



## 9.0 PROPOSAL FEEDBACK FORM

### FEEDBACK FORM

**Note: Following is a suggested form to provide feedback to the CFIA regarding proposed changes to the *Weed Seeds Order*. Feedback received in any format is welcomed and will be reviewed by CFIA officials.**

**Please respond by September 15, 2011**

#### **A. DEFINITIONS:**

1. Prohibited Noxious:

The species is not yet present in Canada, or is present and is under official control as it has not yet reached its full ecological range. Official control is used to prevent further spread of the species and with the goal of eradicating the species. The species must be a weed whose presence in seed could affect the value and/or intended use of the seed lot; and/or could have potential impact on the economy, human health and/or animal health. This determination would be based on a Pest Risk Assessment type process. The species must have identifiable seeds that can be visually distinguished from those of other species, or in rare instances, from entire genera.

2. Primary Noxious:

The species is present in Canada and has not reached its full ecological range. The species must be a weed whose presence in seed could affect the value and/or intended use of that seed lot; and/or could have a potential impact on the economy, human health or animal health. This determination would be based on a Pest Risk Assessment type process, when deemed to be necessary. The species must have identifiable seeds that can be visually distinguished from those of other species, or in rare instances, from entire genera.

3. Secondary Noxious:

The species is relatively common and widespread in Canada. The species must be a weed whose presence in seed could affect the value and/or intended use of the seed lot. The species must have identifiable seeds that can be visually distinguished from those of other species, or in rare instances, from entire genera.

SUPPORT  **CONDITIONALLY ACCEPT** (Class 1 and Class 2 Definitions)

**CSTA accepts the proposed definitions for Class 1 – Prohibited Noxious and Class 2 Primary Noxious, but only if all of the species placed within those classes truly meet the definitions. That is not the case with the CFIA draft proposal as it currently exists.**

**DO NOT SUPPORT the proposed definition for Class 3 – Secondary Noxious**

**This class should be more clearly defined than proposed. We support the following definition:**

**“The species is relatively common and widespread in Canada. The species must be a weed whose presence in seed could affect the value and/or intended use of the seed lot. The species must have the potential to be a serious weed in certain crops, but be relatively easy to eradicate with current crop and seed plant management practices. The species must have identifiable seeds that can be visually distinguished from those of other species, or in rare instances, from entire genera.”**

**B. STRUCTURE:**

1. Currently Primary Noxious does not apply to Grade Table XIV (Lawn or turf mixtures of two or more kinds of seeds) or Grade Table XV (Ground cover mixtures composed of seed of two or more kinds other than cereal mixtures, forage mixtures, and lawn or turf mixtures).

Should Primary Noxious apply to Grade Table XIV (Lawn or turf mixtures of two or more kinds of seeds) of Schedule I?

SUPPORT

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**DO NOT SUPPORT**

**Applying Class 2 to tables XIV and XV would have extremely negative consequences for Canada’s turf seed sector. Currently, on average 5 – 10% of the turf seed produced annually contains one or more of the following weeds: Couch Grass (Quack Grass), Cleavers and Canada Thistle. However, under the current Weed Seeds Order structure, turf grasses that do contain these weeds are still marketable, and provide a less expensive option to consumers who wish to establish ground covers or revegetate damaged areas. It is important to note that lawn and turf does not generally produce seed because it is cut regularly.**

**CFIA’s proposal to apply Class 2 to all tables would make these grasses unmarketable. The economic damage to the industry would be extensive. Growers would exit the industry for fear of producing an unmarketable crop; seed companies would find it very difficult to secure supplies for their historical needs, and these supplies would almost certainly come at a much higher cost.**

2. Should Primary Noxious apply to Grade Table XV (Ground cover mixtures composed of seed of two or more kinds other than cereal mixtures, forage mixtures, and lawn or turf mixtures) of Schedule I?

SUPPORT

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DO NOT SUPPORT

**Under the current Weed Seeds Order structure, grass seed mixes that do contain these weeds are still marketable, and provide a less expensive option to consumers who wish to establish ground covers or revegetate damaged areas. CFIA's proposal to apply Class 2 to all tables would make these grasses unmarketable. The economic damage to the industry would be extensive. Growers would exit the industry for fear of producing an unmarketable crop; seed companies would find it very difficult to secure supplies for their historical needs, and these supplies would almost certainly come at a much higher cost.**

3. Do you have any further comments regarding the proposed amendments to the *Weed Seeds Order* that you wish to share?

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### **C. SPECIES PLACEMENT**

