



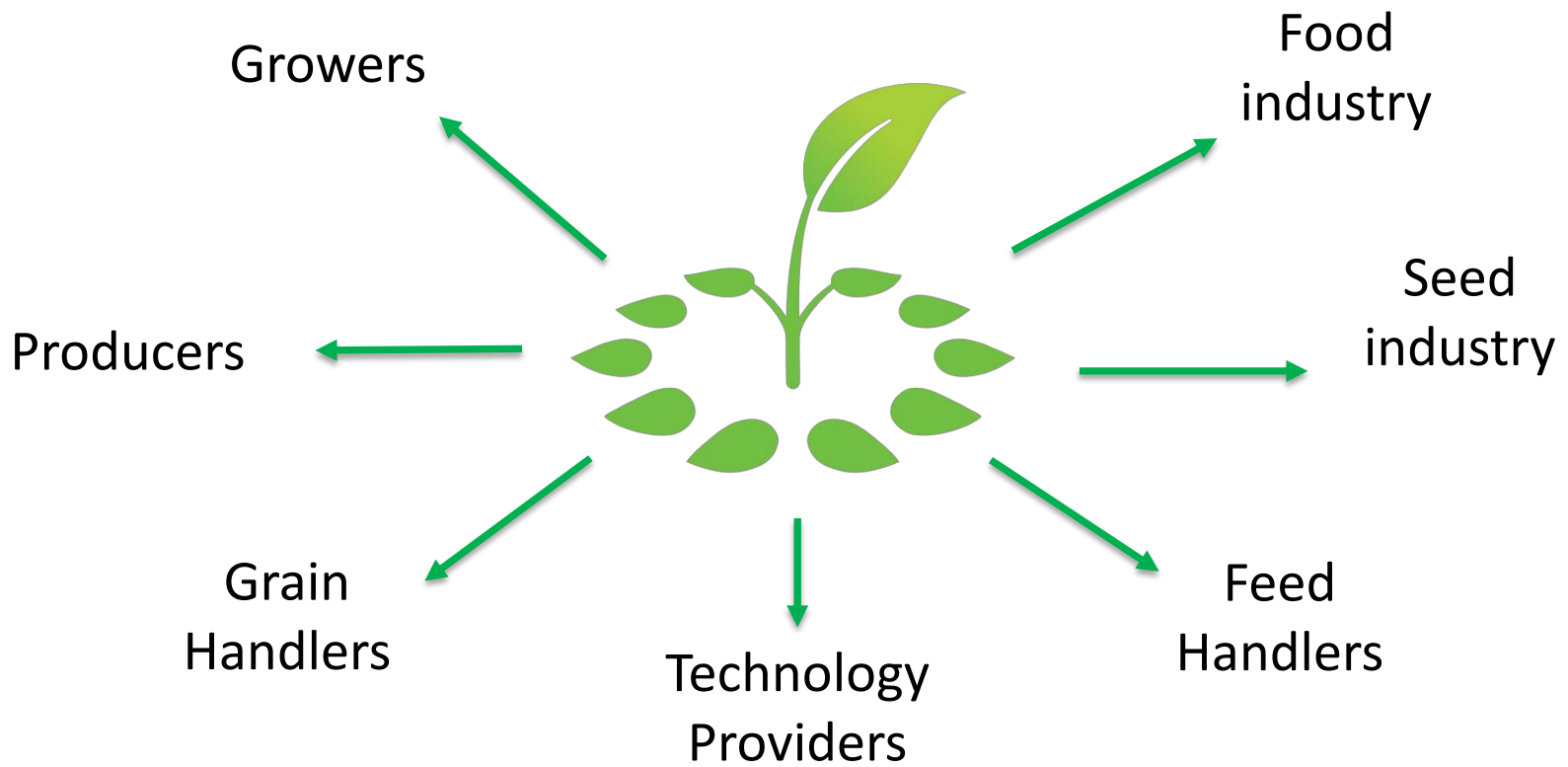
Amsterdam 18.11.2015, Beat Spath (EuropaBio)



Global Alliance
for Ag Biotech Trade

*GAABT Perspective on
Low Level Presence*

GAABT: United Farm to Fork Coalition



Diverse Membership Across Agriculture



Global Leaders in Stewardship



Our Mission



Working together, GAABT encourages the development of trade policies that facilitate the movement of seed, grain and processing ingredients, and reduce the potential for trade disruptions.

