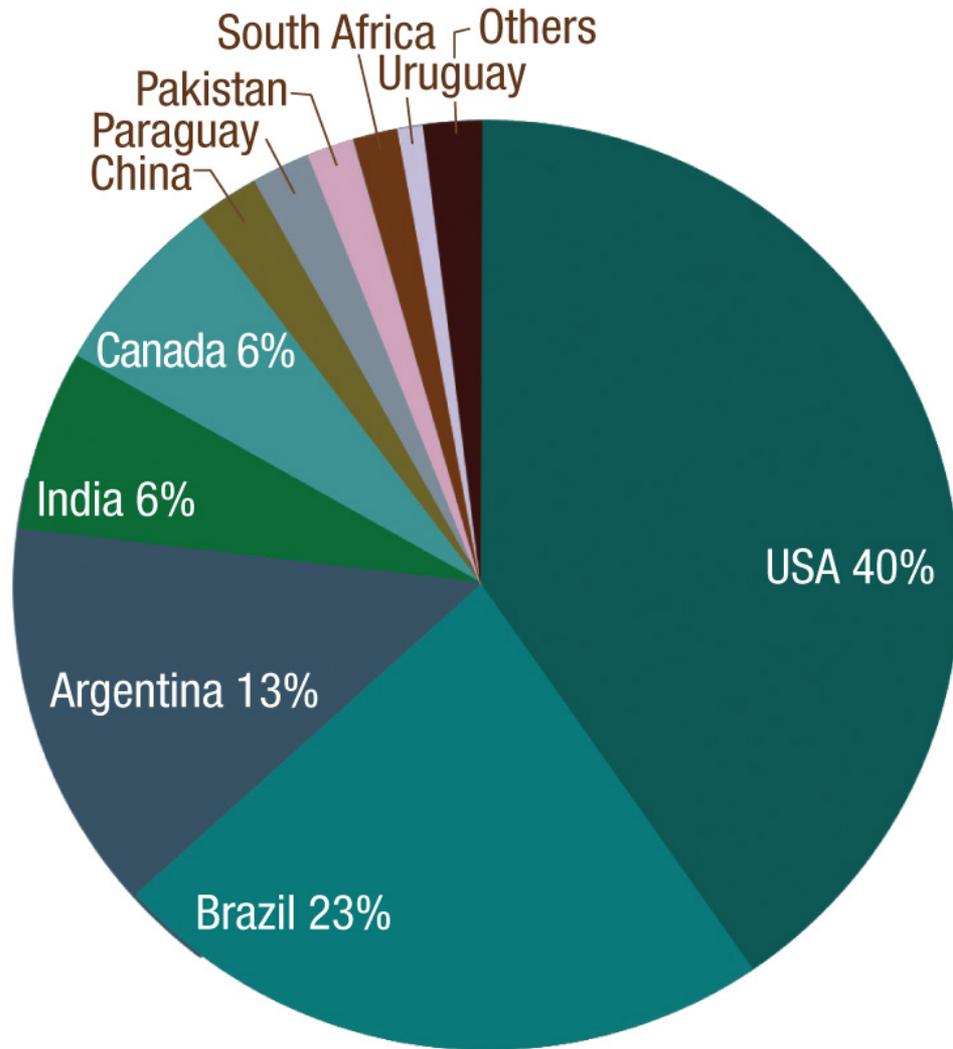




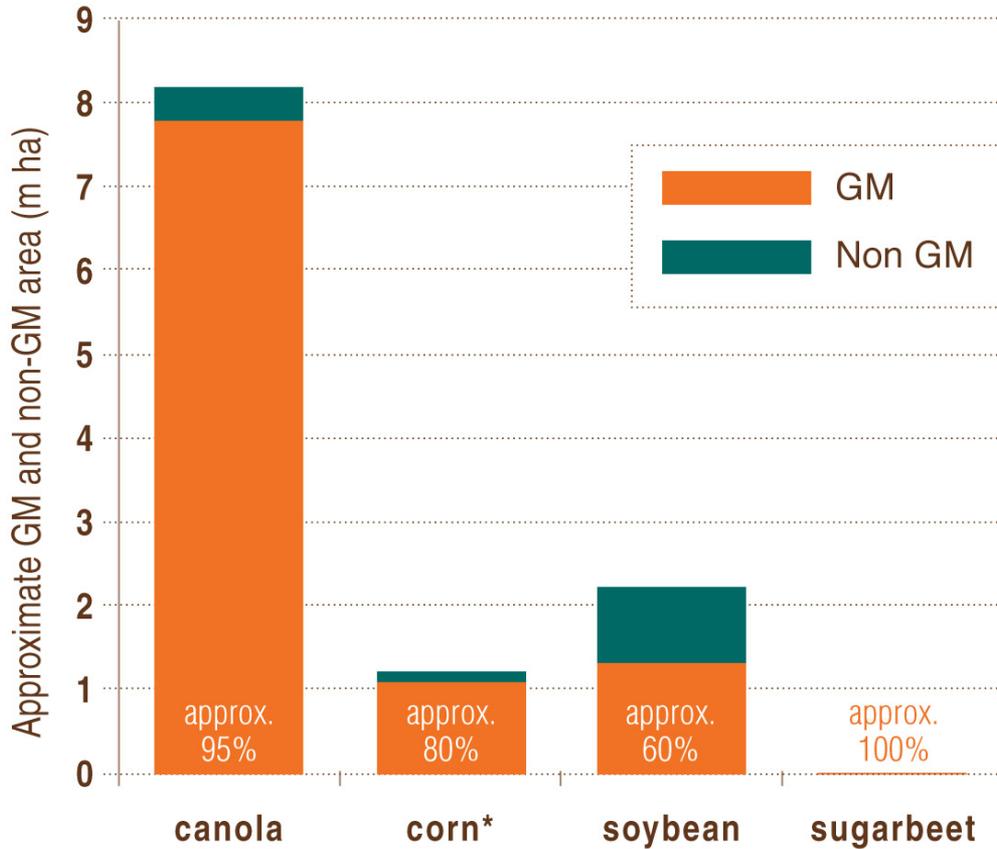
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Campaigning  
for Food Sovereignty  
and Environmental  
Justice**



# 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](http://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](http://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](http://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](http://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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