

# Let's Talk SRM!

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# **Strong Foundation. Bright Future.**

We're Building an <u>Even Better</u> Seed Certification System Through the Seed Regulatory Modernization Process



# Who We Are

CSGA is Canada's national seed crop certification authority and Canada's largest seed organization representing over 3,000 seed growers across 2,500 seed growing businesses across 8 provinces.

Through a **100+ year partnership with government** we are a respected, sciencebased, global leader in **seed crop certification**, supporting **innovation**, **new technologies**, and the **growth** of the Canadian seed sector.

# What We Do

We set seed crop standards and certify seed crops with the guidance of strong grassroots representation from a board of seed grower directors, our provincial branches and government advisors, seed sector experts and our open and transparent public consultations.

+2,000

**Different Varieties** 

70

Different Crop Kinds +1.24

Million Acres

# Why We Do it

For the Benefit of All Canadians! 9 of 10 bites of food begin with seed, so seed quality & innovative varieties are essential to a sustainable and thriving agriculture and agri-food sector.

We are proud to partner with government for the greater good of Canadians 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.

# **CSGA's Foundation**

Our foundation is **public trust**. You can't buy it. It's earned.

In the field: Seed growers have earned the public trust with their dedication to producing the seed that farmers and consumers rely upon.

**In government:** We have been a dependable regulatory partner for over 100 years, developing traceable and transparent systems with decision-making coming from the ground up.

**Internationally:** We are international leaders with a strong presence at OECD and AOSCA to ensure harmonization and lead innovations like digitization and standards development.

Together, we're driving progress and creating a brighter future for Canada's seed and agri-food sectors and Canadian agriculture.

# **CSGA's Vision**

What does a successful future for Canada's seed sector look like?



Innovative + Inclusive: Sector-led and government-enabled to prioritize stakeholders & reduce the gap between the sector's needs and execution.



**Efficient + Sustainable:** A digital end-to-end single window for a costeffective and agile certification process for all stakeholders that encourages innovation.



**Trusted + Transparent:** Transparent by default in both certification and consultation by upholding Variety Registration and broader engagement with Multi-Stakeholder Advisory Committee.

# **CSGA's Plan**

We've built a strong foundation, and together we're creating a brighter future for Canada's seed sector and Canadian agriculture.





Variety Eligibility and The Appropriate Role of Government



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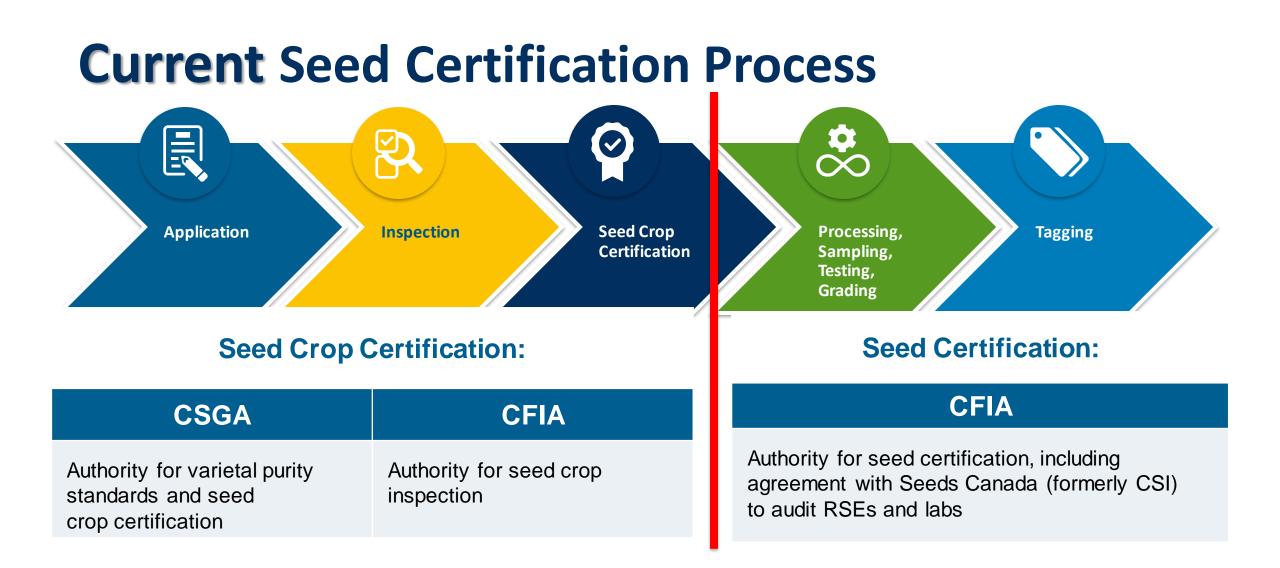
**Governance and Partnerships** 

