

May 1, 2007

## 2007 MEMO

### PLANT BREEDERS and CROP CERTIFICATE ASSIGNEES

This technical memo contains:

- recent and proposed changes in seed crop certification services from CSGA;
- reminders of specific requirements for production of Breeder seed crops; and
- news on developments that may interest those involved with Breeder seed production.

CSGA continues to review the previous land use requirements for pedigreed seed crop production, especially for crop kinds affected by major changes in varieties, new technologies and production practices. Several research projects are underway on persistence of volunteers and verification testing of distinguishing traits.

If you have questions, please contact the CSGA office, at our office address below.

#### **- NEW in 2007**

##### **1. THIRD-PARTY Auditors Required for Breeder seed crop Quality Management Systems (QMS)**

In 2007, the audits required to certify Breeder seed crops must now be conducted by qualified, third-party auditors. If Plant Breeders use the revised 2007 version of CSGA's *Application for Breeder Seed Crop Certificate (Form 43 / 2007)*, then the revised Section 12 will remind them that these audits must now be conducted by qualified, third-party auditors. A copy of this revised *APPLICATION* is available from the CSGA's website at: <http://www.seedgrowers.ca/cropcertification/breederseed.asp?lang=e>. For these CSGA QMS audits:

- Third-party auditors means: "a person who is independent of those...who provide as well as those who use the (audited) product or service". Definition references include ISO Guides 65 and 39 as well as ISO 17000.
- Qualified auditors include QMS assessors from the *Canadian Seed Institute (CSI)*, who have been trained to conduct CSGA Breeder seed crop QMS audits, and experienced third-party auditors who have completed ISO Lead Auditor training recognized by *RABSQA International* or the *International Register of Certificated Auditors (IRCA)*, the two major certification bodies for ISO auditors.

##### **2. CHANGES Effective in 2007 in CSGA's REGULATIONS (Circular 6)**

Changes for 2007 include revised isolation distances for corn crops, to maintain international equivalence, and simpler definitions of the harmful contaminants in canola crops. Changes for 2008 are referenced below and include revised previous land use for Soybean and Durum crops. The changes effective in 2007 were posted January 31<sup>st</sup> on CSGA's website at: <http://www.seedgrowers.ca/cropcertification/circular.asp#1>. Replacement pages for revised sections of Circular 6 were sent in February, 2007, to growers, Plant Breeders and crop certificate assignees. Additional copies are available from the CSGA office or website.

##### **3. DECLINE PROCEDURES for CROPS with GIANT FOXTAIL (now a Prohibited Noxious Weed)**

**In 2007, CSGA will DECLINE crops containing Giant Foxtail when the incidence level exceeds "Few".**

The "Few" level is defined as 5 to 20 plants / 100 square metres.

In July, 2005, the federal Weed Seeds Order was revised and Giant Foxtail was designated Prohibited Noxious. In 2006, CSGA put warning messages on crop certificates issued for crops containing Giant Foxtail, communicated this issue to seedgrowers and helped revise inspector training programs. For more information on Trace, Few and Numerous weed incidence levels, see Section 7.5, *Condition of Crop*, in CFIA's *Pedigreed Seed Crop Inspection Procedures* (QSP 142.1) at: <http://www.inspection.gc.ca/english/plaveg/seedsem/proseeie.shtml#32>.

## **- CONTINUING from 2006**

### **1. OFFICIAL VERIFICATION of ISOLATION REQUIREMENTS**

CSGA regulations require that isolation requirements for pedigreed seed crops be met "at the time of inspection". For seed crops not in compliance at the time of inspection, two options exist.

Both options require a re-inspection by the CFIA. The two options are:

- i) The required isolation strips must be removed prior to the re-inspection, OR
- ii) Except for cross-pollinated crops (such as canola and most forage species), a pedigreed crop can be harvested leaving behind a portion of the crop equivalent to the required isolation. This isolation strip and the crop perimeter should be clearly identified. Also, the isolation strip left behind must be verified by a CFIA re-inspection.

Isolation strips that are removed or left behind must not be used as pedigreed seed. To request re-inspections, growers need to contact their local CFIA office. Fees for re-inspections are billed by and payable to the CFIA.

### **2. CROP INSPECTION REPORTS in Application for Breeder Seed Crop Certificate (Form 43)**

Section 7 of the *Application for Breeder Seed Crop Certificate (Form 43)* was revised to permit CSGA to apply the following requirements and restrictions when Applications do NOT include a crop inspection report completed by an officially recognized inspector: a \$30 administration fee, submission of Breeder QMS audit verification (including maximum plot size) and ineligibility of the seed for demotion to a lower pedigreed class. This revision ensures that at least one generation of pedigreed seed is subject to official post-control, variety verification testing.

