



union farmer newsletter



NFU Priorities for the Next Policy Framework

The NFU wrote to all federal and provincial Agriculture Ministers ahead of their July annual conference where they will set the priorities for the Next Agricultural Policy Framework (NPF), successor to the current Canadian Agricultural Partnership.

The NPF is a key agriculture policy tool. This \$3 billion investment over the five-year program period, along with the Business Risk Management (BRM) programs, allows governments to shape our food and farming system. Each policy framework is informed by recent events and long-term trends. In the next period, from 2023 to 2028, Canada will face multiple crises that affect agriculture where good programs are needed to make a positive difference.

The NFU's letter urges ministers to use the NPF wisely and fairly to address food system weaknesses made visible by the pandemic, reverse biodiversity loss in our agricultural landscapes, drastically reduce the greenhouse gas emissions from agriculture and help farmers adapt to the climate crisis, rebuild rural prosperity by addressing inequality in the allocation of farm revenues and net income, and address the alarming loss of farmers by making farming both possible and attractive for the next generation.

We asked the Ministers to consider which priorities will provide the best outcomes for our food system, our farmers and the Canadian public, and to use indicators and set targets for success that will help agriculture serve the common good.

How we measure success

- ✓ Total number of farmers (up)
- ✓ Average age of farmers (down)
- ✓ Number of farmers who are women, Indigenous, Black and People of Colour (up)
- ✓ Farm debt (down)
- ✓ Realized net farm income (up)
- ✓ GHG emissions from fertilizer production, use and application (down)
- ✓ Soil Organic Carbon (up)
- ✓ Area of wildlife habitat in agricultural landscapes (up)
- ✓ Percentage of beef, pork and poultry killed at provincially licensed facilities (up)
- ✓ Farmgate price of commodities (up)
- ✓ Imports of high value food (down)
- ✓ Sales of domestically produced food (up)

NFU Priorities

Increase infrastructure capacity for local, regional and domestic processing, storage, transportation and distribution

Promote farmer-led innovation and knowledge-sharing.

Uphold supply management, support increasing its farmer numbers and alternative production and on-farm processing opportunities.

Help farmers mitigate and adapt to climate change risks by setting targets for GHG emission reduction, funding new agri-environmental programs, and establishing a Canadian Farm Resilience Administration.

Ensure NPF investment results in more farmers and provides valued service to farmers like publicly funded agronomists and free soil testing.

Build public trust in the food system by regulating for, and promoting ecologically friendly farm practices that a growing proportion of consumers demand.

Ensure BRM Programs are accessible, relevant and equitable useful for farms of different sizes and production systems, and do not promote excessive expansion by the largest farms.

Support land access for new and young farmers and marginalized groups.

No NFP funding of large agribusiness corporations and their lobby groups.

Our letter highlights NFU priorities (see right box) along with examples to show the kinds of program ideas we have in mind. We also warn against policy ideas we oppose, such as replacing some BRM tools with private insurance, and private certification schemes promoted by agribusiness corporations.

AAFC uses export growth as its primary indicator of success. We recommend that the NPF use broader measures of success to reflect the range of problems that need to be addressed.

After the Agriculture Ministers create their vision statement for the NPF in Victoria they will begin to negotiate the details of the 60-40 cost-shared funding programs and the BRM safety net.

To read the NFU letter to Ag Ministers, go to <https://www.nfu.ca/policy/priorities-for-the-next-agricultural-policy-framework/>

NFU comments to Health Canada on regulating gene-edited products

—by Cathy Holtlander, NFU Director of Research and Policy

In May 2021, the NFU submitted comments to Health Canada consultations on its proposed regulatory guidance for foods derived from plants developed with gene-editing and from “retransformants”. Key points are summarized in this article. To read the full submission visit <https://www.nfu.ca/policy/submission-to-health-canada-on-proposed-new-guidance-for-novel-food-regulations/>

Health Canada regulates Plants with Novel Traits (PNTs) under the authority of the Food and Drug Act Regulations. The proposal would not alter the regulation itself, but would change the “regulatory guidance” that tells Health Canada how to interpret it.

Canada’s approach to regulating biotechnology is triggered by novelty (newness), not the technology. Government safety assessment and pre-market notification is required for Plants with Novel Traits (PNTs). Currently Health Canada considers a plant “novel” if it does not have a history of safe use “as an ongoing part of the diet for a number of generations in a large, genetically diverse human population where it has been used in ways and at levels that are similar to those expected or intended in Canada.”

