



“Working Together to Make Trade Work”

NAEGA MAP Trip Report – Global Low Level Presence Initiative – Rome, Italy

Name of Traveler: Paul B. Green, NAEGA Senior Advisor

Dates of Travel: June 12-16, 2017

Purpose of Travel:

Consistent with advancing NAEGA UES objectives Paul Green, NAEGA Senior Advisor and contract consultant, traveled to Rome, Italy on June 12-16, 2017. In Rome, Mr. Green participated in the fifth meeting of the Global Low Level Presence Initiative (GLI) on June 14-15. At the GLI, Mr. Green utilized his professional experience and knowledge of global plant production technologies and trade to monitor, report and analyze developments and work with like-minded governments and the International Grain Trade Coalition (IGTC) to provide for:

- The GLI as an active, ongoing and relevant forum where government can work together to harmonize LLP policy globally;
- Information to GLI members on how an LLP policy might be implemented.

A primary goal of Mr. Green’s participation in this GLI was to convey grain trade practical experience and knowledge as part of a broader effort to move GLI countries to endorse and begin implementing the “Practical Approaches Paper” that was a prominent part of the agenda.

Summary of Findings/Conclusions/Accomplishment

This fifth meeting of the GLI countries was to further advance joint understanding and recognition of the need to implement actions by individual countries to manage asynchrony of authorizations for biotechnology events in a trade enhancing manner. Specifically, the meeting was to seek participating countries formal endorsement of the GLI Draft Statement: “Principles, Criteria and Practical Approaches for Addressing Low-Level Presence (LLP) in International Food and Feed Trade of Plant Material”. NAEGA and the IGTC place a high priority on the adoption of that paper and its implementation by as many of the GLI members as possible, in a timely manner.

Acting as the Secretariat of the GLI, Canada has encouraged private sector representatives from the producer, technology provider and grain trade industries to play an active part in the discussions. Both the Global Alliance for Agricultural Biotechnology Trade (GAABT) and the IGTC were invited to portions of the meetings and to make presentations to the country representatives that would further inform their discussions.

Several other participants representing members of the IGTC were active. Tyler Bjornson from the Canada Grains Council, Chair of the IGTC LLP Committee acted as spokesperson for the IGTC. IGTC and NAEGA objectives for the meeting were to assure the GLI members recognized the urgency felt by importers and exporters for practical approaches to the problems of LLP, including efforts to expand the countries that are members of the GLI and committed to actions that are trade accommodating. The US, which authored the ‘Practical Approaches Paper’ was not optimistic that it would be adopted at this meeting. Because the GLI only meets once a



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year, we felt it was important that they adopt this and move forward with plans to get some member countries involved with implementing some approaches as soon as possible. The GLI unanimously adopted the paper, subject to review in capitals. This is an excellent outcome, since it provides the opportunity for GAABT and IGTC, as well as other governments to engage individual government regulators to brainstorm on practical ways their regulatory systems can accommodate LLP.

GAABT, on behalf of the Crop Life International members offered to assist GLI member countries who might consider practical approaches to LLP by preparing a ‘model LLP Safety Assessment’ and pledging to prepare such information on each event in the future, making it available to those countries that have not approved an event, but were preparing a proactive policy to maintain trade until such approval was completed. The availability of this has been offered before (in the Codex Annex discussions), but CLI hasn’t done it, since there remains skepticism that countries would actually use it for the intended purpose. The GLI seemed interested in it this time, but GAABT spokespeople made it clear that availability of the LLP safety assessment package would be a quid pro quo for either synchronous approvals or some practical approaches action by individual governments.

GAABT made another request to GLI members that IGTC supported – that the IGTC be invited to participate in periodic GLI interstitial calls between meetings. It is clear to the private sector that government to government momentum is not easy to maintain without input from the trade and tech providers.

During the GLI, there were 3 presentations from IGTC and GAABT (GAABT LLP Background, LLP Risk Assessment criteria, and Threshold Setting) that were welcomed and seemed to add to the common understanding among the GLI country members and observers. As we’ve noted in past meetings, repetition of our messages is welcome, since many of the participants from member governments were not present at the previous meetings.

While there were some new observers at this year’s GLI (notably Indonesia, Malaysia and Honduras), we also noted South Africa, Korea and some others who had participated previously were no longer present. The longer the GLI continues without examples of countries implementing procedures to manage asynchrony, the more difficult it is to maintain interest among importing countries

The GLI observers from China (a biotech researcher who is part of the NBC) and the EU (DGs Trade and Sante) continue to be somewhat engaged, but without any input on how their actions could contribute to common understanding of the serious nature of this issue.

Although they’ve had several Co-Chairs of the individual meetings, the impetus behind the GLI effort is still the Government of Canada.

Because GAABT had previously and continues to advocate for a LLP implementation model that is not practical and places unreasonable and unmanageable risk on the trade of grains, oilseeds and other agribulks, NAEGA worked to assure that the final presentation at the event by GAABT



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did not continue the concerning advocacy. Particularly important was to assure that GAABT advocacy did not include the use of repeated testing of shipment as a management tool for asynchronous approval issues on specific events. Such measures would not be trade facilitating and are impractical for global bulk grain handling facilities.

Changes to GAABT policy papers and advocacy were attempted but could not be finalized prior to the GLI meeting. GAABT has acknowledged IGTC concerns and is reconsidering its advocacy. Meanwhile GAABT is proceeding with a series of webinars that address LLP. .

Recommendations

- Continue to promote the adoption of the Practical Approaches Paper, which provides the opportunity for GAABT and IGTC to make an outreach plan to member governments to work with regulators toward a legal scrub that would fit within their regulatory structure and provide trade facilitating predictability for asynchrony.
- Encourage the IGTC and GAABT to revise its outreach materials to be consistent in advocating proactive LLP policies that will not attempt to manage asynchrony on a shipment by shipment basis or rely on testing as a management tool for LLP.
- Work to expand GLI participation.
- Identify key regulatory regimes to target for LLP implementation.
- Provide for and lead any outreach to governments regarding implementation of LLP policy.
- NAEGA and IGTC should express its appreciation to Frederic Seppey for his personal and Canadian Government leadership.

Attachments

- *Global Low Level Presence Initiative Agenda*
- *Attendees*