



Collaborative Campaigning for Food Sovereignty and Environmental Justice

The GMO Council
South Africa

August 29, 2008

RE: Canadian experience relating to Bt potatoes

Dear GMO Council,

As you are deliberating a permit for commercialization of genetically engineered Bt potatoes in South Africa, we are writing to share our relevant experience with Bt potatoes and their associated environmental, health and consumer issues in Canada. The Canadian Biotechnology Action Network, a network of 17 farmer, environmental, development and consumer groups, has been monitoring issues raised by genetic engineering since 1999 and holds considerable expertise relative to regulation for environmental and health safety as well as consumer issues.

In addition to the below details we would like to state our concerns over the inevitable development of insect resistance to Bt and the need to further study the impacts of toxic Bt plant residue on soil and water ecosystems. Additionally, we are very concerned about the potential health impacts of consuming Bt potatoes and believe that public, independent peer-reviewed science should be required to enable government authorities to adequately assess environmental and health questions.

Between 1995 and 2001 the relevant authorities in Canada, the Canadian Food Inspection Agency and Health Canada, approved numerous varieties of Monsanto's Bt potatoes. These potatoes were however taken off the North American market by Monsanto in 2001.

Environmental Management Problems

The eventuality of insects developing resistance to the Bt toxin has always been a concern with the introduction of Bt crops but this risk was viewed by the Canadian Food Inspection Agency (CFIA) as one that could be effectively managed. However, a CFIA audit of Bt potato test sites revealed the failure of Monsanto to accurately follow guidelines for managing risk. ("Genetically modified spuds cleared: Inspectors had blasted 'extremely poor' field trials", Toronto Star, January 23 2001, Stuart Laidlaw, From Access to Information documents obtained by Ken Rubin for the Canadian Health Coalition). An October 1998 audit by the CFIA's Fredericton office described the test sites as "extremely poor". The audit revealed that the refuges at the test sites were not being maintained but in many cases were being sprayed with insecticides, defeating their purpose. "The results of this audit clearly demonstrate that Monsanto was not able to manage confined trials of this size," wrote CFIA employee Morven McLean, who conducted the audit, in a memo dated Feb. 19, 1999. "The

production of 10,000 acres of transgenic potatoes, as proposed by the seed-potato industry, would put the CFIA, the minister and the industry at risk as such large-scale production cannot be grown under adequate conditions of confinement and the environmental, food and feed safety of these transgenic potatoes has yet to be determined." We view this audit as a significant warning as to the ability of corporations and farmers to follow the necessary guidelines in place to delay the onset of insect resistance to Bt.

Health Concerns

Health Canada, the government regulatory authority over food health and safety, does not conduct its own tests but relies on corporate-generated data in order to assess product safety. An undated memo obtained through Access to Information revealed that when Health Canada requested further data from Monsanto on safety and nutritional quality of their Bt potatoes, Monsanto refused. ("Government fast-tracked Monsanto's GM potatoes: Private deal struck quietly to speed up regulatory system", Ottawa Citizen, Pauline Tam, November 30, 1999) Health Canada stated, "Monsanto objected to these requests; believing that their data adequately supports their conclusions that these products present 'no significant environmental, feed or food safety risk". Eventually, Monsanto provided this data in return for a determined date for approval of the Bt potatoes. We conclude that independent, peer-reviewed science should be required in order to adequately assess the safety of Bt potatoes for human consumption.

Consumer and Manufacturer Concerns

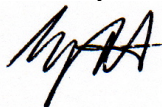
In 1999, Canadian company McCain Foods (the world's largest maker of french fries) stated that they would not use the GE potatoes because of consumer concerns. McCain Foods (Canada) sent a letter to farmers informing them that it would not accept genetically modified potatoes. In 2001 Monsanto stopped marketing the potato in Canada and it is no longer available in North America.

Summary

The Canadian Biotechnology Action Network reiterates the concerns of Canadian consumers over the health impacts of consuming Bt potatoes. Our organization objects to the commercialization of Bt potatoes in Canada and would assist Canadian consumers in refusing Bt potatoes and potato ingredients imported from other countries.

Thank you for your consideration of our information.

Sincerely,



Lucy Sharratt
Coordinator