

# **Seed Regulatory Modernization**

## **Grade Tables and Seed Standards**

### **Task Team**

### **Final Report**

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Special recognition and gratitude to our CFIA staff leads for their many hours of dedication and expertise helping to organize and educate the team members on the topics.

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Thank You to all those who have contributed to this report

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## Background

The most recent amendments to Schedule I of the *Seeds Regulations* “the Grade Tables” occurred in 2007 and was based on two rounds of consultations. Shortly after, a larger systematic review was initiated with industry stakeholders including seed growers, seed analysts, representatives of the seed trade and officials from provincial governments. An Options Paper was developed based on information gleaned from the 2006/2007 Seed Program Modernization Initiative (SPMI) consultations, from a targeted call for issues (August 2008), and from feedback obtained at a Grade Tables Review Workshop held on October 30, 2008 in Ottawa, Ontario.

A review of these options to simplify Canada’s seed grading system took place at a meeting in March, 2009 with the intent to develop a consensus for regulatory amendments. However, to date, no significant changes have been made to modernize the seed Grade Tables.

The CFIA is committed to a full-scale review of Part I - Seeds other than Seed Potatoes, Part II- Seed Potatoes, Part III - Variety Registration and Part IV-Registration of Establishments that Prepare Seed and Licensing of Operators of the *Seeds Regulations*. The objective of the Seed Standards Task Team is to provide recommendations in a report to the Seed Regulatory Modernization Working Group on opportunities for improvement with respect to the Grade Tables and seed standards in the *Seeds Regulations*.

## **Executive Summary**

The *Seeds Act* and *Seeds Regulations* have undergone periodic amendments and modernizations since the first laws were established in 1905. During this current initiative the CFIA is looking to update the *Seeds Regulations* to:

- improve responsiveness and consistency
- reduce complexity
- become adaptable and flexible to address future technical advances and scientific innovation
- protect producers and consumers by strengthen existing requirements

Canada's Grade Tables and seed grading system are unique in the world. There are a large number of grade names and associated seed standards which make the system somewhat complex. In addition, the lack of flexibility and the inability to adapt standards quickly to industry changes has been identified as a challenge to stakeholders.

Based on the initial topics suggested by the Seed Regulatory Modernization Working Group, the Task Team presented a work plan for the analysis and discussion of the following seven topics:

- Purity and Germination
  - Higher voluntary standards
  - Additional quality standards
  - Aligning standards
- Weed seeds
- Incorporation by Reference of the Grade Tables
- Varietal Blends
- Mixtures

The Task Team focused on three major opportunities for improvement:

1. Ability to adapt standards to changes occurring within the Seed Sector
2. Simplifying standards for sale of seed in Canada
3. Strengthening existing requirements

A total of 28 options were proposed and discussed by the Task Team which generated 30 recommendations being presented to the Seed Regulatory Modernization Working Group:

### **Topic 1 - Higher Standards:**

1. **Grade Tables should continue to exist for pedigreed grade standards.**
2. **CFIA should continue to set the minimum standards for purity and germination.**
3. **CFIA should explore having only one Common grade standard per Grade Table and eliminating the Common No.2 standard. (This recommendation to be forwarded to the Common Seed Task Team)**

4. CFIA should explore making additionally requested information available via a QR code on the official tag/label. (This recommendation to be forwarded to the Records, Information, Labelling Task Team)

#### **Topic 2 - Additional Quality Standards:**

5. There was general consensus that additional (new) standards should not be added to the Grade Tables at this time.
6. Explore the development of a non-government, national system for standardization of test methods for additional quality standards. (This recommendation to be forwarded to the Seed Testing Task Team).
7. Explore options for labelling of test results of additional quality traits. (This recommendation to be forwarded to the Records, Information and Labelling Task Team)

#### **Topic 3 - Aligning Standards:**

8. For No. 2 pedigreed grade names, adopt the No. 1 standards for purity and disease but keep both the No. 1 and No. 2 standards for germination.
9. CFIA should review the recommendations from this Task Team with representatives from the vegetable seed industry and adjust them if needed.
10. Keep Canada's seed standards for purity higher or equal to international standards.

#### **Topic 4 - Weed Seeds:**

11. The regional standards for wild oats and tartarian buckwheat should remain within the *Seeds Regulations*.
12. CFIA should explore additional regional standards and/or how to amend the *Weed Seeds Order* (national standards) in a more timely and predictable manner. The focus should be on protecting Canada from invasive or other harmful species that could increase costs to farmers and pose trade barriers for seed as well as grain export markets.
13. The *List of Regulated Pests regulated by Canada* (incl. quarantine weeds) should be amended in a more timely and predictable manner. It was noted that this list is not part of the *Seeds Regulations*, therefore this recommendation falls outside of the scope of Seed Regulatory Modernization.

#### **Topic 5 - Incorporation by Reference:**

14. The Grade Tables (standards for both Common and pedigreed grade names) should become a document that is incorporated by reference so that changes can be made in a more timely manner.
15. CFIA should continue to set the minimum standards for purity and germination.

16. The Grade Tables (standards for Common and pedigreed grade names) should be incorporated by reference and be administered by CFIA with predetermined expert recommending/technical committees providing advice and recommendations.

#### **Topic 6 - Mixtures:**

17. Purity standards should remain in the Mixtures Grade Tables and be tightened as needed.
18. Germination standards for Mixtures should be eliminated from the Mixtures Grade Tables.
19. A new requirement for the components of Mixtures to be tested and meet their individual table's standards (purity and germination) prior to mixing should be put in place.
20. No. 2 purity standards should be raised to be the same as No. 1 purity standards as per the previous recommendation (Topic # 3: Aligning Standards).
21. No. 2 Common/Canada grade name should be eliminated as per the previous recommendation (Topic #1: Higher Standards).
22. The requirement for percentages of labelled components to be verified by the lab should be retained (no change to existing requirement)
23. CFIA should explore eliminating Grade Table III (Cereal Mixtures)
24. If the Cereal Mixture Table is retained, the requirement for only one variety per kind or species should be eliminated
25. Seed Testing Task Team should review the Mixtures Tables also to input advice into tightening the purity standards of these Tables.

#### **Topic 7 - Varietal Blends:**

26. Remove the Varietal Blend grade names from the Grade Tables VIII – XII.
27. CFIA should explore grading and labelling options for non-PPTM Varietal Blends using the existing Canada Certified grade names. (This recommendation to be forwarded to the Labelling Task Team)
28. CFIA should conduct a survey on what types of non-PPTM Varietal Blends stakeholders are currently using and what blends they anticipate being used in the future.
29. CFIA should explore allowing for the use of PPTM Varietal Blends for all crop kinds.
30. Explore the possibility of having an official tag for Varietal Blends, possibly of a different colour but still compliant with AOSCA requirements. (This recommendation to be forwarded to the Labelling task team)

Additional support was provided to the Task Team from an Advisory Group of seed sector stakeholders. Four seed analyst advisors from the Advisory Group provided their expertise during several of the Task Team meetings. In addition, written feedback from Advisory Group members was included verbatim as an Appendix to each topic's Options and Recommendations report. The Task Team and Advisory Group members shared similar views on the topics and options discussed.



