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**CANADIAN SEED INSTITUTE**  
**GRADE TABLES WORKSHOP II**  
***"CONSIDERING THE OPTIONS"***

**MEETING REPORT**

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**MARCH 12, 2009**  
**OTTAWA, ONTARIO**

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## 1. WORKSHOP OVERVIEW

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On March 12, 2009, the Canadian Seed Institute (CSI) convened a working group meeting in Ottawa to discuss proposed options to improve Canada's seed grading system. There were 20 participants at this day-long workshop; participants included seed growers, seed analysts, representatives of the seed trade, officials of the Government of Quebec and of the Canadian Food Inspection Agency.

The workshop was a follow up to an October 30, 2008 session, attended by many of the same participants, which had scoped issues of concern related to the current seed grading system and identified possible options for change. Both workshops were funded, in large part, by the Advancing Canadian Agriculture and Agri-food Fund (ACAAF) of Agriculture and Agri-Food Canada. This support stems from an initiative by the CSTA, the CSGA and the CSI which has led to a series of policy and technical consultations under the umbrella of the National Forum on Seed (NFS).

Using the output from the October workshop, as well as ongoing stakeholder feedback, CFIA Seed Section drafted an Options Paper titled "Modernizing Canada's Seed Grading System". This paper, which put forward several proposals to improve the current seed grading system, was circulated prior to the March workshop. It served as the starting point and focus for much of the group's discussions.

The specific objectives of this workshop were:

1. To evaluate potential options for change with respect to
  - expression of standards in working sample weights, and
  - modernization of Canada's seed grading system.
2. To introduce the concept of maximum lot sizes.

CFIA officials made presentations to review and clarify the proposed options. Participants had frank and fulsome discussion around these proposals; in most cases, participants expressed general support but also suggested a number of additions or alternatives. This report summarizes the discussions that took place during the workshop.

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## 2. EXPRESSION OF STANDARDS

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**PRESENTATION: *Establishment of Seed Standards Based On Working Sample Weights* - Willy Drost, CFIA**

When sample weights and the expression of the purity standards had been discussed at the October 2008 workshop, all participants had agreed in principle that it was desirable to change the current system to express the standards in terms of the actual quantity of seed being analyzed in the lab.

At the current workshop, a proposal to amend the Canadian seed grading system by establishing seed purity standards based on working sample weights (WSWs) was presented by Willy Drost, Chief of Seed Standards, CFIA Seed Section.

Ms. Drost explained that the working sample weight (WSW) is the quantity of seed used for the purity analysis to determine the number of noxious weed seeds, other weed seeds, other crop seeds, and other physical contaminants.

Internationally, it is generally accepted that the WSW should be based on the approximate weight of 25,000 seeds of the crop kind to be tested. In Canada, however, since the purity standards are expressed in the grade tables as the maximum number of weed seeds and of other crop seeds in 25 g, 500 g, or 1000 g of seed, Canadian WSWs have been set as multiples or fractions of those quantities so as to facilitate comparison to the standards. Canadian WSWs range from a minimum of 3.13 g for very small seeded crop kinds to 1000 g for large seeded crop kinds. Most of the grade tables establish purity standards in 25 g (small seeded crop kinds) or in 1000 g (large seeded crop kinds); only one grade table (Grade Table XVI-beets/mangel/swiss chard) establishes purity standards in 500 g.

The first part of the presentation discussed the drawbacks of the current system to establish seed standards based on 25 g, 500 g, or 1000 g of seed instead of on the quantity of seed examined (the WSW). The WSW is often different than the quantity in which the standard is prescribed. This difference often causes confusion and has led to misinterpretation of seed testing results and incorrect grading of seed.

