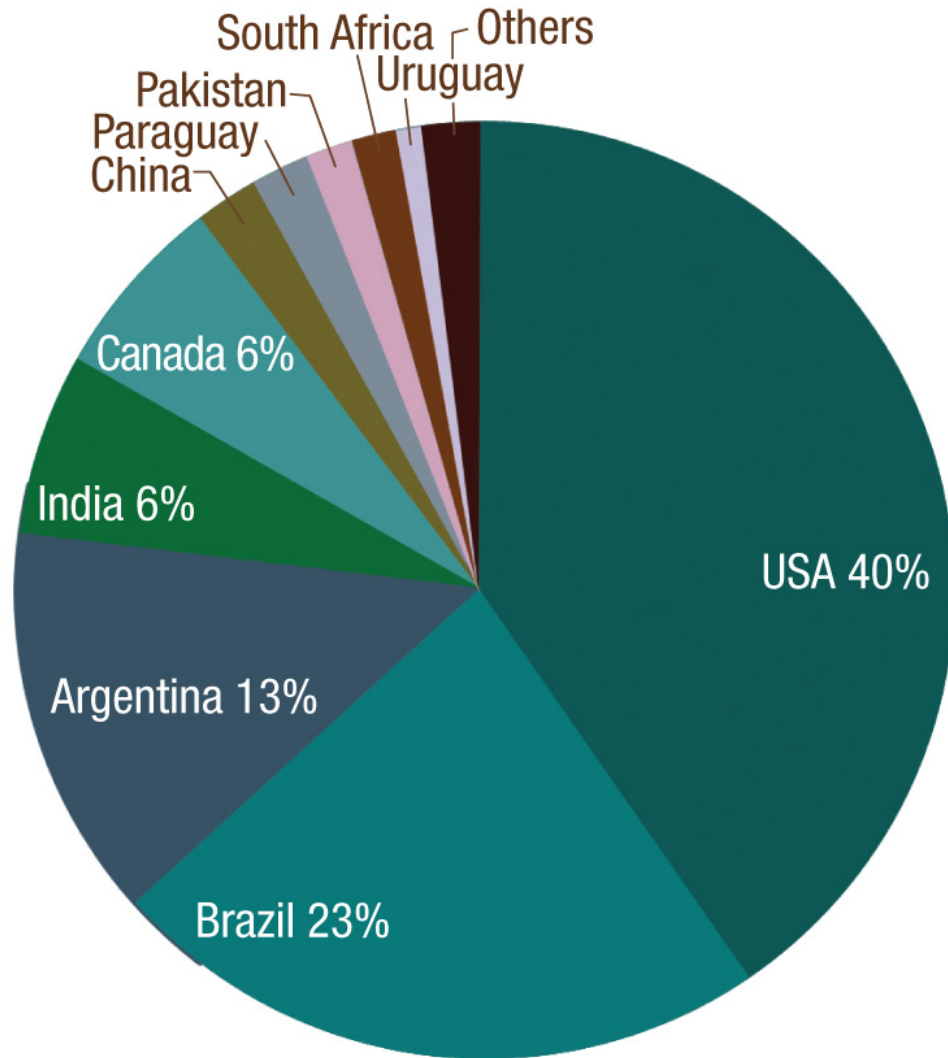




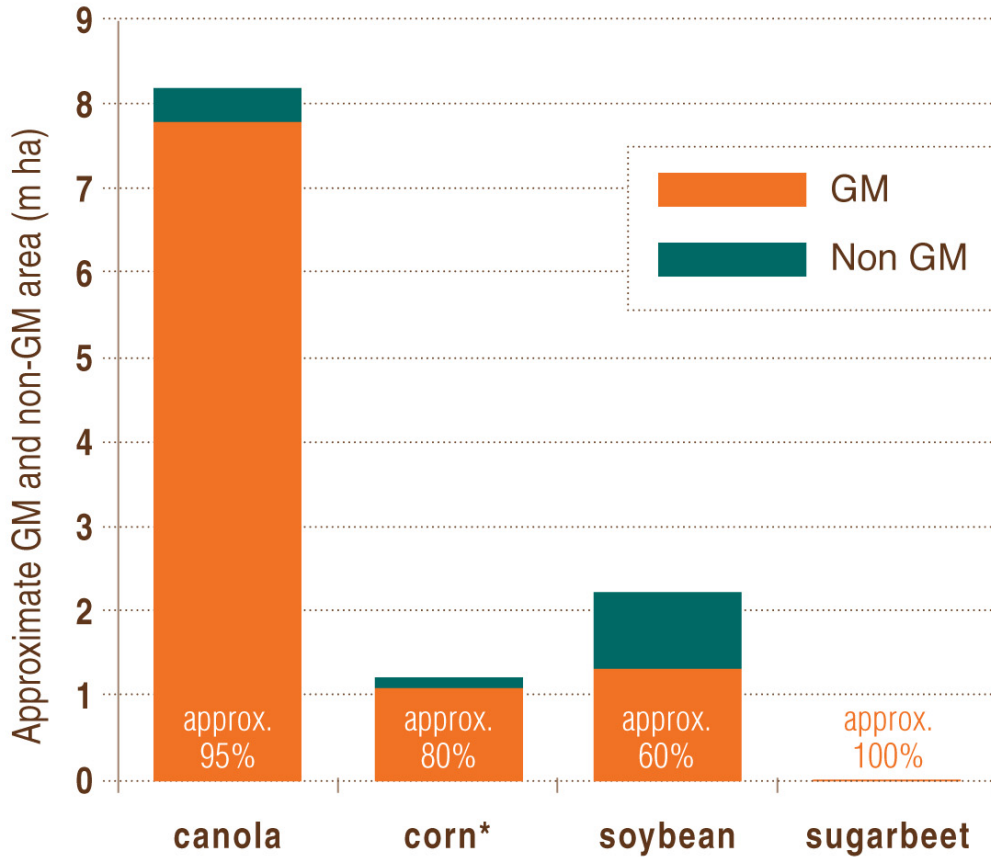
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**Canadian Biotechnology
Action Network**

