

# Quality System Procedure 142.1: Pedigreed Seed Crop Inspection

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## Date

This version of the Quality Systems Procedure (QSP) 142.1 - Pedigreed Seed Crop Inspection was issued April 15, 2022.

## Contact

The contact person for this document is the National Manager, Seed Section. Comments regarding the content of this document should be addressed to the [National Manager](#) at: [SeedSemence@inspection.gc.ca](mailto:SeedSemence@inspection.gc.ca)

## Review

This Seed Program Quality System Procedure (QSP) is subject to periodic review. Amendments will be issued from time to time to ensure the procedure continues to meet current needs.

## Endorsement

This Seed Program QSP is hereby approved.

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Director, Plant Production Division

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Date

## Distribution

This document will be maintained on the CFIA website. The National Manager, Seed Section will maintain the signed original. A copy of the latest version is available upon request to SeedSemence@inspection.gc.ca

## **0.0 Introduction**

This Seed Program Quality System Procedure (QSP) outlines the procedures for pedigreed seed crop inspection in Canada intended to maintain and safeguard varietal identity and varietal purity during seed multiplication. The Canadian Seed Growers' Association (CSGA) is identified in the [Seeds Regulations](#) (the Regulations) as the authority for seed crop certification of most crop kinds in Canada except potatoes. The Canadian Food Inspection Agency (CFIA) is Canada's seed certification authority and administers the [Seeds Act](#) and the Regulations. The CFIA is also the National Designated Authority for the implementation of the [Organisation for Economic Co-operation and Development \(OECD\) Seed Schemes in Canada](#) (OECD Seed Schemes).

## **1.0 Scope**

This QSP applies in all cases where pedigreed seed crop inspection is provided either by a CFIA seed crop inspector or by a Licensed Seed Crop Inspector (LSCI).

## **2.0 Definitions, acronyms and references**

For the purposes of this QSP, the definitions, acronyms and references given in [SPRA 101 – Definitions, Acronyms, and References for the Seed Program](#) apply.

## **3.0 Outline**

The CFIA inspector or LSCI, hereafter referred to as the seed crop inspector, are certified or licensed by the CFIA as evidence of their proficiency in seed crop inspection. In performing their duties, the seed crop inspector must adhere to this QSP, the applicable specific work instructions (SWI) and CSGA's [Canadian Regulations and Procedures for Pedigreed Seed Crop Production](#) (Circular 6).

Seed crop inspectors must pass written and practical evaluations prior to certification or licensing by the CFIA to demonstrate their competence to inspect pedigreed seed crops. LSCI are individually licensed according to [QSP 142.2 Licensing of Authorized Seed Crop Inspection Services and Licensed Seed Crop Inspectors](#) and CFIA inspectors are certified according to QSP 142.4 Official Crop Inspector Certification Procedures.

LSCI are subject to oversight by the CFIA to verify their compliance with the conditions of their licence. Oversight of the activities of seed crop inspectors is conducted in accordance with [QSP 142.3 CFIA Oversight of Authorized Seed Crop Inspection](#) and [SWI 142.3.1 CFIA Oversight of Authorized Seed Crop Inspection](#).

CFIA inspectors are subject to internal oversight conducted by the CFIA.

## **4.0 Roles and responsibilities**

Additional information on roles and responsibilities is provided in [QSP 142.2 Licensing of Authorized Seed Crop Inspection Services and Licensed Seed Crop Inspectors](#).

### **4.1 The roles and responsibilities of the CSGA**

The CSGA establishes standards for the varietal purity of pedigreed seed crops and issues crop certificates for seed crops meeting the standards.

