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Chair

Mr. Merv Tweed

Standing Committee on Agriculture and Agri-Food

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● (1105)

[*English*]

The Chair (Mr. Merv Tweed (Brandon—Souris, CPC)): Good morning, everyone.

Welcome to meeting number 71 of the Standing Committee on Agriculture and Agri-Food. Pursuant to Standing Order 108(2), we are resuming our study of the agricultural and agrifood products supply chain in regards to grains and oilseeds.

Joining us today is Lucy Sharratt, the coordinator of the Canadian Biotechnology Action Network. We also have Gordon Harrison from the Canada Grains Council, and Franck Groeneweg from the Grain Growers of Canada. Welcome.

We are up against a bit of a time schedule so we are going to hear the presentations. You may hear bells ring, and we'll make a decision from there how we proceed.

Whoever wants to take the first section, please begin.

Mr. Franck Groeneweg (Director, Grain Growers of Canada): I could get started if you want. That would be good.

Thank you for the opportunity to present to the Standing Committee on Agriculture today.

I'm Franck Groeneweg. I farm at Edgeley, Saskatchewan. It's about half an hour northeast of Regina, Saskatchewan.

I grew up in France on a farm south of Paris. I spent six years in the U.S. producing corn and soybeans. Ten years ago my wife, Kari, and I bought a farm in Saskatchewan. We have expanded it to our current 7,500 acres. We use the best practices and technologies possible to produce top quality, nutritious, and affordable crops in the most environmentally sustainable manner. But foremost we do it for our family—Luke, Julia, Emma, and Solange—making sure our land is better when they get it than when we received it.

I'm a director with Grain Growers of Canada. We do national policy development and represent tens of thousands of successful farmers. Our members are from the pulse and oilseeds producers groups across Canada.

To ensure that our products can continue to be exported, it is imperative that countries around the world adopt a low-level presence policy. Grain Growers commend the work of this government in moving forward to develop our low-level presence policy. Canada has the chance to be a leader and help direct the tone of the policy around the world, and Grain Growers of Canada fully supports this.

The lack of low-level presence policy in export markets has led to their closure when unapproved events show up. Zero tolerance is unachievable, and I will explain why in the next few slides.

An unapproved event such as the Roundup Ready gene is one that is not approved in the country of import but is approved in the country of export. If it has been approved for use as food, feed, and for environmental release—especially in a place like Canada, which has a strong science-based regulatory system—then its presence is not a food safety issue, but rather a technical barrier to trade that some countries are using to protect their own industries or to cater to public perception.

The world's population continues to grow, and we will need a way to feed them. Biotechnologies have directly contributed to increase soil, air, and water health and quality. On my farm they have allowed me to be more productive at the same time, which is truly a win-win situation. That is why the technology is so rapidly adopted around the world. Truthfully, my farming brothers in France can only wish they would have access to the same science-based technologies we have in Canada.

In 2011 alone, 16.7 million farmers grew biotech crops on almost 400 million acres in 29 countries. It is important we have the proper policies in place to ensure incidents of low-level presence are dealt with in a realistic manner and that doesn't result in trade impediments or restriction. In brief, the use of GMO grain has been highly beneficial both to farmers and to the marketplace.

On our farm we grow canola, wheat, peas, durum, flax, faba beans, and industrial hemp. Here you can see zero tillage seeding equipment. The main reason for this variety of crops is environmental diversity. This rotation ensures each crop advantages the following crop by the qualities it brings to the land in water and nutrient use efficiency, but also weak competition. The proper use of rotation benefits higher and more sustainable production.

But even with the best weed control, we still have volunteer growth, and each crop can become a weed for the next crop. There is never 100% weed control so it is reasonable to have a few plants escape and be harvested. This diversity is the start of an inevitable contamination unless of course we were to advocate for monoculture, which would be a huge step backwards.

As you can see by this extensive list, prior to moving off the farm to be sold, the grain moves around the farm a lot, which provides numerous instances where mixing can occur. Cleanliness is so important. Still, it is impossible to prevent mixing of some seeds, but being diligent about cleanliness helps to minimize mixing.

● (1110)

Here you can see our harvesting equipment full of wheat. We switch from crop to crop, which can happen multiple times during harvest, as each field does not mature at the same rate. One might have had an extra rain shower in the last few days. We can switch crops nearly daily, so we do spend some time to reasonably clean our equipment to limit contamination. Yet the more time we spend in cleaning, the less time there is for harvest. This picture shows close to $2 million worth of equipment. With only 45 to 60 days to harvest, too much time spent cleaning will quickly teach what the laws of diminishing returns are.

From the combine to the grain truck to the auger to the grain bin, even new bins have gaps where some crop can stay lodged. Here is a bin floor, where you can sweep; you can do the best you can, but there are always a few seeds left.

Here's a truck unloading at the grain elevator. The next truck might be a truck full of canola or wheat or oats or other crop, and so on. Sure, the platform can be swept, but it is never 100%, even with the best care. It does not to be absolute also, yet some of our export markets can test to levels of 1 part per billion. Now to put it in perspective, see this truck on the picture there? It has about 40 tonnes of grain. See in this little jar here. There are nine seeds of nutritious, heart-healthy genetically modified canola seeds, safe for my kids to eat. Testing to the one part per billion would detect the presence of the equivalent of these nine seeds in this grain truck. When these get into a rail car, which more than likely was also not 100% clean, they continue and keep going into the handling system, where there's also more chance for contamination. I know, as a farmer, taking all the best precautions, that I cannot eliminate contamination.

Most farmers are more aware of the need for separation and cleanliness. In the last 20 years, many have signed contracts for specific varieties in production. For example, there's a bakery in the U.K. that does specific contracts and needs very close cleaning and segregation. But still with that, there is some need for some standards of low-level presence.