## Introduction

The Canadian Food Inspection Agency (CFIA) is responsible for administering and enforcing the *Seeds Act* and *Seeds Regulations*. The main purpose of *the Seeds Act* and *Seeds Regulations* is to protect producers and consumers from misrepresentation, prevent the use of low quality seed, and to create a level playing field for companies and individuals involved in seed production. Canada's seed grading system:

- establishes minimum physical purity and germination standards for seeds;
- conveys information to consumers in a simple fashion (i.e., grade names);
- presents the standards in a comprehensive format (i.e., Grade Tables); and
- facilitates domestic seed trade.

The Grade Tables (Schedule I of the *Seeds Regulations*) set out the minimum standards for weed seeds, other crop seeds, some seed borne diseases, and germination for seed of most crop kinds sold in Canada. The *Regulations* also set out additional seed standards, prohibitions and allowances such as seed must not contain prohibited noxious weed seeds and only pedigreed seed can be sold with a pedigreed grade name. Seed of kinds listed in the Grade Tables must be sold by grade name.

Seed of crop kinds not listed in the Grade Tables must meet minimum weed seed and other crop seed standards of the appropriate Grade Table based on seed size of that crop kind but standards for germination and seed borne diseases do not apply to these crop kinds. These crop kinds may not be sold by grade name since not all of the standards applicable to the grade name will have been tested for.

The seed grading system was implemented in 1905 and was optional up until 1920 when it became mandatory for many crop kinds. In the current seed grading system, 186 crop kinds are grouped into 22 Grade Tables according to seed size, similarities with respect to potential seed contaminants, and intended use. The large number of unique grade names and associated seed standards make the grading system somewhat complex. In addition, the lack of flexibility and the inability to adapt standards quickly to industry changes has been identified as a challenge to stakeholders.

## Topics

The following topics were provided by the Seed Regulatory Modernization Working Group (SRMWG) to the Seed Standards task team:

- Purity and Germination
- Weed Seeds
- Varietal Blends
- Mixtures

In addition, the following overarching topics provided by the SRMWG were to be considered during the discussion of specific topics:

- Future Trends
- Government versus Industry Role
- Linkages and unintended consequences
- Incorporation by Reference
- International obligations
- Alternative service delivery including licensing and accreditation

Based on the above, the Task Team developed a work plan consisting of 13 meetings with the following finalized list of topics:

- Purity and Germination
  - Higher voluntary standards
  - Additional quality standards
  - Aligning standards (Domestic/International, seed standards/field standards)
- Weed seeds
- Incorporation by Reference of the Grade Tables (The Task Team determined that this should be a specific topic rather than overarching one)
- Varietal Blends
- Mixtures

The Work Plan was presented to the SRMWG at their May 18, 2021 meeting.

## **Task Team Representation and Goals**

**Task Team members were from the following groups (see Appendix 1):**

1. Seed sector
2. Producer groups
3. Commodity associations/value chain associations
4. Other non-government stakeholders

**Task team goals:**

1. Identifying the issues/ gaps/ inconsistencies associated with the current regulatory framework and provide context identifying which sectors of the value chain are currently affected.
2. Engaging with affected stakeholders when needed.
3. Providing options and developing recommendations to improve and enhance the current seed regulatory framework in a report for consideration by the Seed Regulatory Modernization Working Group.

In addition to support provided by government representatives, the Task Team incorporated feedback from an Advisory Group of seed sector stakeholders. Four seed analyst advisors from the Advisory Group provide their expertise during several meetings to ensure the analysis and recommendations were robust. Both the Task Team and Advisory Group members had similar views on each of the topics. Written feedback from Advisory Group members was added verbatim as an Appendix to each topic's Options and Recommendations report.

### **Opportunities for Improvement:**

The Task Team identified three major opportunities for improvement based on the issues identified in the Introduction:

- 1. Ability to adapt standards to changes occurring within the Seed Sector**
- 2. Simplifying standards for sale of seed in Canada**
- 3. Strengthening existing requirements**

Based on these opportunities for improvement and goals of the Task Team, the following are examples of questions considered by the Task Team when the topics were assessed:

- Does Canada still need Grade Tables and a seed grading system to sell seed in Canada or should more responsibility be given to farmers to know the quality of seed they are purchasing?
  - Should Canada remove all seed standards and have a “truth in labelling” system
- If Canada maintains a seed grading system, should the seed industry rather than the CFIA be responsible for ownership and maintenance of the Grade Tables?
- Should standards be adjusted to allow for a higher level of impurities for seed being sold in Canada?

## Purity and Germination

Canada's Grade Tables and seed grading system are unique in the world. There are a large number of grade names and associated seed standards which make the system somewhat complex. Canada pedigreed grade names are seed certification statements that represent a process throughout which assurance and verification of pedigreed status and seed standards occurs at multiple stages. Grade names are a combination of pedigreed status (determined by the cycle of seed multiplication and application of CSGA's varietal purity standards to crop inspection results) and numerical grade (determined by analysis of seed samples for seed quality characteristics).

In order to examine purity and germination more broadly, the Task Team chose to examine it as three distinct topics:

- **Higher standards,**
- **Additional quality standards**
- **Aligning standards.**

## Topic 1 - Higher Standards

The seed grading system was established at a time in history when it was difficult for farmers to ascertain the quality of seed. The establishment and use of grade names has communicated information to buyers in a simple way and has provided sufficient confidence regarding the quality of seed. Although today's farmers have more information and technology at their disposal, there is still general agreement that communicating information on seed quality in a simple fashion has its merits.

In addition, the current system establishes minimum purity standards for import and sale of seed which:

- prevents the spread of weed seeds within Canada, and
- ensures sale of high quality pedigreed seed in Canada

The seed grading system protects producers from purchasing seed that is contaminated with harmful weeds or seed that has poor germination because the seller is obligated by law to guarantee the quality. For many farmers, there is comfort in knowing that the quality is backed by government. However, it is recognized that an opportunity for improvement would be to simplify standards for sale of seed in Canada.

Should CFIA explore having minimum standards for purity and germination outside of the Grade Tables while industry is responsible for the higher standards related to pedigreed seed within the Grade Tables? Could this approach give flexibility to industry to decide the standards within the Grade Tables while CFIA still maintains the minimum standards for sale of seed in Canada or should Grade Tables be eliminated?

### **Options:**

- 1. Remove the minimum standards (Common grades) from the Grade Tables and only have pedigreed grades within the Grade Tables. CFIA would be responsible for setting the minimum standards and industry would be responsible for setting the standards within the Grade Tables.**

This option would leverage industry resources and expertise, including connections with stakeholder groups in setting the standards for pedigreed grades. CFIA would still set the minimum standards and would continue to have the responsibility to ensure standards within the Grade Tables continue to align with central regulatory objectives and legal obligations.