1. Please provide feedback on species placement on the *Weed Seeds Order* by completing the following table.



Scientific Name (Source: GRIN)	Common Name	Current Classification (Weed Seeds Order, 2005)	New Proposed Classification (June 2011)	Agree	Remove / Reclassify	Rationale
<i>Aegilops cylindrica</i>	Jointed goatgrass	Class 1	Class 1			
<i>Alopecurus myosuroides</i>	Slender foxtail	N/A	Class 1		<b>XX</b> <b>Class 2</b>	Does not meet the definition of Class 1 as it is present in Manitoba. Its seed has been found in imports from the EU for years.
<i>Bothriochloa ischaemum</i>	Yellow bluestem	N/A	Class 1			
<i>Bothriochloa laguroides</i>	Silver beardgrass	N/A	Class 1			
<i>Centaurea diffusa</i>	Diffuse knapweed	Class 1	Class 1			
<i>Centaurea iberica</i>	Iberian star thistle	N/A	Class 1			
<i>Centaurea solstitialis</i>	Yellow star thistle	Class 1	Class 1			
<i>Centaurea stoebe</i>	Spotted knapweed	Class 1	Class 1			
<i>Centaurea virgata</i> Lam. subsp. <i>squarrosa</i> (Boiss.) Gugler (= <i>Centaurea virgata</i> var. <i>squarrosa</i> )	Squarrose knapweed	N/A	Class 1			
<i>Crupina vulgaris</i>	Common crupina	Class 1	Class 1			
<i>Cuscuta</i> spp.	Dodder	Class 1	Class 1			
<i>Echium plantagineum</i>	Paterson's curse	N/A	Class 1			
<i>Eriochloa villosa</i>	Woolly cup grass	Class 1	Class 1			
<i>Halogeton glomeratus</i>	Halogeton	Class 1	Class 1			
<i>Milium vernale</i>	Spring Millet grass	N/A	Class 1			
<i>Nassella trichotoma</i>	Serrated tussock	Class 1	Class 1			
<i>Paspalum dilatatum</i>	Dallis grass	N/A	Class 1			
<i>Peganum harmala</i>	African-rue	N/A	Class 1			
<i>Persicaria perfoliata</i>	Devil's-tail tearthumb	N/A	Class 1			
<i>Pueraria montana</i>	Kudzu	N/A	Class 1			
<i>Senecio inaequidens</i>	Narrow-leaved ragwort	N/A	Class 1			
<i>Senecio madagascariensis</i>	Madagascar ragwort	N/A	Class 1			
<i>Solanum elaeagnifolium</i>	Silverleaf nightshade	N/A	Class 1			
<i>Taeniatherum caput-medusae</i>	Medusahead rye	N/A	Class 1			
<i>Zygophyllum fabago</i>	Syrian bean-caper	N/A	Class 1			
<i>Abutilon theophrasti</i>	Velvetleaf	Class 2	Class 2			
<i>Acroptilon repens</i> (= <i>Rhaponticum repens</i> (L.) Hidalgo)	Russian knapweed	Class 1	Class 2			

<i>Amaranthus tuberculatus</i>	Tall water-hemp	N/A	Class 2			
<i>Ambrosia trifida</i>	Giant ragweed	Class 2	Class 2			
<i>Anthriscus sylvestris</i>	Cow parsley	N/A	Class 2			
<i>Berteroa incana</i>	Hoary alyssum	N/A	Class 2			
<i>Carduus acanthoides</i>	Spiny plumeless thistle	N/A	Class 2			
<i>Carduus nutans</i>	Nodding thistle	Class 1	Class 2			
<i>Cenchrus longispinus</i>	Long-spined sandbur	N/A	Class 2			
<i>Chondrilla juncea</i>	Rush skeletonweed	N/A	Class 2			
<i>Cirsium arvense</i>	Canada thistle	Class 2, 5	Class 2			
<i>Conium maculatum</i>	Poison hemlock	Class 1	Class 2			
<i>Convolvulus arvensis</i>	Field bindweed	Class 2	Class 2			
<i>Datura stramonium</i>	Jimsonweed	Class 1	Class 2			
<i>Elytrigia repens</i> (= <i>Elymus repens</i> (L.) Gould)	Couchgrass	Class 2, 5	Class 2			
<i>Euphorbia esula</i>	Leafy spurge	Class 1	Class 2			
<i>Galega officinalis</i>	Goat's-rue	N/A	Class 2			
<i>Galium aparine</i>	Cleavers	Class 2	Class 2		<b>XX Class 3</b>	Weed is widespread, but Glyphosate tolerant Canola has made the weeds relatively easy to control in the field.
<i>Galium mollugo</i>	False baby's breath	N/A	Class 2			
<i>Galium spurium</i>	False cleavers	Class 2	Class 2		<b>XX Class 3</b>	Weed is widespread, but Glyphosate tolerant Canola has made the weeds relatively easy to control in the field.
<i>Galium verrucosum</i>	Warty bedstraw	N/A	Class 2		<b>XX Class 3</b>	
<i>Heracleum mantegazzianum</i>	Giant hogweed	N/A	Class 2			
<i>Heracleum sosnowskyi</i>	Hogweed	N/A	Class 2			
<i>Lepidium appelianum</i>	Globe-pod hoary cress	Class 1	Class 2			
<i>Lepidium draba</i> subsp. <i>chalapense</i> (= <i>Lepidium chalepense</i> L.)	Lens-pod hoary cress	Class 1	Class 2			
<i>Lepidium draba</i> subsp. <i>draba</i> (= <i>Lepidium draba</i> L.)	Heart-pod hoary cress	Class 1	Class 2			
<i>Linaria</i> spp.	Toadflax	Class 2	Class 2			
<i>Lythrum salicaria</i>	Purple loosestrife	Class 2	Class 2			
<i>Nicandra physalodes</i>	Apple of Peru	N/A	Class 2			
<i>Odontites vernus</i> subsp. <i>serotinus</i>	Red bartsia	Class 1	Class 2			
<i>Raphanus raphanistrum</i>	Wild radish	Class 2	Class 2			

