



## SASKATCHEWAN CANOLA GROWERS ASSOCIATION

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**Cindy Pearson**  
**Senior Specialist, Variety Registration**  
**Canadian Food Inspection Agency**  
**1400 Merivale Road**  
**Ottawa Ontario**  
**K1A 0Y9**

Dear Ms. Pearson:

I am writing you in regard to the Proposed Changes to Canola Variety Recommendation and Registration Requirements to provide the thoughts of the Saskatchewan Canola Growers Association (SCGA).

The proposed changes are welcomed by the SCGA. These changes will provide canola growers with quicker access to new varieties and seed traits. As new varieties are developed it is often in the interest of canola growers to gain access to the new or improved technologies in order to be first adopters on a global basis. If Canadian canola growers are able to access the new or improved technologies they are able to remain competitive with rapeseed and canola growers in other countries.

The SCGA does have some concerns about the proposed changes. A concern of the SCGA is the confusion that may be created for canola growers in regard to the interim classification. This classification needs to be stated to growers for any variety that has an interim registration. It will be important that canola growers are aware that the variety they are growing may not be registered after three years. The SCGA would like to see the new recommendation and registration requirements include some requirements that the company seeking registration would follow in order to help the canola grower understand the definition of an interim variety and that the variety is an interim variety available for three years and then will become an unregistered variety unless the Western Canada Canola/Rapeseed Recommending Committee (WCC/RRC) recommends the variety for unrestricted registration. It is the opinion of the SCGA that the interim variety information needs to be clearly stated to the canola grower in order that any variety that does not become an unrestricted variety is quickly removed from the market in order that our international buyers of canola do not implement trade restrictions in future years. One way to communicate this to canola growers may be to use the Canola Council of Canada's Export Ready program.

In addition to the communication to canola growers to the meaning of an interim registration the SCGA would like to see the inclusion of a plan that the company applying for the variety registration would follow for removing a variety from the system if the variety is not accepted by the WCC/RRC for full registration after three years of interim status. If the variety does not meet the requirements after three years and the variety cannot be fully registered there will need to be a methodology in place for removing the seed from the system to ensure any negative impacts for the canola industry may develop in the future.

The SCGA thanks the Canadian Food Inspection Agency for the opportunity to provide comments on this very important issue for canola growers. If you have any question please do not hesitate to contact Wayne Thompson, Executive Director, at 306-668-2380.

Sincerely,

Wayne Thompson  
Executive Director