The Task Team identified potential risks with this option which included: possible erosion of CFIA's oversight of the pedigreed grade standards over time; concerns that the consultation process for making changes to the Grade Tables may not be broad enough in terms of stakeholder engagement; and whether removing minimum standards from the Grade

Tables may be confusing for users as minimum standards and pedigreed grade standards would be housed in different locations.

## **2. Status Quo – Leave the minimum standards (Common grade names) within the Grade Tables.**

CFIA would retain control over the modification process for all standards and would continue to be a neutral party in discerning what changes would be appropriate based on the perspectives of a broad range of stakeholders. However, there were concerns CFIA may not make changes as quickly as an external organization especially if the Grade Tables remained as a Schedule within the *Seeds Regulations*.

## **3. Eliminate the Grade Tables and label all seed with the test results. Minimum standards for the sale of seed would remain within the *Seeds Regulations*.**

Canada's Grade Tables and seed grading system are unique. Although other countries have standards, they don't use seed grades to convey information on the quality of seed. For example, the United States use a system where information on the quality aspects of the seed lot are printed on the label. This option would eliminate seed grading and potentially could reduce the complexity of the system, however all of the stakeholders on the Task Team agreed that Grade Tables and the use of grade names has communicated information to buyers in a simple way and has provided confidence regarding the quality of seed.

### **Summary:**

There was consensus among all sectors on the Task Team that Grade Tables are beneficial and seed grade names are an efficient way of conveying seed quality information. There was also consensus that CFIA rather than industry should set the minimum purity and germination standards.

A majority of the members from the seed sector preferred Option 1 while a majority of the members from the other stakeholder groups felt Option 2 should be recommended to SRMWG. A decision was made by the task team to re-visit Options 1 and 2 during the meetings where Incorporation by Reference was discussed. This allowed Task Team members to further explore CFIA's *Incorporation by Reference Policy* and to discuss the oversight measures that could be put in place within a Memorandum of Agreement.

As part of the discussion around minimum purity and germination standards, there was consensus amongst the sectors that consideration should be given to collapsing the Common grade standards (Common No. 1 and No. 2) into one single standard and that that single standard should be the current Common No. 1 standard.

## Recommendations

1. Revisit Options 1 and 2 during the meetings where Incorporation by Reference will be discussed.
2. Grade Tables should continue to exist for pedigreed grade standards.
3. CFIA should continue to set the minimum standards for purity and germination.
4. CFIA should explore having only one Common grade standard per Grade Table and eliminating the Common No. 2 standard. (This recommendation to be forwarded to the Common Seed Task Team)
5. CFIA should explore making additionally requested information available via a QR code on the official tag/label (This recommendation to be forwarded to the Records, Information, Labelling Task Team)

## **Topic 2 - Additional Quality Standards**

In order to sell seed in Canada, standards for weed seeds, other crop kinds, germination and disease (for some crop kinds) must be met. For each of these standards, there are prescribed test methods in the *Canadian Methods and Procedures for Testing Seed* which is a document administered by the CFIA with input from commercial seed analysts.

Although the standards within the Grade Tables are considered to be comprehensive, it has been suggested that additional quality standards could be included in the Grade Tables. Specifically, the most common requests are for seedling vigour and some seed borne diseases. However, in some cases with respect to seedling vigour, the request has more to do with having a standardized method for testing rather than having a quality standard inserted into the Grade Tables.

It can be argued that adding new standards to the Grade Tables does not meet the goal of simplifying standards for sale of seed in Canada, however the task team felt it was important to explore whether they are required to ensure the quality of Canadian pedigreed seed in the marketplace or whether they are more of a marketing tool.

An alternative system to CFIA adding new standards to the Grade Tables would be for industry to set its own standards for additional quality traits and/or to conduct its own validation/standardization of the test methods for additional quality traits.

### **Options:**

#### **1. CFIA should add other quality standards such as seedling vigor and/or other seed borne diseases to the Grade Tables.**

This option would establish minimum standards that would be national in scope and enforced by CFIA. A national standard provides buyers with predictability rather than only some seed being tested and/or meeting a voluntary standard. However, a national standard will not likely address regional differences and the accompanying tests would have to be incorporated into the Agency's quality system standard, audited and monitored within the CFIA proficiency monitoring program. CFIA may not be able to implement this in a timely manner.

#### **2. Status Quo – The existing standards within the Grade Tables are sufficient and other quality standards should not be added.**

The existing standards within the Grade Tables for weed seeds, other crops kinds, germination and diseases (for some crop kinds) are generally the core standards used around the world for the testing and sale of seed. Information for additional quality aspects are considered a valuable marketing tool and is desired by buyers but is not necessarily



required to ensure the basic quality of Canadian pedigreed seed in the marketplace domestically and/or internationally. This option allows for flexibility for companies to establish their own standards for additional quality traits and develop their own test methods, however this can make purchasing seed less predictable for those quality traits.

### **3. Option 2 plus industry stakeholders set additional quality standards and develop their own standardized methods for testing for those quality traits.**

Stakeholders could establish national standards for other quality traits which could be published separate from the Grade Tables. In addition, this document could also outline reporting and test methods guidelines so that there is national consistency but without CFIA involvement or oversight. However, it may be difficult to get agreement on a national standard and it is possible that standardizing tests could stifle innovation.

#### **Summary:**

The majority of Task Team members did not feel that additional standards should be added to the Grade Tables. Rather than adding new standards to the Grade Tables, some of the Task Team members felt that concerns could be addressed through labelling. This would avoid the lengthy process of developing an appropriate standard while still providing the farmer with information on the quality of seed. However, there was some thought that a minimum standard applied nationally would provide more assurance and make it more predictable for farmers.

Regardless of whether Option 1, 2 or 3 moves forward, the Task Team members felt that it is important that any new quality parameters (standards or methods) must be established by a qualified group of stakeholders with input from a broad range of stakeholders so that the best possible information on seed quality is made available to buyers.

## **Recommendations**

- 1. There was general consensus that additional (new) standards should not be added to the Grade Tables at this time.**
- 2. Explore the development of a non-government, national system for standardization of test methods for additional quality standards. (This recommendation to be forwarded to the Seed Testing Task Team)**
- 3. Explore options for labelling of test results of additional quality traits. (This recommendation to be forwarded to the Records, Information and Labelling Task Team)**

## Topic 3 - Aligning Standards

Canada's Grade Tables and seed grading system have a large number of grade names and associated seed standards. For example, most Grade Tables have eight grade names, each with a set of seed standards of 8-10 columns for purity, germination and disease categories. The result is that there can be between 50 -100 standards per Grade Table depending on which Grade Table is being used.

Other countries have seed standards but they are more streamlined. In the United States there is generally one set of seed standards for Foundation, one set for Registered, and one set for Certified (versus two sets per pedigreed class (No. 1 and No. 2) in Canada's system). In the European Union a similar situation exists but is dependent on the crop kind. In some cases, there may only be one set of seed standards for all three classes of seed.

