

October 26, 2021

The Honourable Jean-Yves Duclos Minister of Health and The Honourable Marie-Claude Bibeau, Minister of Agriculture and Agri-Food

### **Call for Transparency and Government Oversight of All Genetically Engineered Foods and Seeds: No Regulatory Exemptions**

Dear Ministers,

**We demand government oversight of all genetically engineered foods and seeds including those produced through gene editing. All genetically engineered foods and seeds should be subject to government safety assessments and mandatory reporting to government.**

**We call on the Ministers of Health and Agriculture and Agri-Food to commit to transparency and independent science in the regulation of all genetically engineered organisms for use in food and farming.**

**We oppose the sale of unregulated, unreported genetically engineered foods and seeds. We oppose the proposals from Health Canada and the Canadian Food Inspection Agency (CFIA) that would allow many gene-edited genetically engineered foods and seeds onto the market with no government oversight.**

Proposed new regulatory guidance from Health Canada and the CFIA would shift some safety assessments away from government regulators to product developers themselves, with no government checks. Companies would be permitted to introduce many new genetically modified organisms (GMOs) without any independent science, and with no independent government science reviews. Companies would be allowed to release these GMOs into the environment and sell them without notifying the government and without publicly disclosing which seeds are genetically engineered.

Gene editing can make significant changes to a plant's genome without introducing DNA from another species - by deleting genetic material, for example. Gene editing can be imprecise, and even making small changes in a DNA sequence can have big effects. Possible unintended effects need to be looked for and assessed for safety. Proposals to exempt gene-edited GMOs from regulation if they have no foreign DNA are simplistic and overlook important safety issues that can result from the process of gene editing.

The regulatory guidance proposals would result in an almost total lack of transparency over the use of genetic engineering in food and farming in Canada - the

government itself would not know which genetically engineered foods and seeds may be on the market.

Canadians rely on Health Canada and the CFIA to be independent regulators of genetically engineered products, to ensure food and environmental safety. Relying on unseen corporate safety assessments and corporate science, without any government checks, would undermine public trust in both the food system and government regulation. **This proposed corporate self-regulation of genetically engineered foods and seeds jeopardizes food safety, our environment, and the livelihoods of many Canadian farmers.**

Sincerely,

Canadian Biotechnology Action Network (CBAN)  
Canadian Health Food Association  
Canadian Organic Trade Association  
Coopérative pour l'agriculture de proximité écologique (CAPE)  
National Farmers Union  
Organic Agriculture Protection Fund of SaskOrganics  
Vigilance OGM  
BC Association of Farmers' Markets  
Canadian Friends Service Committee (Quakers)  
Canadian Labour Congress  
Cooper Institute, PE  
Council of Canadians Campbell River Chapter, BC  
Earth Education League, NB  
Eau Secours, QC  
Ecology Action Centre, NS  
Edmonton Small Press Association  
Environmental Coalition of Prince Edward Island  
Environmental Defence  
Équiterre  
French River Horticultural Society, ON  
Front commun pour la transition énergétique. QC  
GE Free Comox Valley, BC  
GMO Free PEI  
Group Ambioterra, QC  
Growers of Organic Food Yukon  
Inter Pares  
Interlakes' Cattle Belles, South Caraboo, BC  
Lillooet Food Matters, BC  
Mères au front, QC

MacKillop Centre for Social Justice, PE  
Mouvement d'éducation populaire et d'action communautaire du Québec  
National Union of Public and General Employees  
Nature Canada  
No More GMOs Toronto  
Organic Alberta Council  
Organic BC  
Prevent Cancer Now  
Real Food for Real Kids, ON  
Safe Food Matters  
SaskOrganics  
SeedChange  
Shuswap Seed Savers  
Slow Food Montreal  
Toronto Non-GMO Coalition  
Transparence, QC  
Union Paysanne  
Young Agrarians