



To: The Honourable Lawrence MacAulay, Minister of Agriculture and Agri-Food
Cc: Paul Glover, President, Canadian Food Inspection Agency;
The Honourable James Gordon Carr, Minister of Natural Resources

July 13, 2018

Dear Minister MacAulay,

RE: Need for action relating to field-testing of GM crops

The Canadian Biotechnology Action Network is writing, firstly, to support the call from the National Farmers Union for a ban on outdoor testing of genetically engineered (also called genetically modified or GM) crops, as a necessary step to prevent the spread of unapproved and/or unwanted GM crop plants.

Secondly, we support the National Farmers Union's request to publish the precise location of every current and past GM wheat test site so that farmers and other Canadians can take action to mitigate the risk of contamination (in a June 20 letter to Paul Gregory, President of the Canadian Food Inspection Agency "Requesting CFIA to publish location of genetically modified wheat field trials"). We would add the need to publish a list of GM alfalfa test sites, given the high risk of contamination with alfalfa and the anticipated costs of GM contamination.

Thirdly, the Canadian Biotechnology Action Network is asking for a change in regulation to require an assessment of potential economic harm before new GM crops and animals are approved for commercial production/unconfined release. Canadian farmers and fishers need to be consulted before new GM crops and animals are introduced onto the market, in particular because GM contamination could jeopardize important domestic and international markets.

Genetically engineered plants and animals pose a risk of contamination that can have economic consequences. The risk of contamination in this context is not assessed as part of the current regulatory regime. However:

- Canadian farmers have already paid a heavy price because of widespread GM flax contamination that reached 35 countries. The cost to the industry is estimated at \$29.1 million.

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- The costs borne by Saskatchewan organic grain farmers of contamination from GM canola are documented in their work to seek a class action suit against Bayer and Monsanto for compensation.

We are, additionally, gravely concerned about the potential for contamination from outdoor field tests of genetically engineered trees. In 2008, CBAN and groups across the world supported a call for a global ban on GM trees at the United Nations Convention on Biological Diversity. CBAN, in community with groups across the world, reached the conclusion that “The only reliable method for preventing the escape of genetic material such as transgenes from genetically engineered trees is to not release such trees into the open environment.” (<https://cban.ca/wp-content/uploads/Potential-Impacts-of-GE-Trees-SBSTTA-13-briefing.pdf>)

Thank you for your attention to this important matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'L. Sharratt', is centered on the page.

Lucy Sharratt
Coordinator