

Fall 2023 Consultation: Forage and Turf Grasses and Legumes

Current status: Open

This consultation period opened on September 20, 2023, and will close on November 15, 2023.

About the Consultation

Focus of Consultation:

- Circular 6, Section 6 Forage and Turf Grasses and Section 7 Forage Legumes
- Isolation requirements and maximum impurity standards for mechanical purity
- Species which may readily cross-pollinate, and species with seeds considered difficult to distinguish from one another in a lab test

The purpose of this consultation is to obtain feedback from stakeholders on proposed revisions to the isolation requirements and maximum impurity standards for the mechanical purity of forage and turf seed crops for Foundation, Registered and Certified status. The revisions relate to the proximity of seed crops to adjacent crops of other kinds and the presence of plants of other crop kinds within the inspected crop as reported during seed crop inspection. It is a follow-up to the previous consultation on the same subjects conducted in the fall of 2022.

Background

Currently, the certification requirements for all classes of most forage and turf species includes a maximum impurity standard for other crop kinds where the seed of the other kinds are considered “difficult to separate” (DTS) from one another during seed conditioning. The in-crop maximum impurity standard relates to the number of plants which may be present in the field as observed during seed crop inspection. If a seed crop is not certified due to mechanical purity at the time of inspection, it prevents final certification of the seed even if the seed processor has been able to remove enough seeds of the other kind to meet the seed standard.

Where the other kind is considered DTS, a 3-meter isolation is also required between the adjacent crop and the inspected crop so that the other crop kind is not accidentally harvested with the seed crop. However, plants in ditches, fence lines, hay and pasture fields and treed areas surrounding pedigreed seed crops often lead to isolation corrections and re-inspections, which result in extra costs and the loss of valuable pedigreed seed.

The proposed changes address concerns that these crop kinds do not require isolation from other crop kinds, especially when the other kind is permitted within the seed crop. Also, seeds from plants of other crop kinds found during inspection can be removed during seed processing with modern seed-cleaning equipment. In addition, export markets for forage and turf species often do not have the same strict standards for the presence of other kinds in seed as in the Canadian seed standards.

Additional background information and initial recommendations from CSGA’s Regulatory Services Committee and the Forage and Turf Working Group can be found here in the [October 2022 consultation document](#).

Progress to Date - What We Heard

During the previous consultation, many stakeholders were in favour of no longer having maximum impurity standards for other crop kinds in forage and turf species. Other stakeholders supported having inspectors report other kinds by frequency as they do for weeds (e.g., trace, few, numerous) without it being part of the certification decision. Reporting by frequency would simply provide valuable information for the seed processor without preventing the certification of the seed crop.

However, we also heard that not all standards could or should be removed for various reasons. Which standards need to remain in place and the rationale for doing so is the subject of the current consultation. Although the consultation is about mechanical purity, CSGA's core function of maintaining varietal purity must be taken into consideration. Where cross-pollination is a potential between species, isolation requirements and maximum impurity standards must remain in place to maintain varietal purity. For that reason, the current isolation requirements already make references to species which can cross-pollinate. With the support of experts in this area, CSGA has undertaken a review of the species which may "readily" cross-pollinate, and the proposed standards clarify what those are.

International harmonization is another important factor to be taken into consideration. The Association of Official Seed Certifying Agencies' (AOSCA) Seed Certification Handbook includes specifications for "inseparable other crops" and "shall include crop plants, the seed of which cannot be thoroughly removed by the usual methods of conditioning". However, member agencies are not bound by the mechanical purity standards, and it is up to each agency to determine which crop kinds are considered "inseparable".

The Organisation for Economic Cooperation and Development (OECD) Seed Schemes have field standards for plants with seeds that are "difficult to distinguish in a lab test". However, it is left up to each participating country to determine which species are difficult to distinguish. For the purposes of this review, CSGA consulted experts in this area and referenced the *Canadian Methods and Procedures for Testing Seed (M&P)*, which identifies species with seeds that are difficult to distinguish in a lab test when found as a contaminant (section 3.8.1, Table 1). CSGA is recommending, for species that are considered difficult to distinguish in Canada, that an isolation adequate to maintain mechanical purity and a maximum impurity standard remain in place. It is more efficient and effective to achieve high seed standards by maintaining a field standard where it is difficult to determine the presence of other kinds during seed analysis.

