

GRAIN GROWERS
OF CANADA



LES PRODUCTEURS
DE GRAINS DU CANADA

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Members:

Alberta Barley
Commission

Alberta Grain
Commission

Alberta Oat Rye &
Triticale Association

Alberta Pulse Growers

Alberta Winter Wheat
Producers Commission

Atlantic Grains Council

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Association

Oat and Barley Council
of Ontario

Prairie Oat Growers
Association

Western Barley
Growers Association

Western Canadian
Wheat Growers
Association

October 27th, 2009

Elwin Hermanson
Chief Commissioner
Canadian Grain Commission
600-303 Main Street
Winnipeg, MB R3C 3G8

Mr. Hermanson,

RE: Canadian Grain Commission Proposals on Licensing and Regulatory issues

The Grain Growers of Canada, representing 80,000 Canadian farmers through our Member Associations, would like to thank you for the opportunity to provide input on proposed changes to current grain licenses and regulations.

We have carefully reviewed the different elements of your letter, such as the moisture shrinking formula and the proposal to extend the shrinking allowance to licensed transfer and process elevators.

The move to increase the number of farmers who have access to CGC "subject to grade and dockage" is positive as is the intent for consistent application of regulations so that all elevators - primary, processing, terminal and transfer- face the same environment. The varying standards grain companies have today require variable training and internal compliance measures at both inland and port positions, all of which have costs associated.

Those additional dollars and costs, one way or another, come out of the producers pockets at the end of the day. Therefore, the Grain Growers of Canada support the Grain Commission's initiative to harmonize regulations and standards as listed in your consultation document.

Finally, we would like to say that many of our farmer board members and staff have had the opportunity to tour the CGC headquarters and they are always impressed with the people, the quality of work and facilities. Please contact us at any time for further information or input.

Sincerely,

Doug Robertson
President,
Grain Growers of Canada