



The Honourable Ginette Petitpas Taylor

Minister of Health

Cc: The Honourable Marie-Claude Bibeau, Minister of International Development

March 20, 2018

RE: Concern over Health Canada's review and approval of genetically engineered "Golden Rice"

Dear Minister Petitpas Taylor,

We are writing to express our concern about Health Canada's approval of the genetically engineered food "Golden Rice" and the implications of a policy that supports the safety review of genetically engineered products that are not intended for the Canadian market.

On Friday March 16, Health Canada posted a notice of approval for the genetically engineered product "Golden Rice" which is not intended to be sold in Canada. We remain concerned about the rationale behind the use of resources for this safety evaluation.

Firstly, as stated in Health Canada's technical summary of its approval, "The main intended market for this product is in countries such as Bangladesh and the Philippines where diets are typically low in vitamin A... The IRRI has indicated that this product is not intended to be sold in Canada." And yet Health Canada also says that it conducted a scientific assessment "in order to determine whether this rice variety could be sold in Canada as food."

Furthermore, in a February letter responding to our request for a rationale for the departmental review of Golden Rice, the Director General of the Food Directorate at Health Canada, Karen McIntyre, said, "Health Canada's science-based regulatory system for novel foods is internationally recognized and developers often choose to seek authorization in Canada as a first step in their regulatory plan even if they do not plan to sell the product in Canada."

We do not think it is appropriate for Canadian regulators to use government resources to assist the 'regulatory plan' of companies/institutions that do not in fact plan to market their product in Canada.

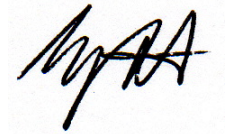
Regarding its role in the regulation novel foods, the department says, "Health Canada assesses the safety of all genetically-modified and other novel foods proposed for sale in

Canada.”<sup>i</sup> But, in fact, Health Canada’s practice goes beyond this role to assessing the safety of any genetically engineered food for which approval is requested, even if it the food product is explicitly intended for sale in other countries and not Canada.

Please clarify the purpose of Health Canada’s regulation of genetically engineered organisms. Please also clarify how the safety review of products used in other countries, and not in Canada, assists Canadians and the mandate of Health Canada: “Health Canada is responsible for helping Canadians maintain and improve their health. It ensures that high-quality health services are accessible, and works to reduce health risks.”

Secondly, in its technical summary, Health Canada states that, “Intrinsic food supplementation could be a useful tool for alleviating vitamin A deficiency (VAD) in children, a known and preventable cause of blindness.” Has Health Canada or Global Affairs therefore assessed the use of intrinsic food supplementation in nutrition and development strategies? We ask the government to provide the evaluations that inform this statement.

Sincerely,



Lucy Sharratt, Coordinator  
Canadian Biotechnology Action Network

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<sup>i</sup> Genetically Modified (GM) Foods and Other Novel Foods  
<https://www.canada.ca/en/health-canada/services/food-nutrition/genetically-modified-foods-other-novel-foods.html> Accessed March 19, 2018 11:53 AM