

Brussels, 5 October 2010

Dear Sir,
Your Excellency,

The countries listed below, the EU's major suppliers of food and feed commodities, would like to draw your attention to the increasingly critical problem posed by the very slow pace of approvals for genetically modified organisms (GMO) in the European Union compared to our countries, often referred to as "asynchronous approvals".

2. According to a study by the Joint Research Centre (JRC) of the European Commission, "The global commercial pipeline of new GM crops - implications of asynchronous approval for international trade (2009)", by 2015 there will be more than 120 commercial GM events cultivated worldwide, a figure four times higher than the current one.

3. This rapid growth in the use of GMOs worldwide calls for improved authorization systems, especially as regards imports of agriculture GM products. According to a statement by the "EU Food and Feed Chain", conveyed in February 2010 to the European Commission, the asynchronous approval of GMOs represents a major concern to companies involved in the direct use or processing of agricultural products, notably in that it increases the price of agricultural raw materials for food and feed processing industries and renders European businesses less competitive. It should also be mentioned that the price increase due to this problem impacts not only EU companies, but above all EU consumers.

4. The more significant the number of asynchronous approvals between third countries and the EU, the higher the likelihood of finding, in commodity exports to the EU, minute traces (low-level presence, or "LLP") of GMOs that are approved in third countries but not yet in the EU. Given the overall progress of green biotechnology worldwide, and in particular in our countries, LLP is likely to become more frequent and to affect a wider range of crops in the future. At the same time, the EU approach is that even minute traces of GMOs approved in third countries but not yet in the EU results in the seizure or rejection of commodity shipments at the EU border, so that the impact of this policy on food and commodity supplies from our countries can only get worse. Concrete cases which occurred in 2009 caused severe financial losses for EU companies and third countries' exporters.

Commissioner John Dalli - Health and Consumer Policy

Commissioner Dacian Cioloş - Agriculture and Rural Development

Commissioner Karel De Gucht - Trade

Mr. Paolo De Castro - MEP - Chairman of the Committee on Agriculture and Rural Development - European Parliament

Heads of Permanent Representations of EU Member States in Brussels

5. In this regard, we would like to draw your attention to the conclusions of a study titled "Economic Impact of Unapproved GMOs on EU Feed Imports and Livestock Production", by the European Commission Directorate-General for Agriculture and Rural Development: "From an economic point of view, the EU will certainly profit if it can ensure greater flexibility in maintaining imports from different countries, by limiting the potential impact of, and by avoiding, asynchronous approvals of GMOs. Therefore, there is an urgent need to take action in order to avoid negative implications for EU livestock production and agriculture overall."

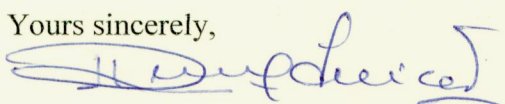
6. We understand that the European Commission, following a request by the College of Commissioners in May 2008, is considering the proposal of a "technical solution" for the LLP problem. We think that this "technical solution", to be meaningful, should include both food and feed. This is not only because these trace amounts of GMOs are safe and have been approved for food use in the third country concerned, but also because grain shipments from third countries are indistinguishably used for food and feed purposes in the EU territory: any attempt to separate them into "food-only" and "feed-only" would pose insurmountable difficulties for trade operators and EU food and feed processors.

7. We also understand that our concerns are shared by important segments of the EU private sector, by EU consumers, and the Parliament, who want safe and high quality products in the EU at affordable prices.

8. In this sense, we would like to request your support for:

- improvements to the timeliness of the GMO authorization system in the EU, especially for import purposes, to ensure that international trade in agricultural commodities is not unnecessarily hindered; and
- the urgent adoption of a commercially viable "technical solution" for LLP which encompasses both food and feed.

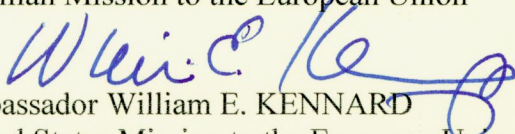
Yours sincerely,



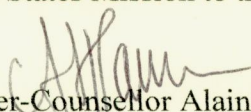
Ambassador Jorge REMES LENICOV
Embassy of Argentina to the European Union



Ambassador Ricardo NEIVA TAVARES
Brazilian Mission to the European Union



Ambassador William E. KENNARD
United States Mission to the European Union



Minister-Counsellor Alain HAUSSER, Chargé d'Affaires a.i.
Mission of Canada to the European Union