NAEGA
North American Export Grain Association

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Crop Biotechnology

NAEGA is working with its members, their customers, counterpart organizations around the world, government officials and other stakeholders here and abroad to accommodate new technologies used in crop production. Addressing related commercial and regulatory challenges while providing for safety, competition and compliance in an informed and responsible market environment for the crops our members buy and sell is critical.

NAEGA has established these policies to guide and enhance our ongoing and successful work addressing new market conditions.

In all NAEGA policy, the following apply:

I. Commercial solutions are the most effective and preferable means to meet customer needs for unique commodities. We seek to minimize government interference with commercial activity related to meeting customer needs.

II. It is important to utilize, and for the grain export industry to participate in, appropriate, relevant, and effective national and international proceedings where policies and regulatory action affecting the industry will be negotiated or discussed.

III. All governments regulatory procedures and statutory authority need to ensure regulatory decisions reflect sound science, be proportionate to risk, provide for safe products, foster increased consumer confidence, and support a competitive and informed commercial response to market conditions and not be used as barriers to trade.

To specifically address plant breeding biotechnology:

I. The best way to overcome global controversy and trade disruption in bulk commodity shipments due to crop products derived from genetic modification, with gene editing as well as transgenic methods, is the adoption of a comprehensive, harmonized, global regulatory approval processes that address key issues like Adventitious Presence (AP). Until such processes are in place, commercialization of genetically modified plants without prior approval by the governments in major international markets for such products should be avoided.

II. The commercialization of crops using seeds that are produced with genetic modification technology without prior approval by the governments in international markets for such products has the potential to disrupt global trade and adversely affect the entire value chain. The extent of this impact will depend not only on whether governments adopt prudent and internationally consistent or compatible science and risk- based approaches for review and oversight of the technology and the crops produced utilizing genetic modification, but also on the degree of consumer acceptance. Ultimately consumer acceptance will be reflected in the purchasing and sourcing decisions of upstream customers (e.g., food manufacturers and retailers).

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III. Information about the development and commercialization of crops from seeds produced with or from genetic modification needs to be readily available to the grain trade. Breeding and seed companies and other entities that are developing and commercializing seeds produced with or from genetic modification are in the best position and bear a responsibility to provide accurate, timely and authoritative information, as well as to identify and mitigate any risks associated with the marketability and consumer acceptance of such traits to avert trade disruption. t is the primary responsibility of the life science, breeding and seed industry to undertake a comprehensive educational effort to inform the public of the benefits and risks, if any, from genetic modification of seeds. NAEGA will continue to provide fair and balanced information to domestic and foreign audiences.

IV. All modifications to crops commercially used for food or feed must have regulatory approval that recognizes their exposure to food and feed. Such regulatory approval must include a sound science-based approach to the potential Adventitious Presence of such modification in the supplies of all agribulk commodities destined for food and feed use. In the absence of a comprehensive regulatory structure to manage AP, all modifications to crops commercially used for food or feed must have complete regulatory approval for use as food and feed.

V. Governments in countries where genetically modified crops are approved should provide leadership in appropriate national and international fora in the development of workable threshold levels that address the many complex issues related to the Adventitious Presence of products derived from biotechnology in commodities. Official leadership is also needed to strongly advocate for predictable and transparent approaches to improve synchrony of global regulatory authorizations as the most effective way to minimize or eliminate Low Level Presence (LLP) situations for grain, food and feed. These approaches should include bilateral or multilateral trade agreements that incorporate commitments to allow trade to continue in the instance of an LLP situation.

VI. The global trading system, foreign governments and international organizations must recognize the reality that any and all bulk commodity shipments "may contain" some coincidental amounts of commodities derived from seeds that are produced with or from biotechnologies. Hence, policies and customer demands, that include zero tolerance for GMO events in commercial production are impossible to meet.

VII. Labeling of products should provide useful information and, to the greatest extent possible, only be required when health and safety concerns warrant such information be disclosed on a label. When a government mandates a label of a product intended to provide consumer information, the labeling regulatory regime should provide the highest level of flexibility possible for meeting statutory requirements; and in no circumstance should inadvertent non-labeling or mis-labeling be punishable by civil or criminal penalties. In no case should governments impose mandatory traceability requirements on the production and marketing process simply to gather information that may, or may not, be used for labeling purposes.

VIII. Additional mandatory sampling and testing of commercial grains and oilseeds for genetic content unnecessarily increases costs, decreases competitiveness, and restricts liquidity in global commodity markets and should be avoided. If governments dictate such testing occur, then those governments should fund efforts to develop and gain international acceptance for sampling and testing procedures that do not impede commercial grain and oilseed export operations and are approved by the grain trade.