

NFU Farmers Guide to the new CFIA survey:  
***Winter 2024***  
***Seed Regulatory Modernization***  
***Consultation and Update***



The Canadian Food Inspection Agency (CFIA)'s major review of Canada's Seeds Regulations could result in far-reaching changes to our seed system. Our seed regulations build, maintain, and protect the value of Canadian agricultural products for farmers and end-users with an evidence-based and transparent variety registration process. They ensure farmers can easily get relevant and meaningful information about the seed they use. Canada's current seed regulations also respect farmers' ability to use farm saved seed and to exchange or sell public domain seed to each other as common seed.

**The Seed Regulatory Modernization review puts all of this on the table.**

The CFIA wants input from farmers and others in the seed sector. You can add your voice by filling in the CFIA survey. By filling in the survey, your answers will ensure the CFIA clearly hears that our seed regulations must protect the well-being of farmers.

Multinational seed and chemical companies have their own ideas about what this review should do. If their input is not countered by farmers, the review could bring in major changes that make seed more expensive and less accessible for farmers, may harm the public interest, and weaken agriculture in Canada.

The National Farmers Union (NFU) has carefully analysed the questions, and with this **Farmers Guide** you can easily complete the survey with answers that support farmers. **Deadline is May 1, 2024.**

The NFU has also produced **fact sheets** related to Canada's Seeds Regulations - in advance of completing this survey, you can check out the fact sheets on Variety Registration, Pedigreed and Common seed, and Seed Imports and Exports at [www.nfu.ca/seed-regs](http://www.nfu.ca/seed-regs) along with more information about the Seed Regulatory Modernization process and its implications.

In the guide below, the CFIA's questions and background information are shaded on the left side, and the NFU's recommended answers and suggested comments to add to your answers are on the right.

In the **Demographics** section respond with information about yourself as an individual.

Make sure you click the "**submit**" button when you finish to make sure the CFIA gets your responses.

The more responses the CFIA gets from farmers like you, the better! **Please share** this guide with other farmers who want to make sure our seed regulations work for farmers!

**Survey link - [https://ca1se.voxco.com/SE/93/SRM\\_MRS/?&lang=en](https://ca1se.voxco.com/SE/93/SRM_MRS/?&lang=en)**

## Variety registration

<p><b>Do you want to answer this section on variety registration?</b></p>	<p>You must answer <b>YES</b> to proceed to the questions.</p>
<p><b>Question 1:</b>  <i>Sometimes farmers would like to continue to use a variety that a registrant cancels on request. Cancellation of the registration prevents the sale of both pedigreed seed and common seed of this variety, but does not prevent farmers from using farm saved seed. Some possible reasons why a Registrant may wish to request cancellation of a variety include i) when quality issues arise after successive generations of production that were not seen when the variety was originally registered, ii) if the variety is old and has not been used in years, to decrease additional costs to maintain the variety in the system, and iii) the variety has a herbicide tolerant trait under a stewardship program to ensure there are no issues with the trait in the environment or market, etc.</i></p> <p><b>Do you support registrants being able to cancel varieties at their own request when there are no safety concerns with the variety?</b></p>	<p><b>NO</b>          You <u>must</u> provide comments on why your answer is <b>NO</b>.</p> <p>Here are some ideas you can use for your comments:</p> <p>Cancelling seed varieties on request by registrants where there are no safety concerns gives seed corporations too much power over farmers' choice of seed.</p> <p>The CFIA is already obligated to cancel registration for varieties that are susceptible to disease or harmful to health or the environment.</p> <p>Cancellations on request reduce seed diversity and availability. Farmers should be able to access the varieties they need for their farms. Genetic diversity is also important to help farmers adapt to the changing climate. Cancellation on request should not be allowed.</p> <p>Some registrants might cancel good older varieties as a way to force farmers to buy newer varieties where the company can charge royalties. This makes seed more expensive without improving the value of seed available for production.</p> <p>Allowing cancellation at the request of registrants could remove varieties that have unique economic, cultural, or agronomic value, particularly for organic growers who benefit from varieties that perform well in organic or low-input production.</p>
<p><b>Question 2:</b>  <i>The Canadian Seed Growers Association (CSGA) has put forward a proposal to the Seed Regulatory Modernization Working Group for the CFIA to take on the responsibility of determining variety certification eligibility for all crops not subject to variety registration. The Export Task Team also</i></p>	<p><b>YES.</b> You <u>must</u> provide comments about why your answer is <b>YES</b>.</p> <p>Here are some ideas you can use for your comments:</p>