One of the keys to success is good management and cleanliness. Another is to understand the financial and trade issues: if something is rejected in a boat somewhere in an export position, it can cost the farmers a lot of money when the price of that commodity drops overnight. That can be as costly as $50,000, $100,000 on a given farm. Third would be to train your staff in cleanliness, cleanliness, and more cleanliness. Fourth, we can start with pure seeds, preferably certified seeds.

As efficient as we can be, we can improve in these areas, but some mixing is inevitable.

As you can tell, I'm passionate about my job as a food provider. In Canada we are export oriented. We export over 70% of our production. We generate wealth. Agriculture is a forerunner in our rural economies. We really need this kind of a low-level presence policy to continue to export and make our farms worth handing over to the next generation.

Thank you very much.

The Chair: Thank you.

Ms. Sharratt, please.

Ms. Lucy Sharratt (Coordinator, Canadian Biotechnology Action Network): Thank you, Chair.

I'm speaking on behalf of the Canadian Biotechnology Action Network, which is a network of 18 organizations, and we have participated in the consultations on low-level presence where invited.

The adoption of the LLP policy would establish Canada as the first country in the world to accept imports contaminated with levels of GM foods that have not been approved by our own regulatory agencies.

I thought firstly I'd like to ask the question what LLP does achieve. Firstly the LLP policy does not achieve the stated trade goal. The proposed LLP policy will not accomplish the stated goal of minimizing disruption to Canadian exports. The LLP policy would govern imports to Canada.

The rationale for adopting this LLP policy rests on the hope that other countries will follow Canada's example and adopt similar LLP policies. We do not know, however, that this will be the result. Canada's acceptance of LLP does not necessarily bring us any closer to this goal.

Rather than improving the position of Canada's commodities in the international marketplace, LLP has a high potential to undermine Canada's international reputation regarding both food safety regulation and the integrity of our food system. This is because through LLP we are actively inviting contamination of our food system without domestic regulatory oversight.

Secondly, LLP will change domestic GM food safety regulation. LLP would change the way GM foods are regulated in Canada. The policy proposal asks Canadians to accept GM foods as safe even when Health Canada has not fully evaluated them and approved them as safe. LLP asks all Canadians to accept GM foods as safe even where Health Canada has not approved those GM foods as safe for human consumption. LLP also asks Canadians to trust the regulatory processes of other countries. LLP asks all Canadians to agree to the assumption that at a low dose, unapproved GM foods are safe.

What are the implications? In our analysis, LLP will sacrifice health and safety for elusive trade goals.

From a public health and safety perspective, there's no justification for allowing the import of foods contaminated with products that have not been fully evaluated by Health Canada. LLP will undermine consumer trust in Canada's food safety regulation.

The LLP policy introduces further uncertainty for Canadians in relation to what GM foods are in the food system. It creates further complexity for Canadians in understanding how GM foods are regulated and by whom. The LLP policy would further obscure the place of GM foods in the Canadian food system and would aggravate the current problem of the lack of GM food labelling. The policy asks all Canadians to accept the potential of unknown GM contamination in every food item on the shelf.

LLP will compromise Canada's science-based regulation of GM foods. The regulatory system for GM crops and foods in Canada has consistently been described as science based. Here, however, scientific oversight over GM foods is being removed in relation to the action level proposal and seriously reduced—in an as yet undefined way—in relation to the threshold level proposal. LLP is trade-based regulation that would irrevocably compromise Canada's claim to science-based regulation of GM foods.

In the interest of time I thought I would perhaps condense a little bit of what I have presented on paper to look at the specific implications of the action level and the threshold level, which, with the existing approval system for GM foods in Health Canada, essentially create three tiers of regulation for GM foods, where of course the action level allows for a small amount of contamination.

The implications are really that the action level is not based on science. It's based on an assumption of safety relating to the science that has been assessed by another country. This is not science that rests inside Health Canada, and certainly there's no science behind a decision to choose one action level over another, 1% over another. The action level asks Canadian consumers to trust the regulatory systems of other countries.

● (1115)

In relation to the threshold level that allows for a higher level of contamination, higher than the action level, determined apparently by what's achievable in the industry, this would be allowed after a "Canadian LLP risk assessment".

The proposal for a threshold level in our analysis further complicates the LLP proposal and further compromises Canada's claim to science-based regulation of GM foods. The proposal that a threshold level could be allowed after a "Canadian LLP risk assessment" begs the question, what is that risk assessment and how does it differ from the current Health Canada approval process for GM foods?

The proposal to establish threshold levels introduces a new second-tier approval process for GM foods based on an as yet undefined process and criteria. The fact that this assessment process is not defined brings home the point that the LLP policy is not science based.

Threshold levels would severely undermine the ability of a great portion of the Canadian public to trust Canadian regulation for food safety and for GM food safety in particular. Evaluation of GM food safety is already a process that is largely hidden from the Canadian public, and the proposal for threshold levels via a Canadian LLP risk assessment would further complicate and obscure the regulation of GM foods on the shelves.

In summary, our analysis is that the policy does not secure the stated goal of easing trade of Canadian exports. Rather, it has serious implications for the future of Canadian food safety regulation and Canadian trust in such regulation. Acceptance of LLP would undermine Canada's international reputation for food safety. It would seriously compromise Canada's claim to science-based regulation of GM foods, both in international markets and domestically. It would further engender consumer distrust of GM food safety regulation and leave the government with little ground to build or maintain that trust. This policy is extremely vulnerable from a public health and safety perspective, and this vulnerability extends to the biotechnology industry itself, which seeks a positive public perception for its products based on an appeal for Canadians to trust in government regulation. I would suggest that there are a number of stakeholders and actors in the food system that similarly rely on this same appeal.

Thank you.

● (1120)

The Chair: Thank you.

