



CANADIAN SEED TRADE ASSOCIATION

L'ASSOCIATION CANADIENNE DU COMMERCE DES SEMENCES

39 Robertson Road., Suite 505, Ottawa, Ontario K2H 8R2

Email: csta@cdnseed.org

<http://www.cdnseed.org>

Telephone (613) 829-9527

FAX (613)829-3530

May 29, 2007

Federal and Provincial Ministers:

Hon. Chuck Strahl, Government of Canada

Hon. Pat Bell, Government of British Columbia

Hon. George Groeneveld, Government of Alberta

Hon. Mark Wartman, Government of Saskatchewan

Hon Rosann Wowchuk, Government of Manitoba

Hon. Leona Dombrowsky, Government of Ontario

Hon. Larent Lessard, Government of Quebec

Hon. Ronald Ouellete, Government of New Brunswick

Hon. Brooke Taylor, Government of Nova Scotia

Hon. Jim Bagnall, Government of Prince Edward Island

Hon. Kathy Dunderdale, Government of Newfoundland and Labrador

Re: Next Generation of Agriculture and Agri-Food Policy

Ministers:

The Canadian Seed Trade Association has been pleased to participate in every level of the consultative process established by working group of Assistant Deputy Ministers, around the development of the next generation of policy for Canadian agriculture and agri-food. CSTA staff was part of a stakeholder reference group at the beginning of the process, and staff and elected representatives have participated in all three consultative phases.

The Canadian Seed Trade Association represents the interests of about 140 corporate members who are engaged in all aspects of seed research, production and marketing, both domestically and internationally. Our membership ranges from those who market garden seed and herbs to large western grain handlers, and from small family-run businesses to large multinational corporations. CSTA members work with seeds from 50 principal crops, including: grains and oilseeds, special crops, forage and turf grasses, flowers, vegetables, fruits.

Seed is the foundation of innovation in the agriculture and agri-products sector. Seed driven innovation continues to substantially increase crop productivity for farmers. For example, corn yields have increased 4-fold in 60 years, almost directly due to advances in variety development. Agronomic advances such as insect and disease resistance or tolerance, improved nutrient use, and increased yield continues to benefit Canadian producers. Plant breeding is also delivering new market opportunities for farmers. Canola is an excellent example of Canadian innovation. From its development by Agriculture and Agri-Food Canada researchers, through improvements by private sector breeders to quality, productivity, oil quantity, and disease resistance, canola continues to deliver innovation for Canada and the world. The Canadian seed sector continues to strive for even more. Look for even stronger improvements in crop agronomics, as well as new varieties that deliver health and wellness; which are a sustainable resource for non-food uses; and which contribute to the health of our environment.

As I have stated, CSTA has been actively involved in the work to recommend the next generation of agriculture and agri-food policy in Canada. We were very happy to see the strong focus on innovation in the original discussion paper. The paper developed by the federal/provincial/territorial ADM group very accurately defined the needs of seed innovators. Specifically, the original documents discussed:

- The need for an effective regulatory environment that is timely, transparent, informed by science, and which includes a dynamic review system. This is of the utmost importance as we work to bring innovation to the Canadian agriculture and agri-products industry. While we understand the need for regulations to protect health and safety and the environment, lengthy approval times, and conflicts between different legislation and regulations often serve to stifle innovation.
- The need for industry and government to work together to ensure that regulators understand emerging technologies and the impact of regulation
- The need to develop tools for a globally competitive intellectual property environment, to encourage investment in innovation in Canada.

We were disappointed, however that the document presented to the third round of consultations in May did not contain these very important points. While the document does make some positive suggestions about consultation, public research, and aligning government investments to the priorities of the Agriculture Policy Framework; the very important issues of regulatory reform, the creation of an investment environment that enables innovation, and the development of globally competitive intellectual property tools, are absent.

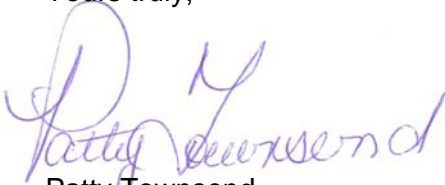
As has been clearly recognized throughout the consultation on the next generation of agriculture and agri-food policy, the participation of new, low cost competitors in international bulk commodity markets will continue to drive prices down, seriously affecting the income situation of Canadian farmers. Canada can and will continue to compete in these markets, but success will depend partly on seed driven innovation that helps farmers to reduce costs and risks, and that improves productivity. It will also depend on advances that deliver specific qualities and attributes for both food and non-food uses, to open up new, higher value market opportunities for Canadian farmers. In order to continue to deliver innovation to Canadian farmers and end users around the world, the seed industry needs:

1. Quick and decisive action to create predictable, transparent, flexible regulations that, while protecting health, safety and the environment, will enable and encourage timely introduction of new technology. Policy development should occur in parallel with industry research and development (R&D) so that we are ready to receive new technologies and commercialize them. Policies and regulatory proposals for plant molecular farming are an example.
2. A regulatory framework throughout federal and provincial governments that is in step with our international trading partners and competitors, including:
 - Completed work towards complementary pesticide and biotechnology regulation in North America;
 - Leadership to establish international standards for low level adventitious presence of genetically engineered plant products already authorized as safe in one or more countries;
 - Aligned policy for adventitious presence with the U.S.;
 - Provisions for acceptance of scientifically established health claims.
3. An inclusive process that will help to ensure that regulators understand, recognize and anticipate emerging technologies, and the importance of facilitating their introduction.

4. An intellectual property protection tool box that puts Canadian investors on an even footing with competitors. CSTA appreciates the work done so far to benchmark Canadian IP tools against other countries, and looks forward to learning the results. As a first step, CSTA supports amendments to Canada's Plant Breeders' Rights legislation to comply with the 1991 convention of the International Union for the Protection of New Varieties of Plants (UPOV).
5. Continued and enhanced efforts to eliminate non-tariff trade barriers by:
 - Developing bi-lateral trade agreements with our export market partners to address technical barriers to trade. Pesticide maximum residue limits and genetically enhanced crops are examples.
 - Advocating for science-based regulations within international trade agreements and treaties.

CSTA has been very pleased to participate in the Next Generation process, and is pleased to provide this input. We trust that our needs will be very seriously considered, and that they will be incorporated into a stronger focus on innovation in federal and provincial policy for agriculture and agri-products.

Yours truly,



Patty Townsend
Vice-President

c.c. Federal/Provincial ADM Working Group

Susanne Vinet, AAFC	Daphne Stancil, British Columbia
Collin Jeffares, Alberta	Hal Cushon, Saskatchewan
Lorne Martin, Manitoba	Jim Wheeler, Ontario
Sylvain Boucher, Québec	Kevin McKendy, New Brunswick
Brian Smith, Nova Scotia	Brian Douglas, Prince Edward Island
Jeffrey Whalen, Newfoundland and Labrador	