

October 29, 2010

Mrs. Mary Tang  
Clerk for the Subcommittee  
Legislative Council Secretariat  
Legislative Council Building  
8 Jackson Road  
Central  
Hong Kong Special Administrative Region  
Email: [mpoon@legco.gov.hk](mailto:mpoon@legco.gov.hk)  
Fax: (852) 2869 6794

**RE: L.N. 96 of 2010 – Genetically Modified Organisms (Documentation for Import and Export) Regulation**

Dear Mrs. Tang:

In response to the published notice soliciting written views about L.N. 96 of 2010, the Biotechnology Industry Organization (BIO) is pleased to have the opportunity to present comments regarding Hong Kong's "Genetically Modified Organisms (Documentation for Import and Export) Regulation.

BIO represents more than 1,100 biotechnology companies, academic institutions, state biotechnology centers and related organizations across the United States and in more than 30 other nations. BIO members are involved in the research and development of innovative healthcare, agricultural, industrial and environmental biotechnology technologies.

We commend Hong Kong's intent to adopt biotechnology regulations, and we are encouraged by the transparency of the process. So that we may offer our assistance in helping facilitate the implementation of these import and export regulations, we offer the following suggestions:

- With regard to Adventitious Presence, BIO strongly supports the five (5) percent threshold for GMO-FFP to trigger the need for documentation requirements.
- However, we recommend that the threshold for intentional release be increased from zero (0) percent, recognizing the impossibility of achieving a zero (0) percent threshold for adventitious presence despite best laboratory and agricultural practices and product stewardship on the part of our members. Further, there are no science-based safety issues to necessitate the need for a 0 percent policy.



PRINTED ON  
RECYCLED PAPER

- Additionally, we suggest the adoption of seed purity level standards to the threshold for intentional release.
- BIO also strongly supports the use of commercial invoices and shipping documents as these documents provide an efficient means for product recognition.

Finally, we would appreciate and welcome the opportunity to engage in a discussion with you on these matters, and offer our continued support and assistance as Hong Kong implements these important regulations.

Sincerely,

A handwritten signature in black ink, appearing to read "Sharon Bomer Lauritsen". The signature is fluid and cursive, with a long horizontal line extending to the right.

Sharon Bomer Lauritsen  
Executive Vice President  
Food and Agriculture