



June 16, 2017



The Honourable Lawrence MacAulay
Minister of Agriculture and Agri-Food



RE: Request for urgent action to prevent economic harm due to GM alfalfa

Dear Minister MacAulay,



Ecological Farmers
ASSOCIATION OF ONTARIO

On April 20th 2016, our organizations jointly called upon the federal government to cancel variety registration for all genetically modified (GM or genetically engineered) alfalfa until a full economic impact assessment is conducted, and to establish a protocol for testing all imports of alfalfa seed grown in the US. One year later, nothing has been done and urgent action is still required. It is not too late to prevent cross contamination and protect the livelihoods of Canadian farmers and the success of many important sectors of our farm economy.

Through local distributors, Forage Genetics International (FGI) is marketing alfalfa stacked with GM traits for low-lignin and glyphosate tolerance. In 2016, the company released a limited amount of seed in Eastern Canada (Ontario, Quebec, New Brunswick, Nova Scotia, Prince Edward Island and Newfoundland). FGI is releasing it on a wider scale in 2017, increasing farmers' uncertainty and concerns.

Alfalfa has great economic value, as it is used by farmers across the country producing a number of commodities with different production systems. Whether for domestic use or export, alfalfa is harvested both as hay and as seed. It is used to produce of a wide variety of foods for Canadians, and is a cornerstone crop in sustainable agricultural practices.

Continued commercial planting of GM alfalfa seeds will inevitably contaminate both seed stocks and stands of feral alfalfa (volunteer alfalfa growing outside of cultivated alfalfa fields). If not stopped, this contamination will have devastating impacts on all forage seed growers and the whole Canadian alfalfa industry, including farmers, commodity sectors and food production businesses in Canada, both conventional and organic. The farming industry is already at risk from US alfalfa seed imports. The release this spring on a larger scale in Eastern Canada exacerbates that risk.

Alfalfa is the first perennial crop to be genetically modified and approved for sale in Canada, and this fact, along with other biological realities (such as insect pollination, seed size and the existence of feral/uncultivated alfalfa populations), means that cross contamination of non-GM alfalfa is certain. The risk of contamination from GM alfalfa is widely acknowledged. For detailed documentation, please see *The Inevitability of Contamination from GM Alfalfa Release in Ontario* (attached), a report by the Canadian Biotechnology Action Network.

Farmers in both Eastern and Western Canada are exposed to contamination risk. While FGI has stated it intends to sell GM alfalfa only in the East, release there also places Western alfalfa seed and all other forage seed production for export at significant risk of market loss due to contamination.

1: GM alfalfa varieties must be deregistered

We restate our demand that the government deregister all GM alfalfa varieties this year, removing them from the market. This is the best way to prevent contamination of non-GM alfalfa.



Les
Producteurs
de lait
du Québec



2: Location of GM alfalfa plantings must be made public

Pending the deregistration of GM alfalfa, a transparent and public registry of all GM alfalfa sales and the locations of GM alfalfa planting is required to ensure farmers know whether they need to take measures to protect their crops, fields and products from potential contamination of non-GM alfalfa.

In the face of strong opposition to GM alfalfa by Canadian farmers, the Canadian Seed Trade Association (CSTA) attempted to allay concerns by developing “coexistence plans” for Eastern Canada in 2013 and Western Canada in 2016. GM alfalfa is now being marketed in direct contravention of the CSTA’s “coexistence plan.” Since the Eastern plan was published, FGI has added the GM low-lignin trait to its glyphosate-tolerant GM varieties. This trait permits – and promotes – harvesting hay up to the 50% flower bloom stage, much later than the coexistence plan’s recommended maximum 10% for reducing risk of GM contamination by pollination. GM alfalfa sellers are now telling farmers that three cuts are optimum instead of the CSTA’s coexistence guidelines recommended four. Before the season began, the coexistence guidelines were already being undermined by the very seed dealers charged with communicating the coexistence Best Management Practices (BMPs) to their customers. This ought to be a clear indication that the guidelines are both meaningless and inadequate.

