Minister
of Agriculture and
Agri-Food
and Minister for the
Canadian Wheat Board

Ministre
de l'Agriculture et de
l'Agroalimentaire
et ministre de la
Commission canadienne du blé

Ottawa, Canada K1A 0C5

DEC 2 3 2010

Quote: 152827

Ms. Maureen Carter-Whitney
Research Director
Canadian Institute for Environmental Law and Policy
729 St. Clair Avenue West, Suite 13
Toronto, Ontario M6C 1B2

The Reverend Dr. Karen Hamilton
General Secretary
The Canadian Council of Churches
47 Queen's Park Crescent East
Toronto, Ontario M6K 1B9

Dear Ms. Carter-Whitney and Dr. Hamilton:

I am writing in response to Environmental Petition No. 305, which you submitted pursuant to section 22 of the *Auditor General Act*. On October 1, 2010, the office of the Commissioner of the Environment and Sustainable Development forwarded the Petition to a number of federal departments for response.

In your petition, you posed four questions. On behalf of all of the relevant departments, I am providing the enclosed response to questions 1, 2 and 3. The Honourable Leona Aglukkaq, Minister of Health, will be providing a response to question 4 and will reflect input provided by Agriculture and Agri-Food Canada and the Canadian Food Inspection Agency, which is under my portfolio.

I appreciate your interest in this important matter, and hope you find the information useful.

Sincerely,

Gerry Ritz, PC, MP

Enclosure

c.c.: Mr. Scott Vaughan, Commissioner of the Environment and Sustainable Development
The Honourable Leona Aglukkaq, PC, MP, Minister of Health
The Honourable Rona Ambrose, PC, MP, Minister of Public Works and Government Services

Foreword

With respect to food, the Government of Canada considers issues of safety to be of the utmost importance. Indeed, Canada has one of the safest food systems in the world that implements policies providing tight safety standards and safeguarding the food supply and the plant and animal resource base. All genetically modified (GM) crops commercially available in Canada have been thoroughly assessed for their food and feed use and for environmental release and determined to be as safe as their unmodified conterparts.

Canada's regulatory system for products of agricultural biotechnology is designed so that every possible precaution is taken. The safety of new products is carefully and cautiously assessed before they can be cultivated by a grower, used in livestock feed or made available to the consumer.

GM crops have been safely grown in Canada for nearly 20 years. More specifically, genetically engineered crops have been reviewed and authorized by Health Canada since 1994, with a documented history of safe use. At any time when environmental concerns about GM crops are raised, the Canadian Food Inspection Agency (CFIA) carefully reviews all relevant scientific data. The CFIA has never found credible evidence to suggest that the cultivation of GM plants in Canada has harmed the environment. In fact, herbicide-tolerant crops have contributed to the adoption of no-till agriculture in Canada, which has many associated environmental benefits, such as healthier soil and reduced emissions from farm equipment.

Health Canada requires a pre-market notification to assess and verify the safety of all GM foods before entering the Canadian marketplace. GM foods are only permitted to enter the Canadian food supply after Health Canada's scientists are satisfied that the data provided by the applicants addresses all health and safety concerns and meets regulatory requirements. The scientific safety assessment undertaken on all GM foods is conducted according to Health Canada's Guidelines for the Safety Assessment of Novel Foods. These guidelines are based upon scientific principles developed through expert international consultation over the last 10 years with agencies such as the World Health Organization (WHO), the Food and Agriculture Organization of the United Nations (FAO), and the Organization for Economic Co-operation and Development (OECD). The approach to the safety assessment of biotechnology-derived foods taken by Canada is currently applied by regulatory agencies around the world in countries such as the European Union member states, Australia/New Zealand, Japan, and the United States.

The Government of Canada supports the principle of providing consumers with credible, useful and clear information about the foods they buy. Recognizing that consumers wanted more information regarding the application of specific techniques of genetic engineering, federal departments and agencies (including the CFIA and Health Canada), along with consumer groups, food manufacturers, grocery distributors, provincial representatives and farm organizations, participated in the development of the National Standard for the Voluntary Labelling and Advertising of Foods That Are and Are Not Products of Genetic Engineering. This standard can be viewed at www.tpsgc-pwgsc.gc.ca/cgsb/on_the_net/032_0315/standard-e.html.

In addition, Health Canada could require mandatory labelling for foods, including those derived from biotechnology, where there are health or safety concerns that could be mitigated through labelling, or to highlight a significant nutritional or compositional change.

