



Saskatchewan Organic Directorate

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February 28, 2003

Adrian C Measner
President and Chief Executive Officer
Canadian Wheat Board
423 Main Street
P.O. Box 816, Stn. Main
Winnipeg, Manitoba R3C 2P5

Dear Mr. Measner,

In response to your letter of February 5, 2003, the Saskatchewan Organic Directorate (SOD) does not support any initiative that will compromise the future ability of farmers to grow non-GMO wheat and that will compromise the ability for people to choose food that is not genetically engineered.

In your letter you ask for support for the document which outlines the conditions necessary to pave the way for the introduction of GM¹ wheat. The document, '*Conditions for the Introduction of Genetically Modified Wheat*'², was developed by the Canadian Wheat Board (CWB) along with representatives from the Canadian Seed Growers Association, the Western Canadian Wheat Growers Association, the Canadian Federation of Agriculture, the Western Elevator Association, the Inland Terminal Association, the Canadian National Millers Association, the Canadian Grain Commission, Agriculture and Agri-Food Canada, the Canadian Food Inspection Agency, Monsanto Canada, and a Farmer at Large.

This group known as the 'Canadian Grain Industry Working Group on GM Wheat,' does not represent the full spectrum of views held by farmers, and certainly not consumers of wheat products. Consumers after all, should be the final arbiters of any direction the food producing sector takes in regards to the introduction of GM wheat.

The Saskatchewan Organic Directorate does not support the thrust of this document which we believe is fundamentally flawed in many of its assumptions. As one example, it is faulty logic to say that the ability to meet requirements for non-GM wheat markets would depend in part on the establishment of an "achievable tolerance level for GM wheat" in non-GM wheat shipments. It is implied in this wily language that we must be prepared to accept some level of GM contamination. Presently Saskatchewan farmers are able to achieve a **zero** GM contamination level to supply our market. We in the SOD believe it is our right to continue to have that ability. Customers of organic wheat do not want their wheat contaminated by genetically modified varieties... period. Furthermore, SOD believes that anyone who contaminates the food system at whatever level, with GM crops, and compromises our ability to serve that market; that they be held liable.

The Saskatchewan Organic Directorate believes there are no conditions under which GM wheat can be introduced, that will adequately protect the needs of customers of non-GM wheat. The segregation system alluded to in the document '*Conditions for the Introduction of Genetically Modified Wheat*' would be a morass of very expensive regulations that will be impossible to implement, and ultimately will fail. The result would be widespread GM contamination of the food system, and probably an end to the ability to farm organically. The stark fact of this threat to organic agriculture clearly shows the falsehood of the assumption in this document that there is some kind of cost/benefit analysis that would apply to all farmers.

Your letter asks for confirmation from the Saskatchewan Organic Directorate that it believes the conditions developed in the document '*Condition for the Introduction of GM Wheat*' are "necessary and sufficient to protect the interests of farmers and customers". Furthermore you state that these conditions outlined in the document should be incorporated formally into the regulatory process.

¹ GM or genetically modified means living products derived from transgenic/recombinant DNA technologies

² *Conditions for the Introduction of Genetically Modified Wheat* document on CWB website: www.cwb.ca

In response, the Saskatchewan Organic Directorate states that adding the flawed principles of this document to an already flawed government regulatory system will not address the concerns and interests of organic farmers, nor those of our customers, about the introduction of GM wheat.

Therefore the Saskatchewan Organic Directorate will not endorse the enclosed draft "sign on" letter to the Minister of Agriculture Lyle Vanclief, asking for regulatory change which incorporates the conditions contained in the document '*Conditions for the Introduction of Genetically Modified Wheat*' and more particularly the proposed regulatory market impact test as outlined in the supplementary document '*Market Impact and the Potential Introduction of Genetically Modified Wheat*'.

