

Variety Registration Working Group IV Summary Report



Winnipeg 25 April 2006



Following receipt from the Canadian Food Inspection Agency (CFIA) of a revised draft of its "Preliminary Proposal for Seed Regulatory Framework Modernization including adjustments to the Variety Registration System", the National Forum on Seed (NFS) convened a fourth meeting of the Variety Registration Working Group in Winnipeg on April 25, 2006. About 40 participants attended, including plant breeders, seed growers, seed distributors, crop producers, representatives of various industry associations and government regulatory officials.

The objective of the meeting was to discuss and advance the thinking on key elements of CFIA's proposal, including the risk-based contract registration option and the role of the proposed Crop Specific Consultative Groups (CSCGs).

CONTRACT REGISTRATION

CFIA Plant Production Division Director, Glyn Chancey, pointed out that although most policy points have now been fully considered, there are outstanding issues about how to strike the appropriate balance between risks and benefits in contract registration, attributing liability in cases of leakage, and capacity building requirements associated with an expanded contract registration system.

Laura Anderson, of the Canadian Grain Commission, made a short presentation about a risk assessment model that was developed to facilitate the assessment of a milling wheat variety with lower quality that was undistinguishable from other hard red spring wheat varieties, and therefore did not meet the criteria for unrestricted variety registration, but had an identified buyer. The Commission set up a committee to assess risk and recommend whether flexibility should be exercised to permit contracted production. The committee listed potential hazards and exposure considerations for wheat and used this information to assess the new milling wheat in comparison with a group of unregistered wheat varieties already in production and a hypothetical ethanol-quality wheat.

Participants queried the rigor of the numeric ratings used, validity of factor weightings, and the potential for exposure factors to change over time (e.g. quality variance, increased acreage, price premiums, unpurchased production). They also sought further information about the restrictions applied to ensure containment.

Sher Bushell-Viau made a presentation outlining CFIA's existing contract registration system and an approach that could be taken to develop a risk-based contract registration system including a generic risk assessment model and crop-specific risk assessment matrices. (See Appendix 1 for a summary of this presentation.)

In response to questions about the potential overlap between the proposed health and safety risk factor for contract registrations and the assessment required for plants with novel traits (PNTs), the CFIA stressed that there would be no overlap. It was clarified that the PNT safety assessments are scientific assessments regarding potential food, feed and environmental risks of PNTs. The contract registration assessment considers the market risks associated with health and safety factors independent of whether or not the variety is a PNT.

Officials also clarified that CSCGs could play a role in determining the weightings for various risk factors and that risks would have to be looked at globally—i.e. from the perspective of any or every party, not just the proponent and the crop sector directly involved.

Participants broke into smaller table groups to discuss the purpose and scope of contract registration and how the proposed new system should function, particularly the generic framework for risk assessment. (A compendium of observations and comments recorded in the table groups is contained in Appendix 2.)

Plenary discussion followed, with most participants expressing support for expanding and adapting the current Contract Registration system along the lines proposed. There was general support for having a generic risk assessment model and most agreed CSCGs should play a role in identifying likely hazard and exposure factors for their

crop kind and in determining the appropriate weighting of these factors.

There were different opinions regarding the potential scope of the proposed Risk-based Contract Registration System. Questions were raised about who would bear liability if contracted varieties leaked into the mainstream commodity production, handling, and processing stream. Some felt liability should be explicitly assigned to the developer/registrant, contracted growers and/or product buyer, while others said government was assuming at least part of the liability by regulating this production, and others pointed out that liability would ultimately be decided by the courts. Concerns were also expressed about some of the possible operational processes. The following sections summarize the main points of discussion and general conclusions.

