

## **SAA Policy on Seed Low Level Presence**

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With the growing adoption and use of genetic engineering (GE) varieties, and the current status of global regulatory frameworks and processes, countries are facing the situation that off-type seed material can now include the unintended low level presence (LLP) of GE varieties that affects both governments and industry.

As global seed trade increases, as well as the growth of the counter-seasonal production among hemispheres, seed movement is vulnerable to restrictions related to LLP.

Existing seed quality standards provide the framework within which seed is moved internationally. Some level of variability is inherent in any biological reproductive system and is reflected in these quality standards.

The most widely recognized quality standards for variety identity and purity are those established under OECD Seed Schemes and AOSCA. The objective of the OECD Seed Schemes for the varietal certification of seed is to encourage participating countries in the use of consistently high quality seed.

To further minimize LLP, seed companies follow their own standards. The seed industry manages seed product integrity through production processes based on best management practices, quality assurance processes and quality control systems with the goal of facilitating international seed trade.

Using the already existing LLP definition of Codex Alimentarius, SAA has engaged in this matter recognizing the need to address this issue with interested parties.

LLP is the unintended low level presence of transgenic plant material that has received approval in at least one country but has not received approval in the country of import.

It is important to establish international risk assessment guidelines for LLP situations. Codex has completed guidelines for food/feed LLP. SAA urges the advancement of the “Seed LLP project” of the OECD Working Group on Harmonization of Regulatory Oversight in Biotechnology, as an appropriate reference to support government initiatives towards environmental risk assessments for seed LLP situations.

To address this situation, SAA supports that:

- the importing country’s national authority takes into account and applies the existing seed quality standards in the country as part of the seed quality management process. In cases where no seed quality standards exist, SAA strongly supports the use of international standards as the OECD and AOSCA seed schemes ones.
- in case national legislations do not allow the above approach, the development of crop specific thresholds would be advisable
- If testing is required to verify the seed quality standards, it is advisable to have a protein based test, rather than an event based test

If in a LLP situation the importing national authority considers a risk assessment to be necessary:

- the concepts of previously known trait-crop interaction, protein familiarity and low exposure levels based on the Seed LLP OECD principles should be taken into consideration by the national authority,
- it is advisable to have a protein based risk assessment rather than event based risk assessment,
- it should utilize, as applicable, any other country’s risk assessment for cultivation. SAA strongly recommends that the countries mutually recognize the risk assessments performed by other competent authorities in order to facilitate the seed movement with LLP,
- risk mitigation should be performed in a manner proportional to the identified risk