The CSTA itself explicitly denies any liability for loss or harm that may result from relying on their coexistence plans. The plans rely on farmers, including those who want to avoid contamination, to voluntarily implement unrealistic and/or ineffective BMPs at their own expense. The plans have no mechanism for assigning liability, and no one is responsible for enforcing any of the recommendations.

3: Testing imports of seed grown in the US is required

We also repeat our request that Canada establish a protocol for testing all imports of alfalfa seed grown in the US. A 2015 US Department of Agriculture study found feral alfalfa contaminated with GM alfalfa in 27% of areas surveyed in three states in 2011. The study confirms that genetically modified alfalfa has dispersed into the environment. GM alfalfa was first planted in the US in 2005-2007 and more widely since 2011.

On February 29, 2016, *Alberta Farm Express* reported that a southern Alberta farmer discovered glyphosate-tolerant alfalfa growing in his field after he planted foundation seed imported from the US. (Please see the addendum: GM alfalfa contamination in the US and Canada).

In conclusion, we ask you to take immediate action to support and protect the future of our alfalfa industry, forage seed production, organic food production, sustainable agriculture and alfalfa-related exports in Canada by deregistering all GM alfalfa varieties, publishing the location and amounts of GM alfalfa seed sales and plantings to date, and testing all alfalfa seed imported from the US.

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

*Atlantic Canadian Organic
Regional Network
Canada Organic Trade Association
Certified Organic Associations
of British Columbia
Ecological Farmers Association of Ontario*

*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; Ruth Ellen Brosseau, New Democratic Party Critic for Agriculture and Agri-Food; Chris Warkentin, Conservative Party Critic for Agriculture and Agri-Food; Simon Marcil, Bloc Québécois Critic for Agriculture and Agri-Food; Elizabeth May, Green Party Leader.

Copies sent to all MPs.

GM alfalfa contamination in the US and Canada

Reported contamination incidents

There have been two documented cases of contamination from genetically modified (GM) alfalfa in the US and one reported incident in Canada.

GM ALFALFA CONTAMINATION IN WASHINGTON STATE (2013)

In August 2013, a farmer in Washington state reported that his non-GM alfalfa shipments were rejected for export when they were tested by the export company buyer and found to be contaminated with Monsanto's GM herbicide-tolerant Roundup Ready trait.¹ The farmer complained to state agriculture officials, who then tested samples and confirmed the contamination. The US Department of Agriculture's investigation into the event concluded that the contamination incident was a "commercial issue" and did not call for any government action.² The statement from the USDA said, "The agriculture industry has approaches to minimize their occurrence and manage them when they occur."³ The alfalfa seed used to grow this crop was purchased in 2010, before GM alfalfa was approved in the US.⁴

CHINA REJECTS GM ALFALFA FROM THE US (2014)

In the summer of 2014, China began testing US alfalfa imports after it found GM traits in US alfalfa shipments from three companies.⁵ Those companies were blacklisted from exporting to China, and several other shipments of alfalfa from the US were rejected when they were found to have GM Roundup Ready traits in them.⁶ Overall US exports of alfalfa to China declined sharply. Between August and October 2014, shipments of alfalfa to China declined by 22% by weight from the year before.⁷

FOUNDATION ALFALFA SEED CONTAMINATION REPORTED IN ALBERTA

In 2016, a farmer in Alberta anonymously reported to the *Alberta Farm Express* that foundation seed that he ordered four years earlier was contaminated with GM Roundup Ready alfalfa seed.⁸ The farmer found the contamination when he sprayed his stand with Roundup to take it out. Approximately 100 plants survived being sprayed. The farmer called Forage Genetics International (FGI), the company that distributes GM alfalfa in Canada, to inspect his farm. The company did not make the investigation public. Four years later, when asked for comment by the media, FGI said the contaminated seed would have come from the US due to a lack of quality control by seed companies: "If someone buys seed from the U.S., they can end up with Roundup alfalfa...Companies can be lousy companies, and not have formal, rigid quality controls and test their seed."⁹