The CSGA is responsible for:

- establishing and communicating the standards for pedigreed seed crops in Circular 6
- establishing and communicating the reporting requirements for Reports of Seed Crop Inspection
- receiving applications for pedigreed seed crop inspection
- distributing requests for seed crop inspection and the Reports of Seed Crop Inspection to be completed
- receiving and assessing completed Reports of Seed Crop Inspection
- issuing crop certificates for pedigreed seed crops conforming to the standards of Circular 6 and/or the OECD Seed Schemes
- consulting Authorized Seed Crop Inspection Services (ASCIS) or the CFIA on specific questions related to submitted Reports of Seed Crop Inspection as appropriate
- notifying the CFIA when permission for re-certification of a pedigreed seed crop is granted
- communicating with the CFIA, the ASCIS and the LSCI, as appropriate
- ensuring seed growers provide field maps in CSGA's SeedCert data management system (CSGA SeedCert)

### **4.2 Roles and responsibilities of the CFIA**

The CFIA will license seed crop inspectors according to [QSP 142.2 Licensing of Authorized Seed Crop Inspection Services and Licensed Seed Crop Inspector](#) and QSP 142.4 Official Seed Crop Inspector Certification Procedures.

The CFIA will oversee the activities of ASCIS and LSCI according to QSP 142.3 CFIA Oversight of Authorized Seed Crop Inspection.

The CFIA will offer direct delivery of seed crop inspection for:

- Seed crops other than CSGA Circular 6 sections 2, 3 and 8 crop types (cereals and pulses, hybrid corn)

- Select and foundation plots of all crop kinds
- Seed crops of CSGA Circular 6 sections 2, 3 and 8 crop types only in the rare event that a grower has been refused by all ASCIS in their Region and if CFIA resources permit
- Hybrid cereal crops and feminized hemp
- Crop types in Circular 6 for which seed crop inspection training has not been provided to LSCI
- Seed destined for marketing in the EU as Basic or Pre-Basic seed

CFIA will not complete seed crop inspection when field maps are not available in CSGA SeedCert

In addition, the CFIA will provide identification services for off-types and weeds encountered during seed crop inspections.

#### **4.2.1 Roles and responsibilities of CFIA lead/alternate lead inspector**

The CFIA lead and alternate lead inspector roles may be a Regional Program Officer, Supervisor or a Senior Inspector depending on the region. This CFIA individual may also be referred to as the main/alternate contact in seed crop inspection documents or CSGA SeedCert.

The lead/alternate lead inspector is responsible for:

- updating the lead inspector and/or alternate lead inspector name in CSGA SeedCert each year before June 15th
- updating the list of CFIA inspectors by using the ASCIS roster document in CSGA SeedCert
- updating the information for each CFIA seed crop inspector in their region
- accepting or rejecting seed grower field applications submitted in CSGA SeedCert within two (2) business days
- assigning an accepted grower field application to a CFIA seed crop inspector
- receiving and providing information from CSGA SeedCert or other resources to the appropriate CFIA contact (Official Seed Crop Inspector or Supervisor) for follow-up, including:
  - notification that an LSCI is scheduled to inspect a new crop type for the first time
  - notification that a prohibited noxious weed has been found
  - complaints
- reviewing and accepting all Reports of Seed Crop Inspection and CFIA Check Inspection Reports to verify that the reports are in conformance with the seed crop inspection and reporting standards prior to the Report's submission to the CSGA within 2 business days of the seed crop or check inspection
- coordinate communication between districts for the CFIA seed crop inspectors
- conduct monitoring inspections on CFIA seed crop inspectors
- communicate with the CFIA auditor for each ASCIS operating in the district/area

- provide efficient and consistent communication with the ASCIS lead/alternate lead inspectors in their Region as communication with the individual LSCI should be minimal

The following responsibilities of the lead/alternate lead inspector may be delegated to another employee at the district or regional level:

- verifying the LSCI's license scope and the LSCI's current "Check Inspection Frequency" on the Seed Section Master List (RDIMS#5569821)
- designating check inspector for each LSCI in the region

### **4.3 Roles and responsibilities of the lead inspector/alternate lead inspector of the Authorized Seed Crop Inspection Service (ASCIS)**

The lead inspector/alternate lead inspector is responsible for:

