

## Submission To the 'Genetically Modified Organisms (control of release) Bill

On the behalf of the Hong Kong Seed Trade Association Co Ltd., we do support the Bill and it is good we will have legislation to govern the safe transfer, handling and the use of Genetically Modified Organisms.

With the advance in technology it is inevitable that we will have the face the reality of GMO. Although it is most unlikely that any GMO will be released in Hong Kong for agricultural production in the foreseeable future, it is always good to have legislation in place to govern this.

On the other hand there may be the chance that we will be handling GMO in transit to third country. We are satisfactory of the very clear, transparent and simple procedures list out for such activities.

However we are very concerned on the adventitious presence of GMO in conventional seeds for growing. At the consultation with AFCD in January, we are informed that the tolerance level of GMO adventitiously presented in seeds for FFP will be set at 5% however no tolerance level for seeds for growing was set at that time and this was to be further studied. This important issue is not being dealt with at this Bill and we would like to know how this will be handled.

For the seed trade, particularly for us in Hong Kong which is mainly a trading centre that a tolerance level for adventitious presence of GMO in conventional seeds for growing is established. Even though all the seeds we handle today are conventional but there is always the likely hood, even though very remote, that they may be contaminated with GMO through mechanical mixing or cross pollination. An established tolerance level in line with international standards will be very helpful to the trade.

Another matter will be the 'Expert Group'. As expressed at the consultation session the seed trade would like to be represented at this 'Expert Group'.

Yours sincerely,

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