



April 14, 2015

Wheat Class Modernization
Canadian Grain Commission
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Canadian Wheat Class Modernization

The Canadian Seed Trade Association (CSTA) appreciates this opportunity to provide comments on the draft proposals for wheat class modernization which we received on February 20, 2015.

The CSTA brings together 130 seed company members that are involved in all aspects of seed and seed technology including: plant breeding, research and variety development; production; processing; marketing; sales; imports and exports. Our members work with over 50 different crop kinds, and serve all production systems, whether they are organic, conventional or make use of biotechnology and other breeding technologies. CSTA's is a very diverse membership, ranging from single grower/retailers to the world's multinational seed companies; and from suppliers of packet herb and vegetable seeds to large grain and oilseed companies.

CSTA's mission is to: "Foster Seed Industry Innovation and Trade". An efficient, flexible and predictable regulatory system is critical to achieving this mission. As the foundation of Canada's crop sector, seed industry participants are very interested in the proposals for wheat classification, especially as it relates, or doesn't relate, to Canada's system of variety registration.

We commend the Canadian Grain Commission (CGC) for recognizing the need to take proactive steps to address the needs of the market place in order to maintain and expand market share for Canadian farmers. It is important that any changes enhance the ability of the wheat value chain (from seed to market) to capture value from the Canadian wheat system using the system of classification to help buyers source the wheat that fits their needs. The CGC's proposals form a good foundation for discussion, and CSTA is pleased to provide some comments.

First of all, it is very important that the CGC clearly communicate that at this stage these are still proposals, and should not be taken as implemented. While the proposals serve as a good foundation for discussions, we request that no decisions are taken until the proposals can be viewed in light of the results of a comprehensive market scan that is being done for the Canadian International Grains Institute and Cereals Canada. The proposals have the potential to affect significant change for plant breeders and variety developers, and if change is to be made, it must be in line with actual market requirements.

The results of the market scan will be particularly important for the consideration of the proposal to create a new milling wheat class in the west. Without a clear understanding of the market, it is not possible to completely assess the advantages and disadvantages of a new milling class. **CSTA requests that consultations on the proposal to create a new milling wheat class in Western Canada proceed after the results of the market scan are known.**

Similarly CSTA's members do not have a solid understanding of the rationale for proposing a new General Purpose class for Eastern wheat. Again, **we submit that consultations around a new GP class for the East should occur when the results of the market scan are known.**

In 2012, CSTA facilitated a value chain session to discuss and recommend improvements to the western wheat variety registration system. Recommendations from that session resulted in some important changes to the Canadian Prairie Spring Red Wheat class. They also resulted in some positive changes to the operating procedures of the Prairie Recommending Committee Wheat, Rye Triticale. However, we recognize that there is still work to do, and we are actively participating in the process that was initiated by the Government of Canada to create a more modern system of variety registration for all crops.

One of the objectives of the review of variety registration that is strongly supported by the CSTA is the development of more efficient and responsive Recommending Committees, where they continue to exist. So we appreciate that the Prairie Recommending Committee: Wheat, Rye Triticale tried to anticipate possible changes to the Canadian Grain Commission's classes for wheat, and made changes to the check varieties for the Canadian Western Spring Wheat and Canadian Prairie Spring Red classes. However, without judging the actual decision, we must express serious concerns with the process. Recommending Committee mandates and roles need to be clear and consistent. Are they recommending committees or decision makers?

Clear lines of accountability in decision making are very important to ensure that the full impacts of decisions on the affected value chain are understood. **CSTA believes that it is very important that the process for decisions and the relation between variety registration and the Grain Commission class system be clearly defined and carefully followed.**

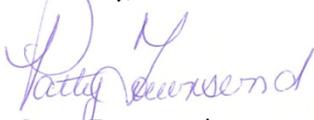
CSTA requests that the seed sector be included in a structured discussion with the Grain Commission, Agriculture and Agri-Food Canada and the CFIA Seed Program to evaluate and define what, if any, linkages should exist between variety registration and wheat classification. Some of the things that require clarification are below, but there are many other issues that need to be addressed.

- To what extent should wheat classification and quality evaluation for purposes of registration intersect?
- Should registration committees use the class system to define quality parameters?
- Should data and information from the quality evaluations done for registration be available for determination of class by the CGC? If so, at what point should the data be made available and to whom?

We look forward to fully participating in this very important dialogue.

Once again, CSTA thanks the Canadian Grain Commission for proactively developing proposals for discussion and input. We trust that the issues raised in this letter will be carefully considered and we welcome ongoing discussions.

Sincerely,



Patty Townsend
Chief Executive Officer

c.c. Greg Meredith, Assistant Deputy Minister, Innovation Policy AAFC
Darlene Blair, Director, Plant Production Division CFIA
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