

Seed Synergy National Engagement 2018

What Was Heard Report

The Seed Synergy Collaboration Project team developed a Green Paper in late 2017, outlining a potential vision for the next generation seed system in Canada. Before bringing a final set of ideas or proposals to the boards of the six Seed Synergy organizations (the Canadian Seed Growers' Association, the Canadian Seed Trade Association, the Canadian Seed Institute, the Commercial Seed Analysts Association of Canada, the Canadian Plant Technology Agency, and CropLife Canada), the project team engaged with stakeholders across Canada in January and February of 2018; facilitated workshops were held in six cities across Canada: Charlottetown, Drummondville, Guelph, Winnipeg, Saskatoon, and Edmonton. The intent of these engagement workshops was to inform stakeholders of the Seed Synergy Collaboration project, explain and answer questions about the preliminary Seed Synergy vision, and most importantly to invite feedback from a wide array of stakeholders, on the major ideas in the Green Paper. In parallel, an online survey was also available for stakeholders to provide input. The responses obtained via the survey delve deeper into specific topics, and are consistent with the key messages heard during the face-to-face engagement sessions.

Individuals and organizations from across the value chain (including members of the six Synergy organizations) were invited to participate in the engagement sessions, including: growers, seed analysts, breeders, seed trade companies, commodity organizations, general farm organizations, and more. Over 200 people attended the sessions, representing a broad diversity of views. This report summarizes some of the major findings from the engagement sessions, but should not in any way be construed as representing the approval or consent of any of the consulted parties. Engagement sessions were designed to elicit feedback and opinions, not to achieve any type of approval or consensus. In addition, any further regulatory change resulting from the Seed Synergy vision will involve a government-led consultation process; the Synergy engagement sessions are not in any way intended to substitute for such processes.

The next stage in the project will be a White Paper, informed by feedback from the engagement sessions, an Economic Risk Impact and Risk Assessment study, and formal review by the Synergy boards of directors.

THE FINDINGS

Engagement sessions were structured around both general feedback, and specific feedback on a core set of ideas from the Green Paper. Attendees were asked for views in the following areas:

- What do you like about the Green Paper vision?
- What concerns do you have?
- Key Idea: Value Creation
- Key Idea: Tiered Risk Assessments
- Key Idea: Traceability
- Key Idea: Industry Leadership
- Key Idea: Single Window for Information

This document provides an overview of the feedback received during the engagement sessions on each of these questions.

1. What do you like about the Green Paper vision?

We asked participants for their thoughts on the positive elements of the Green Paper, areas where they agree with the overall direction, or see potential for the seed sector.

What we heard:

- Collaboration of the six organizations working together is positive, bringing the different parts of the sector together; there is too much overlap today
- Having a clear path to bring new products to market, and a regulatory system that is easy to understand
- Retaining a role for government, not just the industry governing itself without any oversight
- Having a common advocacy voice for the sector is important
- Adapting to changes in the seed business and new technologies
- Driving efficiency in general and making things easier and faster for operators within the seed system
- Having a bold vision to aim toward is positive
- The open and transparent process followed to date by the Seed Synergy Collaboration partners is viewed positively

2. What concerns do you have about the Green Paper vision?

We asked participants for their concerns relating to the Green Paper, areas where they have questions, disagreement, or see potential risks.

What we heard:

- In an “industry-led, government-enabled” system, who is “industry”? Who gets to be at the decision making table, and how is industry leadership held accountable?
- How does common seed fit into this vision for the future? Do we risk threatening pedigreed seed sales by unintentionally making common seed more attractive or accessible? The integrity and trust of the pedigreed seed system must not be undermined.
- How do public plant breeders fit into this process and system? Public breeders aren’t “industry” per se, but play an important role in Canada’s system.
- Some of the Synergy ideas seem like they will entail greater costs. Who will pay? Do we expect the crop grower to foot the bill?
- Government still has an important role to play on several issues..
- The Green Paper features a lot of ideas, but what are the must haves? What are the most important areas to move on in the short term?
- Just bringing new varieties onto the market faster and having more and more varieties available to growers isn’t necessarily beneficial to the seed system. Growers need varieties that perform.
- The end-user, the customer must be factored in and considered – the benefits must be for everyone.

