

January 18, 2001

To: Ms. Bonnie Brown, MP
Chair
Standing Committee on Health
Cc: Members of the Standing Committee on Health
Associate Members of the Standing Committee on Health
Mr. Gary Sokolyk, Clerk for the Standing Committee on Health
Via: E-mail to <brownb@parl.gc.ca>

ENGO Testimonials to the Parliamentary Standing Committee on Health

Regarding the Labeling of Genetically Modified Food

Dear Chair Brown,

In my capacity as National Caucus Coordinator of the Canadian Environmental Network (CEN), I am writing in response to the Health Committee's press release on the subject of the labeling of GM foods. The CEN is a wholly democratized network of over 650 Canadian Environmental Groups, with an issues based caucus structure that provides the best possible access to Canada's environmental community. The committee's current study is of critical interest to the Biotech Caucus which is comprised of over 75 ENGOs (Environmental Non-Government Organizations) actively working on the various aspects of the biotech file. I have [attached](#) a list of Caucus members for your interest.

The Health Committee's study represents one of the first comprehensive reviews of Canadian biotech policy to take place under the auspices of a truly democratic Parliamentary body, and will touch on a concept that is crucial to consumer confidence in Canada's regulatory regime governing biotech: Labeling and the consumers' right to know. The absence of labels prevents the public's ability to make informed decision about the many health, environmental, social and ethical concerns associated with GE food.

That the Committee is providing a forum for the public to discuss this issue with duly elected MPs has resulted in cautious optimism among ENGO stakeholders. The CEN has been asked by several major environmental groups to ensure that the committee is well aware of the breadth and scope of ENGO interest and expertise related to this study. In fact the caucus has a decade long history during which polls sponsored by all sectors consistently indicate environmental groups are on track with respect to public opinion on the biotech file. The purpose of this correspondence is to offer CEN's help in capitalizing on this optimism by providing advice on how best to capture the interests of ENGO stakeholders.

The key to the Committee's success with this study will be deeply rooted in the witness selection process adopted under your chairmanship. It is my understanding that the Committee clerk's office is currently establishing its process for the selection of witnesses. As you make these important considerations, the CEN is formally requesting herewith that the committee adopts a balanced approach that guarantees representatives of public interest are provided with access equal to that granted to industry interests. Anything else will lead to unbalanced results and will further erode the public's faith in the federal government's development of biotech

policy. Consultations geared to unbiased results require the equitable (rather than nominal) participation of all stakeholders.

Specifically, the CEN is offering to help coordinate ENGO testimonials in order to maximize the value of ENGO input and reduce the number of rejections. As an apolitical, non-advocacy network, the CEN is not requesting an opportunity to testify, but holds an important interest in ensuring our member groups do have this opportunity. I am proposing herewith that the Committee, in consultation with stakeholders, identifies its criteria of interest and schedules testimonies by the key sectors accordingly. The CEN Biotech Caucus would then consider and submit a list of individuals and small groups selected to testify on the defined criteria. It is worth noting that the caucus is already retaining regulatory/legislative, medical, ecological and trade advice so as to provide expert opinion on all matters reviewed by the Committee. It is the hope of Caucus Members that the Committee will provide an opportunity for ENGO testimonies on all issues the Committee identifies as part of its study. Members of the caucus have already identified the following criteria as relevant considerations for the Health Committee in preparation for the testimonies:

- Health and safety (e.g.: allergens and toxins)
- Ethics (e.g.: diet restrictions)
- Environmental Issues (e.g.: genetic pollution, horizontal gene transfers, loss of biodiversity)
- Retail costs related to labeling
- Global food security (e.g.: consolidation of control and the effect of GE labeling on competition)
- Consumer attitudes (e.g.: polls covering labeling issues)
- Farming concerns (e.g.: segregation, genetic pollution)
- Patenting/Intellectual Property Rights
- Trade (Biosafety Protocol)
- International trends in labeling legislation
- International trends in labeling by trans-national corporations
- Domestic regulatory process (labeling to protect from regulatory failures, e.g.: Starlink)

It is the considered opinion of the Caucus that this approach as tabled will both facilitate the Committee's work in selecting representatives and maximize the value of ENGO input. If you have any questions regarding the request for equitable access, the caucus proposal for achieving this, or with respect to the CEN more generally, please do not hesitate to contact me.

My coordinates are provided below.

With Kindest Regards,

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CEN National Caucus Coordinator

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Members of the CEN Biotech Caucus

Acadia Environmental Society
Alberni Environmental Coalition
Alberta Environmental Network
Back to the Farm Research Foundation
BC Biotechnology Circle
BC Dietitians And Nutritionists Assoc.
Blue-Green Society
British Columbia Environmental Network
Bruce Peninsula Environment Group
Canadian Animal Rights Network
Canadian Centre For Policy Alternatives
Canadian Environmental Defence Fund - Toronto
Canadian Institute For Environmental Law And Policy
Canadian Labour Congress
Canadian Organic Growers Inc.
Canadian Union of Public Employees - Ottawa
Centre for Longterm Environmental Action in NFLD and Labrador
Citizens Against Neurotoxins
Clearinghouse Group
Coalition For Alternatives To Pesticides
Comité de protection de la santé et de l'environnement de Gaspé
Conservation Council of New Brunswick
Consumers' Union
Council of Canadians
Cultural Survival Canada
Earthcare Connections
Ecologic Institute International
Ecology North
Environmental Coalition of Prince Edward Island
Environmentally Sound Packaging Coalition of Canada
Falls Brook Centre
Farmfolk/Cityfolk Society
Fédération nationale des assoc.s de consommateurs du Québec
First Nations Assoc. of Quebec
Ford Alward Naturalist Assoc.
Friends of the Stikine
Greenpeace Canada
Health Action Network - Yukon Chapter

Hemp New Brunswick
Humane Society of Canada - Ottawa
Humber Environment Action Group
Island Residents Against Toxic Environments (IRATE)
Livelihood Institute
Manitoba Eco-Network
Mental Health Workers For The Environment
Modern Organics Inc.
National Farmers Union
National Farmers' Union - Ontario
New Brunswick Environmental Network
NorNet - Yukon
Nova Scotia Environmental Network
Ocean Resource Conservation Alliance (ORCA)
Ocean Voice International
Ontario Environment Network
Organic Crop Improvement Assoc. - Saskatchewan
Oxfam Projet Acadie
People Against Lepreau II
Prince Edward Island Eco-Net de l'île-du-Prince-Edouard Cooperative Limited
Public Interest Research Group (BC) - Simon Fraser
Réseau Québécois des Groupes Écologistes
Rural Advancement Foundation International (RAFI)
Saskatchewan Eco-Network
Saskatchewan Environmental Society
Shared Farming
Sierra Club of Canada - National Office
Society Promoting Environmental Conservation - Vancouver
STOP
Sustainable Agriculture For The Valley Ecosystem
Tatonka Foundation
Tools For Peace - Vancouver
Toronto Environmental Alliance
Transport 2000 - Québec
Trees International
Windsor And District Labour Council - Environment Committee
Women And Environment Education And Development Foundation