



IGTC

International Grain Trade Coalition

IGTC Policy Low Level Presence August 2016ⁱ

Background: Low Level Presence (LLP) refers to the low 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, 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 working with its global participants, industry stakeholders 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 14 major grain exporting and importing countries/regions and 4 observer countries and regions.

IGTC key messages

1. An enormous risk is carried by the value chain as a result of unworkable and impractical 'zero tolerance' policies regarding Low Level Presence.
2. 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.
3. Moving away from zero tolerance for safety-assessed GM crops is critical to developing predictable trade and underpinning fungible supplies of grain.
4. If the approval process in importing countries is fully synchronized with the approval process employed in exporting countries, then no LLP trade disruptions will occur.
5. Policies on LLP should benefit the entire value chain by:
 - i) ensuring viability of the supply of raw materials at sustainable and affordable prices
 - ii) minimizing market disruptions
 - iii) being in line with the reality of the international grain bulk handling and transportation systems, and food and feed manufacturing processes.

Public institutions and grain trading countries

6. IGTC asks global governments to recognize the grain trade as a key economic driver and a crucial component of world food security.



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7. Exporting and importing governments must work together to improve synchronization of GMO approvals.
8. Importing governments must examine their approval systems to ensure there are no unnecessary impediments that could create delays.
9. Governments are encouraged to enter into bilateral or regional agreements with other governments, in order to recognize equivalency in each country's Codex based safety assessment system. This option would stop LLP from occurring as the events would be approved as soon as the first country approved the product.
10. The IGTC calls upon the Global Level Presence Initiative (GLI) to strengthen and expand its membership, in order to forge solutions that have the buy-in of all countries laying a part in the grain trade, be they importers, exporters or users of grain.

The entire value and stakeholder chain

11. Policies should require technology developers, producers and subsequent holders to be fully responsible for the commercial activities under their respective remit.
12. Technology providers:
 - i) should be inclusive in their development of common approval data packages and provide relevant information for grain trade actors.
 - ii) should be willing to work together with grain trade actors and exchange information during the risk assessment process.
 - iii) must submit necessary approval data packages to major importers at the same time as data packages are submitted to exporters.
13. It is the primary responsibility of the life science industry to undertake a comprehensive educational effort to inform the public of the benefits and risks, if any, of modern biotechnology. IGTC will continue to provide fair and balanced information to international audiences.

ⁱ This policy document was approved by IGTC Management Council on Monday 8 August, 2016