- The WSWs of some crop kinds are smaller than the 25 g, 500 g or 1000 g in which the standards are expressed (e.g. the WSW of tobacco is 3.13 g but its purity standards are expressed in 25 g of seed). Following analysis, the actual number of weeds and other crop seeds found must be multiplied to compare the results to the standards expressed in a different weight.
- The WSWs of some crop kinds are larger than 25 g, 500 g or 1000 g in which the standards are expressed (e.g. the WSW of hemp is 500 g but the standards are expressed in 25 g of seed). Following analysis, the actual number of weeds and other crop seeds found must be divided to compare the results to the standards expressed in a different weight; this may result in reporting fractions of a seed (e.g. 0.2 noxious weed seeds per 25 g of seed).

In some cases, having to multiply the number of weed seeds and of seeds of other crops found leads to an awkward or impractical application of the standard. For example,

- The maximum number of primary noxious weed seeds allowed in Canada Certified No. 1 bentgrass seed is 2 per 25 g.
- The WSW for bentgrass is 6.25 g.
- If the standard is to be met, no primary noxious weed seeds can be found in the analysed sample since any number multiplied by 4 will exceed the maximum number of 2 primary noxious weed seeds allowed.

Besides the practical difficulties introduced by the discrepancy between the WSWs and the manner in which the purity standards are currently expressed in the grade tables, the current system also makes it difficult for the Canadian seed sector to harmonize purity analysis with its international counterparts. Canada's requirement to have WSWs that are multiples or fractions of 25 g, 500 g, or 1000 g does not easily facilitate harmonization with WSWs of international seed testing rules (AOSA (Association of Official Seed Analysts) or ISTA (International Seed Testing Association)) which are generally based on an examination of 25 000 seeds. There is currently an initiative underway to harmonize Canada's WSWs with those prescribed in the Association of Official Seed Analysts (AOSA)'s Rules for Testing Seeds.

The proposal set out in the CFIA Options Paper would see the mechanical seed purity standards revised to be expressed in terms of the actual quantity of seed that would be examined in the lab to assess whether those standards are being met.

Ms. Drost took the participants through a series of examples to show how this change would be reflected in the grade tables. For example, in Grade Table XII, the purity standards for Canada Certified No. 1 seed are established on the basis of 25 g. The maximum allowance for primary noxious weed seeds is 2 per 25 g and the maximum allowance of 'primary plus secondary' noxious weed seeds in this same quantity is 20. There are 13 crop kinds in Grade Table XII; six of the 13 crop kinds have a WSW of 6.25 g (bentgrasses and redtop), eight have a WSW of 12.5 g (bluegrasses and weeping alkaligrass), and one crop kind has a WSW of 25 g (crested dogtail). For crop kinds with a WSW of 6.25 g, the standards of 2 per 25 g and 20 per 25 g would be stated as 0.5 per 6.25 g and 5 per 6.25 g respectively if standards were established on WSWs. For crop kinds with a WSW of 12.5 g, the same standards would be stated as 1 per 12.5 g and 10 per 12.5 g; for crop kinds with a WSW of 25 g, the standards would be stated as they are currently (2 per 25 g and 20 per 25 g).

Where the mathematical conversion of the standard results in a fractional number, such as in the case of the bentgrasses, the standard itself would have to be adjusted (i.e. a decision would be required whether to round the number up or down to a whole number.)

Due to the continuing interest in harmonizing WSWs with the United States because of the significant seed trade Canada has with the U.S., it is likely that some Canadian or AOSA WSWs will change in the future as part of that harmonization effort. Ms. Drost drew attention to a table which showed how the standards for Table XII would further change if the AOSA WSWs used in the U.S. were adopted for the Canadian M&P. In many cases, using these WSWs would lead to crop-specific standards or standards applying to only a small number of similar crops. Hence the single line of standards in the current Table XII for Canada Certified No. 1 seed of the 13 crop kinds would separate out into three lines under the proposed changes and into five lines if the AOSA WSWs were used.