### **3. EXPANSION of ELECTRONIC CROP INSPECTION PILOT**

An expanded E-pilot project in 2007 will continue to assess the costs and benefits of using more computerized tools for seed crop inspection applications and reports. Developments in 2006 included web-based applications for crop inspection and the testing of hand-held reporting units (with integrated GPS) and laptop computers for web-based data transfers among inspectors, growers, assignees and the CSGA office.

Additions in 2007 include bilingual translation, research with CFIA on invasive species data collection, impact assessments of importing from proprietary databases and scaling up the number of growers per inspector.

## **- PLANNED for 2008**

### **1. CHANGES Effective in 2008 in CSGA's REGULATIONS (Circular 6)**

Changes to be effective in 2008 include revised previous land use requirements for both Soybean crops and Durum crops. Notice of these specific changes were posted January 31, 2007, on the CSGA's website at: <http://www.seedgrowers.ca/cropcertification/circular.asp#1>. Replacement pages for these revised sections of Circular 6 were sent to growers, Plant Breeders and crop certificate assignees in February, 2008. Additional copies are available from the CSGA office or website.

### **2. FREQUENCY and SCOPE of AUDITS Required for Breeder Seed Crop QMS**

CSGA's Plant Breeders' Committee has recommended that:

a) FREQUENCY of audits be based on a compliance-based protocol, similar to the "Seed Program Audit Frequencies" (already approved by the CFIA) for the Canadian Seed Institute (CSI), with similar switching rules from NORMAL to REDUCED or TIGHTENED frequency. All Breeder seed crop QMS would start at a NORMAL frequency requirement for an annual audit. If approved by CSGA's Board in 2007, beginning in 2008, after the third (3<sup>rd</sup>) successive audit without a Major non-conformance, audit frequency would switch to a REDUCED requirement of every second (2<sup>nd</sup>) year. A complete outline of switching rules and non-conformance ratings will be available from the CSGA's website later this year.

b) SCOPE of the audits will include complete audit of all QMS elements recommended in the CSGA's "ASSESSMENT CHECKLIST for Breeder Seed Production Quality Management System (QMS)", available at: [http://www.seedgrowers.ca/pdfs/forms/Breeder%20QMS\\_CropCert-Assessment-CHECKLIST\\_English\\_20060207..pdf](http://www.seedgrowers.ca/pdfs/forms/Breeder%20QMS_CropCert-Assessment-CHECKLIST_English_20060207..pdf). Since Breeder seed crops involve many different types of production systems, Plant Breeders and auditors will continue to identify the specific elements required in audited documents and records.

### **3. CONVERSION of Breeder Seed Crop Regulations to ISO Document Format**

CSGA's Plant Breeders' Committee has recommended that the *Breeder Seed Crop Regulations* be converted to ISO document format to ensure consistency with CSGA's *Canadian Regulations for Pedigreed Seed Crop Production (Circular 6-2005)* that include Hazard Analysis Critical Control Point (HACCP) principles and web-based applications. A text review and updating of the *Breeder Seed Crop Regulations* was also recommended to reflect sector and technology changes since last published in 2003. It was also recommended that the revised draft of these *Regulations*, to be reviewed by the Committee, include the text addition, "that recognized Plant Breeders are expected to maintain their professional competence".

### **4. SUSPENSION and CANCELLATION PROCEDURES for Recognized Plant Breeders**

CSGA's Plant Breeders' Committee has recommended that a proposal be drafted, for Committee review, on "*Suspension and Cancellation Procedures for Recognized Plant Breeders*". The proposal will be:

- limited to the scope of CSGA's professional recognition of Plant Breeders for Breeder seed certification;
- based on the authorization principles used in federal Seeds Regulations; and
- linked directly to compliance with the Quality Management System (QMS) required by CSGA for Breeder seed crop certification, with clear definitions of non-conformance categories (Minor and Major).

This proposal could support CSTA's request for a Canadian contribution to the code of conduct discussions at the International Seed Federation (ISF).

### **5. FURTHER EXPANSION of ELECTRONIC CROP INSPECTION PILOT**

Based on priorities identified in 2007, CSGA plans to continue expanding the E-pilot project to use more computerized tools for seed crop inspection applications and reports. Expansions in 2008 are expected to include assessments of potential partnering and strategic alliance networking possibilities with other national regulatory and research programs.

## **- REMINDERS**

### **1. SEPARATE Applications for Crop Inspection REQUIRED for DIFFERENT ADDRESS LOCATIONS**

Most Breeders produce inspected plots at the address of their employer. For plots produced at other locations, Breeders' submitting separate or individual Applications for Crop Inspection for each different address location will help CSGA ensure that inspection reports are sent to the appropriate inspection office for each different location and that inspectors receive the correct land location, landowner's name and accurate directions.

Plant Breeders are asked to submit separate or individual Applications for Crop Inspection, that contain landowner contact information, for each different address location where they are applying for inspections of Breeder seed plots.

