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CANADIAN SEED GROWERS ASSOCIATION / NOVEMBER 16th, 2018 Circular 6 Modernization:

Survey on Proposed Changes for 2019 Executive Summary of Responses

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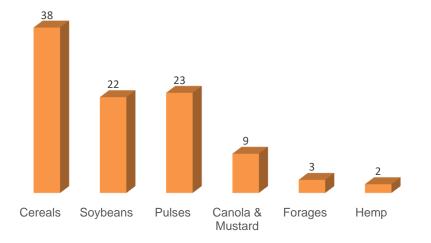


Executive Summary

In Phase 1 of CSGA's Circular 6 Modernization initiative, 6 crop specific working groups were formed and met several times during the fall of 2017 and spring of 2018 which resulted in recommendations for approximately 30 revisions to the standards that were implemented for the 2018 production season and identification of change priorities for future consideration. The process of bringing crop specific technical experts together worked well and has become a formal part of the standards development process.

Phase 2 begun to address the more complex issues not resolved in Phase 1 with the goal to identify further revisions for 2019 and 2020 implementation. Part of the Phase 2 consultation process included a survey asking stakeholders for feedback on potential changes. A summary of the responses to each question are included in the report, as well as highlights of the individual comments.

There were a total of 45 survey responses received. Respondents had the option to skip sections of the survey related to specific crop kinds. Here's a breakdown of number of respondents who chose to answer questions related to each crop kind:



Number of Responses for Each Crop Kind

Following is an overview of responses to the Cereals, Soybeans, and Pulses sections; these crop kinds account for 87% of the responses. Summaries of answers to the Canola & Mustard, Forages, and Hemp sections are included in the report.

Cereals

The majority agreed with simplifying previous land use requirements by adopting standards more like AOSCA's (52.4% or 22 responses). Four agreed to simplify by no longer identifying certain crops as 'break crops', and the remaining did not think any change is needed. When asked if the isolation requirements for varietal purity should be reduced from 3 meters to 2 meters, the majority (21 or 55%) answered yes, 11 answered No, and 6 were not sure. A

number of comments suggested that it should be done if there is not a significant risk of outcrossing.

There was a mix of responses to the question whether CSGA should consider increasing isolation distances for higher classes of Wheat crops. The majority of responses were in support, but these were split between increasing isolation distances for different classes, with Select and Foundation each receiving the most 'Yes' responses. There were comments in support of following AOSCA's standards, but many also said that more evidence/research was needed to see if change was warranted.

When asked whether CSGA needs to consider modern seed cleaning technologies and no longer have field standards, almost 80% of respondents to this question indicated that field standards are still necessary.

Simplification of Maximum Impurity Standards in Table 2.4.4 was supported by 47% but there was still a fair bit of caution in individual comments.

In terms of maximum impurity standards for Wild Oats in Oats, most were not in support (40%) or were not sure (42%) that the standard should be adjusted further than the 2018 change.

Soybeans

Responses were split with regards to changing the isolation requirements in Table 3.4.2 from 3m to 2m for both Soybeans and Pulses, with 46% agreeing and with 56% saying either "No" or "Not sure". In terms of any additional revisions, most (77%) responded that there shouldn't be any further changes.

Further adjustments to maximum varietal impurity standards were not supported by the majority (82%) with comments indicating that even the adjustments for 2018 are not suitable for food grade soybeans, and that the 2018 change was possibly a little too liberal.

Pulses

In terms of increasing isolation distances for different varieties of Fababean crops, especially for higher classes, responses were a mixed bag similar to the same Cereals related question. Most responded 'Yes', however these were split up between the different classes, with the most support for changes to Select and Foundation.

When asked about adjusting the maximum varietal impurity standards for Fababeans further to the 2018 changes, there was some support for revisions to Select (17%), although the majority responded either 'No' or 'Not sure', totaling 83%.

There were a few common themes in the answers for all crop kinds:

- Modern technology should be taken into account, but field standards are still necessary. Canadian certified seed has a reputation for excellent quality and there is a strong desire to not relax the standards too much.
- Scientific evidence is needed to support changes.
- Interactive or on-line tools would be helpful to simplify finding specific requirements.

