



To: The Honourable Marie-Claude Bibeau,
Minister of Agriculture and Agri-Food
Cc: The Honourable Ginette Petitpas Taylor, Minister of Health

June 26, 2019

RE: Our testimony before the House of Commons Standing Committee on Agriculture and Agri-Food regarding the need to maintain Health Canada's role in assessing the safety of GM foods.

Dear Minister,

We are writing to follow-up on our testimony before the House of Commons Standing Committee on Agriculture and Agri-Food in the study of “Public Perception of and Public Trust in the Canadian Agricultural Sector,” and in respect to the Committee’s invitation for you to review our testimony.

In our testimony, and in our enclosed written brief, we offered three recommendations to build public trust in Canadian regulation of genetically engineered (genetically modified or GM) organisms:

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.

The first two recommendations are long-standing requests for change, founded on twenty years of opinion polling and the 53 recommendations of the Royal Society of Canada’s Expert Panel on the Future of Food Biotechnology (2001), respectively. **As a matter of urgency, we are asking you to review our third recommendation, to maintain Health Canada’s role in assessing the safety of GM foods.**

In our April 4th testimony before the committee, we flagged the potential for the implementation of a “Low Level Presence” (LLP) policy to significantly undermine public trust in food safety and Canadian regulation. We recommend that instead of implementing an LLP policy, the government should maintain the role of Health Canada in assessing the safety of all GM foods.

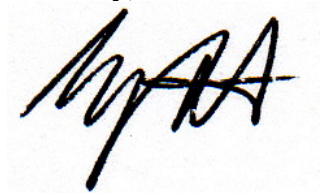
We are bringing your attention to our recommendation with urgency because the text of the Canada-United States-Mexico Agreement states that “Each Party shall adopt or maintain policies or approaches designed to facilitate the management of LLP occurrences.” **We recommend that, to manage LLP occurrences, the current zero-tolerance policy for contamination of unapproved GM foods be maintained.**

If the current zero-tolerance policy is replaced as suggested in the LLP policy model published by Agriculture and Agri-Food Canada in 2017, some GM foods, at a small amount, would be permitted onto the market without Health Canada’s safety assessment. Such a 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, overturning Health Canada’s role as safety evaluator. Health Canada’s safety evaluation would not longer be required if these foods contaminate our food system at a low-level and have already been approved by another government whose regulatory system Health Canada deems as compliant with the *Codex Guideline for the Conduct of Food Safety Assessment of Foods Derived from Recombinant-DNA Plants*. With such an LLP policy in place, the role of Health Canada’s regulators would be replaced with that of regulators from foreign governments.

In a 2015 Ipsos Reid poll conducted for the Canadian Biotechnology Action Network, 57% of Canadians said they were not confident in the government’s safety and regulatory systems for genetically modified foods. We suggest that significant change in the regulation of GM foods via the adoption of an LLP policy would further undermine public trust in Canada’s regulation of GM foods. In fact, we suggest that any move to allow GM foods into our food system without full safety evaluations from Health Canada’s regulators risks a crisis of public trust in the Canadian food system and the government’s safety regulation.

Thank you for your attention to this urgent and serious matter.

Sincerely,



Lucy Sharratt, Coordinator

The Canadian Biotechnology Action Network (CBAN) brings together 16 groups 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 the shared platform of Tides Canada. www.cban.ca

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