



January 4, 2016

Mr. Michael Stahr, AOSA Rules Chair
Mrs. Sue Alvares, SCST Rules Chair

Dear Sir and Madam,

The Oregon Seed Association (OSA) which represents growers, cleaners and dealers in the State of Oregon, a state that produces fine fescue seeds in the USA, expresses its support to discontinue the factoring procedure in fine fescue species.

This association has been part of an ongoing discussion and understands that under the proposed rule, any multiple floret that contains at least one fertile floret will be considered a pure seed unit.

We appreciate that our input has helped shape the current rule proposal. We also want to thank AOSA and SCST for the improvement of testing rules because, in the end, improved testing rules contribute to more objectivity, reliability and efficiency in the industry as well.

We are confident that the new approach will benefit all those that grow, clean and sell fine fescue seeds. Additionally, it is our hope that the new approach will benefit all seed testing laboratories that serve our industry because the new method should be simpler, more objective, efficient and more consistent across labs.

If there are any questions, please let us know.

Sincerely,

Greg Loberg
President, Oregon Seed Association



February 2, 2016

Mr. Michael Stahr, AOSA Rules Chair
Mrs. Sue Alvares, SCST Rules Chair

Dear Sir and Madam,

The Oregon Seed Council (OSC) which represents the entire grass seed industry in the State of Oregon, a state that produces fine fescue seeds in the USA, expresses its support to discontinue the factoring procedure in fine fescue species.

OSC has been part of an ongoing discussion and understands that under the proposed rule, any multiple floret that contains at least one fertile floret will be considered a pure seed unit.

We appreciate that our input has helped shape the current rule proposal. We also want to thank AOSA and SCST for the improvement of testing rules because, in the end, improved testing rules contribute to more objectivity, reliability and efficiency in the industry as well.

We are confident that the new approach will benefit all those that grow, clean and sell fine fescue seed. Additionally, it is our hope that the new approach will benefit all seed testing laboratories that serve our industry because the new method should be simpler, more objective, efficient and more consistent across labs.

If there are any questions, please let us know.

Sincerely,

Roger Beyer
Executive Director
Oregon Seed Council


OREGON FINE FESCUE COMMISSION

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December 30, 2015

Memo to: Michael Stahr, AOSA Rules Chair
Sue Alvares, SCST Rules Chair

From: Bryan Ostlund, Executive Director 

Re: Support to Discontinue Factoring Procedures in Fine Fescue Seed Analysis

The Oregon Fine Fescue Commission, which represents Oregon producers of fine fescue seed, supports discontinuing the factoring procedure in fine fescue purity analysis.

The Commission has been part of the ongoing discussion and understands that under the proposed rule, any multiple florets that contain at least one fertile floret will be considered a pure seed unit.

We appreciate the opportunity to comment on the current rule proposal. We also want to thank AOSA and SCST for considering the improvement of testing rules. It's in everyone's interest to strive for more objectivity and reliability in the purity testing process.

We are confident that the new approach will benefit all those that grow, clean, sell and purchase fine fescue seed. Additionally, it is our hope that the new approach will benefit all seed testing laboratories that serve our industry because the new method should be simpler and more consistent across labs.

If there are any questions, please let me know.

cc: Oregon Fine Fescue Commissioners

