

**The Right Honourable Jean Chretien  
Prime Minister of Canada  
House of Commons  
Ottawa, ON K1A 0A6**

***March 13, 2003***

Re: Canadian General Standards Board (CGSB) Committee on the Voluntary Labelling of Foods Obtained or Not Obtained Through Genetic Modification

***Dear Prime Minister,***

Monday, March 17th marks the three and a half year anniversary of the creation of the Canadian General Standards Board (CGSB) Committee on the Voluntary Labelling of Foods Obtained or Not Obtained Through Genetic Modification. From its inception, the voluntary mandate and bias of the process towards the food biotechnology industry made it clear that the concerns of the Canadian public and non-governmental organizations would not be adequately addressed. This is why on November 16, 1999 over twenty-five health, environment and consumer organizations came together to collectively reject the voluntary process favoured by industry and to call for mandatory labelling of foods produced through genetic engineering.

While forty-two months have passed since this process began, there are still no labels on such foods. In fact, we have moved backwards as major retailers in Canada have forced the removal of labels on foods which are produced from non-genetically engineered sources.

Polls have consistently shown that upwards of ninety per cent of Canadians want labels on genetically engineered foods, a practice which has become standard in much of the world. For a variety of environmental, health and ethical reasons, we believe that Canadians should enjoy that same right. As such, we are writing you today to reassert our call for mandatory labelling of foods produced through genetic engineering and to call into question the purpose and integrity of the current CGSB process. We would like to draw your attention to the problems initially raised with a voluntary standard, most of which remain current with the standard as proposed.

1) There is no requirement that foods be labelled.

In spite of the appearance of balanced requirements in the standard for positive (“product of”) and negative (“not a product of”) labelling, it is obvious that the food industry intends to place the burden of proof for labelling on non-GE foods. There is no reason to believe that companies producing food derived through genetic engineering who currently refuse to voluntarily label their products will do so once a standard is established. It is our belief that companies will attempt to benefit from the market premium of labelling non-GE foods with labels while avoiding the negative market premium of labelling GE food. This, of course, will continue to leave Canadians in the dark about which foods are produced through genetic engineering. It fails completely to address the serious environmental, ethical and potential health impacts of genetically engineered crops. Labels on foods derived from genetic engineering must be mandatory, and should not depend on the self-interest of the Canadian food industry.

2) The currently proposed level of 5% for adventitious contamination is misleading and is not based on current technological capacity.

Common testing protocols for the presence of a genetically engineered ingredient can detect such presence as low as 0.1%. This is reflected in the comprehensive labelling legislation adopted by the European Union which allows for 0.9% adventitious contamination. While a 5% threshold may be convenient for industry, it does not address consumer concerns about genetic engineering.

3) The standard exempts genetically engineered animal feed and does not address traceability, both key components of food production.

The new EU regulations require labelling of GE animal feed, and traceability for all GE foods. We believe this is a reasonable and necessary extension of GE food labelling.

4) This process has been heavily biased towards the food biotechnology industry and has paid little attention to public interests.

It does not reflect what the public expects of the government on this issue. In a manner typical of current policy on genetic engineering, there has been little to no public consultation surrounding this process, and little room for input. The mandate laid out by the CGSB disallows discussion of mandatory labelling, something Canadians have made clear they want. This narrow mandate has precluded our participation in this process. Of the fifty-three members of the committee, over half have expressed clear support for the further use of genetic engineering, while twenty-three have been involved with the recently expired Food Biotechnology Communications Network, a recognized industry front group. Further to this, eighteen members have received funds from Agriculture and Agri-Food Canada's "Agri-Food Trade 2000" fund, much of which has been directed towards biotechnology related activities. It is clear that this process defies its own definition of balanced representation.

5) There is no end in sight.

It is increasingly apparent that the tactics being used by some parties involved in the CGSB process are designed to terminally delay any action on labelling. These tactics have led to costs to the Canadian public of over \$400,000 and a process which as of yet has failed to produce even industry agreement. The original timeline for completion of a standard was the spring of 2001 - two years ago.

For all of the reasons listed above we are asking that your government take timely legislative action on behalf of Canadians and enact a mandatory labelling regime for foods produced through genetic engineering.

We look forward to your response.

**c/o Derek Stack, Caucus Coordinator  
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Email: derek@cen-rce.org**

*continued ...*

***Sincerely,***

Association Coopérative d'Économie Familiale du Haut Saint-Laurent  
Association Coopérative d'Économie Familiale Lanaudière  
Burke Mountain Naturalists  
Calgary Animal Rights Coalition  
Canadian Association of Physicians for the Environment  
Canadian Health Coalition  
Canadian Institute for Environmental Law and Policy  
Canadian Organic Growers  
Centre for International Studies, UCCB  
Citizens For Renewable Energy  
Clearinghouse Groupe  
Conservation Council of New Brunswick  
Council of Canadians  
David Suzuki  
Earth Action  
Environmental Coalition of Prince Edward Island  
ETC (Action Group on Erosion, Technology and Concentration )  
FarmFolk/CityFolk  
First Nations Environmental Network  
Ford Alward Naturalist Association  
Friends of the Earth  
GE Alert  
Gene Action  
Georgia Strait Alliance  
Greenpeace  
Groupe de recherche technosciences du vivant et sociétés, Institut des sciences de l'environnement, UQAM  
National Farmers Union  
New Brunswick Partners in Agriculture  
North West Saskatchewan Organic Producers Inc.  
Option Consommateurs  
Organic Crop Improvement Association - NB  
Oxfam Canada, Prairie Region  
Polaris Institute  
Roseisle Creek Watershed Association  
Saltspringers for Safe Food.  
Saskatchewan Organic Certification Association Inc.  
Saskatchewan Organic Directorate  
Science for Peace  
Sierra Club of Canada  
Sierra Youth Coalition  
Society Promoting Environmental Conservation  
Tantramar Environmental Alliance  
The Coalition for a Green Economy  
The Ecological Farmers Association of Ontario  
The Green Campus Society  
The Ram's Horn  
The Washademoak Environmentalists  
UNB Students' Environmental Society  
Union des consommateurs  
Union Paysanne  
Vancouver Island Public Interest Research Group  
Vegetarians of Alberta Association

Cc: Minister of Agriculture and Agri-Food Lyle Vanclief  
Minister of Public Works Ralph Goodale  
Minister of Industry Allan Rock  
Minister of Health Anne McLellan  
All Members of Parliament  
Ms. Marian Gaucher, Secretary of the Canadian General Standards Board