In summary, the advantages of the proposed change to establish standards based on WSWs are:

- Enables direct comparison of purity analysis results to seed quality standards.
- Moves towards crop-specific standards.
- Eliminates awkward standards where the practical limit is less than the stated standard.
- Reduces cost of seed testing if WSWs are reduced and/or if WSWs are harmonized with AOSA.
- Facilitates international harmonization of WSWs

At the same time, as pointed out in the Options Paper and by Ms. Drost, these changes would be significant and would require much time and effort should this initiative move forward. Considerations noted in this regard included:

- The process would be lengthy as an in-depth review and modification of the current standards as well as a regulatory amendment would be needed for the change.
- The appearance of the grade tables would change significantly.
- Procedures in the M&P would have to be reviewed and revised (e.g. sequential analysis, checking limit, tolerances).
- Proper seed sampling would become even more important if WSWs were to be reduced.

## **DISCUSSION**

Although there continued to be broad support for establishing standards based on WSWs, there were questions and suggestions about how and when this change could/should be implemented. Some participants questioned whether it might be preferable to move to AOSA or ISTA WSWs at the same time as the standards are being re-expressed. On a more cautionary note, concerns were expressed about the time commitment and complexity of implementing the proposal.

Many participants were anxious to move forward with international harmonization of WSWs. A suggestion was made to restate the Canadian standards for purity based on the AOSA WSWs. As noted in the examples provided by CFIA, this would lead to crop specific standards and would also eliminate small difference in WSWs which have come to be seen as 'technical barriers' to trade. Making the changes in WSWs now could obviate the need for a second major round of changes to the grade tables later on. However, there was some reluctance to adopting AOSA WSWs independent of the initiative to harmonize some parts of the M&P and AOSA Rules; in addition, some participants were more in favour of adopting ISTA WSWs than AOSA WSWs.

It was then suggested to go ahead with what has been proposed, which would result in a better base for later harmonization efforts. Most agreed with this course of action in principle.

Concerns were raised regarding the time commitment required to implement the proposal and the complexity of implementing it. It was pointed out that there would be significant operational implications for seed analysts and they must therefore be

engaged in the feedback process. In that regard, there was a call for a fairly fulsome implementation plan, which also identifies all changes that could result, that could be used to better gauge what this change will mean for the various players of the seed industry and to better grasp the resources required to implement the proposal.

CFIA officials agreed that it was important not to underestimate how much work the implementation of the proposal involves. It could take 3-5 years to fully implement it. The Agency is looking for agreement in principle and then to start working with stakeholders on a more detailed implementation timeline. Other proposed changes related to grading have to be kept in mind with respect to an overall regulatory amendment plan.

It was agreed that CFIA officials would prepare a simpler “pre-proposal” that could be presented to directors of the various seed industry meetings during the summer of 2009 with a view to refining the principles and seeking agreement to proceed on that basis. Work on a more concrete proposal, taking on board the concerns expressed at this workshop and at the summer meetings, would then be done in the fall, possibly including a further working group meeting. During the discussion, CFIA officials hesitated to commit themselves to the timeline as this is not a fast track project and the CFIA may be faced with human resource pressures.

Clarification regarding the goal of this initiative was requested. CFIA officials responded that the goal is several fold: simplification of the system; simplification of maintenance of the system; facilitation of crop specific standards; and facilitation of harmonization of seed testing rules.

Some other suggestions and points made during the discussion included:

- A suggestion was made to express the purity standards in 25,000 seeds of the crop rather than the weight of 25,000 seeds. However, several impracticalities were pointed out in this regard: AOSA has a maximum WSW of 1,000 g even though it may contain less than 25,000 seeds; it is more time-consuming to count seed than to weigh it; some WSWs already have more than 25,000 seeds; varietal differences in seed sizes may lead to inconsistencies.
- Some participants had concerns about the complexity of having so many different WSWs and probed options to reduce this number. A suggestion was made to have a minimum sample size of 25 g. This idea was not supported as it would not be practical for crop kinds with small seeds and would, in fact, increase the likelihood of finding weeds. Another suggestion was to try to come up with about 5 WSW groups and place each crop kind in one of the 5 groups only. However, several participants felt that this would just be going half way and preferred to go to crop specific standards immediately.
- One participant inquired about the option of testing multiple samples rather than multiplying up the results from small samples. CFIA officials explained that

sequential analysis (i.e. testing of multiple samples) would have to be re-examined also as part of the implementation of the proposal.

