

FRSA REVIEW OF 2002 AOSA RULES PROPOSALS

May 21, 2002

AOSA Rule Committee

Deborah J. Lionakis Meyer, Chair

California Department of Food & Agriculture

Plant Pest Diagnostics Center

3294 Meadowview Road

Sacramento, CA 95832-1448

Dear Ms. Meyer,

Annually, members attending the April business meeting of the Front Range Seed Analysts (FRSA) review the annual AOSA Proposed Rules as published in the February issue of *The Seed Technologist Newsletter*.

Membership in FRSA is represented by Seed Analysts with AOSA and SCST laboratory affiliations, providing a good cross-section of knowledge and experience to comment on the Proposed Rules. Review comments are the consensus of members attending the April FRSA business meeting and may not represent the views of all FRSA members.

Rule Proposals **supported** by FRSA, as the Proposals were published, are: 1, 3, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15 and 18. The attending FRSA members at the Proposed Rules review wish to express our thanks to the author of Rule Proposal #5 for the time and effort spent on this worthy endeavor.

All analysts will benefit with the adoption of Rule Proposal #5.

Following are comments regarding the remaining Proposals.

Rule Change Proposal #2: Members present at the review would like to know the reason for this rule being proposed and what benefit the rule proposal has to seed testing. Currently, FRSA cannot support this rule proposal without clarification as to need for the rule change.

Rule Change Proposal #4: Some FRSA members present at the review question the use of 5 gms for Minimum Purity Working Weights when 5.5 gms seems more in line with the supporting evidence provided. A request for justification of the decision to use 5 gms from the author of the rule proposal before FRSA can support the rule proposal.

Rule Change Proposal #6: FRSA members present at the review are split in supporting the rule vs. leaving the rule as now written. Those individuals opposing the rule change argue that the number of noxious weed seeds found in the noxious weed test are important to the customer labeling the seed lot. No FRSA consensus of support for this rule proposal.

Rule Change Proposals #16: FRSA members present at review recommend the rule proposal be incorporated into the AOSA Cultivar Purity Testing Handbook. An amended rewrite of the rule proposal is suggested as follows:

3.8 Herbicide Trait Testing—The purpose of herbicide trait testing is to determine the percentage of normal seedlings expressing the herbicide trait within an herbicide trait lot.

Procedures for conducting herbicide trait testing are described in:

Cultivar Purity Testing Handbook, Contribution No. 33 to the Handbook on Seed Testing, AOSA.

Herbicide testing method references are listed in:

McDonald, M.B.; Gutormson, T.J.; and E.B. Turnipseed. 2001. Seed Technologist Training Manual. Chapter 14. Society of Commercial Seed Technologists. 435pp.

(Place the detailed procedures ‘a.’ through ‘d.’ of the proposed rule into the Cultivar Purity Testing Handbook.)

The suggested amended rule proposal follows a similar existing rule for Tetrazolium Testing, Section 7, pg. 33(2001), and Section 4.9.k.(2) Explanation of Table 3, Tetrazolium test (TZ), pg.

25(2001), AOSA Rules for Testing Seeds.

Rule Change Proposal #17: FRSA members present at review recommend the rule proposal be incorporated into the AOSA Cultivar Purity Testing Handbook. An amended rewrite of the rule proposal is suggested as follows:

3.2 Identification and cultivar determination

d. Seed Soak Test to Determine Roundup® Herbicide Resistance in Soybeans – Definitions, methods, and tolerances for conducting the trait evaluations of genetically modified, Roundup Ready® soybeans are provided in AOSA Cultivar Purity Testing Handbook, Contribution No. 33 to the Handbook on Seed Testing.

(Place the detailed procedures ‘1’ through ‘9’ of the proposed rule into the AOSA Cultivar Purity Testing Handbook.)

Editorial Notes regarding the rule proposal: The following editorial corrections should be considered for the proposed rule. Recommended corrections are in **bold** type.

In section 3.2d.7)a. the 3.2.9 should reflect the complete section designation of **3.2d.9)a.**

In section 3.2d.7)d. the word referee within the parenthesis should be (**refer** to Sec. 5.5.)

FRSA thanks the Rule Committee for the opportunity to express opinions regarding the 2002 AOSA Rule Change Proposals.

Sincerely,

Mike Bricker

Secretary

Front Range Seed Analysts

cc: Cheryl Johnson, FRSA President