<p><i>recommended this in order for the process to be more streamlined and consistent with other Organisation for Economic Co-operation and Development (OECD) countries. If the CFIA were to take over this responsibility, the service standards for decision making and the fee for assessment would likely be the same as the variety registration of crops listed in Part III of Schedule III of the Regulations. Information requirements would be similar to the Form 300 process but may require additional variety description forms to be developed for minor use crops (i.e. crops other than corn, industrial hemp, soybean and pulse).</i></p> <p><b>Do you support CFIA taking over the responsibility of determining variety certification eligibility for crops not subject to variety registration?</b></p>	<p>The CFIA taking over this responsibility would be efficient and in line with the CFIA's role as a regulator.</p> <p>Determining eligibility for certification for crop kinds that do not require variety registration will increase the CFIA's capacity to deal with any issues regarding variety certification.</p> <p>Having the CFIA in charge of this responsibility will be transparent.</p>
<p><b>Question 3: Additional Feedback.</b></p>	<p>Please add any other comments you may have.</p>

### Sampling, testing and grading of seed

<p><b>Do you want to answer this section on sampling, testing and grading of seed?</b></p>	<p>You must answer <b>YES</b> to proceed to the questions.</p>
<p><b>Sampling, testing and grading - Question 1:</b>  <i>In an effort to: a) align the testing requirements for seed sold in Canada; b) ensure individuals are qualified to conduct a test to a recognized standard method; and c) increase consumer protection; the Common Seed Task Team and the Seed Testing Task Team recommended that all domestic common seed sold in Canada and all seed of crop kinds not listed in the Grade Tables of Schedule I of the Regulations have testing done by an officially recognized, accredited or supervised laboratory, or in the case of purity testing for crop kinds listed in Grade Tables I-VI, by an accredited grader. Testing for crop kinds listed in Schedule I that are to be graded with a pedigreed grade name would continue as is using an officially recognized test in an officially recognized laboratory, or in the case of purity testing for crop kinds listed in Grade Tables I-VI, by an accredited grader.</i></p>	<p><b>NO.</b> You <u>must</u> provide comments about why your answer is <b>NO</b>.</p> <p>Here are some ideas you can use for your comments:</p> <p>Requiring common seed to be tested by an accredited laboratory would be cost prohibitive to farmers who buy and sell common seed, particularly smaller scale growers.</p> <p>The costs involved with testing all common seed kinds in Canada would likely destroy farmer-to-farmer seed sales and domestic vegetable seed production which are essential to the resilience of Canada's agriculture and food system.</p> <p>If all common seed had to be lab tested, the amount of seed available would become limited, and the cost of seed would go up.</p>

<p><b>Do you support the requirement for all seed types to be tested by officially recognized, accredited or supervised laboratories only, (or in the case of purity testing for crop kinds listed in Grade Tables I-VI, by an accredited grader)?</b></p>	<p>If all common seed had to be lab tested, fewer varieties would be sold, reducing the biodiversity in Canada’s agriculture system, making it less resilient.</p> <p>Common seed is an important safety valve in years when poor growing conditions result in low yields of certified seed. Onerous testing requirements could lead to seed shortages with disastrous effects on food production. Common seed and farm saved seed are both necessary to ensure there is always enough seed to grow Canada’s crops.</p> <p>If testing of common seed was required, it would blur the distinction between certified and common seed, weakening the value proposition of certified seed.</p>
<p><b>Sampling, testing and grading – Question 2:</b>  <i>Seed of crop kinds listed in the Grade Tables of <a href="#">Schedule I of the Regulations (opens in a new window)</a> must be sold by grade name. Canada pedigreed grade names can only be applied to seed by an accredited grader, however anyone may apply non-pedigreed grade names (e.g., Common No. 1, Common No. 2). In an effort to ensure that those applying a Common seed grade name to a seed lot sold in Canada are knowledgeable of the regulatory requirements and can accurately and consistently determine if the minimum standards have been met, the Common Seed Task Team recommended that common seed should be graded by an accredited grader for all crop kinds with the exception of seeds in the horticulture sectors (e.g., fruits, vegetables, roots, herbs, flowers, etc.).</i></p> <p><b>Do you support allowing individuals to apply a Common seed grade name only if they are an accredited grader? This would apply to all crop kinds of common seed with the exception of seeds in the horticultural sectors.</b></p>	<p><b>NO.</b> You <u>must</u> provide comments on why your answer is <b>NO</b>.</p> <p>Common seed is an important and necessary part of Canada’s agriculture system. Requiring an accredited grader to grade all common seed other than horticultural seed is unnecessary and expensive. It would result in less common seed being available for production.</p> <p>This requirement would limit access to varieties available only as common seed, reducing biodiversity across the farming system, and forcing farmers to purchase varieties that may not be the best for their operation.</p> <p>This would heavily impact farmer-to-farmer seed sales, and would push farmers to buy more expensive certified seed more often.</p> <p>Organic farmers often prefer registered public-domain varieties that perform well in low-input cropping systems that can be difficult to source as pedigreed seed. Adding onerous requirements for common seed sales would harm organic farmers.</p> <p>This recommendation underestimates the due diligence and cleaning processes already undertaken by farmers buying and selling common seed.</p>