<i>Senecio jacobaea</i> (= <i>Jacobaea vulgaris</i> Gaertn.)	Tansy ragwort	Class 2	Class 2			
<i>Setaria faberi</i>	Giant foxtail	Class 2	Class 2			
<i>Silene latifolia</i> subsp. <i>alba</i>	White cockle	Class 2	Class 2		<b>XX Class 3</b>	Present the same as <i>Silene noctiflora</i> (Night-flowering Catchfly). Number of seeds producers and methods and ease of control are the same. They should be in Class 3 with <i>Silene noctiflora</i>
<i>Silene vulgaris</i>	Bladder campion	Class 2	Class 2			
<i>Solanum carolinense</i>	Horse-nettle	Class 1	Class 2			
<i>Sonchus arvensis</i>	Perennial sow thistle	Class 2, 5	Class 2			
<i>Sorghum halepense</i>	Johnson grass	Class 1	Class 2			
<i>Tribulus terrestris</i>	Puncture vine	N/A	Class 2			
<i>Ambrosia artemisiifolia</i>	Common ragweed	Class 3	Class 3			
<i>Anthemis cotula</i>	Mayweed	Class 3	Class 3			
<i>Avena fatua</i>	Wild oat	Class 3	Class 3			
<i>Avena sterilis</i>	Sterile oat	Class 3	Class 3			
<i>Barbarea</i> spp.	Yellow rocket	Class 2	Class 3			
<i>Bromus arvensis</i>	Field brome	N/A	Class 3		<b>Should remain not listed in the WSO</b>	Are group for marketing purposes in the U.S. and the U.S. market accepts forage seed up to 0.5% (some states up to 2%) Well established in much of Canada and has likely reached ecological limits. Has little effect on seed establishment or quality.
<i>Bromus japonicus</i>	Japanese brome	N/A	Class 3			
<i>Bromus secalinus</i>	Cheat	N/A	Class 3			
<i>Bromus tectorum</i>	Downy brome	N/A	Class 3			
<i>Daucus carota</i> subsp. <i>carota</i>	Wild carrot	Class 3	Class 3			
<i>Erucastrum gallicum</i>	Dog mustard	Class 3	Class 3			
<i>Lepidium campestre</i>	Field peppergrass	Class 3	Class 3			
<i>Leucanthemum vulgare</i>	Ox-eye daisy	Class 2	Class 3, 5			
<i>Lolium persicum</i>	Persian darnel	Class 3	Class 3			
<i>Pastinaca sativa</i>	Wild parsnip	N/A	Class 3			
<i>Plantago lanceolata</i>	Ribgrass	Class 3	Class 3			
<i>Rumex</i> spp. (except <i>R. maritimus</i> & <i>R. acetosella</i> )	Dock	Class 3	Class 3			
<i>Silene noctiflora</i>	Night-flowering catchfly	Class 3	Class 3			
<i>Sinapis arvensis</i>	Wild mustard	Class 2	Class 3			
<i>Sisymbrium loeselii</i>	Tall hedge mustard	Class 3	Class 3			
<i>Thlaspi arvense</i>	Stinkweed	Class 3	Class 3			

