



Ecological Farmers
ASSOCIATION OF ONTARIO



National Farmers Union
Union Nationale des Fermiers



Les
Producteurs
de lait
du Québec



L'Union des producteurs agricoles

April 20, 2016

The Honourable Lawrence MacAulay
Minister of Agriculture and Agri-Food

RE: Request for urgent action to stop further release of GM alfalfa seeds

Dear Minister MacAulay,

We are writing to ask you to take immediate action to stop any further introduction of genetically modified (GM, genetically engineered) alfalfa in Canada and to establish testing of imports of alfalfa seed grown in the US, in order to protect the livelihoods of Canadian farmers and the future of many important sectors in our farm economy.

Any commercial release of GM alfalfa seeds will result in unavoidable contamination, with a range of devastating impacts on a wide range of farmers, commodity sectors and food production businesses in Canada, both conventional and organic. Farmers across Canada are already at risk from contaminated US alfalfa seed imports.

The economic importance of alfalfa to agricultural and food sectors across Canada demands your particular attention and immediate action. Alfalfa is the first perennial plant to be genetically modified and this fact, along with other biological realities (such as insect pollination, seed size and the existence of feral/uncultivated alfalfa populations), means that contamination of non-GM alfalfa is certain. Alfalfa is also unique because of its economic value to so many different farmers and commodity sectors across the country – both domestic and export, harvested as both hay and as seed – as well as its role in the production of a wide variety of foods for Canadians, and its role in sustainable agricultural practices.

Firstly, we ask you to take immediate action to stop the further commercial release of GM alfalfa seeds by removing variety registration for all GM alfalfa varieties, until a full economic impact assessment is conducted.

The company Forage Genetics International (FGI) announced in late March 2016 that it intended to sell GM alfalfa seeds for spring planting, for the first time in Canada, and an April 1st media story confirmed that the seeds had already been sold. FGI is marketing alfalfa with (Monsanto's) stacked GM traits for low-lignin and glyphosate resistance. The company said it would release seeds in Eastern Canada (Ontario, Quebec, New Brunswick, Nova Scotia, Prince Edward Island and Newfoundland) and that "expected seed quantities will be limited in 2016 but are estimated to be sufficient to plant a small, targeted launch of less than 5,000 acres of hay."¹ Even this limited release will lead to a measure of contamination and begin a spiral of uncertainty for Eastern and Western farmers and their customers.

The risk of contamination from GM alfalfa is widely acknowledgedⁱⁱ and is detailed in the report *The Inevitability of Contamination from GM Alfalfa Release in Ontario* by the Canadian Biotechnology Action Network.ⁱⁱⁱ In an attempt to address contamination concerns, the Canadian Seed Trade Association (CSTA) developed a coexistence plan in Eastern Canada (2013). However, **we have no confidence in this plan**. The plan is not workable and has been critiqued in the report *The Canadian Seed Trade Association's so-called "Coexistence Plan" is a gateway to GM alfalfa contamination* by the National Farmers Union and the Canadian Biotechnology Action Network.^{iv} The plan is now also out of date and rendered invalid by the addition of GM low-lignin as a stacked trait: this trait is designed to allow – and promote – the harvesting of alfalfa hay at a flower bloom stage far later than the maximum 10% recommended in the plan's current (and inadequate) "Best Management Practices."

A release of GM alfalfa in the East also places Western alfalfa seed production for export at significant risk of contamination, a risk recognized by FGI: "The [coexistence] plan for Western Canada is in response to requests for additional stewardship actions that address the possibility of product moving from Ontario/Quebec to Western Canada."^v However, this plan is not yet finalized.

Importantly, no authority is actually responsible for the implementation of the coexistence plans and no one stands behind them. The CSTA itself explicitly denies any liability for loss or harm that may result from relying on the coexistence plans. The plans rely on farmers, including those who want to avoid contamination, to voluntarily implement unrealistic and/or ineffective "Best Management Practices" at their own cost.

Secondly, we ask you to urgently establish a protocol for testing all imports of alfalfa seed grown in the US.

A December 2015 US Department of Agriculture study found that 27% of areas with feral alfalfa surveyed in three states were contaminated with GM alfalfa. The study did not identify causes – both seed spillage and cross-pollination are possible – but confirms that genetically modified alfalfa has dispersed into the environment.^{vi} GM alfalfa was planted in the US 2005-2007 and 2011-present (the survey was conducted in 2011).

A February 29, 2016 article in *Alberta Farm Express* reported that a batch of foundation seed contaminated with the GM Roundup Ready trait was sent to a forage seed grower in southern Alberta four years ago.^{vii}

The consequences from the release of GM alfalfa seeds are extremely serious. We ask you to take immediate action to support and protect the future of family farming, organic food production, sustainable agriculture and alfalfa-related exports in Canada.

Thank you for your attention to this urgent matter. We look forward to your prompt response.

*Atlantic Canada
Organic Regional Network*

Canada Organic Trade Association

*Certified Organic Associations
of British Columbia*

*Ecological Farmers Association
of Ontario*

Forage Seed Canada

*Growers of Organic Food
Yukon*

Manitoba Organic Alliance

National Farmers Union

Organic Alberta

Organic Council of Ontario

Organic Federation of Canada

*Peace Region
Forage Seed Association*

*Les Producteurs
de lait du Québec*

SaskOrganics

*L'Union des producteurs
agricoles*

Please forward your response to :

Jan Slomp, President, National Farmers Union,
306 652 9465
nfu@nfu.ca

Cc: Jean-Claude Poissant, Parliamentary Secretary to the Minister of Agriculture and Agri-Food; Chris Warkentin, Conservative Party Agriculture Critic; Ruth Ellen Brosseau, NDP Agriculture Critic; Simon Marcil, Bloc Québécois Agriculture Critic; Elizabeth May, Green Party Leader

- I. Forage Genetics International, Stakeholder Update, March 2016, <http://www.monsanto.ca/newsviews/Pages/SU-2016-03-29.aspx>
- II. See for example, Challenges and approaches in mitigating risks associated with the adventitious presence of GM products in organic crop production in Canada, EcoRessources Consultants, for the Organic Value Chain Roundtable & Agri-Food Canada. June 2012.
- III. Canadian Biotechnology Action Network, The Inevitability of Contamination from GM Alfalfa Release in Ontario. April 2013. <http://www.cban.ca/alfalfaONreport>
- IV. National Farmers Union and Canadian Biotechnology Action Network, The Canadian Seed Trade Association's so-called "Coexistence Plan" is a gateway to GM alfalfa contamination. July 2013. <http://cban.ca/content/view/full/1751>
- V. Where's the GM alfalfa? Julie McNabb, Germination. September 24, 2015. <http://germination.ca/wheres-the-gm-alfalfa/>
- VI. Greene SL, Kesoju SR, Martin RC, Kramer M (2015) Occurrence of Transgenic Feral Alfalfa (*Medicago sativa subsp. sativa* L.) in Alfalfa Seed Production Areas in the United States. PLoS ONE 10(12): e0143296. doi:10.1371/journal.pone.0143296.
- VII. Alexis Keinlen and Glenn Cheater, GM Alfalfa May Already be in Alberta, Alberta Farm Express. February 29, 2016. <http://www.albertafarmexpress.ca/2016/02/29/exclusive-gm-alfalfa-may-already-be-in-alberta/>