The bells have just started ringing in the House. I'm looking for direction from the committee on whether we would like to come back after the vote, which would probably be around 12 o'clock.

Frank.

Mr. Frank Valeriote (Guelph, Lib.): I'm just wondering, given that there will be a bus downstairs to take us all over, if we might not hear from Mr. Harrison, then head over, and return for questions.

The Chair: My advice is that the committee has to end with this ringing of the bells. That's the direction we're getting from the whip's office from all sides.

So we'll return immediately after the vote. Is everybody is comfortable with that? I, too, would like to hear Mr. Harrison, and we'll have about a half hour to 45 minutes.

To our witnesses, I appreciate your indulgence. We are interested in what you have to say and are prepared to listen if you can abide with us.

We'll suspend until noon, or after the vote.

● (1120)

(Pause)

● (1215)

The Chair: Welcome back. Thank you for your patience.

Mr. Harrison, we're going to move to you for your comments. Then we'll go to questions from the committee.

Please begin.

Mr. Gordon Harrison (Member, Canada Grains Council, and President, Canadian National Millers' Association): Thank you very much, and thank you for the opportunity to appear.

I'm here today on behalf of the Canada Grains Council. My position in the industry is as president of the Canadian National Millers' Association, which is Canada's national association of cereal grain processing companies and plants. The Grains Council, as I think you will know, is the national federation of grain industry organizations. The council represents seed developers and growers, producer organizations across the country, railways, grain-handling and transportation companies, research foundations, ports, and others who are participants in the supply chain.

I'd like to comment at the outset that the Canada Grains Council has been an advocate of and supports fully the establishment of a low-level presence policy. The Grains Council and its members see the establishment of a low-level presence policy as being enabling, as being a strategic objective that has to be realized if we want to preserve and enhance market access and make it predictable market access globally.

So the Grains Council is very much about and in favour of establishing a low-level presence policy.

The trade goals that the LLP policy brings to mind are not elusive but have been already achieved in the past. In some cases, the circumstances we're dealing with that are changing, such as the aforementioned ability and the moving ability of science and scientific methods to detect ever-lower levels of substances, are changing the environment. The overarching purpose of the LLP policy that the Canada Grains Council supports is that we would like to see Canada set a valuable precedent for other jurisdictions to follow.

What the council believes to be at risk, as a participant in an international grain trade coalition, is the ad hoc adoption of standards for low-level presence that are never going to be practicably achievable. In the absence of internationally recognized standards that can be met by the participants in the international grain trade, we are going to have unpredictable market access.

The LLP policy, about a decade in the making, as released and shared for comment in recent months, is vital to Canada's grain industry and supply chain. That is why the Canada Grains Council endorses it.

The LLP policy indeed is new, but it does not alter the pre-market evaluation requirements or the pre-market evaluation process for genetically engineered traits; it does not change that. We acknowledge at the Grains Council that if it takes a lot of resources on the part of Health Canada or CFIA to manage the LLP policy, there's a potential for those resources to take away from the business-as-usual pre-market evaluation process. This is a comment that we submitted online to the federal government.

The subject of recognizing or accepting the safety assessments of other jurisdictions is pretty important. This is something we already do in Canadian regulation of drugs and will do increasingly in the future. We need to support and negotiate mutual recognition agreements with other jurisdictions in food-producing and exporting countries. We need to recognize the competence of their regulatory agencies and would expect their countries and agencies to respect the competence of our agencies. Mutual recognition agreements are going to have growing importance, and in doing business internationally in the future, we will have no alternative but to recognize, multilaterally or even unilaterally, the competence of regulators in other jurisdictions.

Part and parcel of the low-level presence policy, which can be reviewed in detail, if you haven't done this already, is that we're talking about a policy that applies to genetic traits that have been approved for unrestricted, 100% food use in other jurisdictions—and by competent jurisdictions: part and parcel of the policy is the identification of countries whose regulatory agencies are deemed and considered by Canada to be competent. LLP policy as proposed does not apply to unapproved events.

With those over-arching comments, here's what the Canada Grains Council has to say about the proposed policy. As I said, we expect it to be enabling. We think it's a strategic step that has to be taken.

● (1220)

We would cautiously advocate that Canada lead the parade in this. We think that if all else fails, once we have a policy that we believe is actionable, comprehensive, clearly understood, and capable of being implemented without unforeseen consequences to anybody in the grain supply chain, perhaps Canada ought to go first.

Clearly, it's ideal that Canada be among a number of trading partners who adopt a policy that can be implemented in all of those countries; this would be more strategic in terms of facilitating trade and market access. We would see a precedent like this as being strategic. But “a precedent only if necessary”, I would say.

We've commented to the consultation team that the proposed action levels of 0.1% or 0.2% are pretty low. Those are below the levels one would normally have to be working with in the management of co-mingling of commodities in domestic and international grain trade. Additionally, those levels are near the limit of quantification—not detection, but quantification—and so there are analytical uncertainties. We have thus commented that it has to be at least 0.2% plus an allowance for analytical uncertainty. Again, we've noted that this applies to 100% food-use approvals.

We've also commented that the policy as drafted to date needs more work. I think all parties that would be affected by this policy need to have a better understanding of what the whole thing looks like. How will we implement this? What kinds of oversight and monitoring will we have? What are the sampling protocols? What are the analytical methods?

These are questions that have been asked of the federal parties by a number of stakeholders. To date, these details aren't there. It's not that they're not susceptible of being outlined, because we know what works and what doesn't in terms of sampling and analytical methods.

We also need to know what means are at the disposal of industry that would allow industry to restore compliance. If the policy is implemented and there is an action level established, and then a threshold level—which is actually a maximum limit—and you are outside of the maximum limit, what are you allowed to do to restore compliance, if you have in your possession an imported commodity that you can't re-export? You paid a great deal of money for it, you paid the transportation to get it in position, so what are you allowed to do to restore compliance?