USDA STUDY FINDS GM ALFALFA HAS SPREAD IN THE WILD

In 2016, a team of US Department of Agriculture (USDA) scientists published a study that confirmed GM alfalfa has dispersed widely into the environment in the US. The scientists studied alfalfa-seed producing areas in 2010-2011, and found that 404 sites had feral alfalfa.¹⁰ 20.5% of the feral populations contained the GM trait. The scientists believed that most of the GM alfalfa came from spilled GM seed, and found that "transgenic plants could spread transgenes to neighboring feral plants, and potentially to neighboring non-GE fields."¹¹

The scientists also found evidence that the GM trait may have been spread by bees, since the GM feral alfalfa stands were within foraging distances for honeybees, leafcutter bees and alkali bees.¹² The amount of GM alfalfa being planted in the US has significantly increased since 2011, when this data was collected.

- 1 Gilliam, Carey. 2013. Washington state testing alfalfa for GMO contamination. Reuters. September 11. <http://www.reuters.com/article/us-usa-alfalfa-gmo-idUSBRE98A16H20130911>
- 2 Gilliam, Carey. 2013. USDA will not take action in case of GMO alfalfa contamination. Reuters. September 17. <http://www.reuters.com/article/usa-alfalfa-gmo-idUSL2N0HD1SQ20130917>
- 3 Ibid.
- 4 Center for Food Safety. 2013. Petition for Agency Action, Rulemaking, Investigation, and Otherwise Collateral Relief on Recent Genetically Engineered Alfalfa Contamination. http://www.centerforfoodsafety.org/files/cfs_petition_usda_alfalfa-contamination_9_26_2013_final_57348.pdf
- 5 Newman, Jesse. 2014. China's hard line on biotech burns US hay. Wall Street Journal. December 15. <https://www.wsj.com/articles/u-s-hay-exports-to-china-shrivel-up-1418598477>
- 6 MacArthur, Mary. 2014. Roundup Ready in alfalfa exports 'catastrophic'. The Western Producer. November 28. <http://www.producer.com/2014/11/roundup-ready-in-alfalfa-exports-catastrophic/>
- 7 Newman, Jesse. 2014. China's hard line on biotech burns US hay. Wall Street Journal. December 15. <https://www.wsj.com/articles/u-s-hay-exports-to-china-shrivel-up-1418598477>
- 8 Kienlen, Alexis and Glenn Cheater. 2016. GM alfalfa may already be in Alberta. Alberta Farm Express. February 29. <https://www.albertafarmexpress.ca/2016/02/29/exclusive-gm-alfalfa-may-already-be-in-alberta/?module=carousel&pgtype=homepage&i=1?module=carousel&pgtype=homepage&i=1>
- 9 Ibid.
- 10 Greene, Steffanie, Sandya R Kesoju, Ruth C Martin and Matthew Kramer. 2015. Occurrence of transgenic feral alfalfa (*Medicago sativa* subsp. *sativa* L.) in alfalfa seed production area in the United States. PLOS One. <http://journals.plos.org/plosone/article?id=10.1371/journal.pone.0143296>
- 11 Ibid.
- 12 Ibid.

ADDENDUM

Subsequent endorsements to the 2016

“Request for urgent action to stop further release of GM alfalfa seeds”

On April 20th, 2016, the following 15 farm groups sent the letter “Request for urgent action to stop further release of GM alfalfa seeds” to The Honourable Lawrence MacAulay, Minister of Agriculture and Agri-Food. The letter is available at <http://www.nfuontario.ca/wpr/wp-content/uploads/2016/04/Joint-Letter-to-Minister-MacAulay-on-GM-alfalfa-April-20-2016.pdf>

Atlantic Canadian 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

The following organizations and farm businesses have since endorsed this letter and its demands:

1113461 Alberta Inc.

3104-1189 Quebec Inc. Les Fermes Erskine Farms

9025-4897 Québec Inc

À Deux Pas Du Potager

Action pour un environnement sain

Adjala Environmental Studies

Ail du Rang St-Olivier

Alberta Organic Producers Association

Alimentex

AmiEs de la Terre de Brandon

Association des producteurs de fraises et framboises du Québec

Au Champ d'ail Vert Inc.