Scope and Purpose:

- There was broad agreement that contract registration should not be a means to bypass or “get around” the merit-based variety registration system, but rather a way to recognize and deal with specific cases that do not fit well within that system. It was pointed out that a requirement for specific characteristics and/or specific end-users would control this potential abuse, as would costs associated with the required Quality Management System (QMS).
- At least two individuals voiced their opposition to expanding the current contract registration system because of potential damage to other producers whose crops might be impacted.
- However, the large majority of participants supported a wider application in order to foster innovation, meet market demands and allow producers and other members of the agri-food value chain to access new opportunities for profit. At the same time, a risk-based system would comprise measures to assess market risks if these new varieties were commingled with the mainstream commodity and to avoid or mitigate potential risk.
- It was generally felt that increased transparency and objectivity should be inherent in the proposed Risk-based Contract Registration System to enhance its

utility beyond the current niche market varieties, as well as increasing awareness and understanding throughout the value chain.

- There was no consensus on what the scope of the proposed system should be. Some liked the definition in the CFIA presentation—“Restricted registration of varieties that have value, but would not otherwise be suitable for unrestricted registration due to potential risks if commingled with the traditional commodity.” Others felt that “value” should be more specifically described by “potential for profit” or “specific characteristics”. There were suggestions that applicability might be best circumscribed by the existence of a specific end user and the possibility for identity preservation.
- Some participants would like to see upper and lower limits based on the extent of potential harm. Some said contract registration should only apply to crop kinds subject to merit-based assessment. Others thought it should be open to all field crops. Others suggested crop kinds exempt from variety registration might use contract registration on a voluntary basis to deal with potential harm and liability issues.

Implementation Considerations:

- Participants generally agreed on the need for a generic model to ensure sound and consistent risk assessments.
- Most agreed crop-specific guidelines and weighting of risk factors would also be required and that the proposed CSCGs should play a role in determining them.
- There was some dissent about including economic impact among the hazard factors to be assessed.
- There was consensus that Contract Registrations should be granted for a set period (perhaps three years) and be subject to periodic review to assess QMS compliance and whether there had been any significant changes in hazard and exposure factors.
- Transparency of the process was considered very important, though some limits might be needed to restrict access to confidential business information.

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- Some said anyone who may be exposed to risk should have the ability to intervene in the contract registration process, including appealing decisions.
- It was agreed the extent and nature of containment measures and monitoring requirements should vary depending on risk factors. Concerns were expressed about both ends of the spectrum—i.e. QMS requirements not set so high as to be an administrative burden at the low end and very strict limits and assignment of liability (or refusal of contract registration approval) to be required where risks were assessed as high.
- There was general support for having some kind of contract registration committee to assess and provide advice to CFIA on the control, mitigation and monitoring measures proposed by applicants.

Concern was expressed that more time was needed to consider and discuss the options put forward in the CFIA presentation. Glyn Chancey noted that the VRWG meeting would not be the last opportunity to comment on these topics and that CFIA was putting forward possible approaches to stimulate discussion and further the thinking about implementation aspects of the Preliminary Proposal.

CROP SPECIFIC CONSULTATIVE GROUPS

Glyn Chancey reviewed how the concept of Crop Specific Consultative Groups had evolved and explained that the Canadian Food Inspection Agency was considering and working out how these groups might operate.

Because of efforts already underway, the canola and corn sectors may be well positioned for early creation of CSCGs. Representatives of these two commodities were invited to share with VRWG participants their thoughts on how the CSCG concept might apply in the corn and canola sectors.

John Cowan, of Hyland Seeds, explained that corn was exempted from the variety registration system about nine years ago after the corn industry asked for this change because they perceived the system was putting them at a disadvantage relative to U.S. producers. All seed corn sold in Canada is certified seed and sold by variety name. He confirmed corn

sector interest in the proposed Consultative Framework and reported on a meeting held in March where principles and structure for a Corn Consultative Group were discussed. Such a group would have a national focus and be open and inclusive of the complete value chain. Proposed membership would include 3 corn producers (from Ontario, Quebec and Manitoba, representing the corn producer association of their respective province), 4 seed developers and distributors (3 private sector and 1 public sector), 1 seed grower, 3-4 post-farm-gate handlers and processors, 1 member-at-large (a corn extension specialist) and 1 ex-officio government regulator (CFIA technical expert). The industry would like CFIA to formally recognize the proposed committee. In the meantime, the industry plans to develop a list of all corn hybrids currently sold in Canada. The meeting also generated a list of issues; most were non-regulatory. CFIA officials had attended the March meeting and expressed appreciation for the efforts taken and the value of this meeting in identifying existing priorities for the corn industry.

