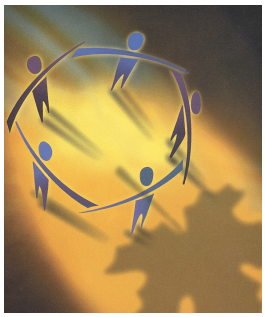

CBAC GM Foods Project /
Projet du CCCB sur les aliments GM

MEETING SUMMARY

Second Meeting of the
CBAC GM Foods Reference Group

Monday, January 29, 2001
Westin Hotel
Ottawa, Ontario

MEETING SUMMARY

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Westin Hotel, Ottawa, Ontario
Monday, January 29th, 2001
9:00 a.m. – 4:00 p.m.

Introduction

The 2nd meeting of the CBAC GM Foods Reference Group was convened to seek comment and advice from participants on the draft CBAC Consultation Document which is under preparation; and, to update participants on CBAC plans for stakeholder consultation and public dialogue. Seven Reference Group members participated; four sent regrets (one of whom submitted comments in writing prior to the meeting). Three members of CBAC participated in the meeting. The list of participants is attached.

1. Review of Meeting Summary from the First Meeting of the Reference Group

Participants commented that there is a need to use clear and straightforward language in the reports to fully reflect what has been said; to state who is responsible for undertaking recommended follow-up activities; to identify where there is common direction or consensus among the Group, and to include comments sent in by members in reviewing the draft meeting report.

Follow-up

- Previously submitted comments from members will be appended to the report of the 1st meeting.
- Comments submitted by individual members for the current and future meetings will be circulated to the full Reference Group by e-mail and by fax or courier for those without e-mail.
- Materials for the next meeting will be sent sufficiently ahead of time to permit members to review them; receipt of documentation will be tracked and documentation resent if it has not been received by all members.

2. Review of Revised Consultation Plan

Who will be consulted?

The CBAC GM Foods Steering Committee Co-Chair informed the Reference Group of the revised approach to stakeholder consultations and citizen engagement. A first phase consultation will primarily focus on stakeholders, with interested public also invited to comment. CBAC will use existing stakeholder and partner networks to invite stakeholders to participate in the consultations and to maximize outreach to others. A preliminary list of stakeholders and partners was circulated at the meeting. These organizations will be encouraged to use their own networks to inform others about the consultations. Reference Group members were invited to submit suggestions to CBAC for additional contacts, particularly to fill in gaps in regionally based organizations.

The Reference Group concurred with the plan for stakeholder consultations in five regions in winter 2001; and with the CBAC objective of citizen engagement(catalyzing informed public dialogue) in the future, using simpler materials than for stakeholders. It was suggested that CBAC should consider ways to encourage continuity of dialogue with stakeholders following the consultation sessions. One Reference Group member re-emphasized the opportunity to take advantage of stakeholders' expertise in working with Canadians to gain their input on how and for which issues to best engage the public in dialogue.

Analysis of Consultation Results

It was stressed by several Reference Group members that CBAC must be clear about stakeholders being the primary target for consultations, and on how the results of the consultations, as well as other information available to CBAC (public opinion research, research studies, Reference Group, etc.), will be used in its June report and recommendations to Ministers. They commented that means for input other than the CBAC website would be needed to allow stakeholders and informed members of the public to comment. One member cautioned CBAC on the use of public opinion research, suggesting its results should not take precedence over what is heard at the consultations workshops.

Members also emphasized the need for solid and transparent analysis of the results of the consultations. They felt that the consultations reports must go beyond "minutes" or "statistics" to be drafted in a manner that will inform the CBAC work on the future of GM foods regulation.

Role of the Reference Group

Some members expressed an interest in participating in all, or several, of the consultations workshops in order to adequately provide advice to CBAC at the next Reference Group meeting. The mandate of the Reference Group (as a sounding board and advisor to CBAC on specific issues and activities) does not include Reference Group participation in the scheduled consultations workshops. However, each member will have an opportunity, as part of their stakeholder group, to participate in the consultations in their region. They will be informed of workshop results through their networks and in their review of the consultation results at the next Reference Group meeting.

The role of the Reference Group should be made clear in the Consultation Document, including stating that the Reference Group does not necessarily endorse CBAC's analysis or options/ways forward.

3. Overall comments on the Draft Consultation Document: format, presentation and usefulness for target audiences

General response to the draft document was positive with several members indicating that it is the right type of document for a stakeholder audience. The Reference Group found the overall structure of the themes and issues appropriately laid out. It also found the basic outline and level of detail in each section to be adequate for stakeholder consultations.

