

**GMO-FREE EUROPE 2015 - NGO AND SCIENTISTS DAY**

**PARALLEL WORKSHOP SESSION II  
ZERO TOLERANCE FOR GMO CONTAMINATION IN FOOD, FEED AND SEED  
TOWARDS A COMMON STRATEGY**

Summary of the workshop, 7 May 2015, Berlin

15:00 – 16: 45 Thuringia Representation

**Speakers:**

Philip L. Bereano (Univ. of Washington)

Lim Li Ching (Third World Network)

Lucy Sharratt - Canadian Biotechnology Action Network (CBAN)

Heike Moldenhauer - FoEE Germany (food and feed)

Alejandro Gil - IFOAM EU (seeds)Notes

**NOTES**

**INTERNATIONAL**

- Unauthorized/unapproved GMOs found at “low levels” in shipments of non-GM crops, in shipments of approved GM crops or in food products
- Industry and exporting countries are lobbying countries to drop zero tolerance policies and adopt low-level presence (LLP) policies i.e. accept imports contaminated with a ‘low level’ of GMOs that they have not yet assessed for safety but have been approved in another country
- Unauthorized GMOs would not have undergone a risk or safety assessment in the country of import. This is a circumvention of national and international laws that preserve the right of importing countries to prior informed consent and decision-making based on risk assessment. It also threatens GM-free seed/food/feed supply.
- Possibility of untested GMOs in field trials (e.g. LL601, Bt11, Monsanto HT wheat) or GM crops with higher risk levels entering food and feed supply (e.g. StarLink maize)
- LLP policies would legalize, normalize and expand GM contamination
- With LLP policies, exporting countries will determine what is/is not a risk for importing countries
- There are relevant policy and regulatory means to address the issue – e.g. through Codex and the Cartagena Protocol on Biosafety – and steps that can be taken by both exporting and importing countries to address the issue.
- Civil society should call for the maintenance of zero tolerance policies, i.e. no thresholds for GM contamination in food, feed or seed; stringent controls of field trials and commercial plantings, including monitoring; and data and information availability, including requiring developers to provide detection methods and appropriate reference materials, *inter alia* for GMOs in research and field trials.

## **CANADA**

-To eliminate or minimize the economic cost of GM contamination in the international grain trade, Canada and other large-scale adopters of GM crops are lobbying Europe and countries around the world to implement Low Level Presence (LLP) policies.

-LLP means that national governments would accept imports that are contaminated with a low level of GM food/seed, that their regulators have not yet assessed for safety but have been approved in another country with a regulatory system judged trustworthy.

-Canada is proposing a domestic LLP policy. The proposal would mean that Canada's health regulators would not assess the safety of all the GM foods that Canadians eat. Even if our government has not assessed the safety of a GM product, a percent of that GM product in imports to Canada would be legal if that contamination comes from a country whose regulatory system we trust. The percent of LLP currently proposed is 0.2% or higher.

-LLP would pave the way for Canada, the US and/or Australia to approve GM wheat, for example, because it would remove the threat of trade disruption caused GM contamination in wheat exports (industry has been explicit on this point).

-National governments would recognize the regulatory systems of certain other nations for the purposes of accepting GM contamination in imports from those countries. The GM food/seed in question would not have been assessed for safety by domestic regulators in the importing country.

-CETA, the Canada and European Union Comprehensive Economic and *Trade* Agreement, includes a letter that explicitly requires discussions on LLP as part of a bilateral "Dialogue on Biotech Market Access Issues".

-The "International Statement on LLP" is signed by Australia, Argentina, Brazil, Canada, Chile, Costa Rica, Indonesia, Mexico, Paraguay, Philippines, Russia, South Africa, United States, Uruguay and Vietnam.

## **EUROPE**

The EU's 'zero tolerance' policy bans any food or animal feed imports found to be contaminated by a genetically modified organism (GMO) that has not been approved in the EU. Even if the GMOs are only found in 'trace amounts', the import and marketing is illegal. Any removal of this 'zero tolerance' policy and its implementing measures would significantly increase the likelihood of contamination of food and seeds by non-authorized GMOs.

After a prolonged campaign by agri-business, the 'zero tolerance' policy for animal feed imports was dropped in July 2011. There are now moves by the European Commission to also relax rules for food imports and seeds, under the official name 'low level presence'. This would mean that our food and seeds could be contaminated by GMOs that have been approved in countries such as the US but not approved in the EU.

## **CONCLUSIONS OF THE DEBATE**

-When it comes to trade between countries we have to put the burden on developed countries that has the tools to keep a good traceability system and the capacity to develop controls and analysis. Importers have not this capacity.

-The right of each country to decide what to do with their food is the core of the demands to fight against LLP of unauthorised GMOs.

-LLP would legalize, normalize and expand GM contamination. GM contamination would become the norm in international trade and would gradually increase over time.

-Low Level Presence is a move towards international regulatory harmonization whereby countries recognize each other's regulatory systems or adopt the same regulations.

-LLP is a move towards removing regulation of GMOs altogether. In the case of LLP incidents, national regulations for health and safety are not in use. LLP allows for the consumption of GM foods that have not been approved by domestic regulators.