<i>Tripleurospermum maritimum</i> subsp. <i>inodorum</i>	Scentless chamomile	Class 3, 5	Class 3, 5			
<i>Lepidium campestre</i>	Field peppergrass	Class 3, 5	Class 3, 5			
<i>Vaccaria hispanica</i>	Cow cockle	Class 3	Class 3			
<i>Cerastium</i> spp.	Mouse-ear chickweed	Class 4, 5	Class 4, 5			
<i>Digitaria</i> spp.	Crabgrass	Class 4, 5	Class 4, 5			
<i>Panicum</i> spp.	Panic grass	Class 4, 5	Class 4, 5			
<i>Prunella vulgaris</i>	Heal-all	Class 4, 5	Class 4, 5			
<i>Stellaria media</i>	Common chickweed	Class 4, 5	Class 4, 5			
<i>Alliaria petiolata</i>	Garlic mustard	Class 6	Class 6			
<i>Allium vineale</i>	Crow garlic	Class 6	Class 6			
<i>Alternanthera sessilis</i>	Sessile joyweed	Class 6	Class 6			
<i>Amaranthus hybridus</i>	Slim amaranth	Class 6	Class 6			
<i>Amaranthus powellii</i> S. Watson	Powell's amaranth	Class 6	Class 6			
<i>Amaranthus retroflexus</i>	Redroot pigweed	Class 6	Class 6			
<i>Ammi majus</i>	Bishop's weed	Class 6	Class 6			
<i>Anagallis arvensis</i>	Scarlet pimpernel	Class 6	Class 6			
<i>Bassia scoparia</i>	Kochia	Class 6	Class 6			
<i>Bidens pilosa</i>	Spanish needles	Class 6	Class 6			
<i>Calystegia sepium</i>	Hedge bindweed	Class 6	Class 6			
<i>Camelina microcarpa</i>	Little-pod false flax	Class 6	Class 6			
<i>Camelina sativa</i>	Gold-of-Pleasure	Class 6	Class 6			
<i>Chenopodium album</i>	Lambsquarters	Class 6	Class 6			
<i>Cichorium intybus</i>	Chicory	Class 3	Class 6			
<i>Dioscorea polystachya</i>	Chinese yam	Class 6	Class 6			
<i>Hordeum jubatum</i>	Foxtail barley	Class 6	Class 6			
<i>Impatiens glandulifera</i>	Himalatan balsam	Class 6	Class 6			
<i>Knautia arvensis</i>	Field scabious	Class 6	Class 6			
<i>Phragmites australis</i>	Common reed	Class 6	Class 6			
<i>Polygonum cuspidatum</i> (= <i>Fallopia japonica</i> (Houtt.) Ronse Decr.)	Japanese knotweed	Class 6	Class 6			
<i>Ricinus communis</i> L.	Castor bean	Class 6	Class 6			
<i>Silybum marianum</i>	Milk thistle	Class 6	Class 6			
<i>Solanum ptychanthum</i> Dunal	Eastern black nightshade	Class 6	Class 6			
<i>Solanum sarrachoides</i> Sendt.	Hairy nightshade	Class 6	Class 6			
<i>Soliva sessilis</i>	Carpet burweed	Class 6	Class 6			
<i>Vicia cracca</i>	Tufted vetch	Class 6	Class 6			

<i>Vincetoxicum louiseae</i> (= <i>Vincetoxicum nigrum</i> (L.) Moench)	Black dog strangling vine	Class 6	Class 6			
<i>Vincetoxicum rossicum</i>	Dog strangling vine	Class 6	Class 6			
<i>Xanthium sibiricum</i>	Siberian cocklebur	Class 6	Class 6			



**10.0 IDENTIFICATION OF RESPONDENT**

First Name: Patty  
Last Name: Townsend  
Affiliation: Canadian Seed Trade Association

Are the opinions expressed herein:  
your own or,

**On behalf of the Canadian Seed Trade Association**

Address:

Province: Suite 505, 39 Robertson Road, Ottawa, Ontario  
Postal Code: K2H 8R2  
Email: ptownsend@cdnseed.org

Please identify yourself by selecting from the choices below. Select all that apply.

- agricultural primary producer
- crop input company
- farm organization
- federal government
- industry association**
- interested member of the general public
- other, please specify \_\_\_\_\_
- invasive plant council
- municipal government
- pedigreed seed grower
- provincial government
- research / academia
- seed analyst

**The Canadian Seed Trade Association represents the common interests of 130 member seed companies. It is our sincere hope that CSTA's input will be weighted to recognize our structure and representation.**

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*Thank You*

The CFIA appreciates your time and effort toward improving the Canadian plant regulatory framework. Responses received during the consultation period will be reviewed and considered in finalizing the proposed changes to the *Weed Seeds Order* and any required regulatory amendments. Please note, however, that it may not be possible to respond individually to any comments received.