Health Canada recognizes that plants developed using gene-editing technology are both different from previously existing plants and produced by means of genetic engineering, and thus “novel” according to the current Guidance. However, the proposed guidance would deem “non-novel” those foods derived from genetically modified plants that do not have obvious health risks and do not contain foreign DNA. This means most products of gene-editing would avoid safety assessment.

Who decides what is or is not novel?

The proposed guidance relies on plant developers to decide whether their new variety is “novel”. Health Canada proposes a voluntary database where companies can list their non-novel varieties. But if Health Canada believed a listed variety may in fact be novel, it would ask the company to submit more data and could decide the product is “novel” after all, thus subject to assessment before it could be marketed. The prudent company would avoid this risk. In short, Health Canada’s proposed approach to transparency is “don’t ask, don’t tell.”

Retransformants

Health Canada also proposes to relax the guidance for PNTs with previously reviewed traits and/or DNA

sequences. It contends changes to the same variety using new technology, or to a different variety by using the same technology, and even to a different variety using new technology have “identical” results. These plants are called “retransformants”. The proposed guidance would require only two previous instances of an “identical” transformation to remove the new plant from full regulatory review, allowing it to be approved more quickly and with less data.

Proposed guidance unscientific and non-transparent

Full results of gene-editing are not knowable in advance. Scientific knowledge increases through a constant process of investigating, testing, publishing results and designing new experiments. For our regulator to say “we don’t need to know more” before any gene-edited products are put on the market is fundamentally unscientific. Allowing products to be marketed without identifying them as being developed through gene-editing is the opposite of transparency.

The proposed guidance would make it possible for plant developers to market gene-edited varieties without revealing they were products of this technology. Certified organic farmers risk inadvertently using varieties prohibited by organic standards. Another Triffid flax or Starlink corn situation would be virtually inevitable. Canadian farmers know when unapproved crops are rejected by markets they are the ones who pay the costs.

NFU recommendations

The NFU recommends all gene-edited products should be regulated as novel and therefore subject to government safety assessment and pre-market notification, and all retransformants should continue to be assessed as new PNTs. This would ensure Health Canada maintains its ability to regulate foods derived from gene-edited and transgenic plants in the public interest and that farmers have the information they need to make informed choices about the seed they purchase and crops they grow. Mandatory notification would reduce the risk of market rejection due to the presence of gene-edited varieties not acceptable in sensitive markets. Mandatory pre-market notification would also provide Health Canada with information needed for traceability in the event a recall of food derived from gene-edited plants was necessary. ■

Maintaining public trust in food system requires publication regulation

–by Lucy Sharratt

Millions of dollars and countless hours spent building public trust could be quickly undone if Health Canada finalizes its proposed new regulatory guidance for products of gene editing (also called genome editing).

Despite biotechnology industry complaints that regulation is just red tape that hampers competitiveness, companies rely on the legitimacy that government regulation provides. If the proposed changes go ahead, unregulated – and even unreported – gene-edited products would come onto the market without a stamp of approval from Health Canada.

To be clear, what's on the table is not a fast-track or light-touch approval process for gene editing. Health Canada is proposing a non-approval process that would allow product developers themselves to decide whether certain products are safe or if they need a review from Health Canada. These products would bypass Health Canada. Health Canada may not even know that these new products exist.

Canada does not regulate genetic engineering, it regulates “novel foods” and “plants with novel traits”. So far, all the genetically engineered foods eaten in Canada have been regulated as novel. While some gene edited products may still fit the definition of novel, it's likely that many will bypass the system.

Gene editing is powerful. For example, it can open up new areas of the plant's genome not accessible by conventional breeding.

Currently, gene editing relies on first-generation genetic engineering techniques to randomly insert genetic material that will produce a DNA “editing” system containing targeted gene cutters. The inserted material is then later (in most cases) bred out of the organism. Gene editing can efficiently send gene cutters to a target spot in the genome but they also regularly cut DNA at other places. This is just one of the ways that the “editor” is not precise. The entire process can leave behind unintended effects – and unintended genetic material – which need to be looked for and assessed for safety.

Yet Health Canada proposes that if foreign DNA has been removed from the organism, and if there is no other obvious “novel” characteristic, then safety assessment can be left solely to developers.

This is how Health Canada proposes to surrender its regulatory authority, by narrowing its definition of “novel” and thereby exempting a wide range of possible gene-edited plants.



Health Canada would consequently have no access to the science used by companies to determine safety. Health Canada would have no ability to require information from product developers, not even a notice of a gene-edited product heading to market.