- It was noted that this initiative presents the opportunity to remove the M&P altogether. However, most participants felt that even if harmonization of Canadian WSWs with AOSA and/or ISTA WSWs occurs, it is still desirable to maintain the M&P so as to address Canada's unique requirements in seed production. Even in the EU, each EU country has its own domestic rules and its own independent seed certification system. Several participants commented on the merit of maintaining a unique Canadian M&P even as we endeavor to ensure our system is in line with international rules. The current situation is such that Canada has limited influence to change the AOSA or ISTA Rules as Canada only has one vote at AOSA (compared to approximately 50 US states votes) and only has one vote at ISTA (one vote per country). It was also stated that it is desirable for the choice to use M&P, ISTA, or AOSA to remain available.
- One participant questioned why M&P, AOSA and ISTA each have different WSWs for many crop kinds if the WSWs are supposed to be approximate weights of 25,000 seeds. Mr. Jones (CFIA Saskatoon Laboratory) explained that different organizations established the WSWs at different times and may have used different varieties; in addition, Canada's system of requiring a WSW that is a fraction or multiple of 25 g, 500 g, or 1000 g does not always facilitate the weight of 25,000 seeds. Metrification of WSWs and standards also introduced anomalies.
- Some participants cautioned that if WSWs are reduced for some crop kinds, there may be increased risks of introducing noxious weeds. Mr. Scheffel commented that the risks would depend on crop kinds and origin of the seed, and risk analysis may be required to address the introduction of invasive plants rather than just depending on WSW.

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### **3. MODERNIZATION OF THE GRADING SYSTEM**

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#### **PRESENTATION: *Modernizing Canada's Seed Grading System* - Willy Drost, CFIA**

Ms. Drost began by reminding participants that Canada's seed grading system exists:

- ✓ To establish minimum standards for seed.
- ✓ To convey information to consumers in a simple fashion (grade names).
- ✓ To present standards in a comprehensive format (grade tables).
- ✓ To facilitate domestic seed trade.

The goals of this current initiative to modernize the seed grading system are to reduce the number of grade names and to reduce the complexity of the system.

The presentation included a description of the various approaches to modernizing the grading system; detailed information was also provided in the Options Paper distributed prior to the meeting. The highlights are indicated below:

1. Truth in Labelling Seed

- Maintain minimum standards for imported and domestic seed. Current Common No. 2 standards would become the minimum standards.
- No seed grading would be required.
- Labelling requirements would be the same for domestic and imported seed and would include seed testing results or minimum guarantees for purity and germination.

2. De-Coupling Pedigreed Status and Seed Quality Standards

2A. Two Numerical Grades

- Minimum standards would be prescribed for two numerical grades (No. 1 & No. 2). Current Canada Certified No. 1 standards would become the minimum standard for the new No. 1 grade and current Common No. 2 standards would become the standard for the new No. 2 grade.
- These standards would apply to all classes of both pedigreed and non-pedigreed seed.
- Current Common No. 2 standards would become the minimum standards for import of seed.

2B. One Numerical Grade

- Minimum standards would be prescribed for just one grade, No. 1. The current Canada Certified No. 1 standards would become the minimum standards for the new No. 1 grade.
- These standards would apply to all classes of both pedigreed and non-pedigreed seed.
- Current Common No. 2 standards would become the minimum standards for import and sale of ungraded seed. No grade name would be associated with these minimum standards. However, labelling of results of seed quality testing or minimum guarantees would be required for this ungraded seed.

