



## **CSTA Response to Proposed Changes to Variety Registration**

**December 6, 1999**

During the November 1999 Semi-Annual meeting, the CSTA Board of Directors approved the following as CSTA's position on proposed changes to Variety Registration.

1. The exclusion of agronomically inferior varieties from the marketplace should not be controlled by legislation except where there are agronomic traits such as disease or quality that need to be met.
2. The requirements for "Mandatory Listing" would meet specific objectives for registration and requirements for entry to certification or other agencies would not be part of the information requirements.
3. The CSTA position statement "Variety Registration in Canada, Dec 3, 1998" remains valid as further background information to CSTA's position.

### **Executive Vice-President's Commentary:**

The current mandate for Variety Registration includes ensuring "that agronomically inferior or unadapted varieties are excluded from the Canadian marketplace". The Variety Registration Review suggested that this part of the mandate should not be controlled by legislation and CFIA has accepted this as part of the proposed change for species in the Listing category only. The CSTA Board has endorsed this point of the CFIA proposal and support the application of this principle to all species by deleting this part of the mandate.

Effectively, it is proposed that yield testing is not a mandatory requirement for Variety Registration. This also means that the criteria for merit testing and harm become synonymous as only those species that must meet a minimum standard for disease reaction or quality need to be "merit tested" for Registration purposes. Given that most Registered Varieties can be sold throughout Canada, the limited amount of data required for Variety Registration as a legislated requirement does not ensure that a variety is sold in the proper area of adaptation. With the removal of a legislated requirement for yield testing from the mandate of Variety Registration, the principle of this very significant change must now be applied to each crop species.

Yield testing remains very important. The proposal acknowledges that the marketplace requires considerably more experimental testing than is required for Variety Registration before a variety is approved to go into a company product line and it requires considerably more ongoing recommendation testing before a variety is widely accepted by farmers. This means that most of the existing testing programs must remain intact for purposes of providing testing services for experimental varieties or for recommendation of varieties to seed buyers.

Finally, further clarification is necessary for the application for Variety Registration such as the variety description and cost. The application requirements must be based on a clear understanding of the intended use in order to avoid requests for unnecessary information or can be provided from less costly sources.