



IGTC
International Grain Trade Coalition

10 Aug. 2015

To: Luxemburg Presidency of the EU Council
To: Giovanni La Via, European Parliament Rapporteur
Cc: President Jean-Claude Juncker, Vice-President Frans Timmermans, Commissioner Cecilia Malmström, Commissioner Phil Hogan, Commissioner Vytenis Andriukaitis

Subject: EU Commission proposal COM(2015)0177

Dear Madams,
Dear Sirs,

The International Grain Trade Coalition (IGTC) is seriously concerned by the recent developments of the EU policy on agricultural biotechnology.

Our members (national and international not for profit trade associations, councils and corporate stakeholders) are active in the international trade of grain, oilseeds, pulses and derived products (agri-bulks) striving for harmonized and free market access to enable the movement of agricultural commodities from areas of surplus to areas of deficit at sustainable and affordable prices.

The EU Parliament and Council were recently called upon to express their opinion on the European Commission's proposal, which would allow individual Member States to ban the use of GM food or feed in their territory.

As flagged in several occasions by our EU food and feed partners, this proposal would not only undermine the EU single market but also seriously endanger the EU supply of raw material for food and feed coming from third countries. In addition, it would seriously threaten the trade relations with Europe's main trading partners and it would likely lead to numerous legal challenges in view of the EU's international obligations under WTO agreements. Notably, the EU depends for 75% of its needs for protein-rich ingredients for feeding purposes on the global world markets, with GM soybean meal accounting for 30 – 35 million tons annually, as the most important protein-rich feed ingredient, with no viable alternative.

IGTC, therefore, urges your offices to lead the EU Parliament and Council discussions toward the rejection of this proposal that would dramatically disrupt the trade of agricultural commodities as well as the competitiveness of the whole EU food and feed chain, as it directly threatens the livestock sectors.

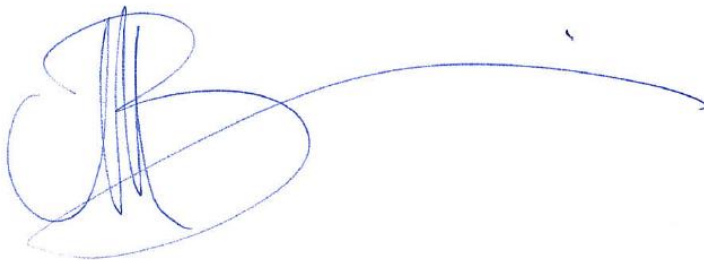
IGTC calls upon you to remind the European Commission about its key responsibilities and commitments as guardian of the EU treaty:

- to ensure that EU regulations are consistent with EU obligation under the WTO SPS agreement and adhere to the EU's existing established timelines as prescribed by laws;
- to retain an EU-wide and predictable GMOs authorization system strictly based on science in which EFSA must maintain a central role;
- to enhance the EU access to the global supply of proven safe, sustainable and affordable agricultural products. Currently this access is often threatened by diverging market, sanitary and phytosanitary requirements between the EU and trading partners;
- to establish a policy on low-level presence of GMOs that is commercially feasible and of practical implementation and to participate actively in the Global Low Level Presence initiative.

A failure to adhere to these key responsibilities and principles would seriously threaten the international trade and completely carve up the EU single market. Only a proper fulfilment and implementation of these principles in the EU policy will prove the necessary level of legal and regulatory certainty to agri-food business operators.

We thank you in advance for taking this request into careful consideration in view of the upcoming EU Parliament and Council discussions.

Sincerely,



Dr. Ir. Marcel B. M. Bruins
Secretariat IGTC