HOUSE OF COMMONS STANDING COMMITTEE ON AGRICULTURE AND AGRI-FOOD STUDY:
*PUBLIC PERCEPTION OF AND PUBLIC TRUST IN THE CANADIAN AGRICULTURAL SECTOR*

# Three Recommendations for Building Public Trust in Canadian Regulation of Genetic Engineering

The Canadian Biotechnology Action Network (CBAN) offers three recommendations for government action in relation to the regulation of genetically engineered (genetically modified or GM) organisms, in the context of the committee's study to examine measures to improve public trust in the Canadian agricultural sector:

1. **Establish mandatory GM food labelling,**
2. **Reform GMO regulation for increased transparency and public engagement,**
3. **Maintain Health Canada's role in assessing the safety of GM foods.**

## RECOMMENDATION 1.
## Establish mandatory GM food labelling

Mandatory, clear, on-package text labelling to identify genetically modified foods would provide transparency in the marketplace and satisfy a desire for mandatory labelling that has been expressed consistently over twenty years by over 80% of Canadians.

### Public Opinion: Over 80% of Canadians say they want mandatory GM food labelling (1994-2018).

**Of 20 public opinion polls since 1994:**

- 18 found that over 80% of Canadians want mandatory GM food labelling,
- Two poll show support at 75% and 78%,
- Ten polls show support at more than 90%, and
- The two most recent polls – an Ipsos Reid poll conducted for CBAN in 2015 and a 2018 poll conducted by Dalhousie University – found 88% support.

**Details:** www.cban.ca/labellingpolls

### Public Opinion: Canadians want mandatory GM food labelling for a diversity of reasons.

**Of the 88% of Canadians who said they wanted GM foods labeled in the 2015 Ipsos Reid poll:**

- 87% just wanted to know what is in the food they are eating
- 58% were concerned that not enough research has been done on the long-term health and environmental impacts
- 55% were concerned about safety.
- 47% were concerned about government transparency in regulation
- 46% were concerned about corporate control
- 46% thought GM is not natural
- 45% had environmental concerns
- 30% had ethical concerns

Mandatory GM food labelling is relevant and urgent for Canadians. For example, in 2015, 45% of Canadians said they would definitely not eat the genetically modified salmon (11% said they would, 32% say maybe, and 12% say they don't know or did not have an opinion).

**Details:** www.cban.ca/2015poll

## RECOMMENDATION 2.

# Reform GMO regulation for increased transparency and public engagement

### Public Opinion: Over half (57%) of Canadians said they were not confident in the government's safety and regulatory systems for genetically modified foods (Ipsos Reid, 2015)

CBAN recommends that the government address the recommendations of the 2001 *Royal Society of Canada's Expert Panel on the Future of Food Biotechnology* to improve transparency in regulation.

Canadian government regulators are independent, but, with a few exceptions, the science they are evaluating is not. Regulatory decisions that allow for commercial release of GMOs in Canada are based on information submitted by the companies or institutions that want their products approved for sale. Canadian regulatory agencies do not require this science to be peer-reviewed. This also means that if any testing is done by companies, all or most of it remains classified as "confidential business information" and is not publicly available – it is only seen by proponents and government safety evaluators.

Health Canada and the Canadian Food Inspection Agency release short *Decision Documents* that summarize how the decision to approve individual GMOs was made – these are the only documents made available to the public. Precisely how regulators assess the safety of GM crops and foods, and what data is evaluated, is therefore unknown to the public and other scientists. In 2001, the *Royal Society of Canada's Expert Panel on the Future of Food Biotechnology* (convened at the request of multiple government departments) described this dependence on data that is not peer-reviewed nor publicly accessible as a problem for public trust:

*"The lack of transparency in the current approval process, leading as it does to an inability to evaluate the scientific rigor of the assessment process, **seriously compromises the confidence that society can place in the current regulatory framework** used to assess potential risks to human, animal and environmental safety posed by GMOs."*

— **Royal Society of Canada's Expert Panel on the Future of Food Biotechnology, 2001 [emphasis added]**

The Expert Panel recommended a system of regular peer-review of government safety assessments, but this has not yet been implemented.

CBAN also recommends that the regulation of individual GM foods, crops and animals include non-scientific considerations such as the potential economic and social impacts and thereby also include consultations with farmers and consumers. Furthermore, we recommend formal mechanisms to track and evaluate environmental, economic and social impacts over time, i.e. positive and negative impacts. This would require the federal government to track which GM foods are on the market and which GM crops, animals and traits are produced in Canada (where and how much).

**Details:**

Are GM Foods and Crops Well Regulated? GMO Inquiry, Canadian Biotechnology Action Network, 2015. www.gmoinquiry.ca/regulation

Where in the World Are GM Crops and Foods? GMO Inquiry, Canadian Biotechnology Action Network, 2015. www.gmoinquiry.ca/where

## RECOMMENDATION 3
# Maintain Health Canada's role in assessing the safety of GM foods

CBAN flags the potential for implementation of a "Low Level Presence" (LLP) policy to significantly undermine public trust in food safety and Canadian regulation. Instead of implementing an LLP policy, CBAN recommends that the role of Health Canada in assessing the safety of all GM foods be maintained.

The proposed policy would construct a means by which some GM foods, at a small amount, would be permitted onto the market without Health Canada's safety assessment. The LLP policy would allow contamination of our food supply with a "low level" of genetically engineered foods that have not yet been assessed as safe for human consumption by Health Canada.

Currently, Health Canada reviews the safety of all GM foods. The LLP policy as proposed would no longer require Health Canada's safety evaluation of all the GM foods that Canadians eat, if these foods contaminate our food system at a low-level and have already been approved by another government whose regulatory system Health Canada judges as functioning according to the *Codex Guideline for the Conduct of Food Safety Assessment of Foods Derived from Recombinant-DNA Plants*.

The federal government's long-standing response to public concerns about genetically engineered foods is to stress the integrity of Canada's food safety system and the role of Health Canada's safety evaluators in ensuring food safety. With an LLP policy in place, this role of Health Canada's regulators is removed and replaced by that of regulators from foreign governments.

The text of the Canada-United States-Mexico Agreement states that, "Each Party shall adopt or maintain policies or approaches designed to facilitate the management of LLP occurrences." We recommend that, to manage LLP occurrences, the current zero-tolerance policy for low level contamination of unapproved GM foods be maintained.

**Details:** www.cban.ca/LLP

**cban.ca**

**The Canadian Biotechnology Action Network (CBAN)** brings together 16 organizations to research, monitor and raise awareness about issues relating to genetic engineering in food and farming. CBAN members include farmer associations, environmental and social justice organizations, and regional coalitions of grassroots groups. CBAN is a project on Tides Canada's shared platform. **www.cban.ca**

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