

February 25, 2022

The Honourable Jean-Yves Duclos
Minister of Health
Health Canada
Address Locator 0900C2
Ottawa, Ontario K1A 0K9

Email: hccminister.ministresc@canada.ca, Jean-Yves.Duclos@parl.gc.ca

The Honourable Marie-Claude Bibeau
Minister of Agriculture and Agri-Food
1341 Baseline Road Tower 7, Floor 9, Room 149
Ottawa, Ontario K1A 0C5

Email: aafc.minister-ministre.aac@canada.ca, Marie-Claude.Bibeau@parl.gc.ca

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

Dear Ministers,

As the Faith and Life Sciences Reference Group of the ecumenical Canadian Council of Churches, we urge the government to continue 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.

Humanity does not own the world, and its riches are not to be used without care and respect. Responsible leadership works to ensure humanity's increasing power over nature is used responsibly for the common good. Self-regulation of GMOs for foods and seeds for the purpose of corporate profit jeopardizes the safety of food, the environment, and the livelihood of Canadian farmers.

We uphold the values of transparency, independent science assessment and regulation of all genetically engineered organisms for use in food and farming. We urge the Government to commit to these principles and to uphold the principles of the court ruling on the patenting and subsequent commodification of a line of living organisms (Harvard College v. Canada (Commissioner of Patents) <https://scc-csc.lexum.com/scc-csc/scc-csc/en/item/2019/index.do>).

Proposed new regulatory guidance from Health Canada and the Canadian Food Inspection Agency would shift some safety assessments away from government regulators to product developers themselves, with no government checks.

Companies would be allowed to release these GMOs into the environment and to sell them without notifying the government and without public disclosure of which seeds are genetically engineered. Companies would be permitted to introduce many new genetically modified organisms (GMOs) without any independent science, and with no independent government science reviews. This seems inconsistent with other government roles that very carefully monitor crop production and the use of pesticides and herbicides, for example.

Gene editing can make significant changes to foods and the genome of a plant without the introduction of 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. Safety requires investigation and assessment of unintended immediate and long-term effects. Proposals to exempt gene-edited GMOs from regulation if they have no known foreign DNA are simplistic and overlook important safety issues that can result during the process of gene editing.

We oppose the sale of genetically engineered foods and seeds which have not been regulated and have not been reported to the authorities. 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 on to the market with no government oversight.

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.

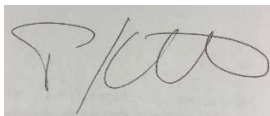
Canadians rely on Health Canada and the CFIA to be independent regulators of genetically engineered products, to ensure food and environmental safety. Relying on unseen corporate safety assessments and corporate science, without any government checks, would undermine public trust in both the food system 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. We encourage you to retain the ability to protect the wellbeing of the Canadian public.

We would appreciate an opportunity to meet with you to share our concerns in more detail.

Please be assured of our continued prayers for you and the Government of Canada, that justice may be upheld and that peace may prevail.

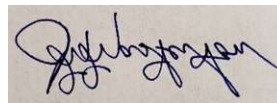
Sincerely,

Co-chair



Rev. Dr. Peter Kuhnert

Co-chair



Rev. Joan Masterton

CC: The Rev. Dr. Das Sydney, President

Luc Berthold, Health Critic, Conservative Party of Canada

John Barlow, Agriculture, Agri-Food and Food Security Critic, Conservative Party of Canada

Don Davies, Health Critic, New Democratic Party of Canada

Alistair MacGregor, Agriculture and Food Critic, New Democratic Party of Canada

Luc Thériault, Health Critic, Bloc Québécois

Yves Perron, Agriculture and Food Critic, Bloc Québécois

Elizabeth May, Parliamentary Leader, Green Party of Canada

The Canadian Council of Churches (CCC) is a broad and inclusive ecumenical body, now representing 26-member churches including Anglican; Eastern and Roman Catholic; Evangelical; Free Church; Eastern and Oriental Orthodox; and Historic Protestant traditions. Together these member churches comprise 85% of the Christians in Canada.

The Canadian Council of Churches was founded in 1944.