JoAnne Buth, of the Canola Council of Canada, reported that the Council had discussed the proposed Crop Specific Consultative Groups at its March Board meeting. She explained that the Canola Council was a non-profit organization funded by a voluntary industry levy. Its membership covers the entire canola value chain and its Board of Directors includes 4 growers (representation for each of the major producing provinces and the national grower association), 4 crushers and processors, 3 exporters, a biodiesel representative and 3 plant developers and agri-chemical members. The Board considered whether the WCCRRC (Western Recommending Committee for canola varieties) could fill the CSCG role, but concluded it was constituted to play a more specific, technical role and that the CSCG role would be better played at the level of the Council itself, possibly by striking an ad hoc committee for this purpose. The notion of inclusivity was endorsed and the group could hold open consultations including other interested parties. The Board also discussed the "tier placement" issue, concluding that this has been extensively discussed over the past seven years and there is no value in a fresh review/debate at this time. There would be interest in having the committee/CSCG discuss contract registration issues.

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Sher Bushell-Viau made a presentation on various aspects of a possible creation and recognition process and operating guidelines for Crop Specific Consultative Groups.

(Summarized in Appendix 3.) Participants were asked what they liked about the proposed approaches and invited to express concerns and offer other suggestions. The following sections highlight the main points that were raised.

Positive Aspects:

- Proposed coordination role for the National Forum on Seed.
- Opportunity for crop value chain to address specific regulatory issues.
- Shows regulatory flexibility—it's up to the crop sector if they want change; if there are no issues, can keep status quo and would not need to create a new group..
- Chance to increase understanding of seed regulatory issues, share information and promote dialogue among stakeholders and regulators.
- Existing committees can be used or form basis for CSCGs.
- Greater potential for building consensus.

Concerns/Suggestions:

- Questions were raised about how CSCGs would be funded. It was recognized that some groups, particularly producers, have less capacity to fund their own participation and if this imbalance is not addressed, it could skew the process.
- Concern was expressed that the CSCG consultative process should remain focused on regulatory issues and barriers and not cross into political policy-making areas.
- Public/consumer interest may be hard to build into CSCGs.
- Many concerns were expressed about having NFS grant official CSCG status. Most participants seemed to concur that the CSCGs should report directly to CFIA with NFS helping develop operating guidelines and advising/assisting with start-up, but then playing only a coordination and communications role.
- CSCGs should not become a bureaucratic layer impeding the timeliness of variety registration, but

rather add value and efficiency to the process by developing consensus where changes are warranted. It was noted that CSCGs might also identify non-regulatory options to resolve crop specific issues.

- NFS might help leverage existing organizations to bring a "critical mass" to the table to create a CSCG.
- It may be important to have regular turnover of individuals participating in CSCGs to spread out the experience and give opportunities for others to participate.

NEXT STEPS

- Meeting report will be prepared and circulated to participants for feedback, then forwarded to National Forum on Seed.
- CFIA's Seed Regulatory Framework Modernization Proposal is expected to be released for public consultation in May. Groups and individuals will have an opportunity to make further comments on the proposal over the coming months.

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APPENDIX 1

GENERIC RISK ASSESSMENT MODEL

(The following notes summarize CFIA's presentation regarding an approach for implementation of a risk-based Contract Registration system, including a Generic Risk Assessment Model. The presentation put forward possible options in order to stimulate Working Group discussion and further the thinking about how the proposed Contract Registration system might operate. The approaches presented do not represent an official CFIA proposal on these points.)