Avofarm

Beitz View Acres

Better Health and Nutrition Coach Inc.

BijkerkVille Tree Farm

Campama Bee Producteurs

Canadian Anti Corruption League

Canadian Organic Growers

Chaibaba Tea House

Circle S Farms Ltd

Clearwater Hosteins and Jerseys

Clef des Champs

Coeur de légumes

Coop les Jardins de la Résistance

Coopérative pour l'agriculture de proximité écologique (CAPÉ)

Culture B

EAT Food for Life Canada

Ecocert Canada

Ecology Action Centre

EcoReality Sustainable Land Use and Education Cooperative

Erablière du chevreuil

Evelyn's crackers

Everdale Environmental Learning Centre

Fair Fields CSA

Fédération d'Agriculture Biologique du Québec

Fédération de l'UPA d'Abitibi-Témiscamingue

Fédération de l'UPA de la Montérégie

Fédération de l'UPA du Sagueny-Lac-St-Jean

Fédération de l'UPA-Estrie

Fédération de la relève agricole du Québec

Fédération des apiculteurs du Québec

Fédération des éleveurs de grands gibiers du Québec

Fédération UPA Lanaudière

Ferme des Taures aux Jardins

Ferme Acabel

Ferme Algan 737 Inc

Ferme Ancestrale 1793 Inc.

Ferme Anrilyn

Ferme Au Pied-de-Loup

Ferme Aube aux champs

Ferme Auny

Continued...

Ferme aux Petits Pignons
Ferme Aventure
Ferme Berlunier inc.
Ferme Bibeau inc.
ferme Bio-De-Ly
Ferme Cadet Roussel
Ferme Clairbel inc
Ferme David Bélanger
Ferme Demca Inc.
Ferme Denijos Inc.
Ferme des Arpents Roses
Ferme des Collines Vertes
Ferme des Libellules
Ferme Deslie Inc.
Ferme Direnat snc
Ferme du Vert Mouton
Ferme Fatran Inc.
Ferme Fibel et Fils Inc.
Ferme Flamande inc.
Ferme Frédéric Chollet
Ferme Galvoie (9189-6746 Québec Inc)
Ferme Guy et Nicole Enr
Ferme H.Léonard
Ferme Hugo Robitaille et Marianne Côté
Ferme Janibert Inc
Ferme Jour de Neige
Ferme Karine et François Inc
Ferme L. & S. Lemieux Inc.
Ferme la Bourrasque
Ferme La Rosée
ferme Lastholme
Ferme Lavoie Inc
Ferme Lécy Inc
Ferme Liziere Inc
Ferme Luron Enr.
Ferme M. Frappier & Fils Inc.
Ferme Malenfant-Chénard inc
ferme Manibel inc.
Ferme Marichel
Ferme Optimus senc
Ferme Patrivan senc
Ferme Pellerat

