

## **FGIS Guidance Requested Regarding a New Canola Trait**

A new canola trait is expected to enter test plots for the 2027 planting season, with potential commercialization and entry into future markets.

Initial research conducted by the Federal Grain Inspection Service (FGIS) indicates that this new canola trait may be visually indistinguishable from mustard seed. Historically, there have been minimal instances of commingling between current canola varieties and mustard seed. During the past five years, only one export vessel has been inspected for canola; the remaining canola shipments were transported by rail to Mexico or Canada.

In light of the potential introduction of this new trait, guidance from FGIS is requested regarding the appropriate inspection and testing requirements when the identity of the grain cannot be confirmed through visual examination.

Specifically, clarification is requested on the following:

- 1. Official Inspection Requirements**

Under what circumstances would an official grain inspection be required, as opposed to circumstances in which it would be sufficient to establish and document the identity of the grain being delivered?

- 2. Sampling and Testing Requirements**

If the identity of canola cannot be visually confirmed, would FGIS consider resuming random sampling of canola shipments for erucic acid and/or glucosinolate levels rather than requiring erucic acid and/or glucosinolate testing on every sample submitted for grading?

- 3. Future Inspection Procedures**

Are there additional sampling, testing, identification, or documentation procedures that FGIS recommends be implemented to address the potential commingling or misidentification of this new canola trait and mustard seed?

We respectfully request FGIS guidance on these questions to ensure that appropriate procedures are established before the new trait enters commercial production and the marketplace.