

QUESTIONS AND ANSWERS FROM THE MAY ASCIS WEBINARS

Authorized Seed Crop Inspection Services (ASCIS) and Licensed Seed Crop Inspectors (LSCI)

- Q1. What kind of information/assistance will be available in the guidance document for Quality Management System (QMS) manuals?**
- A1.** The CFIA document titled "Seed Program Quality Systems Procedures 142.2 - Authorized Seed Crop Inspection" (QSP 142.2) was sent out in early June and contains a set of criteria that the QMS manual must meet, such as the documents and procedures it must conform to, guidelines and retention times for record-keeping, and identification of key personnel and their responsibilities. QSP 142.2 also contains an example of an ASCIS QMS manual that ASCIS may use as a reference when developing their own.
- Q2. What is the role of a lead inspector?**
- A2.** A lead inspector is responsible for:
- being the main liaison between the LSCI and CFIA/CSGA.
 - scheduling seed crop inspections by LSCI such that the crops are inspected within the time frame defined by the SWI for the crop type;
 - being responsive to scheduling requests from growers and/or the CSGA when scheduling seed crop inspections;
 - notifying the LSCI, in an appropriate time frame, based on information provided by the seed grower, of the pest control product spray schedule of fields to be inspected by the LSCI.
- The lead inspector functions and the quality manager functions may be performed by the same person.
- Q3. My LSCI was unable make the classroom training dates in our region. Will other training dates be offered?**
- A3.** Any individuals who were unable to attend a training session and have submitted an application for a Licensed Seed Crop Inspector Licence, will be notified of any additional sessions that are held in 2014.
- Q4. My ASCIS is not located near some of the seed crop fields in my region. Is my ASCIS obliged to offer service to these seed growers?**
- A4.** Yes, by agreeing to become an ASCIS you are agreeing to provide an offer of service for all cereal and pulse growers in your region (up until the minimum number of inspections has been achieved). Ideally an ASCIS would have LSCI located across the region so that they are able to provide service without too much difficulty. ASCIS are able to charge for travel.

- Q5. I noticed some of my LSCI's names were not on the distributed list. Why is that?**
- A5.** The CFIA only circulated the names of LSCI who actively gave their consent to share their information by checking the box on their application form. Once applicants become licensed, their information can be made public but prior to that they have to actively give the CFIA permission.
- Q6. If I wish to change the regions in which my ASCIS operates, how and when can I do that?**
- A6.** The CFIA would request that you make any changes ASAP. Changes for the 2014 inspection season will not be accepted after December 31, 2013. In the following years, ASCIS may enter or exit a region on an annual basis, by Dec 31 of each year.
- Q7. Can an ASCIS solicit business from growers before they are fully licensed at the end of 2013?**
- A7.** A potential ASCIS needs to be licensed by the CFIA before they can submit seed crop inspection reports to the CSGA. Whether the ASCIS solicits clients before they are licensed is a business decision that is up to the ASCIS.
- Q8. When will ASCIS' names and information be made public to seed producers?**
- A8.** A list of all ASCIS licensed for 2014 will be made public at the time of licensing (after December 31st, 2013). Prior to that, the list of candidate ASCIS who have submitted their QMS manual may be made public in the fall of 2013.
- Q9. If an ASCIS hires a CFIA Intermediate inspector who is currently inspecting crop types other than section 2 and 3 crop types (such as forages, canola, special crops), how will this affect the 'minimum' assigned to this ASCIS?**
- A9.** The minimums are calculated on Circular 6 sections 2 and 3 crop types. Inspections of crops other than Circular 6 sections 2 and 3 crop types, completed by LSCI who are licensed for additional crop types, will not be counted towards the minimums in 2014.
- Q10. What type of insurance do I need to be an ASCIS?**
- A10.** The ASCIS is responsible for deciding the level of insurance coverage that is necessary to fulfill its obligations under its licence. Compliance with the insurance requirements does not release the licensee from or reduce its liability under the licence.
- Q11. Can LSCI work for more than one ASCIS?**
- A11.** The CFIA has no restrictions on LSCI having a working relationship with multiple ASCIS or LSCI working in multiple regions. However, individual ASCIS may have requirements that would limit LSCI from working for multiple ASCIS.

Alternative Service Delivery Model

Q12. Why are the minimums based on the number of inspections instead of the number of acres?

A12. The minimums are based on the number of inspections because they are designed to ensure that every grower gets an offer of service for each field they need inspected. We recognize that some fields are much larger than others. It is the CFIA's experience that while larger fields take longer to inspect due to the long distances walked, the number of counts is the same as smaller fields so the extra time it takes is not proportionate to the increase in acres. The number of fields that can be inspected in a day is also dependent on how far the inspector has to travel to get to the field and if there are other fields located in the same area that can be inspected on the same day.