# **1.** Main Administrator

The future of our seed sector is an industry-led, government-enabled seed certification system with **CSGA** as the **main administrator** through a digital single window - managing all **seed certification functions on behalf of government.**  Establish CSGA as the **main point of contact** for industry and government **for seed certification**:

- Eliminating regulatory & administrative disconnect
- ✓ Removing information gaps
- Creating streamlined, agile processes
- Reinforcing continuous improvement & technology adoption
- ✓ Prioritizing user experience
- Maintaining quality, trust & genetic identity assurance
- Retaining government oversight









#### The CFIA would be the ultimate authority and oversight of seed certification

#### **CSGA** would:

Retain authority for varietal purity standards and seed crop certification

Have expanded authority for seed crop inspection and seed certification Continue agreement with Seeds Canada to audit RSEs and labs

## **Additional Responsibility**

The CFIA needs to remain the overall regulatory authority for seed and seed certification in Canada.

CSGA could provide the CFIA with the tools required to effectively and efficiently oversee Canada's seed certification system. These additional responsibilities could include:

- Providing a seed certification platform to administer and oversee domestic and OECD certification of seed
- Providing the main point of contact for all questions on seed certification operations
- Administering official labels, including licences to print
- Reviewing the results of variety verification testing, RSE and lab audits and providing the CFIA with corrective action recommendations



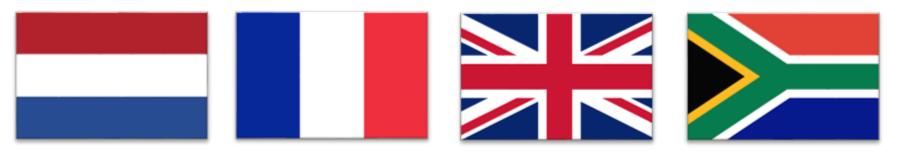
#### **International Precedent**

One point of contact for industry and government for seed certification is **standard practice** in mature seed sectors around the world.

No country in the world has competing seed certification bodies.

Countries that have delegated seed certification functions to a single industry body include:

- ✓ Netherlands (NAK)
- ✓ France (SEMAE)
- England (NIAB)
- ✓ South Africa (SANSOR)





# **2.** Digital Single Window

A future seed system with CSGA as the main administrator should be empowered to establish a Single-Window for seed certification services, expanding SeedCert to complete a digital-end-to-end certification system.

This would allow users to access information **in one place**.

A Digital Single Window would:

- ✓ Simplify processes & reduce burden/cost
- Expedite information flow and decision making
- Create a foundation for future value-added growth
- ✓ Data driven, risk management approaches to regulatory oversight
- Enhance traceability & risk mitigation measures for domestic/international buyers & regulators
- Continue to prioritize data security, privacy & transparency



#### **Proven Results**

As an organization, we embraced digitalization and have **seen transformational change**.

Our award-winning seed certification platform, SeedCert, is used by thousands of stakeholders.

It has streamlined our certification process from **3-4 weeks to just** hours.

# SeedCert \$1.5 - \$2.5M

Annual sector **cost & time savings** associated with adopting a **single window** and a variety profile platform



## Value Added Opportunities

CSGA continues its modernization efforts by conducting a research pilot to digitally-enhanced seed tags.

- ✓ Digitally-enhanced tags have improved security measures to help minimize fraud and increase the value and confidence in pedigreed seed.
- ✓ QR codes to bring users to a validation page to confirm the certification information for the seed.
- ✓ Facilitate the transfer of information between the seed seller and buyer.



#### **Government Benefits**

Expanding SeedCert would enhance transparency and efficiency for CFIA.



A digital single window would :

- Provide CFIA with the tools to oversee domestic and
   OECD seed certification
- Provide real-time transparency into all certification decisions made by CSGA
- ✓ Integrate with existing legacy systems to simplify end-users' experience
- Secure access to Seeds Canada (formerly CSI) auditors to audit Registered Seed Establishments and Seed Labs, enabling remote inspections and more targeted, datadriven risk assessments.



# **3. Variety Recognition**

Formal recognition of the identity of a variety is a prerequisite for seed certification.

Currently, varieties are recognized as unique and 'eligible for certification' through two main pathways, depending on the crop kind (species) and its use.

- CFIA's Variety Registration process for crop kinds 'subject to' registration listed in Schedule III of the Seed Regulations
  - Comprises over 95% of the acres in certification.
- 2. CSGA's Variety Certification Eligibility process (commonly referred to as Form 300) for crop kinds that are *'exempt from'* Variety Registration
  - This includes corn, hemp, and nonoilseed soybeans.