During this topic discussion, the Task Team explored whether consideration be given to aligning/streamlining Canada's seed standards such as:

- a) Having a single set of seed standards for each pedigreed class (Certified, Registered, Foundation),
  - i. if so, which set would be the most appropriate (No. 1 or No. 2)?;
- b) Having a single set of seed standards that applies to all pedigreed classes,
  - i. if so, which set would be most appropriate (Certified, Registered or Foundation standards)?; or
- c) Continue to have a No. 1 and No. 2 seed standards for each pedigreed class of seed (Certified, Registered, Foundation).

### **Options:**

- 1. There should be a single set of seed standards for each pedigreed class (three in total (instead of six): Certified, Registered, Foundation)**

This would reduce the number of standards by half and would streamline the Grade Tables making them easier to read. By removing the No. 2 grade names it would tighten the purity standards, however removing the No. 2 germination standard may cause problems for some crop kinds in some years. Task Team members acknowledged that there was some risk that more seed lots may be demoted or rejected under this option.

- 2. There should be a single set of seed standards that applies to all pedigreed classes of seed (one that applies to all Certified, Registered, Foundation seed)**

Although this would streamline the Grade Tables by significantly reducing the number of standards, this option does not provide flexibility. If one of the Foundation standards were chosen, the standards might be too tight for selling Certified seed causing more seed lots to be rejected. If one of the Certified standards were selected, the standards may not be tight enough for the higher classes.

**3. Status Quo – Canada Certified No. 1 and No. 2, Canada Registered No. 1 and No. 2, Canada Foundation No. 1 and No. 2 seed standards.**

This option does provide flexibility because of the number of grade names, however it does not streamline the standards. In addition, the No. 2 standards for purity are not tight enough given today's technology and modern cleaning equipment.

**4. For No. 2 pedigreed grade names, adopt the No. 1 standards for purity and disease but keep both the No. 1 and No. 2 standards for germination.**

Although the number of grade names remains the same, this option does provide some streamlining of the Grade Tables by reducing the number of purity standards. In addition, it provides flexibility for germination in years where harvest and/or environmental conditions lead to lower germination in seed lots.

**Summary:**

There was consensus among all sectors on the task team that Grade Tables are beneficial but that the standards need to be updated. There was agreement that with the cleaning equipment and technology that is available now, the purity standards for No. 1 pedigreed grade names within the Grade Tables are not too high and the purity standards for No. 2 pedigreed grade names should be tightened. All of the participants wanted to keep Canada's purity standards equal to or higher than other countries. If there are cases where Canadian standards are lower, then Canada should look to align those standards with other countries.

A review of purity and germination standards in each of the Grade Tables was completed which lead to a consensus that all of the Grade Tables should have the No. 2 standards for purity removed and adopt the No. 1 standards instead but retain No. 1 and No. 2 germination standards. There was general consensus that having a No. 1 and No. 2 germination standard for all of the Grade Tables was valuable, particularly in years where the seed harvested has lower germination values due to environmental conditions.

## **Recommendations**

- 1. For No. 2 pedigreed grade names, adopt the No. 1 standards for purity and disease but keep both the No. 1 and No. 2 standards for germination.**
- 2. Defer making a recommendation on the Grade Tables for mixtures until the July 9<sup>th</sup> meeting since mixtures will be the focus at that meeting.**
- 3. CFIA should review the recommendations from this Task Team with representatives from the vegetable seed industry and adjust them if needed.**
- 4. Keep Canada's seed standards for purity higher or equal to international standards.**

Based on the third recommendation, CFIA followed up with representatives from the vegetable seed industry regarding whether the first recommendation would have a negative impact on them. Initial feedback has indicated that the changes to Grade Tables from this

recommendation would not affect them and were supportive of the change for Grade Tables XVI-XX.

## Topic 4 - Weed Seeds

Grade Tables indicate the maximum allowable levels of primary, secondary, noxious and other weed seeds, as well as other crop kinds and inert matter (for some crop kinds) in a specified weight. The *Weed Seeds Order* (WSO) is used in conjunction with the Grade Tables as the WSO is the list of species classified as primary noxious, secondary noxious, and noxious weed species.

The WSO also provides the list of species which are considered Prohibited Noxious weed species in seed. Paragraph 7(1)(a) of the *Seeds Regulations* (the Regulations) states that no seed shall contain Prohibited Noxious weed seeds. It is for this reason that the Grade Tables do not contain any standards for Prohibited Noxious weed seeds; these species are prohibited in all seed as per the Regulations.

The seed standards within the Grade Tables are national standards. However, there are also two regional seed standards within the Regulations.

- a) *In addition to meeting the standards set out in Tables I to III of Schedule I, seed to which those Tables apply shall be free from wild oats in Quebec, Nova Scotia, New Brunswick and Prince Edward Island. (subsection 7(3))*
- b) *In addition to meeting the standards set out in Tables I to III of Schedule I, seed to which those Tables apply shall be free from tartarian buckwheat in Manitoba, Saskatchewan, Alberta and British Columbia. (subsection 7(2))*

Should CFIA consider removing these regional standards from the Regulations or is there rationale to keeping them within regulation? What other issues related to weed seeds need to be addressed?

### **Options:**

- 1. Similar to other regional standards, the regional standards for wild oats and tartarian buckwheat should not be regulated by CFIA. These regional standards should be removed from the *Seeds Regulations*.**

No other species have regional standards within the *Seeds Regulations*, under this option all standards would be national in scope. However, removal of these standards may have unintended consequences for end use markets and possibly could increase control costs for farmers.

- 2. Status Quo – The regional standards for wild oats and tartarian buckwheat should remain within the *Seeds Regulations*.**

Having the regional standards within national *Seeds Regulations* provides more clarity and facilitates interprovincial movement of seed compared to individual regional standards, however it is inconsistent with how the seed standards for other weed species are expressed.

**3. In addition to the regional standards for wild oats and tartarian buckwheat, regional standards for other weed seeds should be added to the *Seeds Regulations*.**

Adding regional standards for other species may allow problem weed seeds to be addressed more quickly in a particular Area rather than going through the process for amending the *Weed Seeds Order* however it was recognized that this could cause confusion.

**Summary:**

Participants started the discussion by asking about the history behind these regional standards, in particular, there was interest in understanding why tartarian buckwheat was an issue. Although these standards were established prior to the mid-seventies, feedback from western producers was that the tartarian buckwheat standard is still relevant today. Tartarian buckwheat needs a rigorous control schedule which leads to increased control costs. There were also concerns expressed as to whether or not there may be consequences to grain exports. In the end, there was general consensus from the participants that the regional standards for wild oats and tartarian buckwheat should remain in the *Seeds Regulations*.

There was general consensus from the group that the process for amending the *Weed Seeds Order* is too long. Some participants asked if Incorporation by Reference of the *Weed Seeds Order* was a possible solution to make changes in a more timely manner rather than adding regional standards.