Current Contract Registration System:

- Developed for niche market varieties which may pose significant adverse effects if commingled with the traditional commodity.
- Recommending Committees involved in defining what constitutes harm, reviewing quality management system (QMS) and data, and recommending varieties for contract registration..
- Applicant describes potential for significant adverse effects, develops QMS, requests Recommending Committee support and submits application for contract registration to CFIA.
- CFIA reviews application for varietal distinctness, uniformity and stability and whether proposed QMS meets principles for closed-loop system and mitigates potential for harm due to leakage. QMS is shared with other government agencies (such as Canadian Grain Commission), as appropriate, to determine acceptability.
- Contract registration may be granted, subject to terms and conditions stipulated by CFIA and applicant may request review of registration decision, if dissatisfied.
- CFIA audits contract registered varieties to ensure compliance with terms and conditions and issues corrective action requests for non-compliance.

Proposed Risk-Based System:

- For restricted registration of varieties that have value, but would not be suitable for unrestricted variety registration due to potential market risks if commingled with the traditional commodity.

- Relevant crop experts (Crop Specific Consultative Groups) would use a generic model to develop a crop-specific risk assessment matrix which would guide applicants in the identification, assessment and management of the market risks associated with potential hazards and exposures for a given variety.
- Applicants would submit applications directly to CFIA, enclosing the completed risk assessment matrix, a proposed QMS and a Recommending Committee statement indicating whether the variety has merit and could pose potential adverse effects to the traditional commodity market if granted unrestricted variety registration.
- CFIA would review the application as it does currently, consulting other government departments, agencies and experts as appropriate. If contract registration is granted, CFIA would stipulate necessary terms and conditions as part of the registration.
- Applicants could request a review of the registration decision, including stipulated terms and conditions, if dissatisfied.
- Registrants would undergo regular third party audits by an accredited body, with corrective action requests being shared with CFIA as well as the registrant.
- All contract registrations would require periodic review, with renewal being dependent on a satisfactory history of compliance.

Generic Risk Assessment Model:

- Articulates the general risk assessment principles and ensures science-based approach to market risk assessments in the context of contract registration so that there will be a consistent approach across all crop kinds to identify and appropriately manage risks.
- Based on the equation: Risk = potential (Hazard x Exposure). Hazard refers to risks associated with the candidate variety relative to varieties with unrestricted registrations. Exposure would include potential risks associated with likelihood of natural spread, volume and geographic distribution of expected production, and potential pathways or points where leakage into the traditional commodity production and marketing system might occur.

- A common rating scale would be applied to allow different products and situations to be compared objectively. Ratings would be attributed to each risk factor, both hazards and exposures, ranging from 0 for negligible risk to 1 for low, 2 for medium and 3 for high. A rating guide describing how to apply the ratings would need to be established by the CSCG to ensure consistent application.
- A weighting system may also be developed to reflect the relative importance of various hazard and exposure factors. Ratings for each risk would be multiplied by the weighting factor and then ratings would be added up separately for all applicable hazards and all exposures.
- Contract registration decisions, terms and conditions and monitoring requirements would be reflective of the hazard and exposure values—e.g. low exposure values might imply fewer monitoring requirements. High hazard and exposure values might result in no contract registration, or one accompanied by stringent control measures and extensive monitoring.
- The following is an illustrative, but not exhaustive, listing of possible hazard and exposure factors:

Hazard Risk Factors

1. Health and Safety—human, livestock and/or environmental health and safety risks associated with the variety. (Note that this risk factor assesses market risks that may be associated with health and safety concerns if commingling occurs and does not substitute for the food, feed or environmental safety assessment conducted for plants with novel traits.)
2. Quality Variance—risks associated with difference in the end-use quality characteristics of the variety relative to unrestricted registered varieties.
3. Disease Profile—risks associated with the susceptibility of a variety to significant diseases.
4. Economic Impact—potential for damage to domestic market and/or access to foreign markets and economic losses due to reduced yield, quality or marketability due to leakage.

