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Comments by the Food Secure Canada Regarding Regulations Amending the Seeds Regulations per Canada Gazette Part 1 VOL. 147, NO. 10 — MARCH 9, 2013.

Food Secure Canada, a Canada-wide network of organizations and individuals concerned with zero hunger, safe and healthy food and sustainable food systems, is pleased to have the opportunity to comment on the proposed changes to the Seeds Regulations. We wish to register our opposition to the proposed changes.

The Seed Act and the related Seeds Regulations must protect the public good. We must ensure that farmers have access to quality, affordable (often meaning non-proprietary) and viable seeds that have benefitted from government oversight. Removing oilseed soybean and forage crops from Part 1 of Schedule III of the Regulation eliminates government oversight with regards to seed characteristics (merit) that will protect the viability of Canadian farms in the long term.

We are also deeply concerned about the proposed changes regarding the cancellation of registered varieties. If varieties can be unilaterally pulled from registered lists by companies (who may have previously held lucrative patents on the seeds), with no government oversight, decisions can be made on the sole basis of profit, with no regard for long-term agro-biodiversity, farmer livelihoods, or farmers' access to affordable, reliable seeds. At a time when the food security of communities around the world is seriously threatened by increasingly unpredictable weather events, more biodiversity, not less, is vital to our survival.

Food Secure Canada urges the Canadian Food Inspection Agency to not only retain soybean and forage seeds in Part 1 of Schedule 3 in the Regulations, but to return the merit requirements in the Regulation to those that existed prior to the amendment of July 2009. A robust review of proposed new varieties is a necessary precaution that can safeguard the \$22.8B farm sector and the important contributions it makes to Canadian food security, the economy and our communities.

Please do not hesitate to contact me should you require further information.

Kind regards,

Diana Bronson
Executive Director