



Agriculture and Agri-Food Canada
Market Access Secretariat
1341 Baseline Road Tower 5
Ottawa, Ontario K1A 0C5
Canada

August 6th, 2021

Submitted Via Email

To Whom It May Concern:

RE: Republic of Korea's World Trade Organization (WTO) notification on its *partial Draft Amendment of the Transboundary Movement, etc. of Living Modified Organisms Act*

On behalf of the Canadian Produce Marketing Association (CPMA), it is my pleasure to provide comments to the Market Access Secretariat (MAS) to inform Canada's position regarding the Republic of Korea's notification to the World Trade Organization (WTO) on its *partial Draft Amendment of the Transboundary Movement, etc. of Living Modified Organisms Act*.

About CPMA

Founded in 1925, the Canadian Produce Marketing Association (CPMA) represents domestic and international members across the entire fresh fruit and vegetable supply chain, from the farm gate to the dinner plate. Our comments are reflective of a wide array of members who are responsible for 90% of fresh fruit and vegetable sales in Canada, working daily to provide Canadians with the fresh and healthy fruit and vegetable options they need and demand.

Comments

Particularly as we mark the UN International Year of Fruits and Vegetables in 2021 and as countries work to achieve the UN Sustainable Development Goals, we would like to take this opportunity to highlight the important benefits that modern biotechnology techniques, such as plant breeding and gene editing, offer for the fresh fruit and vegetable sector. These benefits include increased crop productivity through herbicide tolerance, pest and disease resistance, prolonged shelf-life, the development of food without allergens, improved nutrition, reduced land usage, better taste, resilience in harsh environments, as well as the ability to reduce post-harvest food waste. These innovative technologies can help the fresh fruit and vegetable sector face significant global challenges around food security, adapt to a changing climate and pest pressures, while continuing to grow safe, high quality, affordable food for Canadians and consumers around the world.

Promoting international trade and investment with export markets is a priority for the Canadian produce sector. Regulatory alignment with our trading partners is vital to supporting economic competitiveness and increasing market access for Canadian agricultural operations within the globally integrated fresh fruit and vegetable sector. Consistent, evidence and risk-based regulations related to plant breeding and gene editing will serve to boost trade for producers while also allowing a variety of healthy, safe fresh produce choices to continue to be available to consumers around the world.

CPMA is supportive of the Republic of Korea's proposed creation of a preliminary review system to alleviate the administrative burden in seeking approval for low-risk living modified organisms and better align with international regulatory trends regarding new biotechnologies, such as gene-editing. We would also note that our largest trading partner, the United States, has moved to exempt agricultural innovations that are the products of plant genome editing from being regulated. CPMA urges the Government of Canada to consider following suit and to adopt this approach so that these products can enter the Canadian market at the same time as they become available in the U.S., maintaining the Canadian industry's competitiveness.

Thank you again for the opportunity to contribute to Canada's position regarding the Republic of Korea's notification to the World Trade Organization (WTO) on its *partial Draft Amendment of the Transboundary Movement, etc. of Living Modified Organisms Act*.

We appreciate you taking the time to review our comments.

Sincerely,

A handwritten signature in black ink, consisting of a stylized 'R' followed by a horizontal line.

Ron Lemaire
President