Ms. Drost took questions to clarify the distinctions between these options and summarized some of the advantages and drawbacks of each. For instance, the Truth in Labelling approach would eliminate the costs associated with grading seed and it would provide detailed seed quality information to seed buyers. Its chief drawback is that it is a radical change to the current grading system and would require significant adjustment in the seed industry. Option 2A is a much-simplified grading system (grade names reduced from 36 to 2) which maintains the current high standards of Canada Certified No. 1 seed and introduces more stringent standards for Common No. 1 seed. Its drawbacks are that it lowers the mechanical purity standards for Foundation and Registered seed and that the raising of the standards for Common No. 1 seed could

result in higher levels of non-compliance. The advantages of Option 2B are that it is a simplified grading system which maintains current Canada Certified No. 1 standards and could also offer buyers the choice between buying seed graded as No. 1 or choosing seed simply labeled with quality information. Similar to Option 2A, its drawbacks include the more stringent standards for Common No. 1 seed with potential increases in non-compliance and the slightly relaxed standards for No. 1 seed of Foundation and Registered status.

The blue tag for Certified seed could be retained in any of the three options.

## **DISCUSSION**

### ***Option 1: Truth in Labelling Seed***

For the Truth in Labelling option, there were some questions about the current U.S. system which uses a similar approach. If this option were to be pursued, decisions regarding the information to be labelled would have to be made. Should all of the information currently in the grade tables be labelled or should it only be the quality information that the seller feels is pertinent (as long as it was true)? It was noted that this option still requires that the labelled quality information be supported by a seed analysis certificate and still involves accredited analysts carrying out the purity and germination tests to generate this information. Minimum quality guarantees would be permitted instead of labelling actual seed testing results.

Seed that does not meet the minimum standards would not be allowed to be sold as seed. However, there were some concerns that some allowances would need to be permitted for the sale of higher status seed following a very poor crop year which may have affected purity and/or germination quality of the seed offered for sale. There was some discussion about the sale of seed with low germination, with some participants stating that this would be acceptable, especially when multiplying high status seed from poor crop years, so long as the buyer knew what the germination test results were and could adjust seeding rates accordingly. This does not constitute a change from the current system in principle in that the current system also allows pedigreed seed with lower germination to be sold with a 'substandard' grade if the actual germination is labelled.

Other points of interest include the following. Even though seed would not be graded, it would still need to meet the minimum standards. Therefore, compliance with the minimum standards would still need to be verified by the CFIA or a body authorized by the CFIA to do so. In addition, one participant commented that the Truth in Labelling option would reduce demotion of seed – this was seen to be an advantage.

### ***Option 2A: Two Numerical Grades (No. 1 and No. 2)***

Participants noted that in Option 2A, there is a big difference between the minimum standards for the No. 1 and No. 2 grades – this really allows No. 1 seed to be seen as "the real deal". There were some concerns expressed about Foundation and

Registered seed being treated the same as Certified seed in the new grade tables. However, it was noted that if higher quality standards were needed/warranted, this could be handled either in the grower contracts or by "notwithstanding" lines in the *Seeds Regulations*.

There were suggestions to modify the labelling aspects of this option to apply the grade names only to pedigreed seed and to consider a different system altogether for "Common Seed" or "Standard Seed". Another suggestion was to only allow the grade names to be applied by people/establishments that have been accredited to grade seed so that no seed (pedigreed or non-pedigreed) would be graded without having been graded by a person participating in a quality management system.

There were concerns about adoption of the current Common No. 2 standards as the new No. 2 grade standards and for minimum standards for imported seed. Common No. 2 purity standards are very low and may result in introduction of invasive weeds. It was suggested that it may be better to tighten No. 2 seed standards, for example, adopt Common No. 1 standards as the new No. 2 grade standards for some crop kinds. It is also worth noting that the majority of seed sold in Canada is No. 1 seed. Seed growers expressed concerns that application of the same quality standards to pedigreed and non-pedigreed seed would promote the sale of common seed. It was also noted that this could result in more non-compliance for common seed and require additional resources for CFIA enforcement activities in this regard.