	<p>If accredited grading of common seed was required, it would blur the distinction between certified and common seed, weakening the value proposition of certified seed.</p>
<p><b>Sampling, testing and grading Q3 - Additional Feedback</b></p>	<p>Both pedigreed and common seed are essential to our seed system. How farmers buy, sell and exchange common seed has not caused any problems for crop production or quality in Canada. It is unnecessary to add requirements like purity testing and accredited grading to common seed. Adding these requirements would reduce the supply of seed, increase its cost and reduce choice for farmers.</p> <p>Increasing the regulatory burden on buyers and sellers of common seed would lead to less common seed being sold, and fewer varieties being offered for sale. This would ultimately decrease the autonomy of farmers to select seed that is best for their farms.</p>

**Import, Export and Sale of Seed**

<p><b>Do you want to answer this section on import, export and sale of seed?</b></p>	<p>You must answer <b>YES</b> to proceed to the questions.</p>
<p><b>Import, export and sale - Question 1:</b>  <i>The post-clearance of seed provides opportunities for non-compliance (i.e., if seed gets distributed and/or planted before it is cleared) when seed is not kept intact and in original packaging until the import conformity assessment has been completed. Release at the border by Canada Border Services Agency can easily be mistaken as a sign that the seed meets import requirements. In an effort to reduce non-compliance associated with the post-clearance of seed imported into Canada, the Import Task Team recommended that all imported seed lots must be pre-cleared unless imported by an AI. In the latter case the AI can either pre-clear or post-clear seed destined to their Registered Seed Establishment.</i></p> <p><b>Do you support continuing to allow imported seed to either be pre-cleared or post-cleared by an Authorized Importer but require all other seed imported into Canada to be pre-cleared only?</b></p>	<p><b>NO.</b>          You <u>must</u> provide comments about why your answer is <b>NO.</b></p> <p>The proposal to only allow pre-cleared imports if the seed is not going through an Authorized Importer would make it more difficult for small-to-medium seed growers in other countries to export to Canada, and this would reduce Canadian farmers’ access to seed that may not be available from any domestic source.</p> <p>The CFIA currently offers post-clearance service for importers that are not Authorized Importers. This is in the public interest, and the CFIA should continue doing this. Small exporters may require the post-clearance service to provide specialty seeds that otherwise may not be available, particularly vegetables of cultural significance to new Canadians.</p> <p>Many Authorized Importers are affiliated with seed companies, and as a result may have an incentive to</p>