Reference Group members identified the need for improvement in several areas, including:

i) Simplicity: The entire document should be simplified so it is easier to read and understand. In many places, the text makes assumptions that readers have a certain level

of knowledge which stakeholders may, or may not have. It should be stated clearly at the beginning of the document that it was developed for stakeholder consultation, not broad citizen engagement.

Members also felt that the questions presented in the document need to be reduced in number and simplified – although not oversimplified so much as to draw only general responses from stakeholders.

ii) Clarity of purpose: The purpose of the consultations should be clearly outlined for participants. As well, specific questions for stakeholders to address, and an explanation of how the results of the consultation will be used, should be more clearly stated at the beginning of the document. The broader purpose of the consultations can be seen to go beyond influencing the domestic regulatory system; other possibilities exist including influencing Canadian policy, and helping to define a global vision for GM foods.

iii) Balance: Throughout the discussions, Reference Group members raised concerns over balance in the presentation of issues within various sections. All members stated the importance of presenting a balanced view of the context for GM foods regulation, analysis of issues, options/ways forward, and questions for response.

The Group recommended using a set approach to presentation of the issues analysis. It was suggested to use the approach from the "Crucible Project" reports: present differing views and perceptions of the issues in the following format: "one view is this….another (opposing or different) view is that…, and there is common understanding or agreement on the following….; with options as follows...".

iv) Neutrality: Some members found the overall tone of the document to be defensive and too negative, in particular with regard to descriptions of the current regulatory system. Members cautioned CBAC to be careful about any hidden assumptions that might be included in the document – regardless of the perspective. It was suggested that "screens" be applied rigorously in reviewing the document to ensure neutrality and to clarify underlying assumptions. The issues need to be presented succinctly and neutrally.

Also, some of the group found some of the questions in the document to be directive and leading, and thus inappropriate for consultation purposes. The manner in which the questions are worded is very important. Neutral questions inviting substantive response as well as the use of open-ended questions, were recommended.

v) Referencing background information: Research reports commissioned by CBAC and other sources of available information should be referenced where appropriate throughout the document to provide more context to the issues for discussion.

4. Introductory Sections

Context

Members agreed that it is essential to provide a clear context for presentation of the issues which follow in the paper. The introductory section could be improved:

1. Place GM foods in the broader context of the food production and regulation system in Canada overall, to make clear that GM foods are part of this system and to highlight that

there may be trade-offs in decisions made by producers, consumers and others among the use of GM and non-GM foods.

2. Provide a clear and consistent definition of GM foods at the front of the document; then do not define it again but rather use consistent terminology for the rest of the document. Members generally found the current definitions imprecise and ambiguous.
3. Provide a balanced description of the current GM food regulatory system in Canada which demonstrates that the system is in place, while recognizing that a number of questions or issues do exist about how it addresses potential concerns; this should identify the assumptions on which the regulatory system is based and present the various objectives of Canada's regulatory system including deriving benefits from biotechnology and minimizing environmental and health risks.
4. The international context for the Canadian regulatory system needs to be discussed, including consistency with current OECD standards and on-going international discussions; as well as the development needs of developing countries need to be considered, to ensure that Canadian policy is coherent between its domestic regulation and international objectives.

In addition, some members felt that a more detailed description of the current regulatory system for GM foods is necessary, including the types of products which are regulated, requirements which industry needs to meet, and how stakeholders are currently involved in GM food regulation. Others felt that this could be addressed through direct reference to background materials and CBAC research reports.

Ethical Principles and Values

Overall, the Reference Group felt that this is a useful section. Some felt that it would be helpful to explain succinctly how CBAC derived the values that are stated. It should be made clear that these values describe the possible basis for future regulation of GM foods. There are a number of factors in addition to values which are considered in defining the regulatory system such as their benefits, predictability, trade implications of possible changes, feasibility of implementation, and costs of introducing new measures.

Some members raised a concern that the introductory sections do not adequately address whether and how biotechnology fits with Canadians' underlying values, including asking whether biotechnology is needed, others felt that caution needs to be used in raising such questions because of trade implications. One member stated that Canadians today relate better to biotechnology than in the past. It was agreed that there are different paradigm views and that it is best to show in the document what the present regulatory system does and does not do at the present time.

Other comments had to do with the use of the term "precautionary approach" when "precautionary principle" is considered to be the more widely used term.

