



March 25, 2011

Ms. Kanwal Kochhar  
National Manager  
Grains and Oilseeds Section  
Field Crops Division  
Plant Health and Biosecurity Directorate  
59 Camelot Drive, Ottawa, ON K1A 0Y9

**Re: Consultation Document RMD-11-02 – Pest Risk Management Document for  
*Heterodera glycines* Ichinohe (Soybean Cyst Nematode)**

Dear Ms. Kochhar:

With this letter we are pleased to provide the comments of the Canadian Seed Trade Association on CFIA's Discussion Document for *Heterodera glycines*, Soybean Cyst Nematode. We have circulated this document to our soybean company members, and this letter represents a consensus of the responses that we received.

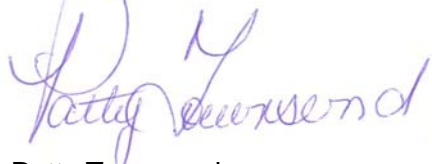
CSTA concurs with, and supports the proposal to deregulate *Heterodera glycines*, Soybean Cyst Nematode (SCN) contained in this consultation document.

- SCN is widespread in most soybean producing areas both in Canada – 75% of the soybean acreage in Ontario and 50% of Canada's soybean production – and in the United States, Canada's largest trading partner. The United States abandoned domestic quarantines for SCN in 1972.
- In order to comply with both the International Plant Protection Committee standards for regulated pests, and with Canada's World Trade Organization obligations, Canada would have to impose, monitor and enforce rigorous domestic movement restrictions from any infested areas. The additional soil surveys and other monitoring that would be required to even come close to describing the true distribution of the pest would impose severe cost burdens on government and industry resources.
- Seed must move freely in Canada and into export markets. Even if they could be enforced, restrictions on movement of soybean seed and associated equipment and materials would have a very negative impact on the seed industry and on farmers, who must have access to varieties.

- Effective Best Management Practices have been developed through industry/government partnerships and are being employed throughout the soybean growing areas of Canada. They include:
  - The use of SCN-resistant varieties in good rotations with non-host crops
  - Planting clean seed that is free of soil peds
  - Thorough farm equipment cleaning
  - Good soil conservation practices to reduce soil movement from field to field
  - Regular soil samples to monitor for SCN.

CSTA appreciates the opportunity to provide input on behalf of our members. We welcome the proposed deregulation of the SCN, and urge CFIA to take the necessary steps to make and implement the deregulation decision *post haste*.

Sincerely,



Patty Townsend  
Vice-President.

c.c. CSTA Corn, Soybeans and Eastern Cereals Working Group