

August 29th, 2022

The Honourable Marie-Claude Bibeau
Minister of Agriculture and Agri-Food
175 Queen Street
Suite 204
Sherbrooke, Quebec
J1M 1K1

Re: CFIA Proposal to Exempt Many Genetically Engineered Seeds and Plants from Regulation a Clear Threat to the Future of Organic Food and Farming.

Dear Minister Bibeau,

We are writing to you to express our concerns regarding CFIA's [proposal of a new regulatory guidance](#), which will allow companies to introduce and sell many new genetically engineered seeds and plants produced through gene editing techniques, without oversight. The Organic Council of Ontario represents over 1400 Ontario organic farms and operators that certify to the Canadian Organic Standards; these standards, along with the organic standards of all our major trading partners, currently **prohibit the use of gene editing technologies** within organic products.

If implemented, the CFIA's proposed regulatory guidance would erode transparency at all stages of the organic supply chain, significantly compromising the traceability and integrity of organic food products, and ultimately jeopardizing public trust in the Canada Organic Logo and our ability to trade internationally. Unregulated gene edited seeds could be sold to Canadian organic farmers without their knowledge. Additionally, farmers would be unable to readily determine whether they were sufficiently distanced from fields growing gene edited crops to maintain certification, and would face increased challenges avoiding inadvertent commingling of their products with gene edited products during storage or processing. In short, the proposed guidance effectively makes it impossible to enforce the organic regulations across Canada. This poses a serious existential threat for Canada's organic sector and the principles of health, fairness, ecology and care that it stands for. As the CFIA oversees the enforcement of the Canadian Organic Standards, which prohibits the use of gene editing and genetic engineering techniques, we ask you to take immediate action to protect Canada's organic farmers.

What Is At Stake For The Organic Sector?

Undermines Consumer Trust in Organics

[Canadians spent over \\$8 billion](#) on organic products in 2020. With demand for organic products growing rapidly, Canadians are increasingly relying on the Canada Organic Logo as a means of ensuring what is (and is not) in the food they choose for themselves and their families. The proposed regulatory guidance undermines public trust and reliance on Canadian organic food, granting a competitive advantage to organic producers abroad where new gene edited seeds are closely regulated. Such action would erode the credibility of both the Canada Organic Logo and the CFIA's governance of the Canadian Organic Standards.

Shifts the Burden of Accountability to Organic Farmers

Just as consumers have the right to make an informed choice, Canadian farmers have the right to know what they are purchasing, growing, and selling. The new regulatory guidance shifts the considerable burden of maintaining transparency solely onto organic operators. This includes searching for alternative

procurement practices to ensure no gene edited seeds are being sourced. Certifying bodies may require organic farmers to conduct increased volumes of pre- and post-harvest testing to prove the absence of genetically modified (GM) contamination; this testing would come at considerable personal expense. Finally, farm operators would face the financial and logistical burden of shipping back crops that fail to pass stricter international testing standards, and finding new conventional markets to sell these crops in, before expiry. Historically, [organic farmers have lost entire markets](#) when new genetically modified crops were released in Canada. The proposed guidance could mean the end of many organic farms across Canada.

Lack of Consideration for Organic International Markets

Canadian organic exports were [worth \\$607.9M in 2020](#), a 32% increase from 2019. Allowing these regulatory changes would compromise the growth of Canada's organic sector on a global scale. Globally, organic legislation continues to strengthen. For instance, the European Union (EU) is extremely averse to genetically engineered products, and has [recently implemented a stricter control system](#) to ensure all imported products are of the same standard. Due to [ambitious targets set to expand the EU's organic sector](#), the EU is currently [a critical international market](#) for Canada's organic exports and continues to gain a competitive edge over the less rigorous organic standards in the US. Under the proposed regulatory guidance, Canada's organic regulatory system will no longer be consistent with that of other countries, threatening Canada's organic equivalency agreements with crucial international trading partners. This will result in significant losses for the organic sector in the future.

Threatens the Future of Sustainable Food and Farming

Canada has previously failed to regulate genetically modified organisms in accordance with the risk of escape from confinement; for example, [GM alfalfa](#) has spread across farms and continues to affect farmers' livelihoods today. In light of the systemic unpredictability introduced by the climate crisis, there is a need to prioritize sustainable and resilient production systems such as organic, not undermine them. With the Canadian organic sector currently [growing by 8.4%](#) annually, it is the responsibility of the CFIA to ensure that the new regulatory guidance does not hinder the progress towards a more sustainable future.

The Organic Council of Ontario will continue to uphold the principles of organic food and support farmers to prioritize public knowledge and trust, all while respecting the land and providing high-quality, nourishing food to the community. We urge you to do the same and take action to ensure safety, transparency and public trust in our food system.

On behalf of the Organic Council of Ontario,



Carolyn Young
Executive Director, Organic Council of Ontario