in a global market; when issues arise that demand government-to-government dialogue, having the Canadian government backstopping the system is invaluable. Moving forward, we feel that government resources would have the biggest impact in the areas of science, strategic policy,

enforcement, and international relations.

What This Means For You

Our vision for Seed Regulatory Modernization will mean:

- ▶ Reducing administrative burden through the Single-Window approach
- ▶ Enhancing secure digital record keeping, reporting, and sharing tools
- ▶ Securing the public benefits of a national, official seed certifying system for the benefit of Canada's agri-food sector
- ▶ Supporting small and medium sized businesses to ensure a resilient and competitive certified seed delivery system
- ▶ Practical, effective up-to-date standards and procedures for seed certification
- ▶ Data driven, risk management approaches to regulatory oversight
- ▶ A regulated common seed sector
- ▶ Continued confidence in certified seed and trust in Canada's seed system

▶ Seed Certification *IS* Your Business

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Now, what does this mean for you. As CSGA engages in the SRM process, we are putting an emphasis on a strong national seed certification system. We envision a future where CSGA becomes the national designated authority that manages all functions of seed certification on behalf of the government.

As the national designated authority, CSGA will put systems, policies, and standards in place to:

- Reduce administrative burden through a digital single window

- Support a resilient and competitive certified seed system
- Enable modern, effective, internationally harmonized seed certification standards and procedures

This, in combination with a regulated common seed sector, will ensure continued confidence in certified seed and a thriving Canada's seed system.

Questions / Discussion



Scan to download
CSGA's SRM
position paper

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We are in the midst of the SRM process and decisions on options for change will need to be made. At end of day, we want streamlined and practical regulations. We want to be aware of unintended consequences - we don't want to lose quality or confidence in the system. It's all about enhancing traceability, transparency, information, quality, and trust in the system while improving the users' experience. The path forward is taking shape and over the next year key decisions will be made. What will the next generation seed system look like? CSGA has a vision for what it would like to see – what would you like to see?