**Collaborative
Campaigning
for Food Sovereignty
and Environmental
Justice**



GM CROPS GROWN IN CANADA



* Over 80% of grain corn is GM. There's also a very small, unknown amount of GM sweet corn.

GM FOODS THAT COULD BE NEXT

Alfalfa

GM herbicide tolerant and low-lignin alfalfa is approved but the seeds are not yet sold in Canada. www.cban.ca/alfalfa

Fish

Canada approved the GM salmon for production but its not yet approved for human consumption in Canada or anywhere else. www.cban.ca/fish

Apple

Canada and the US approved a GM “non-browning” apple in March 2015 and it could be sold in Canada in 2016. www.cban.ca/apple

2,4-D and dicamba-tolerant corn and soy

These herbicide tolerant crops are approved and are in limited but not yet full commercial production. www.cban.ca/24Dcrops

Policy Objectives

“If trace amounts of such unapproved genetically modified product are found in import shipments, in a country where the genetically modified crop is not approved, often times these imports will be rejected...**The unpredictability of rejection of such imports** is a growing concern, given the potential economic impacts low-level presence will have on global trade.”



Policy Objectives

- “Minimize disruption to trade while protecting the health and safety of humans, animals and the environment”
- “Facilitate an effective and efficient risk-based approach to managing LLP”
- “Provide transparency and predictability for importers and exporters”



Policy Objectives

“provide a model that could be adopted globally”



Policy Objectives

Introducing GM wheat

“We encourage expediting the adoption of reasonable low level presence (LLP) policies in exporting and importing nations to minimize trade disruptions resulting from asynchronous approvals. **This would ensure that trade can continue uninterrupted for commodities like wheat** that may contain traces of existing biotech traits approved in accordance with international guidelines by an exporting country.”



“Redefine Zero” as X%

Zero-tolerance is not possible

“Practically speaking, low level presence is
not avoidable”

“Even with best management practices are strictly followed, it is often difficult to prevent this from occurring”



LPP

Imported grain, food and feed

- Approved for use as food in at least one foreign jurisdiction
- Canada has recognized the safety assessments conducted by the regulatory authority in that foreign jurisdiction as consistent with Codex
- A detection method is available



LLP does not apply

- Seed for propagation (LLP for seed – separate)
- Fruits and vegetables
- GM animals or microorganisms
- GM pharmaceutical or industrial crops
- “Adventitious presence” – not approved anywhere
- **GM crops for which there is a reason to believe that LLP may pose a risk to the safety** of human food, animal feed or the environment

X% LLP is safe

- “Response recognizes the “negligible risk” of LLP
- LLP is “unlikely to pose a risk to human or animal health or the environment“



Implications

- In the absence of domestic safety assessment, “negligible risk” of LLP is assumptions-based.
- The mandate and authority of national safety regulation and regulatory bodies are undermined.
- National regulation for safety is made redundant, not because other countries are safely regulating, but because we have a trade agenda to accept and sell GM crops as a priority over safety.



CBAN's Analysis - Canada

- LLP is indefensible from a public health and safety standpoint
- LLP will increase public uncertainty and mistrust in the food system and government regulation thereof
- Health Canada's mandate to conduct risk assessment is important



CBAN's Analysis - Globally

- LLP will legalize contamination, allowing it to expand over time
- Canada will have little incentive to implement better controls
- Gives the green light to new GM products with anticipated contamination risk



“Outstanding Issues”

- Setting the Threshold Level
- Determining an “efficient, effective” LLP risk assessment process
- Determining how to apply LLP levels to stacked events



Other Lessons

Discontinued GM crops

- Not currently in production and off-patent traits

“could persist at low levels in commodity and seed supplies for many years, despite stringent measures to eliminate them.”





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