Exposure Risk Factors

1. Natural Spread—risks associated with natural spread of the variety due to the biology of the crop (e.g. outcrossing, persistence, dormancy and volunteers).
2. Ease of Detection—availability of a reliable, quick and cost effective detection or variety identification test to monitor leakage.
3. Value/End-Use—economic incentives for leakage (e.g. premiums, discounts yield advantages or disadvantages).
4. Production—number of contracted growers, geographic dispersion and production practices.
5. Acreage—environmental exposure associated with acreage of the variety.
6. Supply Chain Pathways—potential pathways or points where leakage could occur in the supply, collection and processing chain.
7. Non-Conforming Product—handling, usage or disposal of any non-conforming product (e.g. downgraded product, screenings, etc.).
8. History and Experience—past compliance history and experience of registrant and people involved in closed-loop system with quality management type systems.

APPENDIX 2

TABLE GROUP DISCUSSIONS ON CONTRACT REGISTRATION

(The following notes summarize points raised during table group discussions and include individual comments and perspectives not necessarily endorsed by the Working Group as a whole.)

Purpose of Contract Registration

- To provide avenue for commercial introduction of varieties that have “value” but do not conform to the normal registration process or need to be kept in a separate stream to capture that added value.
- To permit flexibility, choice and incentive for innovation—producers should have opportunity to be compensated for participation in contract.
- To allow an end-user to access an innovative product within Canada.
- For varieties with specific characteristics demanded in the marketplace which may cause harm if they leak into mainstream commodity market channels or because they do not meet traditional merit requirements.
- To allow for innovation and meet market demands, but still protect overall commodity interests.

Scope of Contract Registration

- Applicable to crops subject to registration and there is potential for leakage out. (No unanimity on this point—see following bullet.)
- Having a specific end-user is a necessary qualifier; contract registration would apply to varieties for which there is demand but which do not meet the profile of mainstream varieties of that crop kind; should open the door to contract registration for crop kinds exempt from registration (perhaps for liability reasons).
- Should not be a mechanism to bypass PNT assessments nor a forum to look at impacts of

genetically modified crops and cannot be a replacement for RIONAP.

- Current policy has been geared to “niche” varieties. May be two categories in future—does it “control a product” or does its commercialization cause potential harm to the wider commodity.
- Applicable to crops subject to merit requirements for registration, with perhaps some flexibility to deal with listed crops not subject to merit assessment. Merit (disease and quality) must be given consideration, but proponent’s QMS and business plan may overcome or mitigate merit issues.
- Contract registration system should be able to handle varieties with varying risk levels. It should be broad enough to deal with new varieties that may have an adverse market impact if not dealt with under a closed-loop system. However, there should be consideration of having an upper limit for risk.
- Markets can regulate some of this without government, through identity preservation processes; low hazard, low exposure cases can be managed commercially. Should explore how Quebec and Ontario producers have managed without increased regulation.
- Field crops most likely to require contract registration; flowers and horticulture crops do not likely require this system. Recommend grains, oilseeds, pulses, potatoes and forages be included, including corn (encourages level playing field for all field crops—exemptions are confusing to this issue).

Implementation Considerations

- Agreement that CSCGs should develop risk assessment matrix as they would represent entire value chain. CSCGs should be able to accurately assess risk, relatively objectively, using “science”.
- One group raised concern about potential politicization of the process, noting it was okay to have a generic risk assessment model, but there would be a danger of politicization if that model was applied by the CSCGs.
- It was noted that the proposed system will allow assessment of market risk, but one group questioned the inclusion of economic impact as a hazard factor.

Another groups felt CFIA should assess hazard factors 1-3 (health and safety, quality variance, and disease profile), but that the CSCGs should determine the potential economic impacts.

