

FEDIOL PRINCIPLES
on appropriate steps to avoid the presence of material
which contains, consists of or is produced from GMOs

This position contains the main principles that shall be taken into account when applying a system that aims to avoid the commingling of products of conventional¹ origin with GM (derived) material.

Verification of conventional origin

When a raw material or derived product is placed on the market in the EU, a distinction shall be made between two categories of products:

1. Products where the conventional origin could be verified by analytical detection:
 - Raw materials (oilseeds, oil fruits).
Monitoring would be feasible at the level of the raw material intake of the EU processing plant.
 - Derived products (oilseed meal and protein products).
Monitoring would be feasible at the level of the placing on the market in the EU (importer).
2. Products where the conventional origin is not verifiable by analytical detection:
 - Derived products (refined oil).
Monitoring would be feasible at the level of the raw material intake of the processing plant in the country of production.

Contract specifications

The contract between a processor or importer and a supplier or exporter shall stipulate the conventional origin of the product under contract (raw material or derived product).

- The supplier or exporter shall be able to demonstrate the conventional origin of the product on the basis of traceability requirements.
- The supplier or exporter shall be able to demonstrate that the appropriate steps have been taken to preserve the conventional integrity of the product (documentation).
- In the case of derived products where the GM-origin is not verifiable by analytical detection, the supplier or exporter shall be able to guarantee the conventional origin of the corresponding raw material at the intake of the processing plant in the country of production.

Main principles to preserve the conventional integrity

The appropriate steps to preserve the conventional integrity of a product shall be part of a system which is designed to avoid the commingling with GM (derived) material. When the importer or processor places a raw material or derived product on the EU market, he shall be able to demonstrate that such system is in place. For verification purposes, the relevant handling procedures and work instructions of this system shall be appropriately documented.

The design of such system relates to three main principles:

- Segregation management at the level of storage, transport and processing.
- Appropriate cleaning procedures at the level of storage, transport and processing.
- Monitoring activities which include adequate sampling and testing.

¹ By "conventional", FEDIOL means the products to which the GMO traceability/labelling obligations do not apply.