Guidance for IGTC member engagement with governments, in advance of the GLI meeting in Natal, Brazil, September 27th and 28th

Key Messages:

- Low-level presence (LLP) poses significant risk to the global grain trade. LLP jeopardizes the predictable supply of affordable grain and contributes to cost increases all along the value chain, including consumers.

- LLP is not a food safety issue. The term LLP applies only to events that have been approved by at least one country in accordance with Codex guidelines. Measures taken by an importing country to deal with LLP should be commensurate with risk.

- Participation in the GLI is important because its members are developing regulatory and policy solutions for managing LLP that are the least trade-disruptive options possible. The IGTC strongly supports the participation of its members and Corporate Stakeholders in this forum.

- Testing is not a solution, does not manage LLP and is not a trade-facilitative approach. Testing for LLP, especially at destination, can prevent trade, be expensive (requiring capital investment in testing laboratories, materials, personnel, etc.), is time-consuming, and is subject to sampling and detection errors.

- Industry stakeholders along the value chain undertake a wide array of measures – known as "process controls" which serve to manage and limit LLP in commodity shipments. Regulators are encouraged to learn more about process controls and to take these measures into account when considering an LLP policy.

- LLP-specific measures under discussion at the GLI are not a replacement for regulatory cooperation efforts that minimize asynchronous approvals (e.g., mutual recognition, risk assessment sharing). When new events can be approved in a reasonable time frame and according to predictable service standards, the duration and costs of LLP to all stakeholders are reduced.