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April 14<sup>th</sup>, 2023

The Honourable Marie-Claude Bibeau, P.C., M.P.  
Minister of Agriculture and Agri-Food  
House of Commons  
Ottawa, Ontario  
K1A 0A6

**RE: Seed Sector commitment to transparency and cooperative engagement on plant breeding innovation.**

Dear Minister Bibeau:

CropLife Canada and Seeds Canada represent over 300 small, medium and large businesses that develop and distribute seed to Canadian farmers in support of all approaches to production, including conventional and organic systems. We appreciate and support the recent work the Canadian Food Inspection Agency (CFIA) has undertaken to clarify its regulatory guidance pertaining to plant breeding innovation in Canada and anxiously await its publication in order to facilitate investment and innovation in Canada's agriculture sector.

In the years ahead, Canada's agriculture sector will face ever-increasing challenges. Extreme weather events, water availability and quality, soil health, and biodiversity will all become even greater areas of focus. At the same time, countries that can produce more, on less land, with fewer resources and environmental impacts are gaining a competitive advantage. The more food that can be grown on each existing field, the less land that needs to be converted to agriculture. Gene editing will help achieve this goal by producing new plant varieties that are better adapted to drought, use nutrients more efficiently, and resist pests and disease.

As recognized in Agriculture and Agri-Food Canada's (AAFC) [Sustainable Agriculture Strategy Discussion Document](#), access to seed innovation, including gene editing, is a key element in responding to these challenges and achieving our collective agriculture sector sustainability goals. CFIA's updated guidance will also help accomplish the objectives set by the [Economic Strategy Table for Agri-Food](#) and the [Treasury Board Regulatory Road Maps](#) to help enable the full potential of Canadian agriculture while maintaining a world-leading level of safety in our food system.

Plant breeding innovations, from conventional breeding to gene editing, all contribute to the development of new and better crop varieties that will assist Canadian farmers as they aim to meet increasing domestic and international food demands while also supporting environmentally and

economically sustainable agricultural practices. Small, large, public and private plant breeders across Canada are working diligently to provide new, safe and improved varieties to farmers every year.

The CFIA's updated guidance on Plants with Novel Traits, which continues Canada's long-standing product-based approach to regulation, is underpinned by the same strong scientific basis that informed Health Canada's updated guidance, published last year. The proposed policies are founded on the fact that all seed in Canada is regulated and subject to the high safety standards set out in the *Seeds Act* and related regulations. Building on this foundation of safety, the CFIA has prepared clarified guidance that recognizes the long history of safety in plant breeding innovation, and will support Canadian farmers' access to beneficial varieties resulting from all forms of plant breeding – from conventionally bred to gene-edited crops.

The proposed guidance is also in line with the scientific consensus of other governments (Australia, Japan, USA, Argentina, Brazil, etc.) and scientific bodies (McGill University's Genome Editing for Food Security and Environmental Sustainability, European Academies' Science Advisory Council, UK Biotechnology and Biological Sciences Research Council, European Commission, etc.) around the world.

### **Delivering world-leading transparency in the seed marketplace for the Canadian agriculture sector**

The seed sector has been fully responsible for, and successful in, the delivery of varietal information to farmers throughout history, including for GMOs over the last 30 years. Information sharing for gene edited products will build on this history of success. CropLife Canada and Seeds Canada have clearly heard how important continued transparency is to the Canadian agriculture sector as gene-edited varieties enter the Canadian marketplace. The seed sector is committed to continuing its existing transparency activities and undertaking new actions to support producers in meeting their market needs including conventional and organic production system requirements. These actions and initiatives include:

- Participating in the new, AAFC chaired, multi-stakeholder "Government-Industry Steering Committee on Plant Breeding Innovation Transparency";
- Delivering a new "[Canadian Variety Transparency Database](#)", which provides an additional resource where seed purchasers can find information about commercially available gene-edited varieties;
- Supporting Government of Canada audits of seed sector commercial transparency activities.

CropLife Canada, Seeds Canada and our respective members also fully support and look forward to continuing to participate in Health Canada's "[Transparency Initiative](#)", which will also help raise awareness about plant breeding innovations such as gene-edited crops. Our organizations will also publicly and actively advocate for both member and non-member organization participation in these transparency activities.

In addition to the above tools, CropLife Canada and Seeds Canada have developed several products to support enhanced transparency, including:

- A "[Best practices for launching of Plant Breeding Innovations in Canada](#)" document outlining communication and value-chain engagement best practices when launching new products, which includes support for existing transparency initiatives;

- Continued support to the “[Notice of Submission Project](#)”, which provides a public summary of new regulatory submissions;
- A [Public information hub](#) on industry best practices for plant breeding in support of public transparency in the breeding process and as a resource for Canadian plant breeders; and
- “[Nature Nurtured](#)” a public engagement initiative for gene editing in plant breeding, supported by 30 agriculture sector organizations, describing the science behind its safety and benefits for Canadians.

**Summary:**

CropLife Canada and Seeds Canada remain committed to ongoing communication with the agriculture sector, including value chain and organic stakeholders, to make sure these world-leading transparency initiatives are functioning well in the coming years.

We also believe that, while the *Transparency Initiative* represents a valuable tool for providing product information to the public, clear communication by government about the scientific basis of its regulatory approach remains critical. For example, Health Canada has provided clear and concise content in its recent “[Scientific opinion on the regulation of gene-edited plant products...](#)” document that describes the safety of plant breeding and in particular gene editing. We encourage the government to continue to communicate this information to Canadians as it moves forward with its proposed policies.

In closing, we would once again like to thank the CFIA for its work toward clarifying its plant breeding innovation guidelines, which prioritize safety for Canadians while aligning with international scientific consensus and regulatory approaches. We request that this guidance be published as soon as possible, as the CFIA’s efforts in this space will also help ensure Canada is not trailing the rest of the world in varietal development. This is crucial to supporting the Canadian agriculture sector’s efforts in protecting the environment, fighting climate change, and contributing to food security, all while reaching for the ambitious agricultural sector growth targets set by the Economic Strategy Tables.

Sincerely,



Pierre Petelle

President and CEO CropLife Canada



Ellen Sparry

President, Seeds Canada

**CropLife Canada** is the trade association representing the manufacturers, developers and distributors of plant science innovations, including pest control products and plant biotechnology, for use in agriculture, urban and public health settings. We are committed to protecting human health and the environment and we believe in driving innovation through continuous research.

**Seeds Canada** is the leading voice of the seed sector in Canada, with members including analysts, breeders, distributors, processors, seed growers and other contributors to the industry, located from coast to coast. Seed is the vital first link in the agriculture value chain, contributing over \$6 billion to the economy, employing more than 63,000 Canadians, and exporting more than \$700 million annually.