Suggestions were made to permit voluntary labelling of quality information for No. 1 and No. 2 seed. For No. 1 seed, quality characteristics that are better than the standards could be labelled while for No. 2 seed quality characteristics that are better than the No. 2 standards (or possibly, those that do not meet the No. 1 standards) could be labelled.

### ***Option 2B: One Numerical Grade (No. 1)***

Participants noted the similarities and differences between Option 2A and 2B. No. 1 seed standards are identical in the two options and the No. 2 standards (Option 2A) and the minimum standards for Option 2B are also identical. The main difference is that Option 2A would allow seed that does not meet No. 1 standards but meets minimum standards to be labelled with the No. 2 grade whereas in Option 2B, a grade would not be assigned for this same seed and quality information would have to be labelled on the package of seed.

A participant noted the logistical issue with regard to tagging/sealing and labelling of seed testing results (or minimum guarantees) prior to the availability of the actual result. A possible alternative may be to make the seed testing information available on the purchase invoice at a later date.

There were definite concerns with respect to having Common seed graded with the same No. 1 grade as pedigreed seed even though Common seed is not subject to the same quality management systems for sampling, testing, and grading of seed. The Common No. 1 and Common No. 2 grade names used in the current grading system

are misleading as they give the impression that Common seed has been subjected to a similar quality management system as pedigreed seed. CFIA officials indicated that Common seed in the current grading system only has to be tested according to a recognized standard method but the testing does not have to be carried out in an accredited lab nor does the grade have to be assigned by an accredited grader.

After this initial discussion, participants broke into 3 table groups to select a preferred option, recommend changes or additions to it or propose other alternatives. The outcome of these smaller group discussions were then presented and discussed in a plenary session.

### ***Result of Table Discussions***

Two groups preferred Option 2B, while one group had a preference for Option 2A. There were several suggestions for additions and modifications.

The group that favoured Option 2A felt it offered more transparency and would be simpler for regulators, graders, packagers, and seed analysts to adopt. The group also suggested various improvements to the proposed Option 2A. The group felt that Common seed could be better differentiated by re-naming it as "Variety Not Verified" since the varietal identity of Common seed is not verified through the crop certification process. They also felt that Common seed should be subject to the same sampling, testing and quality management methodology as pedigreed seed. If this was not the case, then it could be labelled with full quality information (weed seeds, germination %, and so on) but not with either grade name (No. 1 or No. 2).

This group also felt there should also be a voluntary option to label quality information for those characteristics that are better than the minimum standards. Similarly, this group supported voluntary labelling of No. 2 seed for characteristics that do not meet the No. 1 minimum standards. This group also supported the idea that pedigreed seed with low germination should be allowed to maintain its pedigreed status but this should not be the case for pedigreed seed that does not meet the minimum purity standards.

A question was posed as to whether or not establishments would be required to apply a grade to every seed lot or, if there was no grader available, could the seed go out with just the pedigree and the quality testing results or minimum guarantee similar to the idea expressed previously that ungraded import seed could be offered for sale in Canada without being graded. A concern was expressed with respect to the availability of CFIA resources for ensuring compliance of Common seed in this new system. Since standards for Common seed would be raised and Common seed is quite prevalent in the marketplace, there would need to be increased resources for education and enforcement of these new standards.

In plenary, there was further discussion of the proposed "Variety Not Verified" terminology. There was strong objection by some to using this along with an actual variety name as it might imply this was likely that variety but had just not been verified via testing. While this might hold true for self-pollinated species, it would not be true for

forages and some other outcrossing species since outcrossing with other varieties is likely at each generation. The issue of varietal verification gets even more complicated as private laboratories start to offer varietal identity testing. A suggestion was made to use the variety name but to have the seed labelled as 'Variety Not Certified'. However, at a recent technical working group on variety naming, the working group recommended prohibiting the use of variety names on common seed. At this time, variety names cannot be used on Common seed of most agricultural crop kinds.

One group chose Option 2B because it truly simplifies the grading system and requires sellers to reveal quality information in the case of seed which has not met the No. 1 grade. This option focussed on the No. 1 grade which was thought to be a good idea since the majority of seed sold in Canada is No. 1 (vs No. 2).