## **Recommendations**

- 1. The regional standards for wild oats and tartarian buckwheat should remain within the *Seeds Regulations*.**
- 2. CFIA should explore additional regional standards and/or how to amend the *Weed Seeds Order* (national standards) in a more timely and predictable manner. The focus should be on protecting Canada from invasive or other harmful species that could increase costs to farmers and pose trade barriers for seed as well as grain export markets.**
- 3. The *List of Regulated Pests regulated by Canada* (incl. quarantine weeds) should be amended in a more timely and predictable manner. It was noted that this list is not part of the *Seeds Regulations*, therefore this recommendation falls outside of the scope of Seed Regulatory Modernization.**

## **Topic 5 - Incorporation by Reference**

Incorporation by Reference (IBR) is a drafting technique that introduces the content of a document (such as, a policy, directive, list, or standard) into a regulation without having to reproduce the document's text in the regulation. If a document is incorporated by reference into regulations, the incorporated wording has the same effect as if it appeared in the regulations, however changes are not subject to Treasury Board and Governor in Council review and approval. This supports timeliness in the amendment process and creates efficiencies in the Government of Canada's regulatory agenda to deliberate on other matters; this would be a practical process, especially for minor amendments.

### **Grade Tables – Internal vs external document**

If CFIA retains responsibility for the Grade Tables then CFIA can continue to be a neutral party in discerning what changes would be appropriate based on the perspectives of affected parties. CFIA could also invoke a transition period to grant regulated parties enough time to adjust their activities to any modifications.

External administration of the Grade Tables gives stakeholders the responsibility to maintain and modernize the Grade Tables based on the vision of the industry. This option leverages external resources and expertise along with well-established connections with stakeholder groups when amending the document. However, CFIA still has the responsibility to ensure that IBR documents continue to align with central regulatory objectives and legal obligations. An arrangement such as a Memorandum of Agreement (MOA) could be necessary in order to include oversight measures if the Grade Tables become the responsibility of industry.

A key component of this MOA would be establishing a process that allows CFIA and the external administrator to adhere to the following:

1. CFIA may be involved with the development of the proposal with the administrator
2. CFIA will notify and direct domestic stakeholders and international partners to the proposal and consultation held by the external party.
3. CFIA will direct stakeholders to the proposal and any consultation held by the administrator
4. For a proposal that may have an impact on international trade, CFIA will contact Trade Agreements Division (TAD) in International Affairs Branch for the submission of a notification to the World Trade Organization (WTO), in accordance with Canada's international obligations. A 60-day notification process is usually required.
5. CFIA will create a WG to analyze the proposal from the administrator for consistency with CFIA's policy objective. This includes requesting from the external administrator justification for the modification, its anticipated timeline and access to comments received.

6. CFIA will consider the following factors during its assessment of the proposal:
  - a. Potential administrative and operational modifications required for regulated parties to comply with the proposed modifications,
  - b. Level of clarity in understanding the document's content to ensure stakeholder compliance,
  - c. Resources and capacity required for CFIA inspectors to perform their duties (such as, possible training),
  - d. Impact on current CFIA programs,
  - e. Original cost-benefit analysis,
  - f. International trade implications,
  - g. List of stakeholders that could be affected by the proposal,
  - h. Other considerations
7. CFIA will consult with their legal services for considerations, potential limits or risks.
8. CFIA will submit their comments to the external administrator within the comment period, using the method identified in the consultation.
9. CFIA will forward any other comments received by CFIA through the WTO to the administrator, using the method identified in the consultation.
10. External administrator will analyze comments received from CFIA to ensure that the anticipated modification does not conflict with CFIA's mandate or with Canada's international obligations.
11. External administrator will prepare summary of comments and will make it available (published on website)
12. If the final version of the proposed modification is not consistent with CFIA's program objective, CFIA may consider and adopt a number of alternative approaches, such as proposing a regulatory amendment that would achieve one of the following:
  - i. replace the ambulatory reference with a static reference to the earlier version of the document, thereby making the amended document not in force
  - ii. introduce a qualified reference that excludes specified portions of the document deemed unsuitable
  - iii. include reference to a more suitable external document or internally generate a new document
  - iv. repeal the reference entirely and pursue appropriate legislative, policy or administrative avenues

#### **Options:**

- 1. Grade Tables (Common and pedigreed grade names) are incorporated by reference and are administered by CFIA.**

CFIA would retain control over the modification process for all standards and would continue to be a neutral party in discerning what changes would be appropriate based on the perspectives of a broad range of stakeholders. However, CFIA would not be required to



use the current regulatory amendment process and this would enable changes to be made in a more timely manner.

**2. Grade Tables (Common and pedigreed grade names) are incorporated by reference and are administered by an external organization**

This option would leverage external resources and expertise, including connections with stakeholders groups, in setting the standards. CFIA would provide input but not have the final say over the standards for Common and pedigreed grade names, however this option may allow changes to be made in a more timely manner.

**3. Grade Tables (pedigreed grade names only) are incorporated by reference and are administered by an external organization. CFIA sets minimum standards for sale, import and for Common seed; the minimum standards are incorporated by reference and administered by CFIA.**

This leverages external resources and expertise for administering the standards for pedigreed grade names while CFIA still sets the minimum standards and the standards for Common seed. However, removing minimum standards and Common seed from the Grade Tables may be more confusing for users as minimum/Common standards and pedigreed grade standards would be housed in different locations.

**4. Status Quo – Grade Tables (Common and pedigreed grade names) remain in Schedule I to the Seeds Regulations administered by CFIA**

Although there is consistency and predictability in terms of process, changes to the Grade Tables are not able to be made in a timely and efficient manner. Regulatory scrutiny, including scrutiny by Treasury Board Secretariat, may be excessive for technical standards.

**5. Grade Tables (pedigreed grade names only) are incorporated by reference and are administered by an external stakeholder, Canadian Seed Growers' Association. CFIA sets minimum standards for sale, import and for Common seed which are incorporated by reference, administered by the CFIA, but are made publicly available in one combined document (Common and pedigreed grade names) by the external stakeholder, Canadian Seed Growers' Association. MOA would include that a standing committee for the Grade Tables would be comprised of (table specific Working Groups would be allowed to draw on crop specific expertise.**

Canadian Seed Growers' Association has a long history of managing the *Canadian Regulations and Procedures for Pedigreed Seed Crop Production* for field crop varietal purity standards and associated requirements. Grade Table standards for both Common and pedigreed seed would still be housed in one location for ease of use. Although the make up of the standing committee negates any special interest group influence, a large committee may have more of a challenge reaching consensus.

## **6. Option 1 with predetermined standing committee and/or expert recommending/technical committees**

CFIA would retain control over the modification process for all standards and would continue to be a neutral party in discerning what changes would be appropriate based on the perspectives of a broad range of stakeholders. However, CFIA would not be required to use the regulatory amendment process and this would enable changes to be made in a more timely manner. The predetermined expert recommending/technical committees would leverage industry expertise to identify changes needed to improve the Grade Tables.

### **Summary:**

Mélanie Desrocher, CFIA Regulatory Affairs, explained the process for Incorporation by Reference at the first meeting in order to aid the Task Team discussion. There was consensus that changes under the current regulatory amendment process are not able to be made in a timely manner and that stakeholders would benefit from a more efficient amendment system. It was recognized that there is a backlog of changes ranging from minor administrative changes such as spelling errors to crop kinds not being able to be added to the Grade Tables. Although there is general agreement on the need for making changes in a more efficient manner, there is concern about ensuring a broad consultation so that farmers can provide input on any changes being made to the standards.

