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Health Products
and Food Branch

Santé
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Direction générale des produits
de santé et des aliments

Lucy Sharratt
Coordinator
Canadian Biotechnology Action Network

Thibault Rhen
Coordinator
Vigilance OGM

March 17, 2021

Dear Ms. Sharratt, Mr. Rhen,

Thank you for your correspondence of March 3, 2021, to the Minister of Health, regarding the Canadian Biotechnology Action Network (CBAN)'s concerns with the upcoming consultation on novel food guidance related to plant breeding. Your correspondence was provided to me, as the Director General of Health Canada's Food Directorate, for response.

The Government of Canada is committed to ensuring the safety of the Canadian food supply and the health and safety of Canadians. As you know, Health Canada takes a product-based approach to its oversight of novel foods. Under this approach, the level of pre-market oversight is based on the final characteristics of the product and their potential impact on food safety or nutritional quality, rather than the technology used to make the product.

Health Canada has undertaken a comprehensive effort to develop a proposed policy that is informed by the most current scientific information about modern plant breeding and gene editing techniques. This includes discussions with academics, public sector plant breeders, private sector breeders, and reviews of the scientific literature.

In the summer of 2020, Health Canada conducted a thorough scientific literature review regarding gene-edited plants used for food. In addition, the Department engaged various scientific experts in the field of plant breeding and gene editing to validate the scientific review. Details of this review will be included as part of Health Canada's consultation, which will be launched shortly.

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The Canadian Food Inspection Agency held information sessions for Canadian regulators, including Health Canada, to gather information on current plant breeding and gene editing practices, including the use of conventional and new breeding technologies. In addition, on October 16, 2020, Health Canada organized a scientific panel session to hear from renowned experts from government, academia and industry in gene editing and plant breeding. A summary of Health Canada's scientific panel can be requested here¹. Health Canada further engaged stakeholders in early 2021, where additional scientific evidence and data was provided by the food industry. All meetings are posted on Health Canada's Openness and Transparency web page¹.

Health Canada has reviewed all information obtained through its scientific review, the information sessions and the expert panel to inform its proposed guidance. **Current findings show that gene-edited plants are as safe as their conventionally bred counterparts. Gene editing allows for improved precision when developing new plants and is subject to the same rigorous breeding practices as conventionally bred plants.**

Regarding transparency for foods derived from genome-edited plants, Health Canada intends to expand its transparency initiative that was recently launched with the List of non-novel determinations for food and food ingredients. Indeed, the proposed guidance encourages plant developers to submit information to Health Canada regarding their gene-edited plant ready for commercialization. Health Canada will publish this information online to support Canadians access to information, provide predictability to plant developers, and maintain trust in the regulatory system. Details on the implementation of this initiative will be provided at a later date, once the consultation has been completed and the input received has been assessed and considered.

We appreciate the feedback provided by your organization during our meetings of January 25, February 8 and February 16, 2021, as well as the issues raised in CBAN's gene editing report. Rest assured that CBAN's views will be carefully considered during the finalization of the new guidance.

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¹ <https://www.canada.ca/en/health-canada/services/food-nutrition/genetically-modified-foods-other-novel-foods/transparency-privacy-regulatory-guidance-novel-foods/meetings-correspondence.html>



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We welcome and encourage your participation and feedback as part of the public consultation on this proposed guidance. To participate, please ensure that CBAN has signed up to Health Canada's Stakeholder Registry (CSIMS)². This registry helps stakeholders stay informed and ensure that they are consulted on health topics that are important to them.

I hope that this information is helpful in addressing your concerns.

Sincerely,

Karen E. McIntyre
Director General, Food Directorate
Health Products and Food Branch

c.c. Manon Bombardier, A/Associate Assistant Deputy Minister
Health Products and Food Branch, Health Canada

² <https://www.canada.ca/en/health-canada/corporate/about-health-canada/public-engagement/stakeholder-registry.html>