



Meeting Challenges in a Growing World

29 October 2010

Mrs Mary TANG
for Clerk to Subcommittee
Legislative Council Secretariat
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Dear Ms. Tang,

We thank the Subcommittee on Genetically Modified Organisms (Documentation for Import and Export) Regulation for giving us an opportunity to share our views on 'Genetically Modified Organisms (Control of Release) Ordinance (7 of 2010): Genetically Modified Organisms (Documentation for Import and Export) Regulation (L.N. 96).'

We respectfully submit our comments as follow:

The documentation requirements are consistent with the decisions by the Parties on this issue for all 3 categories: LMO-FFP, contained use, and for release into the environment. Moreover, the use of commercial invoices and shipping documents is adequate for product recognition.

We strongly support the 5% threshold for GMO-FFP.

We recommend a low tolerance level for adventitious presence (AP) of GMOs intended for release to the environment. While adventitious presence can be minimized, as a practical matter it is virtually impossible to eliminate it entirely in the global supply chain. AP situation is not unique to crops enhanced through biotechnology. In addition, there are no science-based safety issues that compel the need for zero percent threshold policy. Instead, we recommend adopting seed purity level standards. There are existing seed genetic purity standards that have been established by state seed laws and seed certification agencies that can help to guide decision-making.

We also reiterate that CropLife members are committed toward production and distribution of high-quality seeds. Further, we believe that the primary approach to managing adventitious presence in the supply chain must remain:

- The implementation of rigorous Good Agricultural Practices (GAP) for the cultivation of biotech crops; and



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- The implementation of Good Manufacturing Practices (GMP) throughout the agri-food chain for products that are authorized in the country of production but not yet in an importing country.

We hope you would find these comments helpful.

Respectfully,

A handwritten signature in black ink, appearing to read "Siang Hee Tan".

Siang Hee Tan
Executive Director

HW
10/29/10