We've also recommended that the action level not be cumulative. That is, each genetic trait would have its own action level; they would not be lumped together.

The final comment I would make—this is the last comment we have provided via the Grains Council's submission—is that no bulk handling system, no channeling system, no identity-preserved system can meet such low levels. Although the policy states that LLP thresholds will be higher, it's important to note that these need to be established as soon as possible so that governments and industry internationally fully understand the difference between an action level and a threshold.

I'll leave it at that. If there are any questions that I can't answer today—I would observe that this submission was prepared by a committee with various industry backgrounds—I'd be happy to take them under advisement from the clerk and respond with written replies.

Thank you.

● (1225)

The Chair: Thank you very much.

Madame Raynault, welcome.

[*Translation*]

Ms. Francine Raynault (Joliette, NDP): Thank you, Mr. Chairman.

Ms. Sharratt, thank you for your patience while we were voting.

[*English*]

The Chair: Does everyone have an earpiece on?

Good. I just wanted to make sure.

Go ahead, please.

[*Translation*]

Ms. Francine Raynault: Ms. Sharratt, you said that GMO crops should only be approved for planting in Canada after the economic consequences of contamination have been evaluated.

Could you explain to us why these evaluations are important?

[*English*]

Ms. Lucy Sharratt: Thank you.

The issue of LLP arises because we're growing genetically modified crops that have not been approved in our export markets.

For some crops in particular, this is a very serious problem. It begs the question of whether there are perhaps remedies we can take here to address the LLP problem, if you will, which is recognizing the existing reality in our export markets for X, Y, and Z crops, and stopping or halting or providing a moratorium if the economic consequences of contamination were extreme, as would be the case with alfalfa, for example.

It also provides the potential for consultation with farmers, which as yet has no place in the regulatory system.

[*Translation*]

Ms. Francine Raynault: In previous testimony, it was mentioned that zero risk—undesirable attributes such as chemical residues, GMO, etc.—in the supply chain is not feasible.

How do you respond to that argument?

[*English*]

Ms. Lucy Sharratt: Every crop is different, so there's a different potential with each crop.

Before genetically engineered crop were introduced in Canada, we had no discussion as to the potential for contamination. We're having that discussion now, and it's better late than never. Zero tolerance is the international standard. It's the policy reality in Canada and in other countries, in our export markets. The question really needs to be asked what zero tolerance means. For health and safety it might be necessary. In terms of some crops, also, it's unavoidable. For example, you would have to make sure that there's no Roundup Ready alfalfa on the market if you're to ensure there's no contamination. We know this is the case for some crops.

There may be the ability to manage contamination in some crops, and that's what the threshold level proposes. The LLP policy recognizes contamination as a problem and actually proposes looking at the biology of crops and what the industry can manage in terms of contamination. That's a discussion we should have had 20 years ago. But I think zero tolerance is what is expected right now from many consumers, certainly.

● (1230)

[*Translation*]

Ms. Francine Raynault: Do you think that organic production and GMO can coexist?

[*English*]

Ms. Lucy Sharratt: They can't, in that organic farmers risk losing their livelihood and certification if there's contamination from genetic engineering and genetically modified seeds. In addition, organic consumers expect a product that is not contaminated with genetic modification. So we have this situation where the issue of contamination is a burden that's borne by organic farmers, organic consumers, and also by farmers who are exporting to countries where these GM traits are not approved. Again, that's a question that needs to be debated. The organic sector needs to be valued for what it provides and its ecological services and products to consumers.

[*Translation*]

Ms. Francine Raynault: In your presentation, you said that the action level proposed was not based on science, but on an assumption of safety.

Could you elaborate on that?

[*English*]

Ms. Lucy Sharratt: It's very clear that the action level requires an assumption of safety based on an evaluation of another country's regulatory system. If Health Canada says that the U.S. or Chinese system is acceptable, that's a generalized assessment based on the Codex international principles, which are, firstly, also open to interpretation. For example, Canada implements the Codex guidelines differently from the European Union in at least one case. We also see the issue where Canada could evaluate a particular country as having an acceptable regulatory regime. But of course on a case-by-case basis we could see that the approval of a particular GM product is compromised in that country because of political interference or any number of issues. We would not necessarily see that happening.

So we're actually asking Canadians to trust in a generalized way the regulatory system of another country as to what we're allowing into our country through LLP. Will that be in perpetuity, or will there be a review every five years or 10 years? Is there a public notice that provides information to Canadians on which countries we agree have a regulatory system that's safe enough to assume a low level of safety through an action level? There are all kinds of questions about that. Is the action level based on someone else's science, or another country's evaluation of corporate science? We've already asked Canadians to trust Health Canada in relation to GM food safety. Now we're saying that Health Canada actually doesn't have a role to play in this particular consumption of these GM foods.

The Chair: Mr. Lemieux.

Mr. Pierre Lemieux (Glengarry—Prescott—Russell, CPC): Thank you, Chair.

Thanks for your contributions to this excellent subject of discussion.

I want to ask Lucy a few questions about low-level presence, particularly in terms of zero tolerance.

Do you really feel that zero tolerance on anything is realistic and achievable?

Ms. Lucy Sharratt: When we're looking at LLP, zero tolerance is our current policy, because Health Canada approves products before we consume them. That's really the essential matter. If zero tolerance isn't possible, an assessment of safety is still required.

Mr. Pierre Lemieux: Sure, but what I'm saying is that even at zero tolerance there is really in a sense a low-level presence, because the presence just might not be detectable.

Let's say that current testing can test to one part per 100 million or one part per billion. If there were one part per 10 billion, testing might not be able to pick that up. So I think it's quite valid to say that zero tolerance is just not realistic, and especially not when you're looking at the supply chain for agricultural products.

