

2022 Rule Proposal #11

PURPOSE OF PROPOSAL

To clarify in Volume 1. Section 15i and j what must be reported when no other crop seeds, weed seeds, or noxious weeds are found.

PRESENT RULE

SECTION 15: REPORT OF ANALYSIS (ROA)

i. When a purity analysis is conducted the following information must be reported under Purity Analysis:

- (1) Weight of purity working sample.
- (2) Percentage by weight of pure seed, other crop seed, inert matter and weed seed found in the purity working sample, given to two decimal places.
- (3) Scientific name, or common name, or both, of all other crop seed or weed seed found in the purity working sample. If none are found, this must be indicated.

j. When a noxious weed seed examination is conducted the following information must be reported under Noxious Weed Seed Examination:

- (1) Weight of noxious weed working sample.
- (2) Scientific name, or common name, or both, of noxious weed seed found, the number of each type found and rate of occurrence per unit weight. If none are found, this shall be indicated.
- (3) The type of examination conducted, including the name of the region (state, province, country, etc.) and examination exclusions as appropriate.

PROPOSED RULE

SECTION 15: REPORT OF ANALYSIS (ROA)

i. When a purity analysis is conducted the following information must be reported under Purity Analysis:

- (1) Weight of purity working sample.
- (2) Percentage by weight of pure seed, other crop seed, inert matter and weed seed found in the purity working sample, given to two decimal places.
- (3) Scientific name, or common name, or both, of all other crop seed or weed seed found in the purity working sample. If none are found, this must be indicated by the word none or none found.

j. When a noxious weed seed examination is conducted the following information must be reported under Noxious Weed Seed Examination:

- (1) Weight of noxious weed working sample.
- (2) Scientific name, or common name, or both, of noxious weed seed found, the number of each type found and rate of occurrence per unit weight. If none are found, this shall be indicated by the word none or none found.
- (3) The type of examination conducted, including the name of the region (state, province, country, etc.) and examination exclusions as appropriate.

HARMONIZATION & IMPACT STATEMENT

Specifying what must be stated when no contaminants are found would harmonize AOSA/SCST closer with Canada M&P, ISTA, and the FSA.

Canada M&P is based off grade table requirements. In Section 1.3.2.e If the number of impurities of a category is nil, this must be reported as "0". If the number of impurities of a category was not determined, this must be reported as "-"

The Federal Seed Act does not have specific requirements for what must appear on a report of analysis. They do however have interpretations on the labeling end of things. 201.35 Blank spaces on the label shall be deemed to imply the word "None," when such interpretation is reasonable. 201.36 The words "free" and "none" shall be construed to mean that none were found in a test complying with the methods set forth in §§201.45-201.52.

ISTA requires that under Section 1.5.2.4. The scientific name and number of seeds of each species sought and found in this weight. If no other seeds are found, this must be indicated on the certificate.

SUPPORTING EVIDENCE

Specifying the wording that must be used when no other crop seed, weed seeds, or noxious weed seeds are found will make the reports of analysis from one laboratory to another more standardized. This will cause the seed company/customer no need to interpret the meaning.

SUBMITTED BY:

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