3. Value Creation

We asked participants for their thoughts on the value creation section of the Green Paper, both around benefits and concerns.

What we heard:

- Workshop participants told us that value creation is important, but that it can be difficult to have a clear view without a specific model to evaluate. The Green Paper speaks to the conceptual need for a value creation solution, but doesn't propose a specific model.
- Nonetheless, many parties noted that Canada could use a greater volume and breadth of innovation, especially vis-à-vis different crop types; today innovation resources are heavily focused on a small number of crops.
- We heard concern specifically about the Australian experience with value creation; several attendees cautioned against the Australian model, and cautioned that adopting a similar system would jeopardize the pedigreed seed market in Canada.
- One participant asked: what is the current investment gap? How much money is needed in the system today to stimulate and fund the kind of innovation that would create growth throughout the agriculture sector?
- Some participants expressed concern that a value creation scheme that includes common seed, even as a second-tier product, might unintentionally drive consumers to purchase more common seed, lending that category a greater degree of perceived legitimacy. At the same time, it would be undesirable to create a system that drives buyers out of the pedigreed market and underground.
- Questions were asked about how any value creation model would assure that value is actually shared throughout the value chain and re-invested/kept in Canada, rather than just enabling profit-taking or funding innovation abroad. In addition, questions were asked about how investment decisions would be made, and the role of government in doing so, and how a system might be designed to ensure value creation and intellectual property protection across the board, from small, to medium, to large enterprises.
- There was considerable discussion around "who pays" in any value creation solution, and several comments around bringing the broader crop and end-consumer into the system, so that value creation costs are not borne simply by the crop grower.

4. Tiered Risk Assessments

We asked participants for their thoughts on the idea of instituting tiered risk assessments for new variety approval, involving government and industry defining tiers with varying levels of oversight, based on risk and novelty.

What we heard:

- In principle a good idea, but the details of how it would work matter. Attendees generally agreed with the premise that today regulatory approvals are slow, costly, and difficult to navigate. Even clarifying the existing process would be helpful, if not overhauling it.
- Participants were clear that they desired a better *process*, but one that does not undermine health and safety risk management; the risk assessment process must be robust. There are some misperceptions in this area, and it must be extremely clear on this point.
- We heard that a simpler, clearer, and less burdensome system might encourage new players – particularly smaller enterprises – to innovate and invest in Canada.

- What is “risk” and who defines it? Comments focused on this idea in particular, enquiring exactly how risk is defined, and by whom. In particular, comments noted a clear, strong role for government in defining risk tiers and evaluation processes. This is an area where “industry leadership” was tested, and many expressed the view that government is required both on its merits, and to maintain public trust in the approval system. This discussion also led to questions around liability: who would be responsible if an approved product were to encounter an issue down the road?
- In the interest of assuring public trust, it was suggested that some degree of public consultation or input be built into the risk assessment system.
- We heard concern that a new risk assessment system and methodology must be accepted by international trading partners. Canada would risk market access in important international markets if its risk assessment process does not enjoy high levels of confidence around the world.
- First movers in such a system might be at a disadvantage relative to other product developers who follow them. That is, the first developer of a novel trait would alone bear the time expense of product approvals, whereas those who follow would face a more streamlined process.
- It was also suggested that applicants have the ability to opt for a higher-tiered risk assessment, if they wished (to meet international market access requirements, for example).

5. Traceability

We talked to participants about key Green Paper proposals related to traceability, particularly a unified product profile for all varieties, and a seed sale listing system.