- having and maintaining a Group 1 LSCI licence
- acting as liaison between LSCI reporting to the ASCIS and the CFIA and the CSGA
- providing technical support and advice to the LSCI reporting to the ASCIS as necessary
- supervising LSCI inspecting a crop kind for the first time
- assessing plant, disease, and weed samples taken by the LSCI reporting to the ASCIS and forwarding the samples to the local CFIA office for further assessment when necessary
- reviewing and approving all Reports of Seed Crop Inspection and verifying that the reports are in conformance with seed crop inspection and reporting standards prior to the Report's submission to the CSGA
- submitting the finalized Reports of Seed Crop Inspection to the CSGA within two business days of the seed crop inspection
- providing LSCI refresher training as required

### **4.4 Roles and responsibilities of the seed crop inspector**

The seed crop inspector is responsible for describing the crop as it appears at the time of inspection in an accurate, unbiased, and comprehensive Report of Seed Crop Inspection. The completed Report of Seed Crop Inspection must be provided to the CSGA within two business days of the actual date of inspection.

The seed crop inspector may inspect only those crop kinds for which they have been licensed or officially certified and are competent. LSCI must inform the CFIA before inspecting a new crop kind for the first time and must also inform the CFIA when inspecting plots for the first time in each crop kind using CSGA SeedCert. In addition, LSCI are encouraged to request the assistance of an experienced seed crop inspector when inspecting a new crop kind for the first time.

Seed crop inspectors must maintain the confidentiality and security of seed crop inspection information. This includes market information, volume and/or value of production, and variety parentage or production methods that are of a confidential nature. Seed crop inspectors must not discuss a grower's crop with any other party, and must ensure that neither Reports of Seed Crop Inspections nor their contents are accessible by other parties. Confidential personal or business information under the control of the seed crop inspector must not be disclosed except for the purposes for which it is intended and may only be shared with the CFIA, the CSGA and the grower or assignee.

The seed crop inspector must not, under any circumstance, anticipate the decision the CSGA may take concerning the crop, nor make any recommendation regarding the CSGA's decision on certification of the seed crop.

In addition to confidential grower information, seed crop inspectors are responsible for maintaining confidential breeder information included in the descriptions of the varieties (DoV). The DoVs are provided solely for the purposes of seed crop inspection and variety verification, and must not be distributed. Information included in variety descriptions may be considered confidential business information by the owner of the variety.

LSCI must:

- be under the supervision of an ASCIS licensed by the CFIA
- comply with any conditions contained in their LSCI licence
- operate within the Quality Management System (QMS) of the ASCIS to which they report

All seed crop inspectors are responsible for:

- protecting their personal safety by taking reasonable precautions against harm
- obtaining all required seed crop inspection tools
- advising their supervisor of any potential conflicts of interest
- providing any rough inspection notes to their supervisor or ASCIS for retention
- being able to identify all prohibited noxious weed species

The seed crop inspector should also maintain a professional decorum in their work, demonstrated by actions such as:

- making contact by telephone in advance of arrival for crop inspection
- allowing the grower to accompany the seed crop inspector on the crop inspection, if requested
- closing any gates the seed crop inspector opens to enter or exit the field
- not smoking in the field
- wearing appropriate clothing
- avoiding damage to crops when driving between fields
- being prepared to show appropriate personal identification upon request

- providing copies of completed Reports of Seed Crop Inspection to the grower on a timely basis

#### **4.5 The Seed Grower's or Applicant's responsibilities**

A grower who wishes to produce a pedigreed seed crop must have the standing crop inspected by seed crop inspector. To do so, the grower must submit an application for seed crop inspection to the CSGA by the established deadline date.

The seed grower must submit a field map in CSGA SeedCert. Maps are required for all fields and must include easily recognizable landmarks, adjacent crops and buildings, distance measurements, legal land descriptions and/or a legal physical address. Distances are given in either metric or imperial measurement, indicating units. Individual plots, staked plots or plots within seed crop fields require detailed maps. Maps are easily uploaded into CSGA SeedCert electronically.

Growers are responsible for ensuring their crops are inspected prior to swathing or harvesting; swathed or cut crops cannot be inspected except under instruction from the CSGA. Roguing activities must be completed and isolation zones established prior to inspection.