Proposed Revisions

The proposed revisions seek to:

- **Categorize** as contaminants those crop kinds:
 - that will readily cross-pollinate (CP) with one another
 - where seeds of the contaminant are considered difficult-to-distinguish (DTD) in a lab test from seed of the inspected crop
 - where seeds of the contaminant are considered difficult-to-separate (DTS) from seed of the inspected crop
- **Where the contaminant may readily cross-pollinate** with the inspected crop (either CP or both CP and DTD):
 - require isolation adequate to preserve varietal purity (e.g., 50m for Certified status)
 - have a maximum impurity standard for varietal purity equivalent to the current standard (i.e., 3 plants/100m² for Foundation, 1 plant/10m² for Registered and Certified)
- **Where seeds of the contaminant are considered difficult-to-distinguish** in a lab test from the inspected crop, but the two crop kinds do not readily cross-pollinate with one another (DTD, but not CP)
 - require isolation adequate to maintain mechanical purity, and move from the current 3-meter requirement to a 2-meter requirement like Section 2 and 3 crop kinds (e.g., wheat, soybeans)

- have maximum impurity standards for mechanical purity equivalent to the current standard (i.e., 3 plants/100m² for Foundation, 1 plant/10m² for Registered and Certified)
- **Where seeds of the contaminant are considered difficult to separate** from seeds of the inspected crop, but the seeds are not considered difficult to distinguish from one another in a lab test, and the two crop kinds do not readily cross-pollinate with one another (DTS only, not CP or DTD)
 - do not require isolation from the contaminant
 - report the contaminant by frequency for the information of the seed processor without it being part of the certification decision

The proposed certification requirements for Section 6 and 7 crops, with the revisions highlighted, can be found [here](#).

The proposed consequential changes to the “Other crop kinds to be reported” table for seed crop inspection can be found [here](#).

Impact Assessment Statement

The proposed certification requirements harmonize CSGA’s requirements with those of AOSCA and the OECD Seed Schemes, which facilitates international trade. The revisions will decrease the “regulatory burden” of the current mechanical purity requirements and encourage the production and sale of pedigreed seed of forage and turf species, which will also have a positive impact on sustainability. It will make it easier for seed growers to manage production of their seed crops and for seed companies to export pedigreed seed. It also provides seed growers and processors with the information necessary and the opportunity to utilize modern seed cleaning equipment and technologies as another means to meet pedigreed seed standards. Seed crop inspectors will be able to complete crop inspection more efficiently, and it may simplify inspector training.

Who is the focus of this consultation?

This consultation will be of interest to CSGA members and seed sector stakeholders, especially those working with forage and turf species, including:

- seed growers
- crop certificate assignees and seed companies contracting pedigreed seed production
- registered seed establishments (RSEs) that process pedigreed forage and turf seed
- plant breeders
- seed analysts
- authorized seed crop inspection services (ASCIS) and licensed seed crop inspectors (LSCI)
- agriculture organizations, including forage and forage seed, councils, associations, and commissions

All comments are welcome from the Canadian agriculture sector, including industry, government, or other organizations or individuals.

How to participate

The CSGA is seeking feedback on the proposed revisions to the forage and turf grass and legume certification requirements in Sections 6 and 7 of the *Canadian Regulations and Procedures for Pedigreed Seed Crop Production* regarding mechanical purity. The proposed revisions are specifically about

- a. maintaining appropriate isolation and maximum impurity standards for other crop kinds that can cross-pollinate with the inspected crop or where the seeds of the other kind are difficult to distinguish from seeds of the inspected crop kind in a lab test; and

- b. no longer requiring isolation from or have a maximum impurity standard for those kinds with seeds that may be difficult to separate from seeds of the inspected crop, but the seeds are not considered difficult to distinguish from one another in a lab test, and the two crop kinds do not readily cross-pollinate.

Stakeholders are encouraged to share comments if there are:

- Concerns with the approach, i.e., maintaining standards for crop kinds that cross-pollinate or are difficult to distinguish
- Concerns with moving away from standards for crop kinds that may only be difficult to separate
- Concerns with specific individual standards for a particular crop kind

Consultation Activities

CSGA will be informing stakeholders about the consultation through this webpage and a series of announcements in CSGA's newsletter Seed Scoop and will provide opportunities for feedback. Key stakeholders will also receive direct targeted emails. Upon request, Policy and Standards staff will meet one-on-one with forage and turf companies who contract pedigreed seed production. If there is sufficient interest, CSGA will host a webinar for interested parties.

Comments can be sent by [email](#) to the Policy and Standards team. Please use the words "Forage and turf grass and legume consultation" in the subject line of the email. The CSGA is asking for comments and feedback by November 15, 2023.

Next Steps

The CSGA will review all comments received and provide a report to the Regulatory Services Committee, which will make a final recommendation to the Board of Directors regarding the proposed revisions. If no significant scientifically valid concerns are raised, the revised certification requirements will be included in the next version of the *Canadian Regulations and Procedures for Pedigreed Seed Crop Production* (Circular 6) posted to CSGA's website by March 1, 2024. If sufficient valid concerns are raised, the Board of Directors or the Regulatory Services Committee may request further review by the Forage and Turf Working Group.

Related information

- [Canadian Regulations and Procedures for Pedigreed Seed Crop Production](#)
- [Schedule I](#) (Grade Tables) to the [Seeds Regulations](#)
- *Canadian Methods and Procedures for Testing Seed* (available upon request from the CFIA)
- CFIA Seed Program
 - [Specific work instructions \(SWI 142.1.1\): Pedigreed seed crop inspection](#)
 - [Appendix VI Other crop kinds to report in counts](#)
 - [Specific work instructions \(SWI 142.1.2-5\): Forages and grasses seed crop inspection procedures](#)

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