



**RQcOGM**  
*Réseau Québécois contre  
les Organismes  
Génétiquement Modifiés*

Meena Ballantyne,  
Assistant Deputy Minister  
Food and Health Products Branch  
Health Canada

RE: Lack of food safety assessment for 'SmartStax' eight-trait GE corn and request to rescind authorization

July 28, 2009

Dear Ms. Ballantyne,

We are writing to request that Health Canada immediately request that the Canadian Food Inspection Agency rescind its authorization of the genetically engineered (GE) eight-trait corn called 'SmartStax' (Monsanto and Dow AgroSciences) and that Health Canada initiate a full food safety assessment of the GE corn as set out by the Codex Alimentarius *Guideline for the Conduct of Food Safety Assessment of Foods Derived from Recombinant-DNA Plants*.

We also request that Health Canada request the Canadian Food Inspection Agency to halt any further approvals of stacked trait products until such time as Health Canada has reviewed its Novel Foods Regulations and initiated a system-wide review of the entire regulatory system for GE foods and crops (Novel Foods and Plants with Novel Traits).

Health Canada has not assessed the safety of 'SmartStax' and has not issued formal authorization for introduction of this GE food.

The international Codex Alimentarius *Guideline for the Conduct of Food Safety Assessment of Foods Derived from Recombinant-DNA Plants* clearly recommends safety assessments of stacked trait GE crops. The Guideline clearly states that unintended effects can arise not only from genetically engineered (GE) plants, but can also arise when those GE plants are crossed via conventional breeding (as in the case of stacked-trait crops such as 'SmartStax'): "Unintended effects in recombinant-DNA plants may also arise through the insertion of DNA sequences an/or **may arise through subsequent conventional breeding of the recombinant-DNA plant**" [bold added] (para 14, CAC/GL 45-2003). Furthermore, the Guidelines also state that such crops should go through a full safety assessment: "The assessment for unintended effects takes into account the agronomic/phenotypic characteristics of the plant that are typically observed by breeders in selecting new varieties for commercialization. These observations by breeders provide a first screen for plants that exhibit unintended traits. **New varieties that pass this screen are subjected to safety assessment as described in Sections 4 and 5**" [bold added] (para 17, CAC/GL 45-2003).

We are extremely concerned that Health Canada did not conduct any food safety assessment of 'SmartStax' and that the regulatory system is not equipped to identify the risk potentials of new GE foods and crops such as this stacked-trait corn.

We look forward to your prompt response.

Sincerely

A handwritten signature in black ink, appearing to read 'L. Sharratt', written in a cursive style.

Lucy Sharratt  
Coordinator  
Canadian Biotechnology Action Network

Cc: Hon. Gerry Ritz, Minister of Agriculture and Agri-Food; Hon. Leona Aglukkaq, Minister of Health; Hon. Stockwell Day, Minister of International Trade.