This group recommended that the No. 1 grade name should only be applied if the seed lot (pedigreed or non-pedigreed) had been through quality management process (ie. licensed sampler, accredited lab, accredited grader). This group also felt that for below grade seed, there should be a minimum standard for the presence of weed seeds and for inert matter.

In plenary, CFIA officials noted that there is a minimum standard (zero presence) for soil in imported seed but this requirement is under a different regulatory authority than the *Seeds Regulations*. For domestic sale of seed, a sample with soil could meet the No. 1 seed standards - perhaps there should be a maximum for the presence of soil. Others commented that the marketplace more or less takes care of this concern since no one wants to buy seed full of soil that could cause mechanical difficulty at seeding (e.g jammed seeders). Including a standard for soil peds might have merit, some argued, as this would help prevent the spread of nematodes and soil-borne diseases. For some crops, like the fescues, controlling dust and dirt particles would be difficult.

The last group preferred Option 2B because it makes No. 1 seed stand out by itself. They felt that the labelling requirement of quality characteristics of non-No. 1 seed would allow the buyer to know the quality status of the seed. To cut down on the number of tags, the third group suggested the same tags should be used for the No. 1 grade across all seed classes. This group had no concerns regarding the standards of Foundation and Registered seed being the same as Certified seed since additional quality stipulations could be part of the grower contract.

In any grading system, applying a No. 1 or No. 2 grade to Common seed is misleading in that it misrepresents the seed as having been processed under a QMS (Quality Management System). This group recommended removing Common seed from the grade tables or replacing it with a new category "Standard" seed which could be graded if it was handled by an RSE. This group also raised the question of why the *status quo* was not included as an option. They stressed that any changes will require a lot of time and an implementation plan that includes marketing the benefits of the proposed changes was needed.

A plenary discussion followed in which it was noted that there would need to be a way to facilitate trade for higher status seed that does not meet the No. 1 standards (i.e. for sale and multiplication of seed produced in a bad crop year). CFIA staff indicated that there wouldn't necessarily be a germination standard below No. 1, but it would still have to meet the current Common No. 2 standard for purity, unless it was labelled as a seed mixture. Concern was expressed about meeting the needs of organic growers (i.e. organic growers may want a different standard with tolerance for more weed seeds). Another participant felt organic growers should clean their seed to the same standards as non-organic seed producers.

There was further discussion about the issue of Common seed and whether higher requirements for labelling of Common seed would exacerbate non-compliance until this was resolved over time by a changing culture within this market segment. Another option might be to not require Common seed to be labelled with a grade but only as 'Common' or 'Standard' (though it would still have to meet the default minimum standards). One participant commented that what is being proposed for Common seed (in Option 2B with modifications as recommended) isn't a radical change from what's happening now. He pointed out that CFIA dedicates most of its time and resources to regulating pedigreed seed. CFIA officials responded that buyers choose between the pedigreed and non-pedigreed (common) seed sources depending on the level of assurance they're looking for and so it's not unreasonable for the regulator to only ensure a minimum level of assurance in the Common seed business while ensuring a higher level of assurance for pedigreed seed. A few participants noted that this is exactly why they feel that a No. 1 grade designation shouldn't be offered outside the pedigreed certification system.

It was pointed out that regarding weed control, there should continue to be some weed seed standards on Common seed which would encompass seed such as wildflower mixtures that may be a source for introducing new weed species. Another participant noted that this is not solely an issue for the seed sector, to be solved within the seed program and its standards, since invasive species are a broader phytosanitary concern and should be of interest to Environment Canada also. A suggestion was made that maybe the current Common No. 1 standards (rather than the Common No. 2 standards) should become the minimum standards for these types of seeds; tighter regulation on their imports could be justified by the risk of introduction of new weed species.