I'm wondering whether you would agree that an absolute zero tolerance is probably unrealistic. I don't think we can find that anywhere in any thing.

● (1235)

Ms. Lucy Sharratt: I think zero tolerance could be realistic. It would just be implemented via another policy, which is that if zero tolerance isn't practical in X, Y, and Z cases, then that GM crop is a problem.

Mr. Pierre Lemieux: Let's not even talk about GM. Let's talk about your harvesting of your non-GM soybeans: you pick up a weed that you were not able to root out of your field; that weed is not fit for human consumption—it hasn't been registered, hasn't been safety tested for human consumption—yet you have this weed that is now ground up in your rail car of non-genetic soybeans.

What would you do in that case?

Ms. Lucy Sharratt: Well, LLP is specific to genetically modified foods.

Mr. Pierre Lemieux: No, I want to talk about the realistic principle of the matter. My guess is that you would accept the weed being chewed up. It hasn't been registered, not necessarily tested for human consumption, and yet here there are trace elements of it—one part per 100 million in a rail car of non-genetic soybeans. My guess is that you wouldn't say, “I'm sorry, but we are just going to have to destroy that rail car of soybeans”.

Ms. Lucy Sharratt: Yes, because here we are talking about a qualitatively different issue, which is the safety issue about a genetically modified food. That's why Health Canada has guidelines for the safety assessment of novel foods.

Mr. Pierre Lemieux: My concern with the discussion of this is that it immediately goes to GMO and then turns into—

Ms. Lucy Sharratt: That's because that's where our trade partners are going, which is why LLP is being discussed at all.

Mr. Pierre Lemieux: Maybe you'll agree with this or maybe you won't, but the point is that GMO products are here to stay. I'm not saying you have to agree with this and I'm not saying anyone has to agree with it, but if the countries that accept GMO products in whatever shape and form have subjected them to sound science and have approved them, I just don't see all of these countries stepping away from what they've said is sound science and saying that now they're shutting down GMO everywhere; that they're doing it because they were wrong. I don't see that happening.

I'm wondering whether you agree that GMO products are here to stay. If so, part of it is that if they are here to stay, then the principle is applicable when discussing low-level presence in the weed—when you are talking about low-level presence in even non-GMO type products—because it's not supposed to be there. It's not registered and it's not supposed to be there.

You are saying that it's not a health threat because it's not GMO. But I'm saying that if GMO has been based on sound science, and multiple countries.... I don't want to get into the sound science argument; I want to talk about the low-level presence. But your argument doesn't really line up, because in one case it's acceptable.... It could even be a non-food product that is in there at the level of one part per billion. That would probably be okay for you, as long as it's not GMO.

Ms. Lucy Sharratt: Science recognizes that there's a difference between genetically modified foods and other foods. We have a novel food category that includes GMOs and others.

Mr. Pierre Lemieux: Sure, but sound science, for our government and for other governments, has said it's safe for human consumption.

Ms. Lucy Sharratt: No, our government and principles of sound science have been used to say that a particular GM canola is safe, a particular GM soy is safe, but not to say that GMOs are safe. It says we have some science—

Mr. Pierre Lemieux: It's particular.

Ms. Lucy Sharratt: It's particular to each crop and each food, which is why—

Mr. Pierre Lemieux: Right. What is your view on that, then, on approved GM products that have been deemed safe—

Ms. Lucy Sharratt: —by another country?

Mr. Pierre Lemieux: No, even by our country. What would you say about that? What would you say about the shipment that has Canadian-approved product, one part per one million in there? What would you say to that?

Ms. Lucy Sharratt: It doesn't matter what I say about it; it matters what our export markets have to say about it.

Mr. Pierre Lemieux: You're here today. I'd like to know what you would say about that and what your organization would say about that.

Ms. Lucy Sharratt: We would say that Health Canada's existing approval process is inadequate, that there's been no independent science done, that there's no transparency—

Mr. Pierre Lemieux: Right. You're back into the GM argument again, and I'm—

Ms. Lucy Sharratt: No, I was talking about transparency and independent science, which is different.

Mr. Pierre Lemieux: Sure, but you're just trying invalidate GM products.

Ms. Lucy Sharratt: No, I'm telling you our view of the regulatory system in Canada, which you asked about. Our evaluation is that it's inadequate.

Mr. Pierre Lemieux: No, I'm asking, whether it's GM or non-GM, if you have something in a shipment that is not supposed to be there, whether you would in principle either accept a tolerance or you would not.

I'm advocating that zero tolerance is impossible. If it's below the threshold of detection, it doesn't mean it's not there; it just means you didn't detect it there.

● (1240)

Ms. Lucy Sharratt: We would advocate that safety is the priority. So with a weed—

Mr. Pierre Lemieux: It's based on thresholds.

Ms. Lucy Sharratt: —versus a GM food, there's a qualitative difference in terms of the question of—

Mr. Pierre Lemieux: But it's based on threshold, would you not agree? Even on elements, elements within our environment, it's based on threshold. It's not based on—

Ms. Lucy Sharratt: We know that industrial products have an *x* level of contamination insects in their processing. We accept various contaminations in our food system right now. We have qualitatively different questions that are raised by the application of new technologies like genetic modification that have a sophisticated, sound science-based process.

The Chair: I have to move this on.

Mr. Valeriote.

Mr. Frank Valeriote: Thank you all for coming and enduring our questions.

I've always said that I don't have a problem with the issue of GMO and its consumption; I've been very clear on that. I know what it's doing, given climate change and our need to feed the world, and yields, and all of those other things we're all aware of around this table.