Task Team members were interested in the consultation being done by an external organization as long as the consultation was broad enough but also wanted CFIA to have the final say on any changes. A majority of the seed sector stakeholders preferred Option 3 while the other stakeholder groups preferred Option 1. After further discussion, a consensus was reached on having the IbR document administered by CFIA with predetermined committees to provide expertise.

## **Recommendations**

- 1. The Grade Tables (standards for both Common and pedigreed grade names) should become a document that is incorporated by reference so that changes can be made in a more timely manner.**
- 2. CFIA should continue to set the minimum standards for purity and germination.**
- 3. Grade Tables (standards for Common and pedigreed grade names) should be incorporated by reference and be administered by CFIA with predetermined expert recommending/technical committees providing advice and recommendations.**

## **Topic 6 - Mixtures**

A seed mixture is defined as containing two or more crop kinds or species. The standards for purity and germination for mixtures are stated in Tables III (Cereal Mixtures), XIII (Forage Mixtures), XIV (Lawn Mixtures), and XV (Ground Cover Mixtures). A Varietal Blend contains seed of two or more varieties of a single crop kind or species whereas a mixture contains seed of two or more crop kinds or species.

Cereal Mixtures (Table III) and Forage Mixtures (Table XIII) may only contain kinds or species listed in Schedule I. Lawn Mixtures (Table XIV) may contain kinds or species listed in Schedule I and may also contain other kinds of grasses not listed in Schedule I, as long as those kinds are indicated on the label. Ground Cover Mixtures (Table XV) may contain kinds or species listed in Schedule I and not listed in Schedule I.

### **Special Exemption for Lawn and Turf Mixtures in Table XIV**

Despite the above, Table XIV has a special exemption in Part II, Group C, for the inclusion of seed of a kind or species of grass only, that is not listed in Schedule I. In the case of a lawn or turf mixture which contains one or more species of grass not listed in Schedule I, the mixture must meet the standards set out in Table XIV - Part I, including the germination standards.

### **Germination standards**

As per subsection 6(1) of the *Seeds Regulations* (the Regulations), crop kinds or species listed in Schedule I, whether they are components of a mixture or a single species or crop kind, must meet the germination standards of the Table in which they appear. Crop kinds or species not listed in Schedule I are not required to meet germination standards (except for Table XIV Part II, Group C species), but must still meet purity standards.

### **Grading Components Before Mixing**

It is recommended that mixtures always be made with components that have met the standards for individual components set out in the Regulations prior to mixing. This will ensure that the mixture meets the standards that are specified in the Tables for mixtures. For instance, canola, alfalfa and wheatgrass intended for a grazing mixture should be analyzed and graded with the standards set out in the Tables in which they appear (Tables VII, VIII and XI) , before mixing the three components into the final product. The final mixture would be required to meet the standards in Table XIII which are lower than those in the individual tables.

The testing requirements set out in section 11 of the Regulations apply to all seed sold or imported into Canada.

## **MIXTURES THAT DO NOT MEET THE REQUIREMENTS TO BE CEREAL, FORAGE, OR LAWN MIXTURES:**

### **Standards for Seed Mixtures containing multiple crop kinds that are listed in Schedule I but not specified in a single Table.**

Mixtures of seed containing two or more crop kinds listed in Schedule I, but not defined entirely within either Table III, XIII, XIV or XV, must meet the standards for weed seed and other crop seed set out in Table XIII. Component crop kinds or species must meet the germination standards set out in the Tables in which they appear. With the exception of Ground Cover Mixtures, no grade name may be applied.

### **Standards for Seed Mixtures containing one or more components which are not listed in Schedule I**

Any mixture of seed containing one or more components not listed in Schedule I is subject to paragraphs 6(2)(h) (or 6(2)(j)) of the *Seeds Regulations* (the Regulations) and no grade name may be applied to these mixtures.

There exists one exception whereby a mixture of seed containing one or more components not listed in Schedule I may be labelled with a grade name. This occurs when the seed is a Ground Cover Mixture as determined by the vendor. Ground Cover Mixtures with one or more components not listed in Schedule I must meet the minimum weed seed and other crop seed standards in Table XV and may be labelled with a grade name.

Paragraph 6(2)(h) specifies seed or mixtures of seed for land reclamation, soil conservation, green cover, wildlife grazing or habitat, wetland restoration and similar purposes, and indicates that the seed must meet the weed seed and other crop seed standards in Table XIII. Furthermore, paragraph 6(2)(h) applies to seed or mixtures of seed where one or more of the components are not listed in Schedule I as per 6(2) and which are intended for planting over large areas. Seed mixtures to which 6(2)(h) applies must meet the minimum weed seed and other crop seed standards in Table XIII.

Paragraph 6(2)(j) applies to wildflower mixtures and similar products intended for landscape gardening use, that is, mixtures intended for planting over small areas. Seed mixtures to which 6(2)(j) applies must meet the minimum weed seed and other crop seed standards in Table XV.

The key distinguishing feature between labelling as per 6(2)(h) and 6(2)(j) is the area of the land to be seeded. Paragraph 6(2)(h) applies to mixes intended for planting over large areas such as highway ditches, power lines and land reclamation projects. Paragraph 6(2)(j) applies to mixtures intended for planting over small areas such as small backyard gardens.

Is there still value in retaining all of the Mixtures Grade Tables (III, XIII, XIV and XV)? Should the existing mixture Grade Tables be eliminated and replaced with a single mixtures Grade Table?

Should mixture Grade Tables be eliminated altogether and switch to a truth in labelling system for mixtures? If one or more Mixtures Grade Tables are retained, do the standards within those Grade Tables need to be adjusted?

**Options:**

- 1. Eliminate existing Mixtures Grade Tables and replace with a single Mixtures Grade Table with appropriate grade names. Mixtures of any kind or species can be sold as long as the components are labelled and meet the standards of their individual Grade Tables.**

Creating just one mixture table will reduce the number of standards and will make the standards consistent among all types of mixtures. In addition, there is a lot of confusion around what components are allowed in a mixture and whether it can be graded as a forage mixture, lawn mixture or ground cover mixture; having just one Grade Table for mixtures potentially could address this problem. However, having the same types of standards for all mixtures may not provide enough flexibility.

- 2. Eliminate existing Mixtures Grade Tables. Mixtures of any kind or species can be sold as long as the components and their purity and germination test results are labelled (i.e., truth in labelling system).**

Canada's Mixture Grade Tables are complex. Other countries don't use seed grades to convey information on the quality of seed mixtures. For example, the United States use a system where information on the quality aspects of the seed lot are printed on the label.