	<p>restrict market access for competitors. By eliminating the CFIA’s post-clearance service, these companies would have undue control over small exporters’ access to the Canadian market.</p> <p>Risks of seed being planted without post-clearance are small, and can be dealt with through education of seed importers to promote compliance.</p>
<p><b>Import, export and sale – Question 2:</b></p> <p><i>In light of increased online sales of small lots of foreign seed for the importer's own use, and in an effort to mitigate any potential biosecurity risks associated with the presence of prohibited noxious weed seeds, the Import Task Team recommended that imported small lots of seed for personal use be tested for purity to verify that standards for seed purity are met (including those for prohibited noxious weed seeds, presence of other weeds and crop kinds, and in some cases disease). This would be in line with purity testing requirements for small lots of seed sold in Canada.</i></p> <p><b>Do you support purity testing of small lots of seed for personal use to verify that seed purity standards are met prior to import?</b></p>	<p><b>DON'T KNOW.</b></p> <p>You may provide comments on why your answer is DON'T KNOW.</p> <p>Here are some ideas you can use for your comments: The questions around purity of seed and accessibility to biodiverse and culturally desirable seed are complex. A one-size-fits all regulation may not be the best solution. The CFIA and Canada Border Services Agency should explore policy and program-based tools to support seed imports that serve farmers’ and their communities’ needs and prevent introduction of serious diseases and/or harmful new weeds.</p> <p>Requiring purity testing for small lots could restrict small-scale producers from seeking culturally appropriate seed from reputable seed producers abroad, as small-scale exporters often do not have the resources available to complete this process. However, there may be seed companies that would use the small lot exemption to sell substandard seed, or which are not aware of what weed seeds are a concern in Canadian agriculture.</p> <p>Reducing the quantities eligible for a small lot exemption (eg. 1 kg for large-seeded and 100g for small-seeded crop kinds) would reduce the risk of weed and/or disease to Canadian agriculture.</p> <p>For online seed sales, put the onus on online marketplaces (i.e. Amazon) to sign the import declarations for seed on their marketplace.</p>
<p><b>Import, export and sale – Question 3:</b></p> <p><i>Common seed must meet certain quality standards and requirements at the time it is advertised and sold in Canada. However, unlike</i></p>	<p><b>OPTION 1.</b></p> <p>You <u>must</u> provide comments about why your answer is <b>OPTION 1: Maintain the current system where sellers of Common seed are not subject to additional</b></p>

<p><i>pedigreed seed, Common seed is not subject to varietal purity standards. As such, seed facilities (including mobile facilities) that handle, process, grade and label only Common seed, are not required to become a registered seed establishment (RSE) under <a href="#">Part IV</a> of the Seeds Regulations.</i></p> <p><i>As such, it is the seller who is responsible to ensure they sell Common seed that meets the necessary standards for this grade. Although all Common seed advertised and sold in Canada, including at Common seed facilities, is currently subject to CFIA monitoring, it is difficult for CFIA to be aware of all sellers of Common seed, because none are required to be identified, registered or licensed.</i></p> <p><b>The Common Seed task team was split with no qualified consensus on a path forward for identifying sellers of common seed.</b></p> <p><b>Which of the options presented by the Common Seed Task Team for sellers of Common seed do you support moving forward?</b></p> <p><b>Option 1: Maintain the current system where sellers of Common seed are not subject to additional requirements but Common seed must continue to meet the standards and requirements for Common seed sold in Canada and be monitored by the CFIA.</b></p>	<p><b>requirements but Common seed must continue to meet the standards and requirements for Common seed sold in Canada and be monitored by the CFIA.</b></p> <p>Here are some ideas you can use for your comments:</p> <p>Common seed is an important and necessary alternative to pedigreed seed, particularly for older varieties and to supplement pedigreed seed production, particularly in years with poor seed crop growing conditions. Adding requirements would make it a less viable option for both common seed sellers and farmers who buy and plant common seed.</p> <p>Requiring those farmers that handle and process common seed to be accredited by Seeds Canada as an RSE would be cost prohibitive and would result in fewer common seed sellers, higher priced seed, and less seed available.</p> <p>Common seed is especially important for small-scale and organic farmers who may prefer varieties that few, or no certified seed growers produce.</p> <p>Those who buy common seed practice due diligence, and those who sell common seed are mindful of their reputations. These safeguards are effective, so there is no need to impose additional requirements The pedigreed seed system exists for farmers that require further quality assurances on the seeds they are purchasing.</p>
<p><b>Import, export and sale Q3 - Additional Feedback</b></p>	<p>I do not support any of the options that would change how imported and common seed is regulated because they disproportionately impact farmers who require seed that is not offered through the pedigreed seed system or via authorized importers. It is not fair to these farmers to increase their regulatory burden, increase the cost of seed, and reduce their access to seed diversity.</p> <p>Canada’s agriculture will require more and more resilience and diversity in the future. Ensuring farmers have affordable and equitable access to non-pedigreed registered seed varieties and culturally important horticultural seed without undue barriers will help our farms and food system adapt to change.</p>