- Concerns were expressed that weighting of certain factors might prevent significant innovation, while others were confident this would not pose a barrier.
- A key consideration is that this proposal would lead to a much more transparent system for the developer and the rest of the industry.
- The developer should make the determination of whether to apply for contract registration. Where Recommending Committees exist, they should have the ability to trigger contract registration consideration. Where no recommending committee exists, the CSCG could have the ability to trigger consideration under contract registration; a contract registration committee would be a subset of either the Recommending Committee or the CSCG.
- Contract Registrations should only be on interim basis to allow for review in cases where risk factors change; but the developer needs to have predictability as to the future of the variety. Onus would be on the developer to submit any revisions to the risk assessment (perhaps yearly, or could be more frequent for higher risk varieties). The CSCG could establish a reporting system.
- Contract registrations can be reviewed at regular intervals, but can't have a 1-year timeline—need 3 years as a minimum.
- Quality Control Systems should be proportional to risk. Caution: process can't be too burdensome for low risk varieties that the merit system can't handle.
- Transfer of liability is a key concern. For commercial agreements, value chain defines liability transfer. Identity preservation (IP) programs are completely different than "containment programs" because IP suggests a willingness to pay while contract registration leaves open the question of who pays.
- Another group commented that the nature of risk assessment will effectively assign liability and that CFIA would not be alone in assigning liability.
- One group debated an "American model" with private sector liability versus a Canadian model (CFIA liability)

or some hybrid between these two approaches, but could reach no consensus.

- For third party audits, have ISO/CSI auditors with some connection back to CFIA. Need to determine how many audits, what points, when to sample and cover this in QMS manual.
- How would adventitious presence be handled? Maybe considered in risk assessment.
- Regarding administrative costs, is there a public good which Canadian government should absorb (CFIA) or should applicant or marketing agents have to pay?
- Variety Registration Office should be involved in the Contract Registration committee process.

Would Generic Risk Assessment Model be Applicable to All Crops?

- Most said yes, but with different rationales and provisos, for example:
- It should be because this introduces some measure of objectivity into a subjective process.
- Yes, based on CSCG recommendations for crop-specific matrices.
- Yes, through use of CSCGs or Recommending Committees and a "sub-committee" dealing specifically with contract registration. Key is the existence of a contract registration committee for that crop kind to employ the risk assessment model and assess proposed risk mitigation processes.
- Certainly for crops subject to merit assessment; may need some flexibility for crops not subject to merit assessment.
- Should be applicable to all crops that require variety registration.
- Concern was expressed in one group that the generic risk assessment model was not necessarily going to be able to apply to all regions, noting that the east-west divide has already demonstrated differences in addressing this issue.
- At least one individual expressed objections to Contract Registration in general, noting that contract registered varieties are treated like unregistered varieties—e.g. in wheat, contract registered product is treated as "wheat of other class" when found in grading/testing process, the same as unregistered

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varieties even though contract registered wheat carries liability relative to unregistered varieties.

Suggested Improvements

- Introduction of a decision tree (tiered approach) depending on the characteristics of new variety (molecular, PNT, GMO, conventional).
- Introduce a process for ongoing evaluation of hazards and exposures and the weighting factors.
- There needs to be more of a sense of what the monitoring and auditing requirements will be so that it can be incorporated into relevant business plans.
- Remove "potential for damage to domestic market or international market access" under economic impact risk factors.
- Have less rigorous QMS requirements for low risk varieties.

APPENDIX 3

CROP SPECIFIC CONSULTATIVE GROUPS

(The following notes summarize CFIA's presentation regarding a possible approach for the creation and operation of Crop Specific Consultative Groups. This approach was put forward to stimulate Working Group discussion and does not represent an official CFIA proposal regarding Crop Specific Consultative Groups.)