Some members asked whether or not it is necessary to discuss the differences between morals, values and ethics in order to make the section clearer. Others felt that it would be more useful to leave the terms open to interpretation to obtain a more genuine response from stakeholders.

In addition to the above, specific suggestions to improve each of the introductory sections, as well as the issues sections, were provided by the Group and noted by CBAC.

5. Theme 1 – Social and Ethical Responsibilities

Issue 1 – Social and Ethical Considerations

The Group recognized that this is a difficult section to draft, since CBAC did not undertake any specific research on these issues as they relate to GM foods. However, the issues are important to the consultation document. Balance in the presentation is essential in this section. Application of the Crucible approach (see previous section) could allow stakeholders and the public to broaden their understanding and become better informed about the nuances around these issues.

Analysis

Ethical Acceptability. The group was generally uncomfortable with this analysis and several members offered to provide more detailed written comments to CBAC. A basic question is whether GM food regulation should be based on science alone or should also respond to ethical concerns. And while the latter may be desirable, the challenges inherent in moving from consultations about policy to implementing recommendations into the product approvals process should be acknowledged. For example, industry and producers need predictability in the regulatory environment, and cannot ignore international understandings on regulatory standards.

One member stated that from a producer perspective, it is important to take into account ethical considerations, but this must be done in the broader context of decisions on the broader range of agricultural practices available

Several members of the group also cautioned that the document should focus primarily on what can actually be achieved, or changed, especially with respect to legislation and the regulatory system. It is a question of managing expectations of those being consulted.

One member commented that people are concerned not only with the value of specific products but also with the broader process of genetic modification. Another member noted that some genetic combinations would never appear in nature and this should be more clearly stated in this paragraph. It was also stated that it is difficult to make strong distinctions when discussing ethical acceptability, as the line between natural and unnatural materials is somewhat blurred.

The point was also made that the domestic regulatory system needs to take account of developing countries' perspectives and Canadian international policy, although not all members agreed that we are in a position to take action on this issue.

Power Imbalance and Vulnerability. The Group felt that this section needed to be presented in a more balanced way which recognizes that shifts in agrarian economies have been occurring for several years not only because of the impact of biotechnology but also due to other influences. In addition, there are other issues related to power, including the effect of raising regulatory requirements leading to greater concentration in the industrial sector, as it becomes more difficult for smaller enterprises to have the resources to meet such requirements, leaving only large companies with the resources to meet the regulations.

Benefits. Some members stated that the document should more clearly state the types of benefits associated with the use of GM foods (e.g. jobs, healthy community, solutions to food problems, etc.), and that the efforts of industry in sharing benefits with developing countries should be acknowledged. They also felt that some of the text appeared biased against GM foods (e.g. "unseen adverse impacts") and that there are unknown risks which are not unique to GM foods.

Others felt that some of these benefits are not clearly demonstrated and should be qualified; and, that the risks accompanying the benefits need to be stated.

Framework. Some members indicated that a broad industry perspective is missing from this section. The importance of predictability was raised as a key issue to include in this section. Most members agreed that predictability is essential to allowing industry to function properly.

This section should also be clearer about what is public and what is private responsibility. Some felt that it is unfair to require industry to address social and ethical considerations on a product by product basis – this would benefit society and cost industry; society needs to address these broader issues. The line between government and industry responsibility should be drawn more clearly.

Some members commented that the provision of for a for dialogue on policy and regulation should be one of the options in this section. There was general agreement that the appropriate forum for such dialogue may not be with individual government agencies and departments, but with Parliament.

Questions

Generally, the group found the first and third questions adequate, although one member found the first question to be leading. The questions should be simplified and clarified to allow social and ethical perspectives to be raised, while at the same time allowing other factors which need to be considered to be raised. A question such as "When you are buying food, what are some of the elements that you consider?" (possibly with a list of possible elements such as cost, taste, ethical issues, etc.) could be a better question.

It was recommended that the 2nd question be reworded for precision and clarity, to include the concept of "decision-making". How have ethical and social issues affected your perception of GM foods or the decisions you make about what food to buy?

One member felt that this is an excellent question to ask farmers, but that the context needs to be stated more clearly.

Issue 2 - Environmental Stewardship

On the whole, the group found the concepts in this section meaningful and interesting but felt that they are presented in a manner that is difficult to understand (e.g. difficult language and long explanations). They also found it difficult to easily identify recommended activities and responsibilities. They recommended that the section needs a clearer purpose stated at the beginning.

