

Delivered by email to: justin.trudeau@parl.gc.ca

January 20, 2023

The Right Honourable Justin Trudeau, P.C., M.P.
Prime Minister of Canada
Office of the Prime Minister
80 Wellington Street
Ottawa, ON
K1A 0A2

Dear Prime Minister,

RE: Publication of the CFIA's plant breeding innovation guidance

Collectively the 58 organizations endorsing this letter represent over 190,000 Canadian farm families and Canada's grain and horticultural value chains, responsible for approximately \$100 billion in agricultural economic activity in Canada. It also includes Canadian organizations which represent business and scientific research activities that support the agricultural sector.

On behalf of our members, we are writing to urge you to publish the Canadian Food Inspection Agency's (CFIA) Guidance for Plants with Novel Traits (PNT) (the guidance).

Here is a summary of the government's process to date:

- The Government of Canada announced in 2018 that it would help the agricultural sector innovate, grow and compete by reducing uncertainty about Canada's regulations for plant breeding innovation.
- In 2019, the Government of Canada committed in its Regulatory Roadmap to develop clarified guidance, with an estimated time frame of 1-2 years.
- In 2020, federal departments (including Agriculture and Agri Food Canada, the CFIA and Health Canada) worked with a wide range of stakeholders to develop rigorous science-based proposals.
- In 2021, the government held fully public and inclusive consultations and considered all responses.
- Health Canada published its updated guidance on this subject in May of 2022 and industry stakeholders were told that the CFIA's guidance is ready and was scheduled for publication in October of 2022.

It has now been over seven years since the broad agricultural sector first requested the guidance be reviewed and over four years since work began. In the government's own words, the clarified guidance documents have been developed through a comprehensive and systematic scientific review process. The process was recently defended by Health Canada in a Hill Times [opinion article](#) as "**an extensive public consultation process in 2021.**"

Our international counterparts in the United States, Australia, New Zealand, Japan, Argentina, Brazil, Paraguay, Chile, Philippines and India, among others, have all completed their guidance updates and are benefiting from increases in investment and innovation as a result.

Releasing the guidance is in keeping with the government's own goals, priorities and independent reports including (emphasis added in bold):

- The 2017 “Barton Report” entitled Unleashing the Growth Potential of Key Sectors which states, “Modernizing regulations to streamline approvals and **remove barriers to bringing new solutions to market** by involving organizations like the Canadian Food Inspection Agency within the sector action teams.” Pg.17
- The 2018 Economic Strategy Table for Agri-Food which recommended, “moderniz(ing) Canada's regulatory approach for new technologies, with particular focus on precision breeding techniques (e.g., CRISPR), to **ensure it continues to provide an efficient and predictable pathway to commercialization.**” Pg. 7
- The 2018 Fall Economic Statement which recommended improving “guidance on how new and novel plant varieties are regulated in Canada in order to **provide clarity to Canadian and foreign firms interested in investing in Canada's biotechnology sector.**” Pg. 75
- The 2021 agricultural “[Guelph Statement](#)” agreement between the federal government and federal, provincial, territorial partners where “**reducing red tape**” and “**accelerat(ing) the development and adoption of new technologies**” was highlighted.

Further to this:

- Canada signed on to the 2018 WTO statement “International Statement on Agricultural Applications of Precision Biotechnology” which states, regulatory approaches “should be science and risk-based, transparent, **predictable, timely.**”
- The government “supercluster” initiative committed \$173 million for Protein Industries Canada which outlined in their [strategic plan](#) that a primary goal was to employ “Genomics and gene editing technologies.... to advance breeding objectives” and highlighted that “**companies are much more willing to invest in the U.S. compared to Canada due to greater certainty about the regulation of gene editing technology in other jurisdictions.**”
- The recently launched Sustainable Agricultural Strategy [consultation document](#) by Agriculture and Agri-Food Canada states “The challenges facing the agriculture sector are significant and **innovation will be vital** to inform and support the magnitude of the changes required to ensure food production systems will be profitable, sustainable and resilient**such as gene editing.**”

Since a single new plant variety may be regulated by both the CFIA and Health Canada, innovators will continue to be restricted until both organizations have finalized their guidance. All that remains is for CFIA to publish the updated guidance.

It is critical for Canada to ensure that this thoroughly vetted, science-based, updated guidance is published immediately before our agricultural sector loses another year of innovation due to uncertainty about Canada's position on plant breeding innovation in the global marketplace. In RBC's recent report “[The Transformative Seven](#): Technologies that can drive Canada's next green revolution” notes this guidance is key to supporting Canada's ability to compete for a global pool of 10 billion USD in agricultural biotechnology investment.

The broad agricultural sector needs access to innovation to remain competitive while achieving our sustainability targets. The agricultural sector is fully committed to open communication within the value chain and responsibly managing the introduction of seed innovation to preserve our export markets, and farmer and consumer choice.

Canada is ready to unleash the full power of its agricultural sector, however, this cannot be achieved if Canadian scientists and growers are hindered by unclear regulatory guidance. This ongoing delay in publication limits growers' ability to choose the tools that will support their endeavors, in the lab and in the field, to address serious environmental, economic and food security challenges that face Canada and the world today.

Sincerely,

[Please see the logos of the 58 participating organizations below]

CC:

The Honourable Marie-Claude Bibeau, P.C., M.P., Minister of Agriculture and Agri-Food
 The Honourable Chrystia Freeland, P.C., M.P., Deputy Prime Minister and Minister of Finance
 The Honourable Jean-Yves Duclos, P.C., M.P. Minister of Health
 The Honourable François-Philippe Champagne, P.C., M.P., Minister of Innovation, Science and Industry
 The Honourable Mona Fortier, President of the Treasury Board
 The Honourable Mary Ng, P.C., M.P., Minister of International Trade
 The Honourable Gudie Hutchings, P.C., M.P., Minister of Rural Economic Development
 MP Francis Drouin, Parliamentary Secretary to the Minister of Agriculture and Agrifood
 MP Kody Blois, Member of the Standing Committee on Agriculture and Agri-Food
 MP Tim Louis, Member of the Standing Committee on Agriculture and Agri-Food
 MP Leah Taylor Roy, Member of the Standing Committee on Agriculture and Agri-Food
 MP Ryan Turnbull, Member of the Standing Committee on Agriculture and Agri-Food
 MP Rechie Valdez, Member of the Standing Committee on Agriculture and Agri-Food
 Ms. Janice Charette, Clerk of the Privy Council and Secretary to the Cabinet
 Dr. Siddika Mithani, President of the Canadian Food Inspection Agency
 Ms. Katie Telford, Chief of Staff to the Prime Minister
 Mr. Chris Forbes, Deputy Minister of Agriculture and Agri-Food Canada
 Ms. Suzy McDonald, Associate Deputy Minister of Agriculture and Agri-Food Canada
 Ms. Kathleen Donohue, Assistant Deputy Minister International Affairs (AAFC/CFIA)
 Mr. Andrew Goldstein, Associate Assistant Deputy Minister (Science and Technology), AAFC
 Mr. Michael Sabia, Deputy Minister of Finance
 Dr. Stephen Lucas, Deputy Minister of Health
 Ms. Heather Jeffrey, Associate Deputy Minister of Health
 Mr. Simon Kennedy, Deputy Minister of Innovation, Science and Economic Development
 Mr. Rob Stewart, Deputy Minister of International Trade
 Ms. Catherine Blewett, Deputy Minister of Economic Development
 Mr. Rodney Ghali, Assistant Secretary to the Cabinet, Impact and Innovation Unit



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