



Canola Industry Policy on Innovation in Seed of Canola and other Brassica spp. and Market Access for Canola

The canola industry was founded on innovation and the key to our continuing growth and development will be through our vision to be innovative, resilient and determined to create superior value and a healthier world. Our success will be contingent upon our ability to maintain and expand our domestic and export markets while at the same time commercializing new and innovative products developed from Brassica species crops.

The Canola Council of Canada (CCC) supports a science based regulatory system. This policy covers canola that has been approved for food, feed and environment in Canada and therefore health and safety issues are not of concern.

This policy covers innovation in seed developed through both traditional and modern biotechnology methods. Recognizing that in many countries, crops developed using biotechnology are regulated, the canola industry must pay particular attention to the regulatory requirements in our export markets. Currently, countries with an operational regulatory system have a zero tolerance for transgenic events not approved in their countries. Recognizing that zero tolerance is not feasible for commercialized transgenic canola, the canola industry supports and is actively involved in the development of a global approach to regulation of transgenic crops that would allow innovation and be non-trade restricting. These include the development of systems for coordinated approvals and the establishment of a global safety assessment policy through Codex for the low level presence of transgenic plant material.

The canola industry encourages the development of *Brassica napus*, *B. rapa* and/or *B. juncea* for food, feed, non-food and non-feed uses. Products that would meet the canola definition and could be used for both food/feed and non-food/non-feed uses would offer maximum flexibility in optimizing market value. For example, high yield and high oil content varieties or high stability profiles would be optimal for both food and non-food uses like bio-diesel.

For the research phase in the development of transgenic canola in Canada, the canola industry supports the current guidance outlined in the Canadian Food Inspection Agency's Directive 2000-07 for confined field trials.

The canola industry will retain a policy of non-segregation for canola with the "traditional" oil profile. Segregation would be required for functional or specialty canola outside of the traditional canola profile. If appropriate, developers should consider using contract registration, appropriate identity preserved protocols, quality assurance systems, segregation systems and/or appropriate approvals in export markets. Whereas closed loop segregation or geographic isolation can be effective for non-transgenic canola, under the current situation of zero tolerance for any transgenic event not approved in canola export countries, closed loop segregation does not provide adequate confinement of transgenic canola to meet export market requirements. Therefore, segregation for transgenic functional/specialty canola would only be effective if regulatory approvals are obtained in all export markets identified by this policy.

In order to ensure that market issues are evaluated and that new technology can be introduced effectively and economically, the CCC encourages developers to use the Market Analysis Principles (MAP) developed by CropLife Canada and the Product Launch Stewardship Policy from Biotech Canada.

The Council encourages early dialogue, while respecting the need for confidentiality of innovative new research and intellectual property, to address potential risks and appropriate regulatory approvals to protect canola food uses and markets. A guidance document on the issues that should be addressed is available from the CCC.

The Canola Council of Canada requires the following:

Species	Non-transgenic	Transgenic
<i>B. napus</i> <i>B. rapa</i> <i>B. juncea</i>	Any company wishing variety registration in Canada to produce products with profiles or distribute seed outside the “traditional” canola profile (food, feed, non-food and/or non-feed) must: <ul style="list-style-type: none"> • meet canola industry criteria for variety recommendation - through the Western Canola/Rapeseed Recommending Committee for canola for western Canada, or alternate requirements for registration for the rest of Canada; • develop a commercialization plan using Market Analysis Principles/Biotech Canada Product Launch Stewardship Policy; and • use appropriate risk management tools to protect current uses and markets. 	Any company wishing variety registration in Canada to produce or distribute transgenic canola seed, must, before seeking registration in Canada: <ul style="list-style-type: none"> • meet the canola industry criteria for variety recommendation - through the Western Canola/Rapeseed Recommending Committee for canola for western Canada, or alternate requirements for registration for the rest of Canada; • develop a commercialization plan using Market Analysis Principles/Biotech Canada Product Launch Stewardship Policy; and • obtain the appropriate regulatory approvals in Canada, U.S.A., Mexico, Japan, China, South Korea and the European Union.
Other <i>Brassica</i> spp.	Any company wishing to introduce new varieties should develop a commercialization plan using the Market Analysis Principles/Biotech Canada Product Launch Stewardship Policy to ensure successful commercialization while protecting current uses in <i>B. napus</i> , <i>B. rapa</i> and <i>B. juncea</i> .	

A meeting will be held annually to discuss modification of the policy to adapt to any regulatory changes, new innovation in processes or products and to ensure adequate time for the developers to adjust to different requirements. For transgenic canola, additional export market opportunities have been identified by the Canola Council of Canada and may be considered for this policy in the future. Please contact the Canola Council of Canada to comment on this policy or for further information.

August 13, 2007

Canola Council of Canada
 400-167 Lombard Avenue
 Winnipeg, Manitoba R3B 0T6