



CANADIAN SEED TRADE ASSOCIATION
L'ASSOCIATION CANADIENNE DU COMMERCE DES SEMENCES
2039 Robertson Road Suite 505 Ottawa, Ontario K2H 8R2
Tel: 613-829-9527 Fax: 613-829-3530 www.cdnseed.org Email: csta@cdnseed.org

August 14, 2015

Michael Scheffel
National Manager, Seed Section and Registrar, VRO
Plant Health and Biosecurity Directorate
Canadian Food Inspection Agency
59 Camelot, Floor 2, Room 250 E Ottawa, Ontario K1A 0Y9

Re: CSTA feedback on Phase II: Second draft of Model Operating Procedures (MOP V 2.0)

Dear Michael:

I write this letter on behalf of CSTA's Board of Directors to provide feedback on the second draft of the Model Operating Procedures (MOP V 2.0) as circulated for comment. This letter can be considered a follow up to our letter dated February 12, 2015 to Mr. Greg Meredith, AAFC that provided feedback on the proposed 'modernized crop variety registration system'.

We welcome the direction from the government for a more streamlined process for crop kinds for which recommending committees and merit testing will still be required (Enhanced Registration). Specifically CSTA supports the development of new operating procedures to ensure that the system is efficient, flexible and predictable. The government's proposed model operating procedures which could achieve clearer criteria; less subjective voting; streamlined performance testing; the acceptance of private and foreign data; and a change in the structure of recommending committees to reduce the size and balance representation; is supported.

We encourage the government to continue the streamlining process beyond the currently proposed MOP V 2.0, and strive for a fully streamlined system that provides significantly higher returns to the value chain while minimizing costs. It is important to continue to modernize the process and we feel that the first priority is to align the variety registration process with value chain needs. We join with other associations including Cereals Canada to restate that change in the system should be led by the value chain. Our policy position defines the value chain as crop specific variety development, production, processing, marketing and trade.

We would also like to take this opportunity to reiterate that our members continue to strongly support the ability to exempt crop kinds from variety registration. Not only must crops currently exempted (e.g. corn, non-oilseed type soybeans, turf species) maintain their exempt status, but exemption should continue to be an option if there is clear rationale and a consensus of support from the value chain to do so.

CSTA's Board of Directors recently received and reviewed the proposal from Cereals Canada for a new structure for the Prairie Recommending Committee: Wheat, Rye and Triticale. It is the opinion of the CSTA Board that the Cereals Canada proposal could result in a smaller and more representative recommending committee. We are aware that further work on the proposal has been completed and the work continues. We suggest that this proposal from Cereals Canada be considered as an option.

We appreciate the consultative and inclusive process that has been undertaken by government, and look forward to continued collaboration.

Sincerely,

A handwritten signature in black ink that reads 'Crosby Devitt'.

Crosby Devitt

Executive Director

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