



# INTERNATIONAL GRAIN TRADE COALITION

## International Grain Trade Coalition Notice to Trade #6

ABIOVE

ANIAME

APPAMEX

AWB Limited

Canada Grains  
Council

Centro de  
Exportadores  
de Cereals

China National  
Association of  
Grain Sector

COCERAL

Grain and Feed  
Trade Association

Hungarian  
Grain and Feed  
Association

National  
Agricultural  
Commodities  
Marketing  
Association

National  
Association of  
Grain Exporters

Grain industry members are encouraged to enter into discussions with their respective governments to encourage flexibility in resolving Article 18.2(a) documentation requirements at COP/MOP-3 in Curitiba, Brazil 13-17 March 2006.

Four practical issues impact global grain trade as COP/MOP-3 determines documentation requirements for transboundary shipment of living modified organisms (LMOs):

- When to use documentation?
- When NOT to use documentation?
- What information to be placed on shipping documentation?
- When to use “contains”?

The IGTC suggests governments adopt the following policies:

- Documentation should accompany “intentional” LMO shipments.
- Adventitious presence of LMOs in non-LMO shipments should not trigger LMO documentation requirements.
- Enable importers to determine documentation requirements:
  - Option One: “may contain” + domestic protocol
  - Option Two: “may contain” + list of events
- Clarify “contains” does not apply to bulk commodity shipments.

Why enable importer choice?

- COP/MOP meetings have occurred rapidly: More time required for capacity building and experimentation.
- Different countries possess different circumstances.
- Importer choice consistent with COP/MOP-1 decision.

Governments need to be reminded that these commodities are intended for direct use as food or feed, or for processing; that these commodities are not intended for intentional introduction into the environment; that the final implementing rules will have a significant impact on the commodity bulk handling system and on the cost of food; and that documentation requirements impact importers and exporters alike.

The Biosafety Protocol should be sufficiently flexible to enable sovereign decisions to reflect each country’s biosafety risk and economic needs. Each importer must be enabled to determine which implementation option best achieves the country’s biosafety objectives.

National  
Corn Growers  
Association

National  
Grain and Feed  
Association

North American  
Export Grain  
Association

Russian Grain  
Union

Solvent  
Extractors’  
Association  
of India

Soybean  
Processors  
Association  
of India

US Grains Council

US Wheat  
Associates

Wheat Export  
Trade Education  
Committee