To compensate for this gap, Health Canada also proposes a “Voluntary Transparency Initiative,” to “encourage” companies to voluntarily send the government a notice of any self-determined “non-novel” gene-edited product. This is a clear pathway for some unknown, unregulated gene-edited products to get to market.

Although the biotechnology industry is desperate to separate gene editing from GMOs in the public's mind, there's no way around the fact that gene editing is genetic engineering. That's the science.

Even if gene editing can also be referred to as a tool of “plant breeding,” it remains genetic engineering. The biotech lobby's argument that gene editing doesn't warrant mandatory government assessments because it's not very new or risky is not supported by science, and much of the public is unlikely to accept it.

Canadians expect Health Canada to be an independent regulator on behalf of the public. However, these proposals reduce it to the status of bystander while the anticipated wave of foods from gene-edited plants enters our food system.

Asking Canadians to accept the safety assurance of product developers and rely on corporate cooperation is fuel for public mistrust.

The Canadian Biotechnology Action Network argues that it's in best interest of the public and the agriculture industry, for Health Canada to retain regulatory authority over all genetically engineered foods, including those produced by gene editing. All gene-edited products need independent safety assessment. ■

Lucy Sharratt is the coordinator of the Canadian Biotechnology Action Network. For more information on regulating products of gene editing visit www.cban.ca/NoExemptions

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Greyhound's exit paves the way for a national public transit system, says NFU

As of May 13, 2021 Greyhound will no longer run in Canada. The company's decision to take a final exit from our highways highlights the need for a national public transit system. A publicly-owned and properly funded system is necessary to ensure Canadians in every province and territory can exercise their right to freedom of movement, as recognized in the United Nations Universal Declaration of Human Rights.

In most of Canada, rural and remote areas are underserved, with intermittent, expensive and sometimes unsafe transportation options; in many cases no public transportation is available. A safe, reliable, accessible, affordable and climate-friendly national public transportation system can be designed to serve both rural and remote communities and larger centers. Such a system would provide greater autonomy, dignity and freedom to people including vulnerable women, youth, elderly, people with disabilities and health conditions and people living in poverty whose safety may depend on reliable transportation. Moreover, Canada's National Inquiry into Missing and Murdered Indigenous Women and Girls final report calls for "safe and affordable transit and transportation services... sufficient and readily available. [Section 4.8]"

We urge provincial, federal, municipal and Indigenous governments to work together to build a transportation system that serves all of our communities. We can build

upon experience with successful current and former public regional transit systems such as the Saskatchewan Transportation Company and GO Transit, and potentially integrate it with public passenger railway services such as VIA Rail and Northland Railway.

We caution against piecemeal efforts that would allocate profitable routes between major centres to private operators and leave smaller centers dependent on precarious private services that must cut corners to stay in business or rely on subsidies that belt-tightening governments could easily cut. National public transit must be understood as public utility — essential infrastructure that creates societal value as a whole system.

Once pandemic restrictions end, Canadians will be eager to travel across the country to visit family and friends, explore new places and make moves for work, education and new beginnings. As climate change costs rise and with greater awareness of climate justice, people increasingly seek alternatives to air travel. In February 2021 the federal government announced it will invest \$14.9 billion for public transit projects over the next eight years: to create jobs, protect the environment, promote health and provide needed service to rural, remote and Indigenous communities. Public transit should not stop at the city limits. Now is the perfect time to create a national publicly-owned transit system that provides safe, reliable transportation for all Canadians. ■

Should Canada trade away Supply Management?

There is a Private Members Bill before Parliament that would make it illegal for future trade agreements to give away any more access to our supply managed markets. Bill C-216, introduced by Bloc Quebecois MP, Louis Plamondon, would stop negotiators from increasing the amount of supply managed commodities that could enter Canada tariff-free and stop them from lowering tariffs on imports over and above the tariff-free limit.

In June, Parliament's International Trade Committee studied and debated Bill C-216. The NFU submitted a brief to outline our support for the bill. You can read the full submission at <https://www.nfu.ca/policy/nfu-submission-on-bill-c-216-supply-management/>. We also launched a

letter-writing campaign urging Committee members to support it. On June 14, the Committee voted 9-2 in favour of recommending it for 3rd Reading. Bill C-216 is now one more step closer to becoming law.

You can send an instant letter to Hon. Mary Ng, Minister of International Trade, with copies to the Opposition parties' trade critics by going to <https://www.nfu.ca/take-action-save-supply-management-support-bill-c-216/>. Send a message to your own MP too. MPs need to hear from constituents to know that voters do not want our supply management system to be used as a bargaining chip in upcoming trade deal negotiations with the UK and the MERCOSUR countries in South America. ■