Having said that, I also agree that the organic sector has carried an unnecessary or disproportionate share of the burden in response to GM. In Denmark, they went out of their way to have regulations and compensation and other things with respect to cross-contamination or the right of coexistence.

I feel we need to honour the right of coexistence. In Canada, we defaulted into, “Well, you know, if you want to keep it organic, it's up to you to go through all those necessary hoops”.

Yesterday, Matthew Holmes from the Canada Organic Trade Association spoke to us. He implied that a low-level presence of maybe 0.1% might be acceptable, with conditions attached. I think it's important for us to get your response to those conditions; otherwise, we won't be able to have a fulsome report to present to the minister. He said that if an LLP of 0.1% were to be introduced into Canada, as a minimum the organic sector would require and call for the following—and I want each of you to respond to these—first, full and routine public testing of imports for GMOs; second, publication and communication of the incidence, the crop, the importer, and the country of origin of the crop, and whether that had come within the action or threshold limits; third, regular and specific reporting of that information to the organic sector so that the sector —its producers, handlers, and manufacturers—might pursue best management practices and targeted testing in an effort to protect its products from further contamination; and fourth, he recommended that we looked to the lead of the United States and Secretary Vilsack in striking the AC21 committee to investigate the means with which to manage risk and compensate farmers whose crops and products are contaminated by unintentional GM events.

You're welcome to ask me if you've missed any of those points.

And I have another question, if you're able to answer it. Is the “toothpaste out of the tube” with all crops? In other words, is it too late to go back with some crops and say we can still have a zero tolerance level, or is the cat out of the bag already?

Let's start with Lucy and work our way to Franck, and then to Gordon.

Ms. Lucy Sharratt: Thank you.

From the organic sector's point of view, I think the conditions that were proposed would be necessary. They've been needed for a while. This whole issue begs for the implementation of these conditions.

Posting incidents of LLP also needs to be established for the Canadian consumer as well as for the organic sector. For all actors, there needs to be this tracing and reporting, absolutely. Currently, we don't see that in the proposal.

Mr. Frank Valeriote: My other question is about the toothpaste in the tube.

Ms. Lucy Sharratt: We grow four genetically modified crops here in Canada. For canola, we could say that the GM trait is going persist into the future. But we have a very important chance to maintain the integrity of the organic sector and evaluate the economic consequences of some GM crops, such as alfalfa, which we can anticipate we cannot take back once Roundup Ready alfalfa is released. We have the chance to assess that now and to address it by making sure it's not released into the environment.

● (1245)

Mr. Frank Valeriote: Franck or Gordon, do you have comments?

Mr. Franck Groeneweg: I want to mention that we're totally for the co-existence of the two systems. Organic has its place in the market. It answers a typical growing niche market of consumers who want that. It's there and that's great. We're ready. We've got a lot to learn from each market.

I also want to respond to the fact that there's an undue burden on the organic community, because that's reciprocal. Between neighbours, there are always some little fights back and forth. Being next to an organic farmer, I have more pressure from weeds. That's just the way it is. I deal with it. There is some cross-contamination going back and forth. On the conventional farming side, we're not always pointing a finger one way or another because it's not a healthy debate. We're trying to work together on that.

As for the four questions, I guess it's a little early for me to answer as we don't have a policy statement as Grain Growers of Canada to talk about that. With quick thinking, I guess full testing—I can't see why there would be a problem with that. The thing is, as long as it complies with our regulatory system and safety levels we've put together, I can't see why it would be a problem. But again, I think it needs to be studied more.

I want to reiterate that we are there to co-exist and it works out.

Mr. Gordon Harrison: Thank you.

Not necessarily in order of importance, I would say that the principle that each import shipment being sampled and analyzed is one that we want to be careful of. If we want to have predictable and orderly trade in agricultural commodities and further processed foods, we're going to have to accept the certifications of other food safety regimes and jurisdictions.

Re-inspection of exports from Canada by competent jurisdictions, including those in the United States, introduces a terrible level of uncertainty. We've seen that in the meat sector in the past two years. Re-inspection as a matter of course is probably not a great idea. If we wish to demand of importers that they get an import permit or a phytosanitary certificate. re-inspection is probably a bad idea. We probably don't have the resources to do that when you apply it to all commodities.

Should there be public disclosure about incidents? I think that's a very healthy thing to do. I think we need public disclosure from CFIA about their ongoing target surveys of foods regardless of what they're worried about—allergens, microtoxins, contaminants. Public funds are being spent to gather information that is valuable to the public and all stakeholders, and I certainly agree with that.

I can't comment on AC21.

Is the toothpaste out of the tube, as we said in our Canada Grains Council submission on the LLP policy? We can expect genetic traits that are no longer in active commercial production, but were in the past, to persist in the environment and in the seed supply and so forth, through volunteers and long-term persistence in the genetic material. So yes, the toothpaste is out of the tube for the major field crops that are grown and that have a large number of genetically modified approved varieties.

The Chair: Thank you.

Mr. Richards.

Mr. Blake Richards (Wild Rose, CPC): Thanks, Mr. Chair.

Thanks to all of you for being here.

I have questions for all three witnesses, if there is time.

I'll start with you, Ms. Sharratt. You're here today on behalf of the Canadian Biotechnology Action Network, or CBAN. I've noted that CBAN is listed as a project of Tides Canada. Is that correct?

Ms. Lucy Sharratt: That's right.

● (1250)

Mr. Blake Richards: I'm sure that most people are quite aware of Tides Canada and their history, but I think it's important to point out that according to media reports out there, Tides Canada has taken about $62 million from U.S. sources over the last decade.

Ms. Lucy Sharratt: Yes, so we're not—

Mr. Blake Richards: Let me finish my question before you provide your response.

I've also noted that if one were to donate to CBAN, you would make your cheque payable to Tides Canada initiatives, CBAN, and you would mail it not to CBAN's Ottawa office but to Tides Canada initiatives in Vancouver.