**Section “Other”**

<p><b>Do you want to answer this section?</b></p> <p><b>Questions on the Establishment of an Advisory Committee- Question 1:</b>  <i>Proposals from individual organizations were put forward to the Seed Regulatory Modernization Working Group to establish an Advisory Committee composed of individuals with balanced representation from across the seed value chain. The common element of these proposals is to have a committee that would provide a forum for discussion, collaboration and consensus building with the purpose of providing input and advice, and making recommendations for the continuous improvement of Canada's seed system. Such an Advisory Committee does not currently exist for the Seeds Regulations. It is noted that the CFIA (or any other organization to which the advice or recommendations from this Advisory Committee may apply) would not be obliged to make any changes to their policies, regulations or standards if they felt changes were not warranted. The CFIA would continue to fulfill its duty to consult all stakeholders prior to making changes to policies, regulations or standards that are consequential in nature.</i></p> <p><b>Would you find value in the establishment of an Advisory Committee with balanced representation from across the value chain for the purpose of making recommendations and providing input and advice targeted towards the continuous improvement of Canada's seed system?</b></p>	<p>You must answer <b>YES</b> to proceed to the questions.</p> <p><b>NO.</b>          You <u>must</u> provide comments about why your answer is <b>NO</b>.</p> <p>Here are some ideas you can use for your comments:</p> <p>The type of advisory committee proposed gives farmers less voice because farmers must take time away from earning a living by farming in order to participate, while industry representatives are well paid, often professional lobbyists. The policy-setting processes that inform regulations are not conducive to farmer engagement, and an advisory committee where farmer voices will be diluted by other actors with more capacity is not the solution.</p> <p>The Advisory Committee idea is similar to what the Seed Synergy group previously proposed for an industry-led group with authority to change seed regulations to benefit big seed companies at the expense of farmers and the public interest.</p> <p>An Advisory Committee with representation from across the value chain would be easily influenced by industry representatives that have the most capacity to advocate for their own interests. The advice provided by such a group is likely to be biased. In addition, the value chain itself does not represent the broader public interest.</p>
<p><b>Questions on the Establishment of an Advisory Committee- Question 2:</b>  <i>One of the suggestions put forward to the Seed Regulatory Modernization Working Group concerning the role of this Advisory Committee, was that the Advisory Committee develop proposals for amending and recommending standards currently set by the CFIA and the Canadian Seed Growers' Association (CSGA). This was in an effort to address potential concerns related to: a non-governmental organization both</i></p>	<p><b>Option A - I would prefer that an Advisory Committee not be involved in standard setting</b></p> <p>Here are some ideas you can use for your comments:</p> <p>The CFIA and CSGA currently have standard setting authority, and the CSGA already requests industry participation and representation to their Regulatory Service Committee, the committee that sets standards. This is an established and proven process</p>



*setting standards and delivering services based on those standards; and having a single stakeholder group set standards that affect the entire value chain.*

*The Seeds Act currently provides the legislative authority for the CSGA to set seed crop varietal purity standards, which are publically available in the Canadian Regulations and Procedures for Pedigreed Seed Crop Production (PDF) (opens in a new window) (i.e. Circular 6). Standards are developed and/or amended based on industry needs and advice from technical expert committees led by CSGA's Regulatory Services Committee. Proposed standards are then presented to the CSGA Board of Directors for final approval. See CSGA's standards development process (opens in a new window). The CSGA uses these standards to determine if a crop meets the standards for certification.*

**When it comes to standard setting which would you prefer?**

**Option A - I would prefer that an Advisory Committee not be involved in standard setting and that the organization responsible for the standard also be responsible for amending that standard (for example, seed grade standards be set and amended by the CFIA, seed crop varietal purity standards be set and amended by CSGA). The Advisory Committee would be able to provide their advice that a particular standard should be reviewed, or provide advice on such things as prioritization of standards for review.**

that works well. Adding another layer would not improve quality or performance.

As mentioned in the answer to Question 1 in this section, the proposed Advisory Committee has a high risk of making biased recommendations that are not in farmers' interests or in the public interest, and thus should not have a role in standard setting.