Q13. Will the CFIA be giving guidance on what the price for seed crop inspection will be?

A13. No, the price for seed crop inspection will be arranged between the grower and the ASCIS.

Q14. How long will the model be limited to third party delivery?

A14. The model will be reviewed regularly and may or may not be open to second party inspections.

Q15. How long will the transition period be?

A15. There is no defined transition period. The model will be reviewed regularly and updates can be made where necessary.

Q16. What levels of seed status are being inspected by an ASCIS in 2014?

A16. The roll out of alternative service delivery (ASD) of seed crop inspection for 2014 (and training for seed crop inspectors for 2013) will focus on Foundation, Registered and Certified status seed crops of cereals and pulses, representing approximately 80% of the pedigreed seed crop area in Canada. Limiting the roll-out to these crops should help manage the large quantity of training for LSCI and will allow them to gain experience with crop inspection and reporting before inspecting more difficult crops. The CFIA will offer training for forages, minor crops and plots (Select, Foundation and Probation) in subsequent years. While LSCI will not be trained on crop types other than cereals and pulses in 2013, it will be possible for former CFIA seasonal inspectors (who become licensed) to inspect all crops for which they are eligible to be licensed for in 2014.

Q17. Will ASCIS be able to inspect more than just cereals and pulses in 2015 and beyond?

A17. If ASCIS have LSCI who are licensed to inspect other crops, such as former CFIA seasonal inspectors, they can do so in 2014. It is expected that in subsequent years training will be offered for crops other than cereals and pulses.

In 2014, only inspections of cereal and pulse crops will count towards an ASCIS' minimum.

Q18. Can you clarify the definition of Third Party and Arm's length? Who will check if an ASCIS is 'arm's length'?

A18. It is the responsibility of the ASCIS to seek legal counsel to determine if they can meet the requirement of the licence, including the requirement to be 'arms' length' from the seed grower, the variety developer or the assignee for the seed crop. CFIA is responsible for ASCIS oversight and LSCI check inspections and 'conflict of interest' will be reviewed as part of the oversight process.

Q19. Does an ASCIS need to be incorporated?

A19. An ASCIS must have the legal capacity to commit to the requirements of the licence. It may be in the best interest of the applicant to be incorporated.



Canadian Seed Growers' Association

Q20. Some applicants are concerned that they are not able to meet the CSGA's Code of Conduct for Licensed Seed Crop Inspectors (LSCI).

A20. Authorized Seed Crop Inspection Services (ASCIS) and their Licensed Seed Crop Inspectors (LSCI) are expected to prevent situations where real, apparent or perceived conflict of interests could occur. Every ASCIS is responsible for ensuring their inspectors avoid conflict of interest. Actual or legal conflict of interest provisions are incorporated in the CFIA licence agreements and are subject to their interpretation and enforcement. The CSGA Code of Conduct in the second information package should be considered to be best practices, the requirements are not mandatory.

Q21. Will the CSGA assign an ASCIS if the grower does not identify one?

A21. No. Growers are being reminded in all CSGA communications on ASD that they are now responsible for making crop inspection arrangements with an ASCIS and designating an ASCIS for each field being applied for inspection. If a grower does not indicate an inspection service for each field, a notification from CSGA will be sent to the grower. The fields without a designated inspection service for Circular 6, sections 2 and 3 seed crops of Foundation, Registered and Certified status, will not be processed until the grower confirms with CSGA the name of the inspection service.

Applications for inspection being made online by seed growers do not permit submission of the application until an inspection service has been designated. Growers are being reminded and encouraged to use the CSGA online application.

Q22. Will the software for electronic submission of reports be provided or will the ASCIS be required to purchase this? Will it be a one time or annual purchase?

A22. CSGA is providing a standardized inspection reporting software to be used by all inspection services. CSGA fees for this software include a \$1,000 software licence agreement fee that is required at start-up. An annual software licence renewal fee of 20% of the software investment (\$200 per software licence agreement) is also required for annual maintenance and up-dates.

Q23. What fees will be required by the ASCIS to CSGA, if any?

A23. CSGA fees can be broken down into two components: software licence fees and system access fees. The actual fees to an ASCIS will vary depending on the size of the ASCIS and the number of acres actually inspected.

The software component involves a start-up fee of approximately \$1,000 and requires an annual renewal for maintenance and up-dates of approximately \$200 (20% of each software licence agreement). Each software licence agreement provides for two concurrent users by an ASCIS so if an ASCIS is working in multiple regions and/or with more than one coordinating office, more than one software licence agreement may be needed by that ACSIS.

An ASCIS will also pay a CSGA Web Access fee based on the number of acres inspected. This access fee is expected to be 10 cents per acre for conventional crops and 20 cents per acre for hybrid crops. It will be assessed at the end of each inspection season.