Is that correct?

Ms. Lucy Sharratt: You could mail it to either.

Mr. Blake Richards: But would the cheque be made out to Tides Canada initiatives, CBAN?

Ms. Lucy Sharratt: It would be processed through Tides Canada, as we are a project of Tides Canada. We don't receive funding from Tides; we are a project of Tides.

Mr. Blake Richards: You're a project of Tides Canada. Correct.

With that in mind, certainly you must have some very strict guidelines and policy safeguards in place to ensure that your tax receipt eligible expenses going to Tides Canada initiatives are used appropriately.

Could you tell me a bit about what those policies and safeguards are that you have in place?

Ms. Lucy Sharratt: Tides Canada conforms to the Canada Revenue Agency requirements. We submit advocacy reports. All of that documentation is on record.

Mr. Blake Richards: I wondered, because I know some of your member groups, like the National Farmers Union and the Council of Canadians, have campaigned against free trade talks with Europe, for example. I wonder sometimes about whether that's a proper use of charitable donations.

Ms. Lucy Sharratt: That's entirely different from the work that we do.

Mr. Blake Richards: Because we only have a certain amount of time, let me move on.

There was a column in the February 25 edition of the *National Post* entitled "Bjørn Lomborg on the unintended consequence of the anti-GMO movement: dead children".

Are you aware of that column?

Ms. Lucy Sharratt: I think I know which column you're referring to. I know which issue.

Mr. Blake Richards: The column indicated that there are about three billion people who depend on rice as their staple food, with 10% being at risk for vitamin A deficiency, which according to the World Health Organization causes 250,000 to as many as 500,000 children to go blind each year.

Despite these statistics, anti-GMO activists, including some of your organization's members, were able to delay the approval of GM golden rice, which includes elevated levels of vitamin A, from being grown in the Philippines.

Are you aware of that situation?

Ms. Lucy Sharratt: Yes. Thank you for asking.

This is—

Mr. Blake Richards: Sorry, I have another question I'd like to ask.

Ms. Lucy Sharratt: I do need to tell you that we actually haven't delayed, no group has delayed, the approval of the golden rice.

Mr. Blake Richards: That's not what the article indicates.

Ms. Lucy Sharratt: The facts are that the international rights—

Mr. Blake Richards: Sorry, I only have so much time.

Ms. Lucy Sharratt: I need to provide you with the facts.

Mr. Blake Richards: I'll let you provide that, but I want to ask another question and then you can provide your answer to—

Mr. Frank Valeriote: Mr. Speaker, on a point of order, I have to object.

Mr. Richards is continuing his effort to badger witnesses and not let them answer questions. He places questions before them that are out of context. Each of these witnesses has a right to respond. I think he is refusing to allow them to do that.

I would ask you to let him give the witness time to respond.

The Chair: Mr. Hoback, on the same point of order.

Mr. Randy Hoback (Prince Albert, CPC): He has his five minutes. He can handle his five minutes whichever way he sees fit. I don't see the reason why Mr. Valeriote would want to be making a point of order in this fashion. This is something that's quite common.

The Chair: Mr. Storseth, on the same point.

Mr. Brian Storseth (Westlock—St. Paul, CPC): I actually support Mr. Valeriote's decision to give Mr. Richards more time.

Mr. Blake Richards: That would be appreciated.

Thank you.

The Chair: It's not a point of order.

I will ask Mr. Richards to complete his questioning so our witnesses can provide an answer.

Mr. Blake Richards: Thanks, Mr. Chair.

I do have lots of questions I want to get in, so I have to use it as wisely as I can.

I believe what this does is to underscore the detrimental effects that anti-GM activism can have. I think fearmongering campaigns like that can make the seed approval process extremely costly, which can shut out small companies from competing. It can also deprive third world countries of new technology that could help them prevent poverty, starvation, and malnutrition.

I realize that your organization opposes the use of GMO products in agriculture. That's understood; we get that.

However, I have to ask, do you not agree there is a possibility that GM products could benefit humanity when there are malnourished children who are going blind and are dying in developing countries around the world?

Ms. Lucy Sharratt: Vitamin A deficiency is a very serious problem. Over $100 million has been spent developing golden rice. Golden rice is not ready for the market. The International Rice Research Institute, just a few weeks ago, published a statement to clarify and make sure it's understood that golden rice is at least two years away from any possible approval. The data is not in that the vitamin A is metabolized—

● (1255)

Mr. Blake Richards: Sorry, I have to cut you off. I know that some people won't like this, but I must because I only have so much time.

I asked a very specific question. Do you not agree that GM products could possibly benefit humanity when we have malnourished children who are going blind and are dying in developing countries around the world?

Ms. Lucy Sharratt: If GM products could work as they are promised to work, then there may be a benefit. We don't see that from vitamin A rice. It does not yet exist.

Mr. Blake Richards: Thank you.

The Chair: Thank you. Your time is up.

Mr. Allen.

Mr. Malcolm Allen (Welland, NDP): Thank you, Chair.

Unlike my friend, if I have a question, I actually am looking for an answer. If I have a statement, I will just say I have a statement.

Mr. Sharratt, if you want to respond to any piece of the statement that was just, I'd be pleased to let you go ahead. Or, you can say no, thank you, in which case I'll move on to the actual questions that I have.

If you want to take a moment to respond to bits and pieces of what you heard over there, feel free to do that.

Ms. Lucy Sharratt: No, thank you. That's fine.

Mr. Malcolm Allen: Mr. Harrison, I'm always enthralled by this. This is a fascinating conversation.

Mr. Gordon Harrison: By me or the subject?

Some hon. members: Oh, oh!

Mr. Malcolm Allen: No, no, by everyone—but also by what you said, Mr. Harrison.