1. Does Health Canada, Agriculture and Agri-Food Canada, Environment Canada, or any other responsible departments plan to evaluate the effectiveness of the voluntary labelling standard, as recommended by the Canadian Biotechnology Advisory Committee? If not, please explain why Health Canada, Agriculture and Agri-Food Canada, Environment Canada, or any other responsible departments do not intend to evaluate the effectiveness of the voluntary labelling standard.

In 2004, the National Standard of Canada CAN/CGSB-32.315-2004 Voluntary Labelling and Advertising of Foods That Are and Are Not Products of Genetic Engineering was published. The Canadian General Standards Board (CGSB) managed the consensus process for the development of the standard. The CGSB is an organization within Public Works and Government Services Canada that facilitates the development of standards and offers standardization products and services. While evaluating the effectiveness of a given standard is not part of the CGSB's mandate, its role is to provide support to economic, regulatory, procurement, health, safety and environmental interests through standards development. The CGSB standard applies to the voluntary labelling and advertising of foods that are and are not products of genetic engineering.

Standards are reviewed in accordance with applicable schedules or needs and are revised, amended, reaffirmed or withdrawn, as described in the Standards Development Process at the CGSB. More detail on the process can be viewed at http://www.tpsgc-pwgsc.gc.ca/cgsb/prgsrv/stdsdev/process-e.html. The CGSB may use monitoring information gathered by industry groups, other government departments or stakeholders in conducting its periodic review of the standard.

Departments and agencies with a role in food safety consider, on an ongoing basis, whether there have been any developments that would warrant a change to the overall approach described in the Foreword; no such developments have been identified.

2. How is Health Canada, Agriculture and Agri-Food Canada, Environment Canada, or any other responsible departments monitoring the use of the current voluntary standards?

Health Canada is responsible for setting food labelling policies with respect to health and safety matters, for example nutritional content and special dietary needs. This applies to all foods, including foods that have been derived through genetic engineering. The CFIA is responsible for the development of non-health and safety food labelling regulations and policies and for the enforcement of both the health and safety and non-health and safety requirements.

Food label and advertising claims pertaining to the use or non-use of genetic engineering are permissible in Canada, provided such claims are truthful; not misleading; not deceptive; not likely to create an erroneous impression of a food's character, value, composition, merit or safety; and in compliance with all other regulatory requirements.

The CGSB standard entitled Voluntary Labelling and Advertising of Foods that Are and Are Not Products of Genetic Engineering is used by the CFIA to help companies comply with the laws that prevent false and misleading representations about the method-of-production claims on their foods.

Provided that the requirements outlined in the above two paragraphs are met, it is up to individual businesses to decide whether they wish to make claims through the use of the voluntary standard; the Government of Canada does not play a role in tracking these decisions.

Compliance monitoring is conducted to verify that activities regulated by the CFIA are carried out in accordance with the provisions of those acts and regulations administered and enforced by the CFIA. Compliance monitoring will take into account any risks to health and safety and the protection of consumers and market access. Compliance monitoring methods include inspection visits, audits and other verification measures; reporting of information in accordance with requirements under the Acts and regulations, including the requirement to keep records, such as Hazard Analysis Critical Control Point and other quality assurance programs; sampling, testing, laboratory analysis and examination of documents; and inspection of products regulated by the CFIA. Delivery of these services is conducted by close to 7000 employees working across Canada.

3. Has Health Canada, Agriculture and Agri-Food Canada, Environment Canada, or any other responsible departments carried out an analysis to assess labelling in other jurisdictions? If so, please explain how this analysis has informed the positions of Health Canada, Agriculture and Agri-Food Canada, Environment Canada, or any other responsible departments on labelling of GMOs.

Departments and agencies consider and take into account the experiences of other countries in this area. Several countries have, like Canada, carefully considered the topic of labelling for products of biotechnology. While broad mandatory labelling policies may be in place in other countries, it should be noted that there are issues regarding the practicality and enforceability of these requirements and the number of claims that may actually appear on food.

Officials from departments and agencies, such as the CFIA, meet regularly with their counterparts from other countries in a variety of fora, including the Codex Committee on Food Labelling. Among other things, this gives our regulators the chance to learn from the experiences of other countries, and it gives other countries the opportunity to learn about Canada's regulatory system.

With respect to the CGSB standard, when the standard was being developed, the CGSB Standards Committee conducted a review of applicable standards from other jurisdictions. During the Committee's deliberations, it considered the technical requirements in other applicable standards for the potential adoption of those requirements in the CGSB standard. However, as Public Works and Government Services Canada, through the CGSB, is not a subject matter expert, it would neither be responsible for, nor involved in, any ongoing analyses to assess labelling in other jurisdictions.