**Establishment of a Digital End-to-End Certification Information System – Question 1a):**

*SeedCert is an information management platform developed and administered by the Canadian Seed Growers' Association (CSGA) for tracking and tracing pedigreed seed crop production to issue a seed crop certificate and facilitate data exchange with users. CSGA, seed growers, licensed seed crop inspectors, authorized seed crop inspection services, assignees, third parties and CFIA rely on SeedCert to manage information and inform*

**YES, ON A MANDATORY BASIS ONLY.**

You must provide comments to support your response.

Participation in a digital certification system should be mandatory for all certified seed production so that farmers can count on having full information when accessing digital tags, and to increase the transparency and accountability of seed certification across the board.

If some seed growers have technical difficulties using



<p><i>decisions. CSGA charges fees for system access and use.</i></p> <p><b>A proposal was put forward to the Seed Regulatory Modernization Working Group to expand SeedCert to provide a digital end-to-end seed certification information management system. This will allow easy access to digital information to verify pedigreed status. In addition to the information that is already collected through SeedCert, are you supportive of the following additional information being collected: information currently contained in a pedigreed seed declaration, seed grading reports and quantity of seed certified?</b></p>	<p>a digital system, the CFIA must provide support so they can participate.</p> <p>Any data collected by a digital certification process must not be made available to third parties for any purpose. The system must be secure. There must be full transparency regarding who has access to the data and how the data can be used.</p>
<p><b>Establishment of a Digital End-to-End Certification Information System – Question 1b):</b></p> <p><b>What would be your concerns with the development and use of a digital end-to-end seed certification information management system?</b></p>	<p><b>SELECT ALL OPTIONS.</b> You may provide additional feedback by selecting “Other”.</p> <ul style="list-style-type: none"> <li>● Data security and privacy</li> <li>● Who should be able to access different information</li> <li>● How the information/data will be used by the administrator</li> <li>● Whether payment for access will be required</li> </ul> <p>Other concerns to mention are:</p> <ul style="list-style-type: none"> <li>● Potential for a security breach</li> <li>● Need to prohibit any sale or sharing of any data with third parties.</li> <li>● Concern that in future, control of the system could be transferred to another organization or agency that could use it for other purposes which may not be in farmers’ interests.</li> </ul>
<p><b>Establishment of a Digital End-to-End Certification Information System – Question 1c):</b></p> <p><b>What do you see as the most important advantages of a digital end-to-end seed certification information management system?</b></p>	<p><b>SELECT OPTIONS 2 AND 3.</b> You may provide feedback by also selecting “Other”.</p> <p>Farmers would have accurate and complete seed tag information on all digital tags, which provides more convenience and accountability.</p>
<p><b>Alternative Service Delivery Arrangement – Question 1a):</b></p>	<p><b>YES</b> You <u>must</u> provide comments to support your response.</p>

<p><b>A proposal was put forward to the Seed Regulatory Modernization Working Group to simplify the seed certification process by having certain aspects of seed certification (for example some of the items listed in 12-15 above) handled by the CSGA. CFIA would still be the responsible authority and would oversee the work undertaken by the CSGA. CSGA would be responsible to set their own fees for services provided. Are you of the opinion that the process would be improved if CSGA took on these additional tasks?</b></p>	<p>The CFIA could ask the CSGA to train, evaluate and license private providers of seed crop inspection, and oversee the alternative service delivery of seed crop inspection. The CFIA should also maintain in-house capacity to understand and carry out the practical aspects of seed crop inspection.</p> <p>The CSGA could administer official seed tags and grant licenses to print official seed tags; certify seed lots meeting OECD Seed Schemes requirements; and address questions on seed certification since these are closely related to CSGA’s existing responsibilities, and would draw upon expertise the CSGA already has.</p>
<p><b>Alternative Service Delivery Arrangement – Question 1b):</b></p> <p><b>If consolidating a number of the seed crop certification and seed certification activities were to happen, which activities would you support CSGA taking on? CFIA would still be the responsible authority and would oversee the work undertaken by the CSGA.</b></p>	<p><b>Don’t Know</b></p> <p>You <u>must</u> provide comments to support your response.</p> <p>It is important for the CFIA to maintain capacity to effectively regulate. If most or all of these areas were contracted to the CSGA the CFIA’s in-house expertise would be reduced. Without having practical experience and its own experts, the CFIA’s ability to fully understand the regulations could be weakened. However, if these functions were to be contracted out, the CSGA would be the best choice to do them on behalf of the CFIA.</p>