Ferme Picardier
Ferme Pierre Labonté
Ferme Pocatoise Itée
Ferme Pré Rieur Inc.
Ferme Rivière Ferrée Inc.
Ferme Romuald
Ferme Roumer Inc.
Ferme Rustik Inc
ferme Stéphane Ouellet
Ferme Sylfield Inc
ferme taillon et fils
Ferme Ticouapé (9217-4127 Québec Inc.)
Ferme Tournevent
Ferme Valdolain inc.
Ferme ValRuest
Ferme Vicclair
Ferme Yari inc
Fromagerie l'Ancêtre
Gelro Farms Inc
Grazing Days
Groupe Multiconseil Agricole Saguenay-Lac-St-Jean
Growing Local Productions
Hawk Feather Farm
Hawthorn Farm Organic Seeds
Hawthorn Hill Farm, Grafton
Interlake Forage Seeds
Jardin des Gourmands
Jardins d'Arlington
Jardins d'En Haut
Jardins de l'Arpentuse
Jardins du Coeur et des Racines
Kamloops Concerned Citizen
Keewatin Farm
Kids Right To Know
Kootenay Sprouts
L'Idéal snc
La Ferme aux Légumes d'Hiverts
La Ferme Blais
La Ferme des Pensées Sauvages
La Fibre Végétale
La JoualVert

La Shop à Légumes
La Terre des Anciens inc.
La Voie des Plantes
Le Champ de la Voisine
Le Noyau
Le Verger Labonté
LeBeau Excel Ltd.
Lecon Holsteins
Les aliments Naturels l'Eau Vive inc
Les AmiEs de la Terre de Québec
Les Champs Marins
Les Ferme Belvache
Les Jardins d el'Écoumène
Les Jardins d'Inverness
Les jardins de la Grelinette
Les Jardins de Sophie
Les Jardins Diversibio
Les Jardins du Lac
Les Jardins Élémentaires
Les Jardins Glenelm
Les producteurs en serre du Québec
Limoges Forage & Grasses Ltd.
Living Harmony Farm
Magik Potion Holistic Practice
Maida Vale Farm - James Robbins and Nettie Wiebe
Mb foresterie
MCS-Canada
Merci la Terre
Miels des 3 Rivières
Milky Whey Farms
Mill Street Brewery
Moulin A.Coutu inc
National Farmers Union, Waterloo Wellington
Naturally Organic Farm
Négondos, Vignoble Biologique
NFU Local 316 (Kingston, Frontenac and Lennox-Addington)
ODA Haute-Gatineau
Ontario Dehy Inc.
Ontario Natural Food Co-op
Continued...

Organic Garage
Organic Producers Association of Manitoba
Pantagrue! Traiteur
Plainfield Heritage Farm
Pranasens Inc.
Queen Beet Farm
RDR grains et semences
Récolte Buissonnièr
RedWillow Organics Inc
Richard Graham
Roots Up! Vegetable Farm
Rucher Apis
Shelburne County Women's Fishnet
Silver Rapids Farm
Slow Food Toronto
Snugg the Bug
Sonia Gosselin, Club lait bio
SpindleTree Gardens Inc.
Spray Creek Ranch
Stride Ahead Equestriun
Studio le Temps pour Soi
Sunflo Dairy
Sunnyside Market Ltd.
Sunpar Properties
Sweet Soil Organic Farm
Symbiofruits
Syndicat de l'UPA de Vaudreuil-Soulanges
Syndicat de l'UPA Rouville
Syndicat des producteurs acéricoles de la Mauricie
Syndicat des producteurs de grains biologiques du Québec
Syndicat des producteurs de lait biologique du Québec
Syndicat des producteurs de lapins du Québec
Syndicat local Haute Mauricie
Syndicat local UPA Vallée-du-Richelieu
Syndicat UPA de la haute-Yamaska
Table Filière biologique du Québec
Terre fruitière, ferme biologique

The Clothes Encounter
The Homestead certified organic farm
The Shared Locus Foundation
Thousand Hills Ranch
Timmins Ecological Beekeeping Association
Toronto Non-GMO Coalition
Tourne-Sol Cooperative Farm
Travailleur autonome
Union Paysanne
UPA Capitale-Nationale-Côte-Nord
UPA Des Chenaux
UPA Outaouais-Laurentides
Verger bio d'Oka
Vertdemain
Vigilance OGM
Watters Farms
Weir Bros. Farm
Whitsend Market Garden
Whole Village Co-operative Farm
Woodshutt organics
Wooldrift Farm
YAL Natrural Farm
York Region Environmental Alliance