

Global Alliance for Ag Biotech Trade (GAABT)¹ Principles and Criteria for Proactive Solutions to Address Low Level Presence of Agricultural Biotechnology-derived Plant Products in Food, Feed, and Grain for Processing

Low Level Presence (LLP) is defined as low levels of recombinant DNA plant materials that have passed a food safety assessment according to the Codex Guideline for the Conduct of Food Safety Assessment of Foods Derived from Recombinant-DNA Plants (CAC/GL 45-2003) (Codex Plant Guideline) in one or more countries, but may on occasion be present in food in importing countries in which the regulatory approval process is not yet complete.

Practical solutions to address LLP in Food, Feed, and Grain for Processing (FFP) should be based on the following **principles**²:

- 1. Zero presence of commercialized agricultural biotech-derived products in global trade is not practical or achievable due to underlying biological realities, production constraints and commodity handling systems.
- 2. The very definition of LLP includes only products that have already passed a safety assessment by at least one regulatory authority according to the Codex Plant Guideline, thereby reinforcing the fact that products detected as LLP are safe for food and feed purposes.
- 3. Food and feed safety assessments should be science-based.
- 4. Application of LLP solutions is temporary and hence does not replace the goal of obtaining approval for imports of FFP.
- 5. Risk management approaches should be proportionate to risk.
- 6. Existing national legal frameworks and sovereign authority of individual governments should be respected.
- 7. Solutions should be compatible with international standards and agreements.
- 8. Importing and exporting governments should work together to harmonize agricultural biotechnology policies and synchronize trait approvals for FFP.
- 9. Information related to the commercial and regulatory status of agricultural biotechnology traits should be publicly available, comprehensive and up-to-date.

Additionally, practical LLP solutions for FFP should satisfy a number of fundamental **criteria**³, and should therefore:

¹ The Global Alliance for Ag Biotech Trade is a "farm to fork" industry coalition that brings together different parts of the agricultural value chain. Working together, we encourage the development of trade policies which facilitate the movement of seed and grain and reduce the potential for trade disruptions. The Alliance represents stakeholders from grower and producer groups, grain and feed handlers, food and seed industries, and technology providers. For more information, please visit <u>www.gaabt.org</u>.

² Principles are either statements of fact (e.g., zero presence is not possible) or conform to general rules of trade (e.g., respect sovereign authority).

- 1. <u>Prevent trade disruption</u> by supporting a proactive approach.
- 2. Be <u>predictable</u>, <u>efficient</u> and <u>achievable</u> for all stakeholders, including governments and industry.
- 3. Be <u>enforceable</u> by government authorities.
- 4. Be amenable to specific <u>thresholds</u> that are realistic, practical and based on the realities of grain handling practices and international trade.
- 5. Be <u>comprehensive in scope</u>, covering products developed and marketed in any country, including products intended for FFP, and both private and public sector traits.
- 6. Be <u>transparent</u>, providing safety assurance to the public.

³ Criteria are the elements of a system that should be optimized to obtain the best possible system.