

November 16, 1999

Dear Minister Rock, Minister Vanclief and Minister Manley,

We, the undersigned, object to the purpose and the process of the Committee on Voluntary Labelling of Foods Obtained Through Biotechnology. We would welcome meaningful dialogue on this issue, but we do not share the Committee's goals. The premise of the Committee is to protect the biotech industry and to deny consumers the information they demand. Industry has always had the option to voluntarily label genetically engineered (GE) foods. We see the construction of this "voluntary" process as an attempt to forestall a mandatory labelling regime. We are, therefore, jointly refusing to participate in this Committee.

We see seven problems with the nature and process of the Committee and we offer our solutions and a labelling regulation proposal in Appendix 1.

Existing Regulations

We believe that the labelling provisions of the Food and Drugs Act, which are intended to ensure that consumers are provided thorough information and are not misled about the characteristics of their food, already require the Government to label genetically engineered food. The Government should enforce the Food and Drugs Act and its regulations. Anything short of this is an abdication of that enforcement responsibility on the part of the ministers responsible. Forty-eight US Congressmen have recently made the same argument to the US FDA. Additionally, we have provided example legislation from Canada (C-309), the EU (1198-98), and the USA (discussion draft).

Health Effects

The potential health effects of GE foods can only be tracked with full, mandatory labelling. The chief researcher for the British Medical Association stated that possible health effects of genetically engineered foods cannot be traced unless products containing GE ingredients are labelled fully and completely. We stringently regulate drugs, which are taken sparsely. But GE food, which is ingested in large quantities, is subjected to only lax regulation. These GE foods have not been adequately tested prior to release, nor monitored post-release, by the Government for human health or environmental impact. The industry testing that has been done is unavailable to the consumer. The companies should therefore be required to list GE ingredients on their product and package labels. Canadians should have the right to a secure and transparent food safety system. In addition, a central register of all GE products should be created by the Government to aid in the monitoring of short and long term effects of GE food.

Lack of Good Faith

Most of the industry and government groups at the heart of these negotiations have been resisting labelling of GE foods, arguing that mandatory labelling would be misleading and confusing. Voluntary labelling will be more confusing to the consumer and will not compel companies to provide this information. Producers of foods containing GE ingredients will be the last to label their products.

Committee Structure

Based on the list available, the representation of voting members on the Committee thus far is heavily biased in favor of industry with no real power given to the public interest groups present. At least 80% of the members have ties to industry. Additionally, there is presently no representation from provincial health ministries or departments of consumer affairs.

Burden of Proof

Voluntary labelling would put the burden of proof in the wrong place. The biotech industry and its advocates would like the providers of traditional foods to prove claims of “GE-free”, rather than accepting responsibility for honest labelling of their engineered foods. Rather than apply the stigma of GE to their own products, they would prefer to see “GE-Free” food become a niche market, one that will be less accessible to lower income earners and less available outside urban centers.

Public Demands

Eighty-one percent of the Canadian public wants mandatory labelling of genetically engineered foods and have expressed this to Government since 1994. Instead of responding to public demand, Government and industry are stalling with an estimated eighteen month process which will be entirely optional when, and if, it is ever completed. This committee will not address the public's right to know what kind of food they're eating, and their right to choose.

Global Trends

The global regulatory trend is towards mandatory labelling. So far, mandatory standards are in place or being developed in the 14 member European Union, Australia, New Zealand, Japan and Korea. Political pressure for mandatory labelling is also building in the USA. Canada is falling behind the rest of the world in informing consumers about the presence of genetically engineered food.

In light of these concerns, we request mandatory labelling begin immediately. We submit to you our expectations for a mandatory labelling regime and example legislation which may assist you in this pursuit.

Sincerely,

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| 1. Action Réseau Consommateur | 15. David Suzuki |
| 2. Biotech Action Montreal | 16. Foodshare |
| 3. Canadian Biotech Action Network | 17. Friends of the Earth |
| 4. Canadian Environment Network –
Biotech Caucus | 18. Greenpeace |
| 5. Canadian Federation of Nurses Unions | 19. Infant Feeding Action Coalition |
| 6. Canadian Health Coalition | 20. National Farmers Union |
| 7. Canadian Health Food Association | 21. National Pensioners and Senior Citizens
Federation |
| 8. Canadian Labour Congress | 22. Ontario Coalition of Senior Citizens |
| 9. Canadian Organic Growers | 23. Ontario Health Coalition |
| 10. Catholic Health Association of Canada | 24. Registered Nurses Association of
Ontario |
| 11. Coalition for a Green Economic
Recovery | 25. Rural Advancement Foundation
International |
| 12. Congress of Union Retirees of Canada | 26. Sierra Club of Canada |
| 13. Consumers’ Right to Know Campaign | 27. Sierra Youth Coalition |
| 14. Council of Canadians | |

cc: Members of the Committee on Voluntary Labelling of Foods Obtained Through
Biotechnology
Office of Consumer Affairs

APPENDIX 1: Labelling Regulation Proposal

Genetically engineered food and food products must be labelled according to the following labelling requirements. This regulation applies both for finished products and their components, regardless of whether the genetic engineering can be detected by currently available scientific standards or not. The complete chain of production and all components of the final product must be taken into consideration. All ingredients and components of the final product must be listed. This labelling should be done immediately through non-removable stickers until direct imprints are available.

The allowable contaminant level of genetically engineered (GE) organisms in non-GE food should be 0.1% within each and any particular ingredient as opposed to 0.1% of the whole. This 0.1% tolerance is only a temporary allowance while the industry segregates GE from non-GE crops throughout the chain of production. Such segregation has been called for by the Canadian Wheat Board and is already being practiced for "Identity Preserved" crops by the very companies that say it cannot be done for GE crops (Laurate canola, for example).

A) LABELLED "GENETICALLY ENGINEERED"

Food products must be marked with the label "Genetically engineered" if one or more of the following preconditions applies to the finished product:

1. Produce that is genetically engineered and sold for food or animal feed.
2. Animals and their parts that are genetically engineered and sold for food or animal feed.

B) LABELLED "CONTAINS GENETICALLY ENGINEERED INGREDIENTS"

Food products must be marked with the label "Contains genetically engineered ingredients" if one or more of the following preconditions applies to either the finished product or one or more of its components:

1. Food products and/or their components that consist of or contain genetically modified organisms.
2. Food products and/or their components and additives that are produced or derived from genetically modified organisms.

C) LABELLED: "PRODUCED WITH GENETIC ENGINEERING"

Food products must be marked "Produced with genetic engineering" if one or more of the following preconditions applies to either the finished product or one or more of its components:

1. Food products that are produced with the help of production processes that operate with genetically modified organisms or their derivatives.
2. Food products that contain or are produced with the help of additives (vitamins, enzymes, etc.) that are produced or derived from genetically modified organisms.

D) LABELLED: "RAISED WITH GENETICALLY ENGINEERED ANIMAL FEED OR MEDICINE"

Food products have to be marked "Raised with genetically engineered animal feed or medicine" if the following precondition applies to the finished product or one or more of its components:

1. Animals or their parts and derivatives sold for food or animal feed that were fed genetically engineered animal feed or administered genetically engineered medicine.

E) LABELLED: "CONTAINS INGREDIENTS FROM ANIMALS RAISED WITH GENETICALLY ENGINEERED ANIMAL FEED OR MEDICINE"

Food products have to be marked "Contains ingredients from animals raised with genetically engineered animal feed or medicine" if the following precondition applies to the finished product:

1. Food products that contain ingredients from animals that were fed genetically engineered animal feed or administered genetically engineered medicine.