



The Honourable Ginette Petitpas Taylor  
Minister of Health  
Cc: The Honorable Chrystia Freeland, Minister of Foreign Affairs

March 1, 2018

**RE: Request for policy change on the regulation of genetically engineered foods not intended for the Canadian market**

Dear Minister Petitpas Taylor,

Further to our January 11 letter requesting confirmation that a safety evaluation of the genetically engineered Vitamin-A enhanced “Golden Rice” is underway in Health Canada and asking for Health Canada’s rationale for conducting this assessment, we are writing to ask you to review Health Canada’s policy regarding the regulation of genetically engineered foods that are not intended for the Canadian market.

In our letter of January 11, as yet unanswered, we requested a rationale for Health Canada’s apparent agreement to conduct a safety evaluation of Golden Rice despite the fact that this product is not intended for the Canadian market, and has not yet been approved in any of the countries of intended release.

**We ask you to review Health Canada’s policy regarding the regulation of genetically engineered foods that are not intended for the Canadian market. We ask you to establish a policy approach for this sub-category of *Novel Foods*, which would include the Vitamin A-enhanced “Golden Rice.”**

Such an approach is needed because it is anticipated that, across the world, more genetically engineered nutritionally-enhanced foods will be developed and that many or all of these will not be destined for the North American market but intended for domestic use in select countries in the Global South. Health Canada’s response to the request to review the safety of the high-profile product Golden Rice will set a precedent for Health Canada in this regard.

Under the current regulatory structure for *Novel Foods* and *Plants with Novel Traits* any request for approval of a genetically engineered product triggers a safety evaluation process inside Health Canada. The process appears to be triggered regardless of where release of the product is intended. There appears to be no criteria to filter such requests, i.e. there is no screening process between an

approval request and the expenditure of the department's financial and human resources to conduct a review (aside from a voluntary pre-submission consultation that relates only to assisting the quality of the submission itself).

We propose that Health Canada should refrain from beginning any safety evaluation for such a product until, at the very least, it is approved in one or more of the countries targeted for release. This would allow national governance in target markets, including any associated public consultations, to proceed unimpeded by the potential of perceived influence from nations such as Canada.

Health Canada's review of Golden Rice could create a precedent that could also inadvertently encourage companies or institutions to seek product approval from Canada ahead of approval in target countries that may have more demanding or lengthy regulatory processes.

We suggest that any Health Canada review of Golden Rice be suspended until a policy approach can be elaborated for this sub-category of genetically engineered foods.

We look forward to your response, and to a response to our initial letter of January 11 (enclosed).

We are pleased to discuss these important issues at any time.

Sincerely,

A handwritten signature in black ink, appearing to read 'L. Sharratt', written over a light grey rectangular background.

Lucy Sharratt, Coordinator

Canadian Biotechnology Action Network  
[coordinator@cban.ca](mailto:coordinator@cban.ca) 613 809 1103 [www.cban.ca](http://www.cban.ca)