Background:

- Effective stakeholder consultation is critical for predictable, transparent, responsive regulatory change.
- The newly formed National Forum on Seeds (NFS) is a stakeholder-led initiative that brings together members from across the agri-food value chain for discussions on seed regulatory issues. The NFS has proven to be an effective consultation mechanism for facilitating dialogue and information exchange among stakeholders and regulators.
- In June 2005, NFS's Variety Registration Working Group (VRWG) proposed establishing crop-specific working groups to determine and modify crop placement within a tiered variety registration system. This concept has evolved into Crop Specific Consultative Groups (CSCGs) that would facilitate crop-specific dialogue among stakeholders and government on seed-related issues, including, but not limited to, variety registration.
- As part of a coherent national seed regulatory policy framework, CSCGs need a well-defined relationship with other bodies, including the NFS.

Rationale:

- Stakeholders have expressed concerns about length of time required for regulatory and policy changes. Consultation mechanism key to a faster, efficient regulatory change process.
- Consultations to date have shown support for an analysis-based and consensus-driven consultative process that would facilitate a more responsive and

crop-kind sensitive management of the seed regulatory system.

- Predictability, transparency, inclusiveness and capacity for unique crop-specific solutions are seen as crucial elements.

Mandate:

- CSCG approach seeks to establish crop-specific groups that represent all components of the value chain.
- CSCGs would facilitate objective stakeholder and government information exchange and dialogue and enhance objective analysis of seed regulatory and policy challenges by identifying issues, assessing regulatory and non-regulatory options, and seeking consensus on the best option.

Relationship to National Forum on Seed:

- Although different crop sectors may require particular solutions to regulatory challenges, most seed issues are not unique to a single crop kind. There is a need to have cohesive and coherent dialogue across crop sectors. To create efficiencies, facilitate this wider dialogue and ensure a coordinated approach between CSCGs and the NFS, one approach would be to make CSCGs an integral component of a NFS-centered seed consultation framework.
- Government would recognize CSCGs as crop-specific component of the NFS, with official CSCG status being granted by the NFS.
- NFS would facilitate the establishment of CSCGs through its expertise in developing effective consultative processes and through its networks and communication instruments. CSCGs would send meeting reports and recommendations to appropriate government regulatory bodies as well as the NFS.

Official Status of CSCGs:

- Each CSCG would need to document its scope and purpose, membership criteria, organizational structure, timing and frequency of meetings and

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reports, and operating procedures demonstrating adherence to the principles of effective consultation.

Operating Guidelines:

- CSCGs would operate within the same guidelines as the NFS, which adheres to the following consultation principles:
 1. Openness—is open to and actively seeks out the views and opinions of the public, interested parties and stakeholders within the value chain for specific crop.
 2. Honesty and Forthrightness—no hidden agendas; outputs are objective and inspired by interests of sector and public.
 3. Inclusiveness—all interested parties, both industry stakeholders and public should have opportunity to participate and contribute to CSCG decision-making.
 4. Transparency—transparent approach to day-to-day business that is reasonable, predictable, documented, and easily understood; rationale for conclusions and identification of minority opinions.
 5. Accountability—members accept accountability for recommendations and advice they provide, as well as legitimacy of consultation process.

Structure/Membership/Operations:

- CSCGs would need to demonstrate that their processes were inclusive of all stakeholders within the value chain, as well as other interested parties.
- Participation should include entire value chain, be representative of regions where crop activities are located, and ensure relevant expertise present for topics being discussed.
- Meetings may be ad hoc, but at least once per year; would be open, announced, and coordinated with NFS; could be held in conjunction with other meetings and use web-based technologies or other communications tools to maximize opportunities for input and minimize costs.
- Record-keeping such as meeting reports, correspondence and financial statements would be expected.

- An annual work plan would be developed in collaboration with the NFS.
- Technical working groups or task teams could be set up as required to undertake specific initiatives; these would be governed by the same operating guidelines and principles as the parent CSCG and the NFS.