Analysis

Life cycle approach

The group felt that the concept of the life cycle approach may not be understood by many stakeholders and members of the public. It is a complex concept and must be clearly explained in the document. In addition, it must be put more clearly into the context of biotechnology and GM foods. For instance, it may not be feasible to apply the life cycle approach to the regulatory system overall (e.g. at the individual product level). However, there was agreement that it is a useful approach for use in the monitoring system for GM foods. It should address long-term environmental/ecological impact considerations and broader ethical and socio-economic considerations – including in the context of international policy - although members were not all in agreement on the practicality of this broader application.

Scope

A number of members felt that social and economic issues are inherent in the discussion of environmental stewardship – both in a domestic and international context– and that they should be more explicitly recognized in this section. Other members questioned how broader socio-economic considerations could be addressed internationally, by one country.

It was also suggested by one member that in monitoring biotechnology's impact on farming systems, the fact that most farming systems are not part of natural ecosystems should be considered. It was recognized that there are substantial differences in the way different stakeholders view the ecological impact of agricultural systems.

Substantial Equivalence

The document should clearly state what CBAC is referring to when it uses the term "substantial equivalence" in the context of genetically modified foods Some members questioned whether "substantial equivalence" is an appropriate or sufficient basis for risk assessment of GM foods. Other members stated that this concept underlies international guidelines on GM food regulation, as well as regulation in many countries. This international context needs to be stated in the document.. Some pointed to the difficulty in applying international standards domestically, when environmental characteristics are different from region to region, as well as country to country.

Questions

The group found the questions to be too complex and too numerous. The group recommended that these questions be simplified and focused on GM foods more specifically, rather than broader questions about biotechnology in general.

The group considered the question "to what extent should this work be done by governments or industry?" to be important. The question of division of responsibilities between government and industry should also be raised in the issues analysis section.

6. Theme 2 – Good Governance

Issue 1 - Separation of promoter and regulatory functions

The group found this section to be an important element of good governance. However, they suggested that the scope of the section be broadened beyond a single federal agency, CFIA, and that the analysis and questions be reviewed for neutrality before release of the document.

Analysis

Further context around the regulatory system in Canada as a whole is required in this section. It was suggested that the role and responsibilities of Health Canada and other federal departments and agencies should be included. Communication (or the need to communicate better) rather than compartmentalization between departments and agencies should also be stressed. Mentioning other departments and agencies in the analysis will help stakeholders to answer the questions better, as they will be thinking about other players rather than just CFIA.

It was felt that it should be indicated that CFIA is responsible for animal food safety as well as the other GM food responsibilities already stated in the document.

While supporting the need for clearly demonstrated separation of regulatory and promotional functions for maintaining the confidence of Canadians, two members raised concerns about the dangers of full separation into different federal agencies/departments, including the risk of putting walls around individual agencies.

Questions

Some members felt that the draft questions were leading, while others did not. It was agreed that the language used in the questions could be phrased more neutrally to not presume the fact nor lack of "independence and integrity" in the current system.

Issue 2 - Regulating research and development activities

Reference Group members called for more clarity in this section, including a clearer outline of the regulatory issues faced relating to research and development activities for GM foods.

Analysis

The Reference Group suggested that the issue needed to focus on the lack of clarity and access to information about the guidelines and protocols which apply to research and development activities for GM foods (e.g. handling of waste products); and whether it would be possible to agree on a minimum set of guidelines to govern such research and development activities.

One member commented that strict regulatory requirements for research on GM foods will make it more difficult for smaller companies to participate, leaving this research to multi-national companies – an issue which had been raised earlier in the meeting.

A caution was raised that CBAC not use wording which suggests that regulations can "prevent" health and environmental impacts. Regulations only "minimize" potential impacts.

One member of the group raised again an issue which had been identified at the first meeting - the need to have a better picture of how, and to what types of research, government funding is allocated, and how the informed public could have a role in determining research priorities.

Questions

The Reference Group felt that the questions in this section were well stated.

Issue 3 - Monitoring for risks and benefits

The group indicated that the purpose of this section should be more clearly stated as monitoring for potential long-term environmental and health effects related to the use of GM foods, in the context of overall food safety. It is also important to clarify and separate the different purposes for collecting monitoring data(e.g. for market assessment, or for long-term assessment of potential health and environmental impacts; or for determining food consumption patterns). One member of the group questioned why a "significant market share" is important in this discussion.

