



IGTC

International Grain Trade Coalition

IGTC Policy Low Level Presence June 2019ⁱ

The IGTC's overarching objective is to achieve a market and regulatory environment supportive of trade that avoids disruptions in the international trade of grain, oilseeds, pulses and derived products.

IGTC Policy

- Given the enormous risk carried by the value chain as a result of unworkable and impractical "zero tolerance" approaches to LLP, IGTC seeks adoption and implementation of policies that prevent or manage LLP in the supply chain, preserve food safety, and do not place unmanageable responsibility on importers and exporters of grains, oilseeds, pulses and other agri-bulks.
- Detection of low levels in an importing country of an event authorized at 100% consumption in one or more countries is not a food safety issue but a legal compliance issue – trade stops thereby adversely impacting importing and exporting countries and threatening global food security.
- Moving away from zero tolerance for safety-assessed GM crops is critical to developing predictable trade, flexible supply chains and underpinning fungible supplies of grain.
- Policies on LLP benefit the entire value chain when they:
 - ensure the viable supply of raw materials at sustainable and affordable prices;
 - minimize market disruptions; and
 - recognize and respond to the reality of the international grain bulk handling and transportation systems, as well as the food and feed manufacturing processes.

Key Actions

IGTC promotes the following steps to ensure an environment that facilitates world trade:

- Governments recognize the economic contribution of the grain trade and a crucial component of global food security.
- Exporting and importing governments must work together to improve synchronization of GM regulatory approvals.
 - Importing governments examine their regulatory approval systems to ensure there are no unnecessary impediments that could create delays.
 - Governments are encouraged to enter into bilateral or regional agreements (e.g., mutual recognition agreements or trade agreements), in order to recognize equivalency in each country's Codex based safety assessment system. This option would prevent LLP from occurring as the events would be approved as soon as the first country approved the product.



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- Where synchronization of regulatory approvals is not possible, importing governments should consider pragmatic and trade-facilitative LLP policies, such as the 2018 GAABT LLP policy model.
- The Global Level Presence Initiative (GLI) strengthens and expands its membership, in order to forge solutions that have the buy-in of all countries which participate in the grain trade, be they importers, exporters or end users.
- LLP Policies should entail segments of the value chain to be fully responsible for the commercial activities under their respective remit.
- Regulatory approval of GM events is a critical component to LLP policy and implementation. Therefore, the value chain remains committed that:
 - All segments of the value chain should demonstrate a willingness to work together and exchange information before, during and after the product approval process.
 - Technology providers should take steps to reduce asynchronous approvals and provide relevant and timely information to other segments of the value chain.
 - Technology providers should develop common approval data packages to the fullest extent possible, and where permissible, submit necessary approval data packages to both the governments of major importers and exporting countries at the same time.

Governments should apply relevant conventions (e.g. WTO SPS) in the management of LLP.

Background

Low Level Presence (LLP) refers to levels of recombinant DNA plant materials that have passed a food safety assessment according to the Codex Guideline for the Conduct of Food Safety Assessment of Foods Derived from Recombinant-DNA Plants (CAC/GL 45-2003) in one or more countries, but may on occasion be present in food in importing countries in which the food safety of the relevant recombinant-DNA plants has not been determined.

Significant and costly disruptions to trade may arise in the context of shared supply chains as a result of this process, when there is the potential for trace amounts of a GM event to be mixed in with other commodities, whether a conventionally or GM bred commodity/variety.

The IGTC is continuing work with its participants, industry partners and governments on this important matter. The government-led Global Low Level Presence Initiative (GLI) is a key focus - initiated by Canada, it and now has representation from 15 major grain exporting and importing countries/regions and 4 observer countries and regions.

Definitions:

LLP: Low levels of recombinant DNA plant materials that have passed a food safety assessment according to the Codex Plant Guideline in one or more



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countries but may on occasion be present in food in importing countries in which the regulatory approval process is not yet complete.

Grain: The seeds or fruits of various food plants including the cereal grasses and in commercial and statutory usage other plants (such as the soybean). For the purposes of this policy, "grain" includes primary processed products such as protein meals and may include all such seed or fruits from a given country of origin.

ⁱ This policy was approved by IGTC Management Council on 29 June, 2019