What we heard:

- Questions were asked about what were the drivers for enhanced traceability.
- With respect to the product profile, stakeholders suggested that a unified source of information about a variety would be useful and desirable, and can help assure access to international markets.
- The discussion expanded into how the upstream processes – Variety Registration and Plant Breeders Rights protection – might be redesigned or augmented to enable a product profile.
- A product profile might contain confidential business information, thus making sure that access is strictly controlled and managed would be imperative.
- We heard the traceability is an increasingly important market demand already, and that the seed industry should expect to have its customers make ever greater traceability demands.
- With respect to a seed sale listing system, stakeholders raised questions about the practicality of the solution, wondering what the incentive would be for a common seed seller to opt in to such a system. Concerns were also expressed regarding risks of undermining one’s competitive positioning from divulging sales information.
- On that theme, we heard questions around the enforcement provisions for a seed sale listing system: how would enforcement be effected? By whom? And who would pay for this? Particularly if common seed purveyors did not see a strong incentive favouring participation, some degree of enforcement action would likely be necessary.
- Here again, participants questioned whether the proposed solution might erode the competitive advantage of pedigreed seed versus common seed, in enhancing the traceability claims of the latter.

- Overall, we heard that end user demand – be it international customers or store shelf consumers – will drive traceability demands, and solutions must respond to those demands.

6. Industry Leadership

We asked stakeholders about the core Green Paper concept of an industry-led, government enabled seed system, and what industry leadership should look like in practice.

What we heard:

- We heard that industry leadership makes sense and offers benefits in general. However, we also heard that there remains an important role for government in various aspects of the future seed system.
- In this context government “enabling” of the system was the subject of much discussion, with the suggestion that “enabling” can be perceived as serving industry interests, when what is actually proposed resembles more of a partnership under renewed conditions.
- Value chains are required to play a larger role in the future, and we heard questions around how this would happen. Who are the value chains? Are they ready to play a greater role? Do they have the support required to do so?
- This notion extended further to include potentially consumers or citizens in some way.
- Not all crops are organized in the same manner, nor at the same level of economic activity or sophistication; this may entail a need for flexible approaches to how we govern certain crop types.
- Some participants pointed to a lack of broader engagement with value chain partners, particularly grain growers, whose views and ultimate support are seen as critical to overall success.
- In general stakeholders support the idea of taking a greater leadership role, particularly in the context of long-term government withdrawal from the seed space. Some participants expressed the view that government has clearly signalled that it does not want to play a leadership role in some areas
- Participants raised the issue of the voice of the seed grower in particular, as well as the crop grower. There was concern expressed that any future governing organization must retain the grassroots nature of the current system, in providing a forum for the grower voice, balanced against the voice and influence of larger seed companies and others.
- Overall, we heard that broad consensus is required, necessitating investment in consultation and coalition building, and that if the industry can achieve such a consensus it will greatly increase its influence to the benefit of all players.

7. Single Window for Information

We asked stakeholders to discuss the Green Paper proposal of a single window for information, managed centrally, and providing a one stop for submitting regulatory information, and accessing regulatory services.

What we heard:

- Here a clear message emerged: this would clearly be beneficial, let's do it. Eliminating duplication of data entry, and making information management for staff simpler just makes sense. Of course, there remain certain important challenges to be mindful of.
- Access to online solutions remains a hurdle for many people across rural Canada. Having a real person able to answer a phone call is still important.
- Managing data, privacy, and data security will be critical. Who has access to information, and on what basis?
- This would be especially useful for new entrants to the system, for whom the web of rules and processes can be particularly daunting.
- The technical aspect may be an important obstacle: creating a single database consolidating records from different organizations can be difficult and costly. It's not a simple task.
- Questions were asked about the expected benefits of a single window. Would it reduce overall administrative cost? Would the Synergy organizations realize bottom line savings as a result?
- Naturally the fundamental question raised was around cost and accountability: who would pay for and administer a single window for seed system information?