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## **Biosafety needs meaningful documentation**

### **Greenpeace comments on Article 18.2(a) of the Cartagena Protocol on Biosafety regarding labeling and identification of living modified organisms (LMO) intended for food, feed or processing (FFP)**

During the 3<sup>rd</sup> meeting of Parties (MOP) to the Cartagena Protocol on Biosafety (BSP) in Curitiba, Brazil, 13<sup>th</sup> – 17<sup>th</sup> March, Parties are to adopt rules, under Article 18.2(a), on the detailed requirements for documentation accompanying shipments of Living Modified Organisms for food, feed and processing (LMO-FFPs). At the 2<sup>nd</sup> MOP held in Montreal in June 2005 no agreement on this contentious issue could be achieved due to opposition of New Zealand and Brasil, supported by various non-Parties and industry representatives. While the overwhelming majority of the Parties to the Protocol (then 116, now 131) wanted to establish clear identification of LMOs in FFP shipments, a small group fought for an option to identify shipments only as “may contain” LMOs, which will not allow Parties to efficiently control the import of LMOs into their country and to fulfill the suite of other obligations associated with the Protocol.

A comprehensive and adequate implementation of the Protocol’s documentation requirements *must* enable the Party of import:

1. to determine whether the LMOs imported are approved or prohibited under national legislation;
2. to establish adequate monitoring measures regarding unintended releases into the environment and regarding their use and consumption in processed food and feed;
3. to determine whether goods consisting of or containing LMOs, which have been imported, can be legally exported to third countries and which information may have to accompany such exports.

These tasks require:

1. *specific identification of all LMOs* that imported goods contain or “may contain;”
2. *information about any thresholds* applied for any unidentified and adventitious presence of LMOs in the shipments;
3. *access to documentation* of the status of risk assessment and approval or non-approval of these LMOs in third countries
4. *practical means to identify these LMOs* in processed goods and in the environment, including unique identifiers and reliable testing methods;
5. easy access to the information available on these LMOs.

Greenpeace is strongly opposed to “may contain” as an option for documentation accompanying LMOs. All shipments should list *all the transformation events* that the shipment is known to contain or that the shipment might possibly contain. Where available this should be done using a unique identifier code.