- 3. Retain the existing Mixtures Grade Tables and adjust the standards within those Grade Tables if needed.**

This would update the purity standards while still providing them in a comprehensive format based on the type of mixture, however, the complexity of testing mixtures will remain the same

- 4. Status Quo – Keep the existing Grade Tables and leave the standards as they currently exist**

Although the standards are provided in a comprehensive format and are specific to the type of mixture based on end use, current standards are not tight enough and some of the categories of standards are outdated

- 5. Purity standards remain in the Mixtures Grade Tables and adjust them as needed but do not retain germination standards. Components must be tested and meet their individual table's standards (purity and germination) prior to mixing.**

This option would update the purity standards while still providing them in a comprehensive format based on the type of mixture. It simplifies the Mixture Grade Tables

by eliminating the germination standards and could potentially reduce the number of purity standards.

### **Summary:**

There was general consensus that the current mixture tables are complex and need to be simplified. In addition, there was general consensus that the purity standards in the Mixture Grade Tables need to be tightened which led to a discussion around Option 3 and the elimination of Option 4. There was unanimous consent that purity standards remain in the Mixtures Grade Tables and adjust them as needed but do not retain germination standards. Components must be tested and meet their individual table's standards (purity and germination) prior to mixing.

There were questions as to whether the Cereal Mixture Grade Table was still relevant. There was general consensus that this table could be eliminated, however, participants suggested CFIA investigate further regarding whether Cereals Mixtures are still sold in some areas of the country (e.g., Ontario and Quebec). If a decision is made to keep Grade Table III, there was general consensus that the requirement for only one variety per kind or species should be eliminated.

## **Recommendations**

- 1. Purity standards should remain in the Mixtures Grade Tables and be tightened as needed.**
- 2. Germination standards for Mixtures should be eliminated from the Mixtures Grade Tables.**
- 3. A new requirement for the components of Mixtures to be tested and meet their individual table's standards (purity and germination) prior to mixing should be put in place.**
- 4. No. 2 purity standards should be raised to be the same as No. 1 purity standards as per the previous recommendation (Topic # 3: Aligning Standards).**
- 5. No. 2 Common/Canada grade name should be eliminated as per the previous recommendation (Topic #1: Higher Standards).**
- 6. The requirement for percentages of labelled components to be verified by the lab should be retained (no change to existing requirement).**
- 7. CFIA should explore eliminating Grade Table III (Cereal Mixtures).**
- 8. If the Cereal Mixture Table is retained, the requirement for only one variety per kind or species should be eliminated.**
- 9. Seed Testing Task Team should review the Mixtures Tables also to input advice into tightening the purity standards of these Tables.**

## **Topic 7 - Varietal Blends**

One of the aspects that makes Grade Tables VIII – XII different from the rest of the Grade Tables is the inclusion of Varietal Blend grade names. In order for a seed lot to qualify for a Varietal Blend grade name, the seed of each component variety must be of pedigreed status. This is what differentiates seed with a Varietal Blend grade name from that with a Common grade name.

The Grade Table standards for Varietal Blend grade names are the same as those for a Canada Certified grade name in that Grade Table. However, seed is no longer considered to be of pedigreed status once the varieties have been blended. Varietal Blend grade names differentiate this type of seed lot from seed lots graded with Common No. 1 or No.2 grade names.

[Note that Plant Pest Tolerance Management (PPTM) Varietal Blends are a unique type of Varietal Blend not specifically intended to be included in the discussion. A PPTM Varietal Blend is a Varietal Blend for plant pest tolerance management that is intended to maintain the efficacy of a plant pest tolerance characteristic. A PPTM Varietal Blend of kinds or species set out in any of Tables I to II.1 and IV to VII of Schedule I can be graded with a Canada pedigreed grade name (i.e., wheat midge tolerant Varietal Blends, corn pest tolerant Varietal Blends).

Is there value in retaining the Varietal Blend grade names in Tables VIII- XII? On occasion, CFIA receives questions on Varietal Blends (non PPTM) for crop kinds such as soybeans (Table V). Should consideration be given to adding Varietal Blend grade names to other Grade Tables?

### **Options:**

#### **1. Remove the Varietal Blend grade names from Grade Tables VIII - XII**

The standards for the Varietal Blend grades are the same purity and germination standards as the standards for Canada Certified No. 1 and No. 2 grade names. Removing these grades would reduce the number of standards within Grade Tables VIII –XII.

#### **2. Status Quo – Keep the Varietal Blend grade names in Grade Tables VIII - XII.**

The Varietal Blend grade names differentiate this type of seed from non-pedigreed seed graded with Common No. 1 or No. 2 grade names. However, it can be confusing that the Varietal Blend grade names are non-pedigreed grade name despite all components being pedigreed seed and the standards being equivalent to those of Canada Certified No. 1 and No. 2 grade names

#### **3. Add the Varietal Blend grade names to other Grade Tables.**

This option would make all Grade Tables the same in terms of Varietal Blend grades and allow for new innovative varietal combinations within all crop kinds to be sold with Varietal



Blend grade names. However, it duplicates existing standards and does not simplify the Grade Tables.

**4. Option 1 plus explore options for all Grade Tables using existing Canada Certified grade names and labelling with “Varietal Blend” on the tag (i.e., Variety name section of tag)**

The number of grade names and standards within the Grade Tables would be reduced. The seed would still have to meet the higher standards associated with Canada Certified grade names and would be differentiated from non-pedigreed seed through labelling.

**Summary:**

There was general consensus from the group that the varietal blend grade names should be removed from Grade Tables VIII-XII. Task team members noted that the purity and germination standards for the Varietal Blend grade names are exactly the same as the Canada Certified No. 1 and No. 2 grade names. It was recognized that the intent was to differentiate this seed from other non-pedigreed seed graded with Common No.1 or No. 2 grade names, however, members felt that this could be done possibly through labelling.

There was discussion about whether there is interest in non-PPTM varietal blends for other crop kinds besides the ones listed in Grade Tables VIII –XII. Similar to PPTM varietal blends, Task Team members felt there was a possibility that existing Canada Certified grade names could be used. Based on this discussion, there was general consensus to have CFIA explore options on using the existing grade names for non-PPTM Varietal Blends and to include other information on the label to indicate it was a Varietal Blend.

