



May 18, 2021

To: Karen McIntyre, Director General, Food Directorate, Health Canada  
CC: Martin Duplessis, Director, Bureau of Microbial Hazards, Health Canada;  
William Anderson, Executive Director, Plant Health and Biosafety Directorate, CFIA;  
Linda Webster, Director, Plant Production Division, CFIA.

**RE: Concern over Health Canada’s discussions regarding “Nature Nurtured”**

Dear Ms. McIntyre,

The Canadian Biotechnology Action Network is writing to express our concern about discussions between Health Canada and the biotechnology and pesticide industry lobby group CropLife Canada in relation to the public relations website “Nature Nurtured”.

Health Canada initiated a March 8<sup>th</sup>, 2021 meeting with CropLife Canada, “To discuss Health Canada’s voluntary transparency initiative on non-novel gene edited plants and the ‘Nature Nurtured’ industry initiative”. This follows February 19, 2021 correspondence with CropLife Canada where the Acting Associate Assistant Deputy Minister, Health Products and Food Branch, stated of the Nature Nurtured site that, “It is clear that this information provides Canadians with clear plain language description of the technology and its potential benefits. These elements are valuable in allowing Canadians to understand the technology and its use in agriculture.”

In the notes from the March 8<sup>th</sup> meeting, we see that “Health Canada opened the meeting by speaking to the importance of transparency to maintain the public trust of Canadians” and “CropLife provided an overview of its ‘Nature Nurtured’ initiative and the intended purpose to raise public awareness about gene edited technology”.

Why is Health Canada interested in discussing this public relations site? Will Health Canada be promoting or otherwise relying on this site to “maintain the public trust of Canadians”?

The website Nature Nurtured advertises many misleading statements and is clearly an unbalanced promotional site for gene editing. For example:

- The website provides descriptions of gene editing that serve biotechnology industry public relations goals rather than educational goals, such as: “Gene editing a plant’s own DNA does not create a GMO. While they are all tools used during plant breeding to improve plants, genetically modified organisms typically include new DNA from another, different organism.” This obfuscates the fact that gene editing is genetic engineering.

- The site highlights the many theoretical benefits of using gene editing in a way that suggests that they either already exist or are inevitable. We are particularly concerned by the bold, incorrect statement that leads the site: “Gene editing is a proven solution for making healthier food, stronger crops and increasing yields all while using fewer resources.” Gene editing cannot be said to be proven in this context, when products are not even commercialized.

We would like to bring your attention to the fact that of the 27 current members of Nature Nurtured, three of these (Bayer, Corteva, and Syngenta) together control approximately 48% of the global commercial seed market and 53% of the global agrochemicals market. Of these three, Corteva holds the most patents on CRISPR technology of any company or institution in the world. We maintain that an association with such vested interests renders the Nature Nurtured website, at best, an unreliable and biased source of information for the Canadian public.

In our 2015 report “Are GM Foods Better for Consumers?” (Attached, pages 36-37), CBAN documented how various early federal government funding for private communications initiatives failed the Canadian public and, instead, contributed to a climate of mistrust.

We maintain that the public deserves impartial information from public institutions rather than communications strategies funded by commercial interests.

The context of Health Canada’s discussions with CropLife Canada about the site further validates our concern that the proposed Voluntary Transparency Initiative would be a mechanism to further shift the provision of important information about genetically engineered products from the public sector, to the private sector. Please see our May 11<sup>th</sup> submission of comment to Health Canada in the consultations on novel food regulatory guidance.

We ask both Health Canada and the Canadian Food Inspection Agency to carefully evaluate the proposals for regulatory guidance and any other associated activities and discussions in order to ensure there is no possible conflict whereby regulatory agencies are seen to be promoting commercial interests.

We ask you to urgently clarify your intentions in relation to the Nature Nurtured website, and to separate the departments from this industry promotional tool.

Thank you.

Sincerely,



Lucy Sharratt  
Coordinator