Health Canada Santé Canada

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August 15, 2019

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Dear Ms. Sharratt,

Thank you for your correspondence of June 25, 2019, regarding Health Canada's role in assessing the safety of genetically modified (GM) foods, and the Government of Canada's current approach to the occurrence of Low Level Presence (LLP).

The Government of Canada is committed to ensuring the safety of the Canadian food supply and the health and safety of Canadians. As part of this commitment, Health Canada conducts a rigorous, science-based assessment of all novel food products before they can enter the Canadian marketplace. Foods that are derived from genetic modification (i.e., GM foods) are regulated as novel foods in Canada. The Department's top priority when performing these mandatory assessments is the health and safety of Canadians. Assessments of GM foods are conducted under the *Food and Drug Regulations*, which prohibit the manufacturers of these products from selling them in Canada until Health Canada has completed a full safety assessment and found them to be as safe and nutritious as conventional foods.

In Canada, Health Canada and the Canadian Food Inspection Agency (CFIA) share the federal responsibility for food labelling policies under the *Food and Drugs Act*. In accordance with its mandate, Health Canada is responsible for food labelling policies with respect to health and safety. The Department requires special labelling of all food products, including GM foods, where there are clear scientifically established health risks or significant nutritional changes which might be mitigated through labelling, for instance, the presence of an allergen in a food. In these situations, labelling is required to alert consumers or susceptible groups in the population at large.

The Government of Canada recognizes that the labelling of GM foods is an important issue for Canadians. To this end, Health Canada worked actively

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with the Canadian Council of Grocery Distributors and the Canadian General Standards Board to develop a Canadian voluntary standard for labelling of GM foods. Other partners in this process included consumer groups, food companies, producers, environmental groups, general interest groups, and other government departments. The standard "Voluntary labelling and advertising of foods that are and are not products of Genetic Engineering" was adopted as a national standard by the Standards Council of Canada in April 2004. It provides guidance to food manufacturers to address consumers demand for the labelling of GM foods in Canada. More detail on this initiative is available on the Public Works and Government Services Canada website at: http://www.tpsgc-pwgsc.gc.ca/ongc-cgsb/programme-program/normes-standards/internet/032-0315/index-eng.html.

Should any GM food product assessed by Health Canada be determined to require labelling for health and safety reasons, the Department would act immediately to ensure that appropriate labelling is made mandatory. Health Canada is committed to ensuring the continued safety of the Canadian food supply and the health and safety of Canadians.

While it is true that the Government of Canada is considering policy options to address the potential issue of the LLP of unauthorized GM organisms in foods entering Canada, no policy option will be considered that undermines the safety of the Canadian food supply. Health Canada is committed to ensuring that all food products sold in Canada are healthy and safe to eat.

As you are aware, LLP refers to the unintended presence, at low levels, of a GM crop that is authorized for commercial use or sale in one or more countries, but is not yet authorized in an importing country, for example, in shipments of raw agriculture material such as grain. The current potential for unauthorized GM crops to enter Canada through imports is low. GM crops that are likely to be found in international trade have already undergone safety assessments by Health Canada and the CFIA, and have been authorized for use in Canada. However, an increasing number of GM products are being developed globally for commercial production and the potential for unauthorized GM crops to enter Canada could increase in the future.

In response to this potential, Agriculture and Agri-food Canada (AAFC) led a policy analysis process regarding this matter. As the regulatory authority for GM food, Health Canada participated in this work to ensure that any policies developed continue to ensure the safety of the Canadian food supply. During this policy analysis process, the Government of Canada twice sought the input of targeted groups from a wide range of areas such as the agricultural industry, consumers, and civil society. The objective of these consultations was to gather Canadian public and stakeholders' feedback on a proposed

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policy to manage LLP. The input received during these processes was used to develop a policy model for managing LLP in Canada. This policy model was published by AAFC in 2017.

Currently, no decision has been taken on how the Government of Canada will address the potential for LLP of unauthorized GM crops. Until a decision is made, Canada's current approach to the LLP of unauthorized GM crops continues to apply. In the event of a LLP occurrence, and at the request of the CFIA, Health Canada will conduct a risk assessment of the unauthorized GM crop to inform any risk management action taken by the Agency. These risks assessments are conducted on a case-by-case basis.

If you would like more information regarding the food safety assessment of GM foods by Health Canada, please visit the Health Canada website at: https://www.canada.ca/en/health-canada/services/science-research/emerging-technology/biotechnology/food.html.

I hope that my comments are helpful in addressing your concerns.

Thank you for writing.

Yours sincerely,

Karen McIntyre
Director General, Food Directorate