



To: The Honourable Ginette Petitpas Taylor, Minister of Health

Cc: Karen McIntyre, Director General, Food Directorate

June 22, 2018

RE: Request for information on the health risk assessment of GM wheat

Dear Minister Petitpas Taylor,

The Canadian Biotechnology Action Network (CBAN) is writing to ask for information about “a health risk assessment” of genetically modified wheat that was conducted by Health Canada, in regards to the detection of unapproved GM herbicide-tolerant wheat plants in Canada.

- In its document “Questions and Answers about this GM wheat” the CFIA says, “Health Canada has performed a health risk assessment and concluded this finding does not pose a food safety risk to Canadians.”
- In this same document, the CFIA also says, “Herbicide tolerance is an approved GM trait in canola, corn and soybeans. In these crops, previous Health Canada and CFIA safety assessments have demonstrated that this trait does not pose a risk to public health, the health of animals or the environment.”
- In its detection report, the CFIA says, “On May 9, 2018, risk assessments examining potential implications of the unauthorized GM wheat to food, animal feed, and the environment were completed by Health Canada and the CFIA. These risk assessments determined that the herbicide tolerant GM wheat does not pose a risk to public health, the health of animals or the environment. GM crops with this herbicide tolerance trait have been authorized in Canada for over 20 years and there have been no human health concerns identified related to these crops.”

Please provide details of these risk assessments completed on May 9, 2018.

1. What were the parameters of Health Canada’s risk assessment? Was Health Canada’s risk assessment specific to “this finding” of GM wheat plants in Alberta i.e. specific to the apparent limited scope of this contamination incident/specific to the CFIA conclusion that there is no dietary exposure, or did Health Canada conduct a scientific evaluation of the safety of this GM wheat for human consumption?

2. We request an explanation of statements regarding risk assessment of the GM trait: “In these crops, previous Health Canada and CFIA safety assessments have demonstrated that this trait does not pose a risk to public health, the health of animals or the environment.” Firstly, is Health Canada saying that if a novel food with a GM trait (e.g. GM “Roundup Ready” corn) has been approved for human consumption, then Health Canada will or may conclude safety for the use of that GM trait in other foods (e.g. GM “Roundup Ready” wheat) without conducting a full scientific evaluation? Secondly, is Health Canada now focusing risk assessment on the GM trait outside of the context of the specific organism/food? This would be a significant departure from the standard of safety assessment implemented via the regulation of Novel Foods. For example, Health Canada’s safety assessments for novel foods include a characterization of the modified plant.

3. Please provide a Decision Document/Technical Summary or the equivalent for these 2018 safety assessments. Such a document is required including to answer the questions: Was a characterization of the modified plant provided by Monsanto? Was there a nutritional compositional analysis conducted? Was potential toxicity and allergenicity assessed? Were animal feeding tests conducted?

Thank you for your prompt response on this important matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'L. Sharratt', is centered below the text 'Sincerely,'.

Lucy Sharratt
Coordinator

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