We seek practical solutions to trade-related issues.

Principles For Practical Solutions



The Reality

- **Zero presence** of commercialized products in global trade is **not achievable**
- Once approved in one country a GM product in grain may appear in another **unintentionally** (LLP - includes only products that have already passed a safety assessment)

Asynchronous approvals:

Recent av. Timelines (approx)

Cultivation: 12-30 months

Ar 30, Aus 12, Br 22, Ca 24, US 23

Import: 78–84 months

EU: 78 (53 risk ass + 25 political)

CHN 60+24 (submission only possible after cultivation approval)

Principles For Practical Solutions



Food and feed safety
assessments should be
science-based

Risk management
approaches should be
proportionate to risk.

LLP solutions are temporary and hence
does not replace the goal of obtaining
full approval for imports of FFP.

Principles For Practical Solutions



Information related to the commercial and regulatory status of agricultural biotechnology traits should be publicly available, comprehensive and up-to-date.

Importing and exporting governments should work together to harmonize agricultural biotechnology policies and synchronize trait approvals for FFP.

Existing national legal frameworks and sovereign authority of individual governments should be respected. Solutions should be compatible with international standards and agreements.

What is a Practical LLP Policy?



Predictable	Efficient	Achievable
Enforceable	Specific & Comprehensive	Transparent

Policies Can Meet These Criteria



- Create a proactive LLP threshold in FFP imports
- Develop a mechanism to motivate regulatory submission for a detected product
- Why?
 - Does not require bilateral/multilateral agreements
 - Allows for smooth flow of trade and limits any disruption
 - Ensures products meet regulatory guidelines before widespread market access

Policies Can Meet This Criteria



What If....

An unauthorized event is detected above the LLP threshold?



An unauthorized event is below the threshold & government has received an FFP submission?



If an unauthorized event is detected & the government has not received an FFP submission?

Policies Can Meet This Criteria



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An unauthorized event is detected above the LLP threshold?



An unauthorized event is below the threshold & government has received an FFP submission?



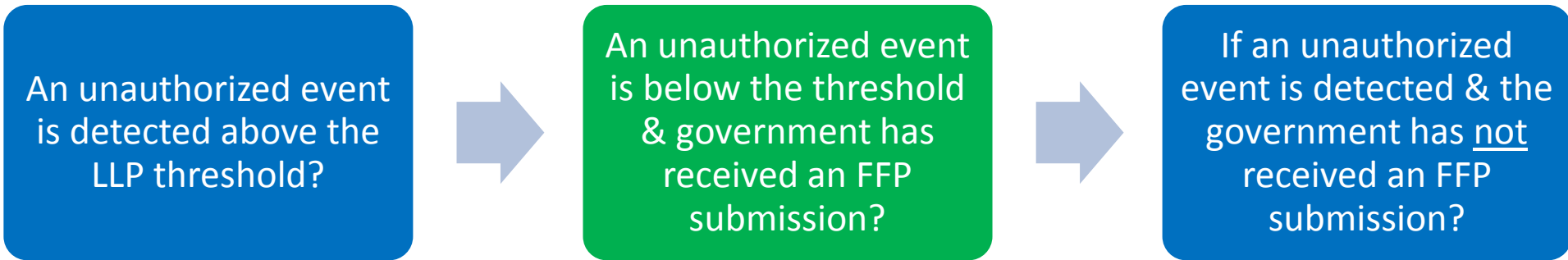
If an unauthorized event is detected & the government has not received an FFP submission?

The shipment should be managed in accordance with relevant national laws and regulations.

Policies Can Meet This Criteria



What If....



The shipment shall be accepted and no action is required by the importer, shipper, or developer.

Policies Can Meet This Criteria



What If....

An unauthorized event is detected above the LLP threshold?



An unauthorized event is below the threshold & government has received an FFP submission?



If an unauthorized event is detected & the government has not received an FFP submission?

In this situation.....

Policies Can Meet This Criteria



Step 1

Shipment accepted, but FFP dossier is required within 60 days.

Step 2

If dossier is received, 5% threshold remains in place until FFP evaluation is completed.

Step 3

If a dossier is NOT submitted, 5% threshold expires and other risk management actions may be taken.

GAABT is Fully Committed to Practical LLP Solutions



- **How can we improve this policy model?**
- **Are there scenarios we have not considered?**
- **Other comments/questions?**