The grower may be asked to assist the seed crop inspector during the inspection.

### **5.0 Application for seed crop inspection**

On the application for seed crop inspection submitted to the CSGA, the grower must indicate the name of the ASCIS that will be responsible for the inspection.

If the grower had an inspection the previous year, the application information will be sent to the grower automatically by the CSGA. A first time or returning seed grower should request an application for seed crop inspection from the CSGA. The completed application form contains the information relevant to the inspection and verification of the seed crop's varietal purity. All accepted applicants become members of the CSGA.

Applications for assigned crops are made in the name of the grower of the crop, although the crop certificate can be assigned to a separate entity by completing CSGA Form 179 (Authorization to Assign a Crop Certificate). This contractual agreement is typically made when a grower is producing the crop under contract to a separate entity (the assignee).

Fees for seed crop inspections and re-inspections conducted by an LSCI are charged directly to the seed grower by the ASCIS to which the LSCI reports. Seed crop inspections conducted by CFIA inspectors are charged to the CSGA. Fees for re-inspections or land use inspections conducted by CFIA inspectors are charged directly to the seed grower by CFIA.



The CSGA reviews the application and forwards the inspection assignment through CSGA's SeedCert to the appropriate ASCIS or CFIA office. The ASCIS or CFIA office acknowledges receipt of the application and assigns a seed crop inspector to conduct the inspection.

The ASCIS must provide notice to the CFIA, through CSGA SeedCert, of the inspection schedules of its LSCI prior to the inspection date. The ASCIS must provide notice to the CFIA through CSGA SeedCert of the planned date of inspections two (2) days prior to the inspection so that the CFIA may schedule and conduct check inspections in a timely manner. In addition, when an inspection is conducted, the LSCI must report this inspection by the end of the day on which the inspection is conducted.

New applications for seed crop inspection cannot be directly accepted by seed crop inspectors and must be submitted to and accepted by the CSGA before a pre-populated Report of Seed Crop Inspection will be generated for the inspection. In the rare instance where the seed crop inspector does not have a pre-populated report for a specific field they may, with ASCIS or CSGA approval, complete the inspection in rough notes. The information is transferred to the pre-populated Report when it becomes available.

## **6.0 Conducting the seed crop inspection**

Seed crop inspection involves:

- identification of seed crops
- seed crop impurity counts
- checking isolation distances
- checking whether pedigreed seed production procedures have been followed

These tasks are described in detail in [SWI 142.1.1 Pedigreed Seed Crop Inspection](#).

The following inspections are required according to Circular 6:

- seed crop inspection for certification as pedigreed seed
- land use inspections
- re-inspections to verify required corrective actions including border removal or when a grower is not satisfied

The following inspections are not described in Circular 6, but may be requested on occasion to meet a specific need. These inspections should be dealt with on an individual basis and include:

- second inspections requested by the grower
- any other crop inspection not previously described

## **7.0 Report of seed crop inspection**

LSCI are required to submit the 'actual date of inspection', via CSGA SeedCert, of each inspection completed by the end of the day on which the inspection is conducted. This is in addition to completing the Report of Seed Crop inspection in CSGA SeedCert.

The Report of Seed Crop Inspection should be completed during or immediately after the inspection. The Report of Seed Crop Inspection provided electronically by the CSGA with the grower and field information pre-populated should be used when it is available.

Reports of Seed Crop Inspection completed by seed crop inspectors must be reviewed by the ASCIS Lead Inspector or CFIA Lead Inspector to which the seed crop inspector reports prior to submission to the CSGA. The grower is provided a copy of the report from CSGA SeedCert after it has been verified and accepted by the Lead Inspector. The ASCIS and CFIA office must maintain any originals or copies of rough notes taken by the seed crop inspector.

**Completed and reviewed reports must be submitted to the CSGA within two business days after the inspection.** Report submission should be given priority and cannot be delayed while the seed crop inspector gives priority to inspecting additional seed crops.

For seed crops which require more than one inspection during the growing season, the seed crop inspector should follow the crop specific work instructions for reporting to CSGA.