I'm always enthralled by Blake's pieces of diatribe.

Mr. Gordon Harrison: You've been a patient listener, and I say that with respect.

Thanks.

The Chair: Mr. Zimmer, on a point of order.

Mr. Bob Zimmer (Prince George—Peace River, CPC): Chair, I take objection to what Mr. Malcolm Allen has said about one of our colleagues over here.

He has the right to ask whatever questions he wishes, and without criticism of us. We give that latitude to you, and I think you deserve to give respect to this side as well.

The Chair: Mr. Allen, on the same point of order.

Mr. Malcolm Allen: Sure. I'll withdraw the fact that it was a bunch of blustering diatribe. How's that?

Mr. Harrison—

The Chair: It's not a point of order, but I would ask all members not only to show respect for each other but also for our witnesses who are here today.

Mr. Malcolm Allen: That would be a novel trait, but I think that's different legislation.

I'm always fascinated by the numbers and by the term "sound science". Let me interject with what my family says about that. My youngest daughter, who is in her late twenties and has an undergraduate degree in biochemistry, says, "Science better be sound or there's a lot of trouble". It's not a question.

There's no such thing as sound science; it's science. You apply certain criteria to the science and you come out with something. You start with a hypothesis. You do some testing. You get a result, draw a conclusion. That's science. There's no soundness to it; it's just science. It's a wonderful term, but it's just a term.

Here's why I say that. Today, Mr. Harrison, you told us what percentage you thought it should be. Yet somebody else over here is telling us another percentage that it should be, and everybody tells us it's sound science. The reason it's difficult for me to get my head around this is that if it's really about science, then how come you all have different numbers? Either you've done the science and there's a number, whatever that low-level number is—and that's what you believe it to be, based on a peer-reviewed piece of science that's been done—or we're into marketing, which is about saying that "Only this can happen here".

I'll let you all answer that one.

The second piece of it is—and this isn't a science piece, but a decision piece—that it doesn't matter why they make the decision, right? It's not an issue. It's about what you hear around here: "It's my five minutes and I get to do what I want with my five minutes".

So if another market, on that is your customer, says, "I don't want it", then who cares about your science? If they say "No, thank you", it's their decision. I they are the customer and don't want it, they will say they don't have to have it. If it means that your market says "No, thank you"—which the EU is doing at the moment—we can say they're wrong. The issue is that if they don't open it up, what do we do about that? How do we square the circle?

My friends have heard me say I don't think there's an absolute zero. If you try to measure that as a temperature, there's no such thing. People have been trying for hundreds of years to get to absolute zero, temperature-wise. There isn't one. It's too hard to do.

I get "extraneous materials". The issue is about GM, and extraneous materials have another issue to them. How do we do that? What is the number?

I hear it might be this for that, or this one for that one, but it seems to me that until the science is done, really done, and we're all agreeing about a number, scientifically speaking, don't you think we're in a bit of a bind?

● (1300)

Mr. Gordon Harrison: Well, there's ample—

An hon. member: Was that a question, Malcolm?

Mr. Malcolm Allen: Yes, it was. It was a question.

An hon. member: It sounded like a diatribe.

Mr. Malcolm Allen: Yes, no problem. You'll know a diatribe if you hear it from me, let me tell you.

The Chair: Order, please. Order, please.

You know that we have a very limited time with our guests and I'd like to hear what they have to say.

Mr. Harrison.

Mr. Gordon Harrison: To your point, there is current science and there is ample current science in many disciplines. Science evolves. There's no question about that, but today, in the context of this policy that we're talking about, we're talking about current science, internationally recognized principles, internationally recognized methods. There's no analytical method that I would know of that competent statisticians could not evaluate in terms of its reliability, its integrity, and the predictability of the results.

The coefficients of variation are the standard deviations, meaning that the uncertainty in any analytical method can be established. The grains council has submitted to the federal government that we need to take those quantifiable uncertainties from analytical methods into account in layering on top of the 0.2%.

For example, we further stated that the numbers that have been put out here are inconsistent with the usual domestic grain trade. The grain-grading standards that we have under the Canada Grain Act and regulations are questionably achievable, and under Canada's federal regulatory policy, the regulated parties have to have the means to achieve.... If a country or a customer in a country says they don't want it, and they are prepared to pay the costs of ensuring that it isn't there, then commerce can proceed. If the customer says he doesn't want it and it's not practically achievable, then responsible vendors say, “I'm sorry, I can't sell to you”.

It's that simple.

The Chair: I have to stop it there. We're past the...

Mr. Richards, on a point of order.

Mr. Blake Richards: Thank you, Mr. Chair.

I just wanted to very briefly apologize to Mr. Harrison and Mr. Groeneweg. Due to the constant interruptions from the other side during my questioning, I wasn't able to get to my questions for them. I apologize.

The Chair: Thank you, Mr. Richards. That's not a point of order.

Thank you to our guests for being here.

Franck, do you have one small comment?

Mr. Franck Groeneweg: With the thresholds, it all depends on where you put the decimal, right?

So on science, if we're going to talk about science.... We have, for example, the GM side, but as was said before, for example I have a market like canary seed, where a small amount of buckwheat is going to Mexico and that border has been shut. It's putting a lot of financial pressure on us.

So if a customer is ordering a load of X commodity and is ready to have that, we need to have a low-level policy so we can actually tell if we need to bring that load back or do something with it. We need to have that policy, otherwise it's costing everybody a lot of grief.

The Chair: Thank you.

Thank you very much, and I'm sure you'll see in our final report a lot of the comments that have been made.

Committee members, next week is break week. I wish you a good week back in your constituencies, and when we return our first meeting will deal with the beverage industry. We have also set a second hour aside for a subcommittee meeting on future business.

The meeting is adjourned.