Almost two decades of Low Level Presence Lessons to be learnt: turning challenges into opportunities?

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FAO International Technical Consultation on low levels of GM crops in international food and feed trade

Rome, 20-21 March 2014
EU association representing the trade with cereals, oilseeds, rice, feedstuffs, olive oil and agrosupply

Grain merchants, storers and/or international traders

30 Member Associations
19 EU countries
1 Associated in Switzerland
2700 companies
The role of trade
Global sourcing of agricultural commodities to meet food, feed and industrial needs

Source: IGTC
Production and trade: to double by 2050

**TODAY:** Roughly 300 million metric tons – about 12% of total demand – enter into world cereal & oilseed trade

**TOMORROW:** An estimated 600 million metric tons of grains & oilseeds from areas of surplus – about 15% of total production – will be transformed & delivered for consumer needs.

Source: Bruinsma, Jell. “The Resource Outlook to 2050”
Grain trade challenges and food security impact

The evolving use of biotechnology and the divergent regulatory approaches to managing GM crops severely complicates the international trade, threatens economic, social and political implications to importing and exporting countries and global food security in general.

Importing country: “zero tolerance” policy on GM

Exporting countries increasing GM commercialization

High risk of finding low level of GMOs in imported commodities
Policies must reflect differences in food safety risk

**LLP is a non-tariff barrier. Safety is not at stake**

**Low Level Presence (LLP):** low levels of recombinant DNA plant materials that have passed a food safety assessment according to 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 safety of the relevant recombinant-DNA plants has not yet been determined.

**Adventitious Presence (AP):** unintentional presence of GMOs that have never been approved anywhere on the basis of the Codex international guidelines for food safety assessment.

[Choices: YES, NO]
## The EU case
Almost two decades of enduring threats to the supply

<table>
<thead>
<tr>
<th>Commodity</th>
<th>Source</th>
<th>GM traits</th>
<th>Year</th>
<th>Origin</th>
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</thead>
<tbody>
<tr>
<td>Maize</td>
<td>LLP from discontinued authorization</td>
<td>GA 21</td>
<td>2007/08</td>
<td>Argentina</td>
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<td>Soybean</td>
<td>LLP from asynchronous authorization</td>
<td>LibertyLink, Roundup Ready 2, MON 88017, MIR 604 and others</td>
<td>2008/09</td>
<td>North America</td>
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<td>LLP from asynchronous authorization</td>
<td>Herculex RW Rootworm, MIR 162 and others</td>
<td>1996</td>
<td>North America</td>
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<tr>
<td>Linseed</td>
<td>LLP from asymmetric authorization</td>
<td>CDC Triffid</td>
<td>2009/10</td>
<td>Canada</td>
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<tr>
<td>Rice</td>
<td>LLP from asymmetric authorization</td>
<td>LLRICE601, LLRICE06 and LLRICE62</td>
<td>2006/07</td>
<td>US</td>
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<tr>
<td>Maize</td>
<td>AP</td>
<td>BT 10</td>
<td>2005/06</td>
<td>US</td>
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<tr>
<td>Rice</td>
<td>AP</td>
<td>Kefeng 6, KMD, others</td>
<td>2006/07</td>
<td>Asian countries</td>
</tr>
</tbody>
</table>
Why LLP is a trade issue

• Once a GM event is authorized in one or more countries it takes only a matter of time for trace levels to be detected in commercial channels:
  – Zero thresholds: GM needs to receive full domestic authorization before being accepted
  – Asynchronous authorizations: full synchronization is difficult to be achieved

“Zero thresholds” are impossible to achieve
No bulk handling system, no channeling system, no IP system can attain zero thresholds
EU import of Corn Gluten Feed (CGF) and Dry Distiller’s Grains (DDGS) from the US in tons

*LLP brings enduring trade flows disruptions*

Source: GTIS, Toepfer
EU import of Soybean from the US in tons

LLP brings enduring trade flows disruptions

Source: GTIS
EU import of linseed from Canada in 1,000 tons

LLP brings structural changes to trade

Source: GTIS
EU import of maize from US in mln tons

**LLP brings structural changes to trade**

Since late 90’s, imports are almost at zero

*Source: GTIS*
EU import of rice from US in tons

LLP brings structural changes to trade

EU import of US origin husked rice (2003-2013)

Source: Eurostat
How to move forward?

International Statement on Low Level Presence, Vancouver 2012

a. Reducing asynchronous approvals the most effective way of reducing trade disruptions due to LLP.

b. Immediate need to address the risk to trade arising from LLP occurrences, a risk that impacts importing and exporting countries alike, and global food security in general.
Long-lasting policies for the management of LLP
A need for trade and supply

1. Provide for food, feed & environmental safety
2. Viability of supply & legal certainty to operators
3. Consistent with bulk handling system and manufacturing practices
4. Providers, producers and subsequent holders to be fully responsible
5. Encourage policy harmonization & synchronization of approvals
6. Scientifically based & internationally consistent
LLP policy must cover:

a. All food and feed domestically produced and imported

b. All GM products fully authorized by one or more exporting countries based on the plant Codex risk assessment guidelines

c. In the importing countries, all GM products that:
   i. Went through a LLP Codex risk assessment and resulted in no risks to human and animal health at low levels
   ii. Were assigned an LLP marketing threshold
Conclusions

Low Level Presence

An international approach to a global issue is needed

- Exporting and importing countries to work together to find global and practical strategies for the management of LLP and reduction of asynchronous GM authorizations

- Regulatory cooperation instead of “too much ado”

- Domestic long-lasting approaches on LLP policy based on international recognized food safety standards and mechanism:
  - to continue moving goods from areas of surplus to areas of deficit
  - to ensure availability of agricultural commodities at affordable prices
  - to provide legal certainty for business operators
Thank you for your attention

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