



July 25, 2013

Wendy Asbil  
National Manager  
Invasive Alien Species and Domestic Programs Section  
Plant Health and Biosecurity Directorate  
Canadian Food Inspection Agency  
59 Camelot Drive, Ottawa, ON K1A 0Y9

Dear Wendy:

Thank you very much for your participation at the Corn, Soybeans and Eastern Cereals Committee during the CSTA Annual Meeting in Québec City. We appreciate the time that you and Melanie Gauthier took to explain the background and proposals for the control of Woolly Cupgrass (*Eriochoa Villosa*) in Canada, to the committee and in an earlier meeting with CSTA staff and one of our members from Québec.

CSTA understands the background, and the fact that Woolly Cupgrass is a regulated plant under the Plant Protection Act and Regulations, and as such is subject to official control. We also understand that the CFIA's objective is to limit the spread of Woolly Cupgrass in Canada. The concern of the Corn, Soybeans and Eastern Cereals committee, reflected by the CSTA Board of Directors, is that while attempting to limit the spread of Woolly Cupgrass, which is not regulated anywhere in the world except for Canada, requirements of the CFIA will put unwarranted economic strain on the seed and grain industries in Québec. We have the following specific concerns:

1. Given that Woolly Cupgrass is not regulated in other countries and other provinces, and given that it is present throughout the grain growing regions of the United States, which is Canada's largest trading partner, what is the likelihood that Woolly Cupgrass is present in other regions of Canada? We understand that thorough investigations have not been undertaken in other areas to make that determination. In addition, since it is not regulated in other areas, even if it was present in a shipment, it is very unlikely that there would be any concerns at the destination.

The imposition of restrictions on farmers and the seed industry in Québec when it is not known if its presence is limited to Québec, and when its presence would have little or no effect on trade because it is not regulated anywhere else, is not justifiable.

2. Specific to the Risk Management Document RMD13-03, the document lists seed produced in a regulated area and commodities harvested from a regulated area as "regulated articles" subjecting them to restrictions.
  - a. Since under the Seeds Regulations, seed must be free of prohibited noxious weeds such as Woolly Cupgrass, it is our understanding that the movement of seed even from a regulated area would not be restricted because it would not contain Woolly Cupgrass seeds. If that is the case, why would seed be listed as a regulated article?

- b. The RMD exempts “commercially clean” grain from the list of regulated articles. During our discussions, we were not given a definition “commercially clean” grain. It seems there is no definition. Without clarity around what measures may be required for grain to move, there is no way to quantify the economic impact on Québec grain producers.

It is our understanding that a thorough study of the status of Woolly Cupgrass in Québec is currently being conducted by the Québec Centre for Research on Grains (CÉROM) and the Québec Ministry of Agriculture, Fisheries and Food (MAPAQ). Given the concerns that have been raised by the Québec grain and seed industries; lack of clarity in the proposals in RMD13-03; and the uncertainty around the situation, CSTA requests that the CFIA delay taking any of the actions proposed in RMD13-03 until the study being conducted by CÉROM and MPAQ has been completed.

Thank you again for taking the time to meet with us.

Sincerely,



Peter Entz  
President

- c.c. Georges Chaussé, La Coop Fédérée  
Doug Alderman, Chair, CSTA Corn, Soybeans and Eastern Cereals Committee