



Association des Amidonniers et Féculiers

AAF POLICY ON GMOs FOR THE FOOD & FEED SECTOR

Regulations 1829/2003/EC and 1830/2003/EC¹ on GMOs have been published in the Official Journal on 18 October 2003 and entered into force on April 19th, 2004.

This legislation defines rules for the placing on the market and labelling of GMOs and food and feed products derived from GMOs. It also defines the rules for traceability of GMOs as well as of food and feed products derived from GMOs.

Biotechnology in general is interesting as it introduces new possibilities (reduction of pesticides, mycotoxins, water and soil pollution etc). However, it is clear that most of the European consumers do not accept GMOs for food use and that, as a consequence, the food and drink industry will continue to require that food ingredients and additives rely upon conventional² supply.

This AAF Policy Paper focuses only on starch products from maize because among the raw materials used, maize is the only crop for which GM events are currently commercially available in the European Union.

Therefore, the AAF will:

1. Continue to respond to current customer demands for conventional products in compliance with EU law as long as consumers refuse GMOs for food use

Since 1999, together with cereals growers, the AAF succeeds to satisfy the demand of consumers for conventional maize-based ingredients for the food and drink industry.

The AAF purchase protocol will continue to ensure the supply of conventional maize, by still requesting that all necessary measures be taken in the supply chain so that the adventitious contamination remains as low as technically achievable.

In the context of the Regulations, the AAF members continue to require through the enclosed protocol that their suppliers are able to demonstrate that they have taken appropriate measures/steps to avoid the presence of GM materials.

¹ Regulation (EC) n°1829/2003 of the European Parliament and of the Council of 22 September 2003 on genetically modified food and feed.

Regulation (EC) n°1830/2003 of the European Parliament and of the Council of 22 September 2003 concerning the traceability and labelling of genetically modified organisms and the traceability of food and feed products produced from genetically modified organisms and amending Directive 2001/18/EC.

² By "conventional" products, the AAF, in line with several European institutions who used this term at many occasions and in line with CIAA, means the products to which the GMO traceability/labelling obligations do not apply. The AAF recommends that manufacturers do not use terms such as "traditional" or "GMO-free" as there is no clear definition of what this means, and it is likely to be very difficult to achieve - and substantiate - in any commercially complex food product. There is no EU legislation covering the use of the term "GM free" on food labels.



Association des Amidonniers et Féculiers

2. Ensure that traceability is implemented

The AAF has always supported the European Commission's initiative to put into place a compulsory system for traceability in general³, and for GM raw materials in particular⁴, with a clear definition of the responsibilities of each operator of the food and feed chain. The traceability is a step by step approach where each operator of the food chain is responsible for the traceability of its supply and of its sales ("from whom to whom" traceability approach). As a result, each operator is individually responsible for the attainment of an adventitious presence as low as technically achievable.

The starch industry put into place, on a voluntary basis, Quality Management Systems such as ISO 9000, including internal operational traceability, well before 1999. All the procedures related to the procurement of conventional maize were further integrated in these systems to ensure that no GM maize enters the manufacturing of our products:

a) There must be adequate measures at all stages of the supply chain, including transport; these must be transparent and documented. For example: seed producers → growers → collectors (who generally also handle the drying) → brokers and traders → procurement departments of the starch producers → maize starch plant.

b) Supply from GM maize is excluded, also when imported from outside the EU 25.

Under EU Regulations, technical segregation in the EU starch plants between GMO and conventional maize at the level currently required is neither feasible nor relevant in the EU starch sector. As a result, starch producers reaffirm the following choices:

c) The entirety of their EU production is based on conventional maize.

d) They apply the AAF purchase protocol (see enclosed).

AAF members have been able to comply with the requests of their customers for conventional ingredients and will continue to do so.

Issued in May 2006

Note: see annex for further details

³ The traceability of conventional maize products is not part of the GM legislation, but is legally required, as from January 2005, under Regulation 178/2002/EC of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matter of food safety. Article 3.15 of this Regulation defines traceability as the "ability to trace and follow a food, feed, food producing animal or substance... through all stages of production, processing and distribution".

⁴ The traceability of GMOs and GM derived products is defined in the Regulation 1830/2003/EC of the European Parliament and of the Council of 22 September 2003 concerning the traceability and labelling of genetically modified organisms and the traceability of food and feed products produced from genetically modified organisms and amending Directive 2001/18/EC. Article 3.3 of this Regulation defines the traceability of GMOs as "the ability to trace GMOs and products produced from GMOs, at all stages of their placing on the market, through the production and distribution chains".



Association des Amidonniers et Féculiers

AAF PURCHASE PROTOCOL

Applying appropriate steps to ensure the supply of maize produced from conventional⁵ varieties should be done against the following criteria :

1. Maize seeds

Criteria concerning conventional maize seeds include :

- Certification,
- Labelling in accordance with legislation,
- Traceability to audited seed producers and importers (where applicable),
- Monitoring the level of adventitious presence of GM maize through appropriate testing,
- Seed purchase records,
- Traceability between seed lots and fields.

2. Maize grower

Criteria concerning maize growers include :

- Production mapping (identification of maize fields),
- Farmer's declaration about the maize seeds used.

3. Collector

Criteria concerning collectors include:

- Field trials mapping,
- GM maize planting mapping (when applicable),
- Segregation of maize of non documented or GM origin.

4. From the maize field to the starch plant

Criteria include the traceability of conventional maize from the maize field to the starch plant, in particular regarding transport, equipment (e.g. harvest, drying), storage.

Conventional maize means maize that fulfils the requirements laid down in the AAF purchase protocol, in particular concerning seeds, segregation, traceability and due diligence at all levels (i.e. farmers, collectors and delivery point).

Issued in May 2006

⁵ By "conventional" products, the AAF, in line with several European institutions who used this term at many occasions and in line with CIAA, means the products to which the GMO traceability/labelling obligations do not apply. The AAF recommends that manufacturers do not use terms such as "traditional" or "GMO-free" as there is no clear definition of what this means, and it is likely to be very difficult to achieve-and substantiate- in any commercially complex food product. There is no EU legislation covering the use of the term "GM free" on food labels.