

Variety Registration Policy, November, 2013

CSTA supports a variety registration system that incorporates the following:

1. Current exemptions from registration must be maintained. This includes corn, non-oilseed soybeans, chickpeas, vegetable and ornamental crops, turf-grass species and emerging industrial crops
2. The ability to exempt crop species, types and kinds from registration (remove them from Schedule III) must be maintained.
 - As a first priority, oilseed type soybeans should be removed from Schedule III exempting them from registration
3. CSTA supports that all crop species, kinds and types should be placed in Part 3 of Schedule III of the *Seeds Regulations*, maintaining government oversight but removing merit requirements and the need for a recommendation from a recognized recommending committee.

However, recognizing that value chains for different crop kinds have different and specific needs, CSTA supports that if the value chain (variety development, production, processing, marketing and trade) for a specific crop kind provides solid rationale and demonstrates consensus, alternate systems could be implemented, including keeping crop species, kinds or types in Part 1 or Part 2 or moving them back to Part 1 or 2

- Should crop species, kinds or types either remain in Part 1 or Part 2, or move back to Part 1 or Part 2, new operating procedures for making a recommendation for registration must be developed to ensure that the system is efficient, flexible and predictable
- CSTA supports if crops are to remain in Part 1, yield and agronomics should not be included in the definition of merit. Candidates should be assessed for disease and/or quality only.

Provision of information for farmer decision making is important. However the collection of information for variety registration is separate from the provision of information to farmers and should not be a reason for a crop to stay in Part 1 or 2.

CSTA believes that this is the best option as it maintains government oversight of the system, and allows flexibility for the value change, but also creates the predictability, flexibility and efficiency that is required to foster investment and innovation to enhance the competitiveness of our farmers; to bring choices to customers; and value to the Canadian agri-food sector and to the economy of Canada.

4. To ensure that the system is nimble and able to respond to the needs of the market, the movement of crop kinds, species and types between parts of Schedule 3 should be by administrative decision, not a regulatory change. CSTA requests that Schedule III be moved out of the seed regulations.
5. CSTA recognizes that some crop value chains operate performance trials. It must be noted that these trials are not, and should not, be linked to variety registration.
6. Contract registration should be streamlined; must not act as a deterrent to value chain systems; and must not impose additional costs on the seed sector.