## Variety Certification Eligibility Listing

CSGA believes that the formal recognition of the identity of a variety should be done **by one authority.** 

We propose a new tier in Schedule III, known as the Variety Certification Eligibility Listing.

This would **NOT** re-introduce merit requirements.

A Variety Certification Eligibility Listing would:

- Closely align with the existing Form 300 process
- Retain government as responsible for recognizing the identity of a variety and its eligibility for certification
- ✓ Allow CSGA to be responsible for certifying the seed of those varieties



## **Role of Government**

While Form 300 has worked, the SRM process allows us to streamline two parallel systems.

The CFIA needs to be ultimately responsible for recognizing the unique identity and eligibility of varieties for certification. The current parallel system results in:

- Inefficiency
- Data silos
- Undue risk and liability onto CSGA
- Limited the CFIA science expertise and lab support for some crop kinds

If we keep Form 300, CSGA will continue to offer this service and seek clear authority from the government to determine eligibility for seed crop certification.

# **4.** Governance and Partnerships

Seed crop certification requirements are developed by the seed sector for the seed sector through CSGA's inclusive standards setting process. This efficient process includes:

- Regulatory Services Committee: Comprised of seed growers, seed company representatives, a seed analyst, an inspector, a plant breeder & government officials.
- **Eight Crop Specific Working Groups:** Comprised of independent, subject matter experts also encompass the entire value chain.
- CSGA's Public Consultation Process: Open to all stakeholders to ensure everyone can provide input – empowering the entire seed sector value chain and beyond.



## **Expanding Engagement**

Since October 2020, CSGA has been developing a plan to build on our inclusive and service-oriented approach and expand stakeholder consultation and engagement by creating a new **Multi-Stakeholder Advisory Committee** and increasing external representation.



#### **Multi-Stakeholder Advisory Committee**

A Multi-Stakeholder Advisory Committee is an efficient and effective way to ensure that future policies, operations, and standards developed by the CFIA, or other non-governmental organizations continue to be well-balanced and reflect the diverse perspectives of all stakeholders in the seed sector. This would :

- ✓ Provide collaboration on emerging, crosscutting, big-picture concepts
- Increase expertise, guidance, and input into policy and standards development
- ✓ Facilitate advice/recommendations to the seed sector and government
- ✓ Ensure key stakeholder groups are engaged
- ✓ Reduce nomination/selection bias and effort
- ✓ Support existing processes/organizations



## Limitations

The Multi-Stakeholder Advisory Committee **would NOT**:

- create governing power
- create a new organization
- require fiduciary responsibility
- be controlled by any one organization
- be a standard setting body

## **Examples of Success**

Advisory committees are important for efficient regulatory systems.

- Association of Official Seed Certifying Agencies (AOSCA) Advisory Committee
- Plant Breeders' Rights Committees (Canada, Australia)
- Seed Sector Review, National Forum on Seed, & Seed Sector Value Chain Round Table

AOSCA is an international seed standard setting body and has successfully leveraged an Advisory Committee model since the 1960s:

- Consists of industry, regulatory, services, and other organizations relevant to the purpose of AOSCA
- ✓ Recognized by By-laws and have the responsibility to review standard changes and provide guidance to AOSCA Board (2005)
- Board determines which groups/organizations are on the Committee
- ✓ Each group/organization selects their own representative



#### **Potential Composition**

#### A AOSCA Inspired

- ASCIS Association
- AAFC
- AOSCA & OECD Seed Schemes
- CFA
- Canada Grains Council
- CSGA
- CropLife Canada
- Seeds Canada
- Seed Change
- Plant Breeders
  - Public & Private

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#### SRM-WG Inspired

- Industry
  - ASCIS Association
  - CSGA
  - Seeds Canada
- Producer Groups
- Other
  - SeedChange
  - COTA
- Technical Advisory
  - CGC



#### Hybrid of Options A & B

## **External Appointments**

Increasing external representation on CSGA committees is another opportunity to improve transparency and ensure that more key stakeholders are engaged in seed certification.

It would also allow external organizations to provide nominations to CSGA on open or vacant external positions. To facilitate the process, CSGA would:

- Develop a skills matrix and specify desired experience
- Post Open/Vacant Positions on CSGA's website and engage with stakeholders to solicit nominations
- ✓ If multiple candidates, CSGA's Governance Committee would review
- ✓ Process could be tied to Memorandum of Understanding/Agreement



#### **Alternative Approaches**

If an advisory committee framework is not adopted through SRM, CSGA will continue to implement our Multi-Stakeholder Advisory Committee to help advise CSGA in its role as Canada's seed crop certification authority.



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3

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**2** Digital Single Window

4

**Governance & Partnerships**