It was concluded that there was some consensus that labelling with quality information without a grade name might have utility, providing that the seed did meet minimum standards. There was also significant support for the concept of dealing separately with Common seed or requiring the Common No. 1 and Common No. 2 grades to be applied within the framework of a quality assurance system similar to that used for grading of pedigreed seed.



apply tolerances. This variation could be due to excessive heterogeneity in large lot sizes.

Participants noted that lot sizes could also be an issue for sampling of seed for phytosanitary certification. Sampling procedures for phytosanitary purposes are mainly prescribed for grain shipments and may include lot sizes of up to 300 tonnes; using the same lot sizes is not appropriate for seed as seed presents a higher risk in terms of a pathway for weed seeds.

It was also noted that a considerable number of voluntary standards are already being implemented by the industry. If a supplier has doubts regarding the homogeneity of the lot, he/she will divide a large lot into several smaller lots to reduce the risk of having the large lot not meeting the grade.

There is currently no concrete evidence that excessive heterogeneity is a problem for large lots produced in Canada and participants showed little appetite for implementing maximum lot sizes unless it was shown there is an overall problem. To assess whether there is a significant problem, participants suggested that CFIA should carry out an experiment and/or to collect the necessary data to show excessive heterogeneity in large Canadian seed lots. It may also be possible to use data from the current monitoring program.

Jim McCullagh reported that the Canadian Seed Institute is in the process of publishing a technical manual that suggests consideration should be given to AASCO maximum lot sizes as a good accepted practice. There was support for using communication and due diligence to keep a voluntary cap on potentially problematic seed lots.

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## **5. NEXT STEPS**

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On behalf of the CFIA, Mr. Michael Scheffel thanked everyone for the opportunity to sit down and exchange information and ideas with people who "really know their stuff". He said he and his colleagues learn a great deal from workshops like this one and it serves as a reality check and a very useful sounding board for testing options and early versions of proposals for regulatory change.

He also put forward the next steps to proceed:

- Analyze the various options based on discussions and suggestions from this workshop and revise the Options paper. More, broader consultation with stakeholders is needed to ensure the revised proposals are viable and reasonable.
- Develop an implementation plan for the proposed changes.
- Establish technical working groups to discuss specific standards.

- Develop brief proposals for the changes to be discussed at summer industry meetings such as CSTA forage and turf committee meeting in July.
- Coordinate the WSO and the Grade Tables Review initiatives.

He acknowledged that there was some split between those preferring Options 2A and 2B, but there were a number of common concerns and suggestions. Therefore, it should be possible to develop a consensus option. He also noted that there were suggestions that are radical changes to the current grading system such as restricting the use of No. 1 and No. 2 grade names only to seed that has gone through a quality management system. CFIA will engage broader stakeholder consultation to build consensus and develop an implementation plan before committing resources to make the regulatory changes.

He expressed confidence that there are good reasons for streamlining the current seed grading system to make it work better. Canada is highly regarded internationally for the high quality of its seed; we need to continue to maintain that reputation.

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## **6. WORKSHOP PARTICIPANTS**

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### **Canadian Food Inspection Agency**

Brenda Baergen – Saskatoon Laboratory  
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Willy Drost – Seed Section (Seed Standards Unit)  
Anita Gilmer – Seed Section (Weed Seeds Unit)  
Steve Jones – Saskatoon Laboratory  
Guy Lévesque - Seed Section (Seed Design and Delivery Unit)  
Janine Maruschak – Saskatoon Laboratory  
Katie Oppen – Seed Section (Seed Standards Unit)  
Michael Scheffel – Seed Section, National Manager

### **Commercial Seed Analysts Association**

Dianne Gilhuly

### **Canadian Seed Growers' Association**

Gerald Girodat  
Randy Preater  
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### **Canadian Seed Institute**

Jacques Dion  
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### **Canadian Seed Trade Association**

Bill Leask  
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### **Gouvernement du Québec**

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### **FACILITATOR**

Raymonde D'Amour -- Intersol

### **RAPPORTEUR**

Sharon McKay -- National Forum on Seed