The seed crop inspector may wish to communicate to the grower any observations made during the inspection that may cause the CSGA to decline the crop or that may require remedial action on the part of the grower in order to obtain a crop certificate from the CSGA.

Requests for completed Reports of Seed Crop Inspection from persons other than the applicant should be referred to the CSGA.

## **7.1 Documentation and information retention**

The seed crop inspector must not destroy the original rough notes (digital or hard copy). Rough notes should be legible, accessible and in a format that can be used by the ASCIS, CFIA, or CSGA to verify and support the completion of the report. Although the development of rough notes is not mandatory, they can be a valuable reference in many situations. Rough notes must be retained by the ASCIS for a period of seven years.

## **8.0 Inspection of varieties not registered in Canada**

Varieties that are not registered in Canada should not be inspected unless the seed crop inspector has a Description of Variety (DoV) for the variety. If the DoV is not readily available through the CSGA, it is the responsibility of the grower/applicant to make it available in one of Canada's two official languages.

If it is not at all possible to obtain the DoV, the seed crop inspector should advise the grower/applicant that the crop could be declined pedigreed status. The seed crop inspector may perform the inspection based on the uniformity of the crop, providing that it is noted on the Report of Seed Crop Inspection that no DoV was available.

## **9.0 Other inspections**

### **9.1 Complaint/referee inspections**

If the classification or identification of off-type plants, other seed crop impurities or prohibited noxious weeds is challenged by the grower, the grower should request a re-inspection from the ASCIS. In the event that the ASCIS cannot provide a re-inspection, or if the grower is still not satisfied, the grower must forward a request through CSGA SeedCert to the CFIA for a complaint/referee inspection. Complaint/Referee inspections are not conducted if the crop has been altered following the first inspection or re-inspection by the ASCIS. This should be verified with the grower prior to the inspection. It is a 'best practice' for all persons involved to go to the field at the same time, with the CFIA inspector.

When a complaint/referee inspection is performed by a CFIA seed crop inspector, the CSGA in consultation with CFIA will determine if the seed grower may be charged an assessment.

Complaint/Referee inspections should be scheduled and performed as resources permit by a CFIA seed crop inspector. The CFIA local office should notify CSGA when these types of inspections occur. The CFIA inspector should submit the Report of seed crop inspection for complaint/referee inspection to the CSGA immediately and provide a copy to the producer.

The outcomes of the inspection must be communicated to the seed section and ASCIS auditor by the CFIA Local office.

### **9.2 OECD field inspection and seed destined to the EU as Basic or Pre-Basic seed**

Crops being certified pursuant to the OECD Seed Schemes are to be inspected according to Circular 6, QSP 142.1, SWI 142.1, and the crop specific SWIs.

CFIA official inspectors will provide direct inspection when the seed is destined for marketing in the EU as Basic or Pre-Basic seed.

### **9.3 Inspections for the re-certification and re-instatement of crops**

In very rare circumstances the inspection services providers may receive requests for seed crop inspection from the CSGA for re-certification or re-instatement.

The frequency of re-certification requests vary by crop kind and by year with the majority being forage crops.

When the seed crop inspector receives a request for inspection for a re-certification of a crop they should make every effort to contact the grower.

The seed crop inspector should attempt to:

- determine the grower's intentions for the harvested crop
- 
- **9.3.1 Re-certification of crops**

Recertification in Canada occurs under the two scenarios described below. In both cases, this recertification in Canada is subject to CSGA approval and policy..

- According to the standards of the Association of Official Seed Certification Agencies (AOSCA), the number of generations through which seed may be multiplied may not exceed two generations beyond Foundation status except where an emergency is declared by the certifying agency stating that the supply of Foundation and Registered status seed is not adequate to plant the required status acreage. In this case, the production of an additional generation of either Foundation, Registered or Certified status seed may be permitted for one additional year.
- Re-certification may also be provided for seed exported under the OECD Seed Schemes which includes pedigreed classes of Certified, 2<sup>nd</sup> generation and Certified, 3<sup>rd</sup> Generation where Certified, 1<sup>st</sup> generation is the first generation from OECD Basic seed (equivalent to Canada Certified status seed), Certified, 2<sup>nd</sup> generation is the second generation from OECD Basic seed and so on.