### **2. VARIETY NAMES used on Applications for Crop Inspection**

Variety names used on *Applications for Crop Inspection* must match the name, or previous experimental name, used on the official Variety Description. These names should not include additional numbers or names often used within company quality control systems. In the case of experimental lines, the use of an "EXP" prefix or suffix is recommended.

### **3. MAXIMUM Breeder PLOT SIZE - 2.5 acres (1 Ha)**

To ensure adequate inspection intensity, maximum Breeder plot size for CSGA certification is 2.5 acres (1 Ha). There is no limit on the number of plots applied for inspection.

### **4. BREEDER SEED TAG SIGNATURES**

Breeders should print their name, after their signature, on Breeder seed tags. This expedites CSGA's verification of parent seed eligibility on crop inspection reports and prevents CSGA from having to send follow-up letters to seed growers, companies or breeders before issuing crop certificates.

### **5. VARIETY DESCRIPTIONS**

For new, unregistered varieties, which have not previously been officially inspected in Canada, Variety Descriptions should be submitted to CSGA either before or with Applications for Crop Inspection of these varieties. To be eligible for certification, these Variety Descriptions must include the distinguishing characteristics of the new variety and identify the variety maintainer. Distinguishing characteristics, additional or higher voluntary certification standards and trait certification are being reviewed by many seed certification agencies as new variety verification testing technology is officially recognized.

## **- AVAILABLE from CSGA**

### **1. From CSGA'S Website at: [www.seedgrowers.ca](http://www.seedgrowers.ca)**

- a) **2007 Application for Crop Inspection** with separate *Fee Calculation* worksheet.
- b) **MEMBER LOGIN** at: <http://www.seedgrowers.ca/CSGAMembers/Login.aspx>, provides Plant Breeders, growers and crop certificate assignees with password-secure, access to their own real-time crop inspection and account records.
- c) Official versions of all CSGA Regulations and revisions;
- d) Authorizations to Assign Crop Certificates (Form 179 and 179A);
- e) Applications for Breeder Seed Crop Certificates (Form 43);
- f) Land Use Verification Requests (Form 101);
- g) Variety Certification Eligibility Applications (Form 300) for entering, into CSGA certification, new varieties of crop kinds exempt from official registration or unregistered varieties that will be exported and officially labeled;
- h) Pedigreed seed promotional items and Pedigreed Seed Crop Directories.

### **2. REPORTS AVAILABLE from CSGA**

In addition to Pedigreed Seed Crop Directories available from our website, CSGA will provide:

- to Crop Certificate Assignees, a list of all inspected crops and growers with certificates assigned to their company.....\$150 (min.); and
- to Plant Breeders or variety developers, or their designates, a list of all the growers and inspected crops of their varieties..... \$150 (min.).

Actual cost of reports is based on the number of growers and varieties involved.

### **3. IDENTITY PRESERVED (IP) CROP INSPECTION**

If you require CSGA support in developing an Identity Preserved (IP) crop inspection program, contact the CSGA office as soon as possible.

### **4. CSGA OFFICE STAFF**

Phone extensions from (613) 236-0497 and e-mail addresses are listed below and also available at: [www.seedgrowers.ca](http://www.seedgrowers.ca) .

Operations Manager	Roy van Wyk	ext. 228	e-mail:	<a href="mailto:vanwykr@seedgrowers.ca">vanwykr@seedgrowers.ca</a>
Ops Coordinator	Gail Harris	227		<a href="mailto:harrisg@seedgrowers.ca">harrisg@seedgrowers.ca</a>
Ops Coordinator	René Daoust	226		<a href="mailto:daoustr@seedgrowers.ca">daoustr@seedgrowers.ca</a>
Ops Admin. Coordinator	Caroline Lafontaine	225		<a href="mailto:lafontaine@seedgrowers.ca">lafontaine@seedgrowers.ca</a>
Executive Director	Dale Adolphe	ext. 224	e-mail:	<a href="mailto:adolphed@seedgrowers.ca">adolphed@seedgrowers.ca</a>
Executive Assistant	Gaye O'Bertos	221		<a href="mailto:obertosg@seedgrowers.ca">obertosg@seedgrowers.ca</a>
Program Manager	Randy Preaterr	223		<a href="mailto:preaterr@seedgrowers.ca">preaterr@seedgrowers.ca</a>
Finance Manager	Rosemary Barr	222		<a href="mailto:barr@seedgrowers.ca">barr@seedgrowers.ca</a>

CSGA plans to continue sending you this annual update on pedigreed seed crop inspection and welcomes comments on any of these subjects. You can contact the CSGA or unsubscribe at:

## **Canadian Seed Growers' Association**

**P.O. Box 8455, 240 Catherine Street, Suite 202**

**Ottawa, Ontario K1G 3T1**

**(613) 236-0497**

**Fax: (613) 563-7855**

**[www.seedgrowers.ca](http://www.seedgrowers.ca)**