



March 30<sup>th</sup>, 2010

The Honourable Gerry Ritz  
Minister of Agriculture and Agrifood  
House of Commons  
Parliament Buildings  
Ottawa, Ontario K1A 0A6

**Re: Canadian Grain Commission Proposals**

Dear Minister Ritz,

The Grain Growers of Canada, representing over 80,000 farmers through our membership organizations, support the changes proposed by the Canadian Grain Commission in the areas of comprehensive shrinkage and moisture shrink. We believe their proposals reflect the changing marketplace our producers face every day.

Our membership has expressed concern over the lack of consistency in shrinkage regulations between primary elevators and process facilities. This inconsistency was created in 2003, when only the licensed elevators were regulated to zero. The CGC's proposal to apply the same regulations to process facilities as licensed elevators will ensure consistency and transparency for producers when deciding who they market their grain with. We support this direction.

Given there is no scientific evidence to support the 1.1% rebound factor, we agree with the CGC proposal to replace it with a reference moisture level of 0.1% below the fixed minimum tough level specified for that grain. This will again provide transparency for our members in marketing their grain.

Measures like these to modernize our grading system will provide our members with more consistency and transparency when marketing their grain. The Grain Growers of Canada strongly support these changes and ask you to proceed with their implementation.

We are also considering the proposed changes to licensing. One of our member organizations is currently working with a number of other farm groups on alternatives to bonding which is linked to licensing. Their final report will be done around April 22<sup>nd</sup> and we will comment further at that time.

Thank you for the opportunity to provide input and direction on the future regulatory framework of our grain industry.

Sincerely,

Doug Robertson  
President, Grain Growers of Canada

Cc: Elwin Hermanson, Chief Commissioner CGC

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**Members:**

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Commission

Alberta Grain  
Commission

Alberta Oat Rye &  
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Growers Association

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Wheat Growers  
Association