## **Recommendations**

- 1. Remove the Varietal Blend grade names from the Grade Tables VIII – XII.**
- 2. CFIA should explore grading and labelling options for non-PPTM Varietal Blends using the existing Canada Certified grade names. (This recommendation to be forwarded to the Labelling Task Team)**
- 3. CFIA should conduct a survey on what types of non-PPTM Varietal Blends stakeholders are currently using and what blends they anticipate being used in the future.**
- 4. CFIA should explore allowing for the use of PPTM Varietal Blends for all crop kinds.**
- 5. Explore the possibility of having an official tag for Varietal Blends, possibly of a different colour but still compliant with AOSCA requirements. (This recommendation to be forwarded to the Labelling task team)**



## Appendix 1: Task Team and Advisory Group Members

Task Team Members	Sector Affiliation
Chair: Roy Klym	Seed Sector
Co-chair: Cam Goff	Producer Group
Marlon Coakley	Producer Group
Scott Sefton (Alternate: Wayne Thompson)	Producer Group
Lynn Jacobson	Producer Group
Bryan Avison	Commodity/Value Chain Association
Caroline Sekulic (Alternate: Don Shepert)	Commodity/Value Chain Association
Geoff Backman	Commodity/Value Chain Association
Danny Limoges	Seed sector
Mike McGorman	Seed sector
Giselle Ulrich	Seed sector
Shawn Fraser (Alternate: Laurie Hayes)	Seed sector
Garry Johnson	Non-government organization
Wilhelmina Drost	CFIA (technical advisor)
Gord Berg	CFIA (Lead)
Mélanie Desrocher	CFIA (Incorporation by Reference Presenter)

Advisory Group Members	Sector Affiliation
Sarah Foster	Seed sector
Gail Harris	Seed sector
Michelle Krawetz	Seed sector
Brigette Moore	Seed sector
Joanne Hinke	Retired CFIA
Peter Hoff	Seed sector
Monica Klaas	Seed sector
Ed Lefsrud	Seed sector
Jennifer Seward	Seed sector

## **Appendix 2: Reference Documents**

### **Seed Standards and Grade Tables Task Team Agendas**

April 16, 2021 Agenda	CFIA _ACIA # 14962063.v1
April 23, 2021 Agenda	CFIA _ACIA # 14996509.v1
April 30, 2021 Agenda	CFIA _ACIA # 15025966.v1
May 14, 2021 Agenda	CFIA _ACIA # 15071284.v1
May 28, 2021 Agenda	CFIA _ACIA # 15112522.v1
June 4, 2021 Agenda	CFIA _ACIA # 15154230.v1
June 11, 2021 Agenda	CFIA _ACIA # 15193592.v1
June 18, 2021, Agenda	CFIA _ACIA # 15220625.v1
June 25, 2021 Agenda	CFIA _ACIA # 15255870.v1
July 9, 2021 Agenda	CFIA _ACIA # 15302828.v1
July 16, 2021 Agenda	CFIA _ACIA # 15335971.v1
July 23, 2021 Agenda	CFIA _ACIA # 15362422.v1
July 30, 2021 Agenda	CFIA _ACIA # 15397890.v1

### **Seed Standards and Grade Tables Task Team Meeting Minutes**

April 16, 2021 Meeting Minutes	CFIA _ACIA # 14962063.v2
April 23, 2021 Meeting Minutes	CFIA _ACIA # 15022144.v2
April 30, 2021 Meeting Minutes	CFIA _ACIA # 15048543.v2
May 14, 2021 Meeting Minutes	CFIA _ACIA # 15102200.v2
May 28, 2021 Meeting Minutes	CFIA _ACIA # 15147960.v2
June 4, 2021 Meeting Minutes	CFIA _ACIA # 15184084.v2
June 11, 2021 Meeting Minutes	CFIA _ACIA # 15227564.v2
June 18, 2021 Meeting Minutes	CFIA _ACIA # 15245660.v2
June 25, 2021 Meeting Minutes	CFIA _ACIA # 15282646.v2
July 9, 2021 Meeting Minutes	CFIA _ACIA # 15321151.v2
July 16, 2021 Meeting Minutes	CFIA _ACIA # 15350313.v2a
July 23, 2021 Meeting Minutes	CFIA _ACIA # 15382804.v2
July 30, 2021 Meeting Minutes	CFIA _ACIA # 15433365.v1

### **Seed Standards and Grade Tables Task Team Topic Outlines**

Topic 1 - Higher Standards	CFIA _ACIA # 15027104.v3
Topic 2 - Additional Quality Standards	CFIA _ACIA # 15070286.v2
Topic 3 - Aligning Standards	CFIA _ACIA # 15105381.v2
Topic 4 - Weed Seeds	CFIA _ACIA # 15122199.v2
Topic 5 - Incorporation by Reference	CFIA _ACIA # 15123329.v2
Topic 6 - Mixtures	CFIA _ACIA # 15291948.v3
Topic 7 - Varietal Blends	CFIA _ACIA # 15223811.v3

## Seed Standards and Grade Tables Task Team Options and Recommendations Reports

Topic 1 - Higher Standards	CFIA _ACIA # 15048462.v6
Topic 2 - Additional Quality Standards	CFIA _ACIA # 15099376.v4
Topic 3 - Aligning Standards	CFIA _ACIA # 15147820.v5
Topic 4 - Weed Seeds	CFIA _ACIA # 15184010.v4
Topic 5 - Incorporation by Reference	CFIA _ACIA # 15247263.v7
Topic 6 - Mixtures	CFIA _ACIA # 15322124.v4
Topic 7 - Varietal Blends	CFIA _ACIA # 15351713.v4

## Other Support Documents

Grade Tables and Seed Standards Background Paper	CFIA _ACIA # 12645647.v11
Schedule 1 Grade Tables PDF	CFIA _ACIA # 14886822.v1
Canadas Seed Regulatory Framework	CFIA _ACIA # 14651502.v2a
Trends and Forces Impacting the Future of the Seed Industry	CFIA _ACIA # 14651503.v1
Seed Regulatory Modernization Executive Summary	CFIA _ACIA # 14651505.v2a
Seed Regulatory Modernization Task Teams Presentation	CFIA _ACIA # 14969549.v1
Seed Standards Task Team Workplan	CFIA _ACIA # 15025137.v2
Alternative Service Delivery Primer	CFIA _ACIA # 14569730.v6
Future Trends Primer	CFIA _ACIA # 14587170.v3
International Obligations Primer	CFIA _ACIA # 14573807.v6
Role of Government vs Industry Primer	CFIA _ACIA # 14570778.v5
Linkages and Unintended Consequences Primer	CFIA _ACIA # 14606737.v4
Needs Assessment Survey Results	CFIA _ACIA # 15027083.v1
Incorporation by Reference Presentation	CFIA _ACIA # 15210934.v2

## CFIA IBR Policy

<https://inspection.canada.ca/about-cfia/acts-and-regulations/incorporation-by-reference/cfia-incorporation-by-reference-policy/eng/1450356693608/1450356805085#a6>

## CFIA IBR Main Page

<https://inspection.canada.ca/about-cfia/acts-and-regulations/incorporation-by-reference/eng/1455803658710/1455804365767>

## Cabinet Directive on Regulations

<https://www.canada.ca/en/government/system/laws/developing-improving-federal-regulations/requirements-developing-managing-reviewing-regulations/guidelines-tools/cabinet-directive-regulation.html>

## Policy on Regulatory Development

<https://www.canada.ca/en/government/system/laws/developing-improving-federal-regulations/requirements-developing-managing-reviewing-regulations/guidelines-tools/policy-regulatory-development.html>

**CFIA Inventory of IBR**

<https://inspection.canada.ca/about-cfia/acts-and-regulations/list-of-acts-and-regulations/documents-incorporated-by-reference/eng/1518625951131/1518625952071>

**Guidelines for IBR Standards (Standards Council of Canada (SCC))**

<https://www.scc.ca/en/about-scc/publications/documents-de-politique/guidelines-for-incorporating-standards-reference-regulations-support-public-policy-objectives>