Analysis

Scope

Some Reference Group members thought that this section focused too closely on environmental issues to the detriment of social and economic factors. It was suggested by one member that human health terminology might encompass all these concepts. The group felt that health, environment, social and economic effects should all be part of the discussion on monitoring.

Current regulatory system

It was stated that a more complete and balanced discussion of monitoring requirements in the current regulatory system needs to be included, which makes clear that industry has responsibilities to fulfill specific conditions and requirements as part of product approvals. Then the adequacy of monitoring to determine implementation of these requirements – as well as for environmental and health impact monitoring - can be assessed to determine where improvements could occur. Some discussion of who will be responsible for long term monitoring and how it will be accomplished would also be useful.

Roles

One member stated that it is important to raise the question of roles – who is and should be responsible for monitoring GM food products through the system – and to consider the costs of such monitoring. One member noted, and others agreed, that the issue of cost, which is mentioned for the first time in this section, should be treated fairly throughout all the issues or not raised. It was suggested that cost considerations be raised in the context section of the consultation document. Some members of the group felt that CBAC should be cautious about asking the public to recommend priorities for government investment in monitoring, since resources are limited and implications of requiring large data collection efforts are far reaching.

One Reference Group member also identified a timing challenge in monitoring long term effects - farmers need to be able to make long term planning decisions based on accurate and

current information. In addition, the long-term effects of GM foods need to be considered along side those of other food production systems.

Food consumption data

Several challenges to obtaining food consumption data were identified including lack of access to proprietary information, lack of ability to disaggregate figures, and unresolved labeling issues. One member noted that other countries have good consumption data because they decided on the type of information that was important to food safety and consumer health. These systems might provide models for Canada and could be mentioned in the document.

Members commented that the analysis mixes two concepts which need to be separated out – labeling for tracking foods and labeling for consumer choice.

International activities

There needs to be some mention in this section about the requirements under the international Biosafety Protocol, to provide additional context regarding harmonization with trade partners.

Questions

The question on reassessment needs to be phrased to be more balanced. One member stated that the question should not assume that product reassessment be automatic or time-based. Instead, the question might ask what stakeholders would see as substantive reasons for triggering reassessment. Another member stated that the assumption of product reassessment is important to build public trust.

An important additional question would be where should monitoring effort be placed given limited resources.

Issue 4 - Capability and capacity in the regulatory system

Some members of the Reference Group indicated that this is the most important issue to raise at consultations. The results of the Royal Society study will be an important consideration for CBAC and should be referenced in this section.

Analysis

The group generally agreed that priority needs to be given to capacity for the risk assessment and decision-making functions. There is a need for a core decision-making body in Canada that is capable and equipped. In addition, harmonization and data sharing with other countries should be encouraged in some instances to support risk assessment. This should be mentioned in the consultation document. One member felt it important to not give the impression that Canada cannot attract or maintain skilled regulatory staff.

The issue of the relationship between outside and inside expertise was discussed at length. The group agreed that the primary issue is not where the expertise is found but whether the right kind and sufficiency of expertise exists to support the regulatory system. It was also suggested that scientific expertise is not the only type needed, and that it is important that expertise of farmers be built-in to aid producer decision making. Informal expertise also

resides with producers, consumer groups and community groups, which can be drawn upon in the regulatory system.

Questions

The questions were considered too complicated and without a clear purpose. The group recommended simplifying the questions to focus on the kinds of capacities that are needed.

Issue 5 - Transparency

The group recognized that this section raises important issues about the level of transparency in the current system. Some felt that the current system does not accommodate transparency: it is often cumbersome for the public to ask questions and get accurate answers. On the other hand, some members felt that the public does not know the level of rigour that is currently required to have a product approved. One member stated that this section should not give the impression that there is no appropriate regulatory system in place – we are not starting from scratch. Rather the issue is about adequacy and availability of information, and about communicating information to the public.

Analysis

The group emphasized the need for a more balanced presentation of the issues in the text. It is important to illustrate the need for transparency in information about regulatory approvals for GM foods, while also recognizing that there may be trade-offs between transparency and availability of information and the need for confidentiality of industry information.

Information on field trials

Some members felt that the analysis does not indicate that transparency in the regulatory system related to field trials is inadequate, while others felt that in the case of field tests the system is adequate. The group generally agreed that some editing could address their concerns to make clear that the intent is simply to describe the system and perhaps show the range of opinions that exist about whether or not the system is adequate.