Although the proposed regulatory market impact test goes part way to addressing legitimate concerns, the suggestion that this additional criteria "...need not alter the current safety approval criteria nor the criteria currently assessed by registration recommending committees." is unacceptable based on our determination of the fundamental flaws within both. The health, feed and environmental assessments for the current regulatory system are currently based on the ridiculous 'substantial equivalence' model that is a mockery of the necessary in-depth independent scientific research needed to determine the harmlessness of plants with novel traits and more specifically to those with GM transgenic traits such as for Roundup Ready wheat. This has been clearly revealed in the document titled '*Elements of Precaution: Recommendations for the Regulation of Food Biotechnology in Canada*'³ by the Royal Society of Canada's Expert Panel on the Future of Food Biotechnology; a panel of 15 eminent scientists from across the country. To the SOD's knowledge, the federal government has to date completely ignored all of the 52 recommendations that this report determined; a report that was commissioned by the federal government's own environment, health and agriculture ministries, all of whom are directly involved in determining regulatory approvals or denials. It is telling that to date in Canada there has never been a rejection of an application for a new transgenic crop variety.

As regards the criteria assessed by registration recommending committees, here too there are obvious inadequacies. For example, the protocols established for the Western Canadian Private Bread Wheat Registration Trial for evaluating Roundup Ready wheat within the Prairie Registration Recommending Committee for Grain (PRRCG) framework, have been called into question by the SOD. There is grave concern that the 30 metre wide isolation perimeter zone surrounding the 'confined' field test plots is inadequate. Whereas initial research determined without doubt that genetic out-crossing by pollen drift was measured at 27 metres, and hence on which the 30 metre distance was established; supplementary information shows the potential for pollen drift to be up to 80 metres⁴. Without substantially increasing the isolation perimeter to allow for the still unknown overall potential out-crossing of wheat, there is already an open possibility that the Roundup Ready gene could be escaping beyond the confines that are currently established and despite the efforts of personnel doing the variety trials research and the on-site inspections that the Canadian Food Inspection Agency is supposed to be doing.

This single issue of potential GM gene transfer by pollen drift alone, to non-GM wheat, highlights to what extent the 'unconfined' release and commercial growing of a GM wheat would quickly contaminate organic and other non-GM wheat crops, regardless of any segregation protocols that could be imposed on farmers.

We know that any change and/or addition to the regulatory system regarding GMOs must specifically address the concerns of organic farmers and our customers about the safety, environmental, agronomic and social implications of this technology.

Saskatchewan organic farmers have launched a class action lawsuit⁵ against Monsanto Canada Inc. and Aventis CropScience Canada Holding Inc. which in part seeks a permanent injunction against the release of Roundup Ready wheat. The Saskatchewan Organic Directorate knows that such a permanent injunction would best reflect the desires and protect the needs of our wheat customers and all Saskatchewan farmers. There is no other acceptable solution.

Furthermore, SOD's position at this time is that any other GM crop introduction be prohibited.

Based on the Precautionary Principle, all countries have the right to impose a moratorium or outright ban on the introduction of GMOs into the environment and food chain. Concerted efforts must be done to ensure that Canada adhere to the Precautionary Principle that it is signatory to, and act immediately to stop further investment, development, testing, unconfined release approvals and commercial release of GE wheat.

We therefore urge the CWB to abandon the flawed work of the 'Grain Industry Working Group on GM Wheat', and put it's support behind organic and other non-GM producers that are working with the long term interests of their customers in mind.

Sincerely,

³ Royal Society of Canada website: <http://www.rsc.ca/> for press release, summary statement, or full report released Feb 5, 2001

⁴ Dec 2002 study: '*Issues Related to Release of GM Wheat: Gene Flow and Selection*' A.L. Brûlé-Babel, R.C. Van Acker, L.F. Friesen, Dept. of Plant Sciences, University of Manitoba

⁵ Saskatchewan Organic Directorate website: www.saskorganic.com, Organic Agriculture Protection Fund (OAPF) section

Marc Loiselle

Communications & Research Director, SOD Organic Agriculture Protection Fund (OAPF) Committee
and member of SOD Research & Development Committee

cc: Minister of Agriculture and Agri-Food Canada, Lyle Vanclief

Minister Responsible for the CWB, Ralph Goodale

Canadian Food Inspection Agency

Canadian Grain Commission

Canadian National Millers Association

Canadian Seed Growers Association

National Farmers Union

Canadian Federation of Agriculture

Western Grain Elevator Association

Inland Terminal Elevator Association

Western Canadian Wheat Growers Association

Monsanto Canada, Inc.

Saskatchewan Association of Rural Municipalities

Agricultural Producers Association of Sask.

Saskatchewan Agriculture and Food & Rural Revitalization