



FLAX COUNCIL OF CANADA



March 25, 2015

Commissioner Vytenis Andriukaitis  
European Commission  
Rue de la Loi 170  
B-1049 Brussels

Dear Commissioner,

The undersigned organizations, representing a broad section of the Canadian food and agricultural industry, urge you and your colleagues to ensure that draft Decisions authorizing the importation for food and feed processing of thirteen new biotechnology products are considered by the College of Commissioners without further delay.

All of these products (e.g. soy, maize, rapeseed) have received positive European Food Safety Authority (EFSA) scientific assessments and have been considered by the Standing Committee on the Food Chain and Animal Health and the Appeals Committee. The majority of these product applications were ready for adoption by the College of Commissioners last summer but unfortunately, the outgoing College failed to act before its term expired.

The length of time taken for EU decisions on new biotech crops has only increased in recent years, and the approval process for import files now appears to have come to a complete stop. The last import authorizations were issued by the European Commission in November 2013. Some of the pending products are already being grown in exporting countries under stewardship programs, and production volumes are increasing each growing season for domestic and export markets.

Timely action by the European Commission will avoid the risk of disruption to the essential supply of feedstocks needed by the EU's livestock, poultry and feed industries, which are more than 70 percent dependent on imported protein. The uncertainty and undue delays surrounding import approvals are creating unnecessary costs for producers and the agri-supply chain. Any trade disruptions will be costly for everyone involved, including European consumers.

Related to this issue, we have noted President Juncker's commitment to conduct a Review of the EU's biotech approval procedure during the first six months of the Commission's mandate. We urge the Commission to ensure that EFSA's scientific opinions continue to serve as the basis for EU approvals, and to use the Review to enable timely and predictable processing of approvals. The existing European framework needs to be properly implemented to ensure a timely processing of all 57 import files currently in the EU system. We further urge the European Commission to respect the EU's obligations under the WTO, to make timely regulatory decisions on new biotechnology applications. These obligations were reaffirmed by the WTO in the Dispute Settlement decision issued in September 2006, which found that the EU was not complying with its obligations to make timely decisions on biotechnology applications.

We also consider EU compliance with its existing trade obligations necessary to enable the success of the soon to be completed Canada-European Union: Comprehensive Economic and Trade Agreement (CETA) and the current Transatlantic Trade and Investment Partnership (TTIP) negotiations. We therefore urge the College to approve the thirteen import dossiers without further delay and to implement the existing framework to ensure timely, science-based approvals going forward.

We look forward to your reply and to your views on how the Commission plans to proceed on these import approvals.

Sincerely,



Canola Council of Canada  
Patti Miller  
President



SoyCanada  
Jim Everson  
Executive Director



Grain Farmers of Ontario  
Barry Senft  
CEO



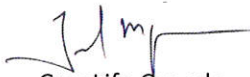
Canada Grains Council  
Tyler Bjornson  
President



Canadian Seed Trade Association  
Dave Baute  
President



Flax Council of Canada  
Don Kerr  
President



CropLife Canada  
Ted Menzies  
President

cc: President Jean-Claude Juncker  
Vice-President Frans Timmermans  
Vice-President Jyrki Katainen  
Commissioner Cecilia Malmström  
Commissioner Phil Hogan  
Commissioner Carlos Moedas  
Ambassador Marie-Anne Coninx