



CANADA GRAINS
COUNCIL

Canada's approach to Low Level Presence

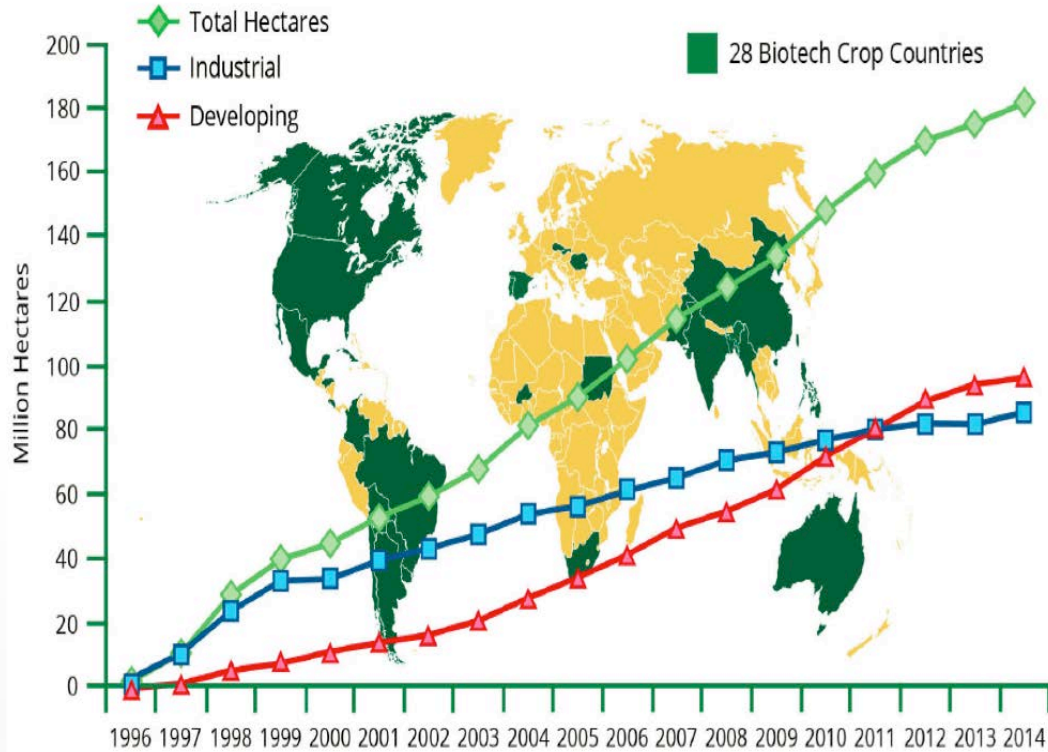
Presentation to GMCC 2015
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Canada Grains Council
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The Canada Grains Council

- Since 1969, Canada's national federation of grain value chain members;
- Multi-stakeholder collaboration; information-sharing and consensus based decision-making on sector issues of national and international importance.
- Representing Canada's cereal grains, oilseeds, pulses and special crops sectors as well as key links in Canada's agriculture supply chain.
- Founding member of the International Grain Trade Coalition



The case for Low Level Presence Policies



A record 18 million farmers, in 28 countries, planted 181.5 million hectares (448 million acres)

Source: Clive James, 2014

- Increasing GM acreage and products;
- Greater number of organizations innovating;
- Increasingly acute testing technology;
- Lack of synchronization of approvals internationally;
- Zero tolerance provides no scope for regulation consistent with risk to safety.

Canada's interest in LLP

- Canadian agriculture reliant on trade. Canadian producers have adopted GM:
 - Canola 97%
 - Corn 80%
 - Soybeans 70%
- Significant disruption of trade in flax (Linseed) from Canada to Europe, 2009
- “Triffid” flax was approved in Canada and several other countries and was detected at low levels – meeting the definition of LLP



Canada's Policy

Objectives:

- Uphold safety for humans, animals and the environment;
- Prevent unnecessary trade disruptions;
- Support an innovative and competitive agriculture sector;
- Develop a risk-based approach within current legislative framework.



Canada's policy development process

- Government of Canada initiated an inter-agency process including all the major government departments concerned - Agriculture, Trade, Health, Environment and Canadian Food Inspection Agency;
- Directed by senior level management committee;
- Consultations with industry. Technical and legal analysis;
- November 2012 draft policy. Notified to WTO.
- Updated draft policy released early 2015. Some outstanding issues.



Basic Eligibility Criteria for LLP

- GM event approved for food use in at least one country;
- Country that approved GM event recognized as following Codex Guidelines;
- Detection method and samples provided to importing country;

Applies to imported whole grain, food and feed products derived from grains.



Compliance consistent with risk

- Policy requires that GM event has been safety assessed according to international guidelines;
- Once safety is determined, threshold levels can be commensurate with risk and reflect realities of grain handling logistics;
- Marketing thresholds can be applied - ubiquitous in international grain handling and trade



Establishing a Low Level Presence Threshold

- Model policy will include a LLP Threshold:
 - Threshold level not yet determined;
 - Expected to be in the 3% to 5% range;
- Additional criteria would need to be met:
 - LLP risk assessment has determined that the GM crop is unlikely to pose a risk;
 - Option being considered: Canada must have received an application for authorization of the GM event.
- If above criteria are met and GM presence is:
 - At or below threshold: Product can enter Canada
 - Above threshold: Existing procedures are applied for unapproved GM materials



Establishing negligible risk from LLP

- When the level of a LLP event is 0.2% or below, no risk assessment is required
- Only basic criteria are applied:
 - GM crop approved for food use in at least one country
 - Country that approved GM crop recognized as following Codex Guidelines
 - Detection method and samples provided to importing country

0.2% level to address LLP situations such as trace amounts of LLP resulting from dust, discontinued events and isolated foreign approvals



Benefits

- Provides a risk-based management approach that:
 - Allows regulatory enforcement actions to be taken in proportion to the negligible risk posed by LLP
 - Provides predictability on how LLP situations will be managed



Policy Summary

Presence of LLP Event		
0% to 0.2%	0.2% to LLP Threshold (3-5%)	Above LLP Threshold
<ul style="list-style-type: none"> ▪ GM crop approved for food use in at least one country ▪ Country that approved GM crop recognized as following Codex Guidelines ▪ Detection method and samples provided to importing country 	<ul style="list-style-type: none"> ▪ GM crop approved for food use in at least one country ▪ Country that approved GM crop recognized as following Codex Guidelines ▪ Detection method and samples provided to importing country ▪ LLP risk assessment has determined that the GM crop is unlikely to pose a risk ▪ Potentially: Canada must have received an application for authorization of the GM crop 	<ul style="list-style-type: none"> • Policy does not apply: Case by case assessment



Next Steps

- National Elections in October 2015. Canada has a new government.
- Challenges of a unpredictable trade environment still very real. Lack of harmonization in approval times for new, innovative seed products continues to be an issue;
- Canadian industry will be urging new government to finalize its LLP policy and make it available for review;
- Global Low Level Presence Initiative (GLI), a coalition of 14 countries and many additional observers, plan to meet in February, 2016 for 4th GLI meeting.
- Opportunity to present and discuss Canada's policy along with other approaches.





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Thank you

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