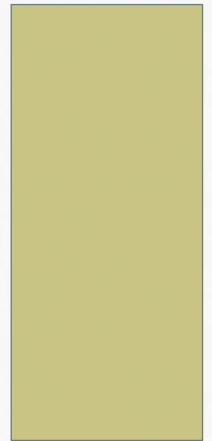


**ZERO TOLERANCE FOR GM  
CONTAMINATION IN FOOD, FEED AND  
SEED: LINKING GLOBAL STRUGGLES  
TOWARDS A COMMON STRATEGY**

*Lim Li Ching, Third World Network  
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# Low levels of GM crops in international trade

- Unauthorized/unapproved GMOs found at “low levels” in shipments of non-GM crops, in shipments of approved GM crops or in food products
- How does it happen?
  - Co-mingling due to nature of commodity grain trade
  - Gene flow e.g. seed or pollen movement
  - Human error

# Scenarios and examples

- Scenario 1: Unapproved GM crop in both countries of export and import (adventitious presence, AP) e.g. LL601, Monsanto HT wheat, Bt10, Bt 63
- Scenario 2: Unapproved GM crop in country of import, but may be authorized in country of export (low level presence, LLP), e.g. MIR162, HT alfalfa, Triffid flax

# Summary of FAO survey results (2013)

- A total of 198 LLP/AP incidents reported
  - 60 from 2002-2009 (8 years)
  - 138 from 2009-2013 (latest 5 years)
- Country of origin of LLP/AP incidents
  - USA, China, Canada accounted for the most number
- Commodities involved
  - Linseed, rice, rice cracker and noodle, maize, papaya, petfood, soybean and soybean products, soybean, canola and oilseed, others

# Potential risks

- Unauthorized GMOs would not have undergone a risk or safety assessment in the country of import
  - In case of LLP, risk or safety assessment may or may not have been done in country of export
  - In the case of AP, risk or safety assessment not done at all, neither in country of export or country of import
- Circumvention of national and international laws that preserve the right of importing countries to prior informed consent and decision-making based on risk assessment
- 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)

# Implications of LLP policies

- Industry and exporting countries lobbying countries to drop zero tolerance and adopt 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
- Threat to GM-free food/feed/seed supply
- 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

# Policy/regulatory means to address issue

- Codex Guideline for the Conduct of Food Safety Assessment of Foods Derived from Recombinant-DNA Plants
  - Annex 3: Food Safety Assessment in Situations of Low-Level Presence of Recombinant-DNA Plant Material
- Cartagena Protocol on Biosafety
  - Article 17: Unintentional transboundary movements and emergency measures
  - Article 18.2(a): Documentation accompanying LMOs intended for direct use as food or feed, or for processing
  - Article 25: Illegal transboundary movements
  - Nagoya-Kuala Lumpur Supplementary Protocol on Liability and Redress

# Considerations for Exporting countries (1)

- Stringent controls of field trials and commercial plantings, including monitoring
- Ensure clear identification in the documentation accompanying shipments
- Segregation, identify preservation and testing to ensure that no unauthorized GMO enters the food/feed chain
- Compliance with importing country's domestic regulations, including zero tolerance policies
- To avoid cases of adventitious presence, ensure conduct of a safety assessment consistent with the Codex guideline, for all GM crops in research and field trials



## Considerations for Exporting Countries (2)

- In cases of 'unintentional transboundary movement', notify affected or potentially affected countries and provide available relevant information
- Consult affected or potentially affected countries to enable determination of appropriate responses and action, including emergency measures
- Data and information should be made available to a publicly accessible FAO database, including where detection method protocols and appropriate reference material may be obtained
- Product applicant should provide validated protocol for event-specific or trait-specific detection method suitable for low level situations and appropriate reference materials

# Considerations for Importing Countries

- Sovereign right to decide on policy, including zero tolerance, and require that all GM crops be risk assessed prior to approval
- Full flexibility for a country to require zero tolerance of unapproved GM crops
- Ensure capacity building for testing and detection
- Determine appropriate responses, initiate necessary action, including emergency measures
- May request source, to dispose, at own expense, of the GMO in question by repatriation or destruction

# What can civil society demand?

- 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
- Data and information availability, including requiring developers to provide detection methods and appropriate reference materials, *inter alia* for GMOs in research and field trials

[www.biosafety-info.net](http://www.biosafety-info.net)

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THANK YOU!

