



Canada Grains Council Policy Position on Plant Breeding Innovation

What's at Stake: The Growth Potential of Canada's Agriculture Sector

Budget 2017 sets an ambitious goal of growing Canada's agri-food exports from \$55 to \$75 billion annually by 2025. This goal can be reached if the right conditions are in place domestically to foster innovation and if markets remain open to enable trade. In February the Barton Report echoed this sentiment, pointing to agriculture as an opportunity for Canada to unleash substantial growth and to move to second-place from fifth in global exports.

Canadian grain stands at the forefront of this opportunity, with over 90 percent of some of our commodities destined for international markets. Canada must continue to drive growth in grain production and productivity to meet the agrifood sector's ambitious targets for exports, but how will this be achieved?

The Canada Grains Council and its members believe it is Canada's strength in science that places these targets within reach. That we must make full use of every available plant breeding technology – including the newest ones – to put innovative crop varieties into the hands of farmers.

The adoption of innovation could take Canada from fifth to second-largest exporter, but if we move forward without our trading partners, without knowing Canadian grain will meet foreign regulatory requirements and flow smoothly to international ports, we will lose this opportunity to drive competitiveness, grow the sector and improve the lives of the Canadians it employs.

Our Objective

The regulatory and policy environment for plant breeding innovation (PBI) must deliver on the dual goals of driving innovation in the crop sector while maintaining market access abroad.

Innovation and Trade: Complementary Goals in Balance

The leap from fifth to second in exports will be made on the backbone of transformative gene editing platforms, tools that can reduce R&D costs and increase the pace of the plant breeding process to meet serious and immediate needs. Needs, such as:

- Meeting consumer demand for healthier, high-quality food, whether by reducing naturally-occurring mycotoxins, increasing vitamins and nutrients, or developing new types of nutraceuticals and functional foods;
- Adapting to climate change and reducing the environmental impact of farming with crops that need fewer inputs and help to conserve water and soil and maintain their quality;



- Lifting farmer income, through yield increases and agronomic traits, especially in smaller-acreage crops with limited capacity to invest in plant breeding;
- Fighting quarantine pests to reduce devastating crop loss and risks to food security, as well as preventing serious trade disruptions.

Canada can be a global leader in enabling farmers and consumers to realize these benefits, but only if we have regulatory predictability and an appropriate level of regulation. Canada has had a robust system for the last 20 years, but it is not keeping pace with advances in scientific knowledge and gains in regulatory experience. Fearing the time and expense of ‘case-by-case’ regulation, some breeders simply avoid activities that could trigger regulation, or they move their research to the US, or elsewhere. Canadian breeders need predictable, clear, risk-based regulations. They need to know when they will be regulated, how much data they will have to provide to obtain pre-market approval, what it will cost and how long it will take. And they should not have to do more than is necessary to achieve the regulatory objective.

This is clarity Canada can provide within its current regulatory system, but is not enough for Canada alone to fix its domestic framework. While innovation is encouraged, trade must be readily available. If numerous countries each take a different regulatory approach for new plant breeding techniques, the complexity of concerns over market predictability will undo the work in Canada to advance innovation.

Today, safe and beneficial genetically-modified (GM) crop varieties can be delayed entry to the market for 10 years or more while awaiting global approvals. Some of Canada’s key markets require a Canadian approval before they will start their review process. These delays rob farmers of potential gains, consumers of a cost-effective value chain for staple foods and seed companies of their return on R&D investments. Furthermore, the legacy of public debate and fear around GM has helped to stifle public sector investment in research. Only the largest companies are positioned to be cutting-edge innovators, and innovative traits are found in only a fraction of the crops that could benefit.

Now, a suite of new plant breeding tools, collectively called plant breeding innovations, or PBI, is offering a new opportunity for agricultural innovation. “Let’s get it right this time” is the undercurrent of an emerging global dialogue on their regulation and entry to market.

Our ASK:

AAFC leadership to establish a whole-of-government commitment to support the introduction of plant breeding innovation (PBI)

AAFC, CFIA, Health Canada, Environment and Climate Change Canada, Global Affairs, Innovation Science and Economic Development, and the provinces all have a role to play in creating a fair and supportive playing field for the introduction of PBI. We propose that a senior official champion be designated to lead this work, with three specific objectives:



1) A collaborative review to ensure Canadian regulatory policies are not inadvertently causing a drag on domestic innovation and are primed to deliver the decisions and transparency required to allow entry of products into the global marketplace. We expect the review to ensure that Canada's regulatory framework:

- Leverages the long, successful history of plant breeding and its exceptional record of safety;
- Is based on sound scientific principles and is proportional to any potential safety concerns posed by new plant varieties;
- Has predictable and consistent decision pathways;
- Responds to the ever-increasing familiarity and scientific knowledge in support of the safety of plant breeding by removing or reducing unnecessary requirements;
- Aligns with like-minded trading partners on the scope of regulated products, and if this is not possible, ensures that Canadian regulators will engage with foreign counterparts to provide positive statements of safety for products that are regulated elsewhere but not in Canada.

This must include a commitment by government at all levels to take action and implement recommendations coming out of the review.

2) Proactive engagement with both like-minded and importing countries to drive a trade-enabling and risk-based global regulatory system, by advocating for regulatory alignment and transparency.

3) A Government of Canada public communication strategy to share not only the readiness of our regulators to protect food, feed and environmental safety, but also the importance and opportunity of innovation in plant breeding for the Canadian agriculture sector.