



Grains Industry Common GM Declarations

What is the issue?

On receipt of grain from a grower or during transfer in the trade, declarations are made on such things as chemical residue status of the grain and variety. This information is used by the buyer or storer of the grain to verify the grain meets regulations or market requirements.

There are various declarations used in the industry, depending on the company receiving the grain. Using several different declarations with different wording has the potential to make traceability and transfer of information about the grain difficult.

With the potential impending commercialisation of GM grain crops in Australia, there is a need for a common GM declaration to be used by industry.

Who produced the declarations?

The Australian Oilseeds Federation, as the peak body representing the interests of the oilseed industry, developed these declarations following feedback from its members. A group within the AOF developed the declarations following extensive consultation among the oilseed industry members. The wording of the declarations was recently unanimously agreed at an AOF Standards Committee meeting.

The NACMA Standards Committee has reviewed and approved these declarations.

Why were they produced now?

Moratoriums are currently in place in most States and thus no GM grain crops are commercially grown at present in Australia. There are currently thresholds for the presence of GM material in crops such as canola that industry and Government have ratified. These are reflected in the definition for Australian non GM canola in the AOF Trading Standards.

Despite this, some members of the grains and related industry continue to use such terms as "GM free" (note GM free implies a zero or nil threshold for the level of adventitious presence).

To assist industry to use the correct terminology, the declarations were developed as an aid to industry. Adoption of the declarations by all industry sectors will assist industry to apply common processes and terminology, ready for any potential introduction of GM crops.

What are the Declarations?

The declaration for grower deliveries ex farm is:

"This commodity is of the declared variety/varieties, and as such, is not known to contain any unapproved genetically modified material nor any approved genetically modified material in excess of the allowed adventitious presence of approved events of 0.9% (seeds in the sample from a GM plant) (as per AOF Standards and legislation in NSW, VIC, SA and WA)."

The declaration for grain moving through trade is

Either

"This commodity is not known to contain any unapproved genetically modified material nor any approved genetically modified material in excess of the allowed adventitious presence of approved events of 0.9% (seeds in the sample from a GM plant) (as per AOF Standards and legislation in NSW, VIC, SA and WA)."

Or

"This commodity has been tested for the presence of genetically modified material, and no unapproved genetically modified material nor any approved genetically modified material was detected in excess of the allowed adventitious presence of approved events of 0.9% (seeds in the sample from a GM plant) (as per AOF Standards and legislation in NSW, Victoria, WA and SA)."

Or

"This commodity has been received into and stored in facilities run by a company which operates under an independently audited QA program. This commodity is of known varieties that are not known to contain unapproved genetically modified material nor any approved genetically modified material in excess of the allowed adventitious presence of approved events of 0.9% (seeds in the sample from a GM plant) (as per AOF Standards and legislation in NSW, VIC, SA and WA)."

What does the grower declaration mean?

This declaration is to be completed by growers delivering crops such as canola where a declaration is required by industry. The purpose is to provide sufficient confidence to Receival Agents that growers are aware of their responsibilities and the grain received in storage is compliant with legislation.

What does the trade declaration mean?

There are three possible declarations depending on the circumstances. One of these declarations only should be used whenever grain is traded through the supply chain.

The implication of the first declaration is that industry stakeholders have their own internal systems that would withstand testing of the commodity if required. Declarations have been received for all tonnage in the storage where the grain was received.

The second declaration could be used where industry stakeholders are conducting their own testing as an adjunct to grower declarations. This may occur where there is a particular market requirement for testing.

In the third scenario, the company supplying the commodity has a number of processes it may rely on to ensure the regulations and industry Standards are being met. This may involve sampling and testing as required.

When should I use them?

These declarations can be used now. The first declaration could be used on a load by load basis for all grain received ex farm. One of the second declarations could be used for grain traded through the supply chain.

Can I use them on other crops?

While the declarations were developed by the oilseed industry, they can be applied to other commodities, with some minor modifications. As indicated above, AOF is working with NACMA to develop a set of declarations that can be used across the industry.

When GM crops are developed or legislation is varied (i.e., removal of moratoriums) the wording at the end of each declaration may need to change to reflect the circumstances at the time.

Can I vary them?

The purpose of the declarations is to have common wording on contracts and common data collection across the entire grains industry. So yes the wording can be altered, but that is not recommended. All industry is encouraged to use the declarations as they are currently worded.

Do I have to use them?

Not all of industry will require a declaration on the GM status of the grain they are receiving from growers or buying through the trade. However where a declaration is required to be made, industry is encouraged to use them.

Why wouldn't I use them?

Some sectors of industry may not require a declaration to be made as there may not be a customer requirement. Industry legislation is currently in place for adventitious presence in canola and may be introduced in future for other commodities. That may suffice for industry needs to ensure customer requirements are being met. Thus declarations and other processes such as testing may not be required, depending on individual company policies.

What about testing?

Individual companies will test receivals based on their own internal procedures and quality systems. The contract between the buyer and seller will determine whether testing will be required to ensure the declaration is correct. As for any other quality parameter, the costs of receipt and storage or the price paid by the buyer for the commodity may reflect any testing costs.

What happens next?

The declarations have been accepted by the oilseed industry. Individual stakeholders are reviewing their policies to determine how they can be implemented within their organisation. This may mean printing of weighbridge dockets or contracts with the specific wording. Alternatively, current declarations used at receipt may suffice but the above wording may be written into contracts or Storage and Handling Agreements.

Who do I contact for more information?

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