Some members also indicated that it is important to state clearer expectations about the role, strengths and limitations of a regulatory agency in order to improve transparency. There are, for instance, inconsistencies in the way information is gathered and disseminated (e.g. in some cases decision documents are written by the proponent). There was also some concern raised about how information can be made simple enough to be transparent without losing the detail that is necessary to illustrate how and why a particular decision was made.

Members felt that a key way forward on transparency could be more correctly stated as "formalizing improved transparency in the regulatory system" rather than suggesting that the regulatory system overall needs to be formalized. Further on this option, it was suggested that the two ideas of provision of information, and how to resolve differences of opinion about GM food safety in the regulatory system, needed to be separated.

Questions

The group felt that the questions are too long and complex but generally address the right issues. One member cautioned against raising expectations that confidential information can be made available when it cannot under the current system.

Issue 6 - Opportunities for public involvement

Reference Group members agreed that this section generally covers the right issues and that it is important that there be adequate public involvement in the regulatory process.

Discussion centred on how best to characterize the range of issues and options in the document. For example, is public involvement needed mainly at the stage of policy and regulatory development by government, or at the stage of product approvals? Some members argued that the most important opportunity for public involvement is in policy and regulatory development, and that involvement in product decisions would in effect be second-guessing the regulators. Others stated that both a democratic dialogue on GM foods policy and regulation, as well as opportunity for public review at the product approvals level, are needed. Regardless, upfront "rules" for public engagement need to be made clear in the regulatory system.

One member stated that the process for public involvement at the product stage must be flexible enough to not lose necessary details relating to each case, and at the same time simple enough for people to understand. Even then, only those with a particular point of view would likely respond and therefore how real would public input be to decision making on products? Another member stated that an option should be notification of specific product reviews prior to issuance of the decision document.

In terms of presentation, the group was asked whether the issue sections on transparency and on public involvement should be combined in the document. There was general agreement to leave them separated as they now appear in the document.

Questions

The group had little comment on the proposed question, but one member raised a concern about not raising public expectations too high, given confidentiality requirements for information provided to regulatory agencies by industry.

7. Theme 3 – Citizen Engagement

Issue 1 - Information provision to support informed choice

Reference Group members recommended that this section be presented in the broader context of the types of information which consumers need to make choices on all types of foods, including GM foods; and information which producers need to make decisions among GM crops and crops which use other farming practices. It also needs to include examples of mechanisms for information provision.

The Group also agreed that the section needs to state that there are differing views about how GM foods differ/do not differ from non-GM foods, and therefore about the types of information consumers need to make choices. Some believe that biotechnology and GM foods are different because of how they are made; others believe that biotechnology is only a technical means for developing new types of food.

Questions

The group generally concurred with the questions, and suggested that the first question ask what "mechanisms", in addition to what information, would be useful to consumers to make informed choices about GM foods.

Issue 2 - Labeling

The group agreed that labeling should be described in a balanced manner with all sides of the issue presented. A filter should be applied to ensure that biased language is eliminated from the document – for example environmental benefits should be described as "potential".

The group was informed that food manufacturers distinguish between labeling for safety reasons and for the purpose of aiding consumer choice.

Some members considered that references to cost were biased to a view that they would be directly transferred to consumers; others indicated that experience has shown this. Again, it was suggested that cost issues not be raised in this section. The group stated that a clearer statement could be made about what is happening in other countries with respect to labeling systems and experience with their implementation.

Clarity is needed in stating whether standards development processes, such as the CGSB process for voluntary labeling, are designed to address either voluntary or mandatory labeling. Further, the implications for implementation of standards will differ between a voluntary and a mandatory labeling mechanism.

Questions

There was general agreement that the first question is acceptable. However, the second question could be presented in a more balanced manner with respect to voluntary and mandatory labeling processes.

8. Next Steps

1. The next meeting of the Reference Group will take place in late April, or early May. The Group will be asked to review the results of the consultations and provide advice to CBAC on its implications.
2. Written feedback on the Draft Consultations Document can be provided to CBAC. Feedback should focus on the content of the document as it will be edited prior to distribution. Specific comments should be submitted to Suzanne Fortin at the Canadian Biotechnology Secretariat by Wednesday, January 31st.
3. Reference Group members are also requested to advise CBAC on the issues that should be considered as discussion priorities for the consultations.
4. The final consultations document will be circulated to the Reference Group before it is posted on the internet.

APPENDIX A

Participants List

GM Foods Reference Group
Bill Anderson, Aventis CropScience Canada
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