If the tenth digit (3<sup>rd</sup> from last) of the crop certificate for the planted seed is a 4 for Certified status (e.g., 13-1234567-401), the crop is being inspected for re-certification. The seed crop inspector should verify that the CSGA has approved re-certification. If the tenth digit of the crop certificate is 8 (e.g., 13-9876543-801), this indicates that this Certified status seed has been produced using re-certified Certified status seed; the crop is therefore not eligible for re-certification.

In addition to permitting Certified to Recertified production, the CSGA Recertification Policy also permits Foundation to Foundation or Registered to Registered production. In these cases, CSGA would include an F or an R in the crop certificate number instead of the standard 1 or 2 (by example 21-5064422-F01). In older crop certificates issued following a recertification, the F or R was included as well as the 1 or 2 (ie. 21-5064422-F101) but this practice has been discontinued.

Because re-certification decisions may not be made until after the crop is planted, it is possible that pedigreed seed tags may no longer be available. In this case, the purchase order or sales invoice may be used to verify the pedigreed status of the planted seed.

Similarly, if the original planting intention for the crop was commodity production, previous land use and isolation may not meet CSGA standards.

The seed crop inspector may encounter communication challenges as decisions to have crops re-certified may not have been made until after planting has occurred, and growers may not be familiar with pedigreed seed crop production requirements. Re-certified crops are inspected according to standard procedures for pedigreed seed crop inspection.

### **9.3.2 Inspection of crops planted with re-instated seed**

Re-instatement occurs when demoted seed already sown is re-instated to its original status or an intermediate status. For example, Foundation status seed demoted to Certified status could be sown as Certified status and inspected as a crop sown with Foundation or Registered status seed.

The seed crop inspector should contact the CSGA to clarify if re-instatement of the crop was granted. If the tenth digit of the crop certificate is an "R" (e.g., 14-1234567-**R**01), this indicates that the crop has been demoted to Registered status. If it is a "C" (e.g., 14-1234567-**C**01), this indicates that the crop has been demoted to Certified status. If there is a possibility of re-instatement of the status, the seed crop inspector must report the seed crop inspection in a manner that will allow CSGA to assess the crop at the highest possible pedigreed status.

### **9.4 Re-inspection to verify corrective action**

Should a grower's crop be declined pedigreed status for conditions such as inadequate isolation distances at the time of inspection, the grower may request a re-inspection to verify that actions to correct the conditions, i.e., the isolation distances, have been taken and are appropriate.

When the grower requires a re-inspection to verify the corrective action, the grower should contact the ASCIS to establish if and when a re-inspection will be provided. Re-inspection of a crop may be done only when directed by the CSGA or by the CFIA as part of a corrective action plan. When a seed crop inspector conducts a re-inspection of a crop, they must complete a **new** Report of Seed Crop Inspection that is classified as a 're-inspection'. This is to ensure that the condition of the crop at the time of re-inspection is clearly communicated to the CSGA and the grower. Report modification must not be used to modify a previously submitted re-inspection report; use "Re-Inspection" in that case.

For those crop kinds listed in Sections 2, 3 or 12 of Circular 6, verification of isolation corrective actions require the seed crop inspector to return to the field either prior to or after harvest to observe that the required isolation distance was not harvested and segregated from the field. These re-inspections are conducted as permitted by resources and weather. Where resources are not available, it is the responsibility of the ASCIS to contact the CSGA to communicate the need for alternative arrangements.

## 10.0 Reporting trends – variety descriptions

Where repeated problems are noted with a specific variety, the seed crop inspector should communicate these to their Lead Inspector (CFIA/ASCIS). The ASCIS Lead Inspector must communicate validated concerns to their local CFIA contact in a timely manner. When required, the CFIA will request that the ASCIS Lead Inspector completes the "Possible Error with Variety Description Form" in CSGA SeedCert.

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