

Procedures for acceptance of GM-risk organic products

The risk of GM contamination in some organic agricultural products depends largely on where they have been grown. Before we can accept products or ingredients as compliant with the Soil Association standards, their risk level must be identified. For this purpose, we have carried out a risk assessment for products and their country of origin. Please refer to the matrix overleaf (figure 1).

Criteria for risk assessment

Our assessment of risk for each country is based on three criteria:

- Whether or not GM crops have been approved in that country for commercial growing.
- If approved, whether or not they have actually been commercially grown in that country.
- Reports of GM contamination relating to the crop from that country.

Criteria for product acceptance

In 2004, the certification committee took the following decisions:

1. Products grown outside the EU
To consider re-certification of GM-risk crops or products, we must be supplied with negative PCR tests and/or IP certification, if it is from a country where:
 - GM crops are or have been commercially grown (risk category 3)
 - there are significant reports of contamination (risk category 2).
2. Products grown in the EU
Where there has been approval for the growth of GM crops, but no commercial growing has yet taken place, we will recertify all GM-risk crops grown in that country, whether commercial growing is approved or not (risk category 1 or 0), and whether or not there have been contamination concerns in the past (risk category 1 or 2).
3. The risk factor assigned to a product is dependent on the country it is grown in and whether GM crops are also grown there; the country that the organic certifier is based in is not relevant. This means we consider that products certified in countries with high risk remain so, even if the certifier is based within the EU.
4. In order for us to accept the result of a PCR test it must be:
 - carried out on each lot of each crop from each year
 - to a sensitivity of 0.1%
 - on a representative sample of the batch
 - analysed by a laboratory accredited to ISO 17025 or equivalent for that test.

Note: A lot may be a bulked load such as a ship, provided the batch to be used can be traced to that lot.
5. In order for us to accept IP certification it must:
 - be to a sensitivity of 0.1%
 - apply to the whole supply chain from farm to processor
 - be valid and in date.
6. We will request evidence of non-GM status on an annual basis, normally through the annual inspection and certification process. This means that you will need to supply us with evidence that you have maintained the correct analysis or IP procedures at, or following, each annual inspection.

Figure 1. GM risk matrix

| Country | GM soya | GM maize | GM oilseed rape | GM cotton | GM linseed | GM sugar beet |
|----------------|----------------|-----------------|------------------------|------------------|-------------------|----------------------|
| Argentina | 3 | 3 | 0 | 3 | 0 | 0 |
| Australia | 0 | 0 | 3 | 3 | 0 | 0 |
| Austria | 1 | 0 | 0 | 0 | 0 | 0 |
| Belgium | 0 | 0 | 0 | 0 | 0 | 0 |
| Bolivia | 3 | 0 | 0 | 0 | 0 | 0 |
| Brazil | 3 | 3 | 0 | 3 | 0 | 0 |
| Bulgaria | 0 | 0 | 0 | 0 | 0 | 0 |
| Burkina Faso | 0 | 0 | 0 | 3 | 0 | 0 |
| Canada | 3 | 3 | 3 | 3 | 2 | 3 |
| China | 2 | 0 | 0 | 3 | 0 | 0 |
| Cyprus | 0 | 0 | 0 | 0 | 0 | 0 |
| Czech Republic | 0 | 3 | 0 | 0 | 0 | 0 |
| Denmark | 0 | 0 | 0 | 0 | 0 | 0 |
| Egypt | 0 | 3 | 0 | 0 | 0 | 0 |
| Estonia | 0 | 0 | 0 | 0 | 0 | 0 |
| Finland | 0 | 0 | 0 | 0 | 0 | 0 |
| France | 0 | 1 | 0 | 0 | 0 | 0 |
| Germany | 0 | 1 | 0 | 0 | 0 | 0 |
| Greece | 0 | 0 | 0 | 0 | 0 | 0 |
| Holland | 0 | 0 | 0 | 0 | 0 | 0 |
| Hungary | 0 | 2 | 0 | 0 | 0 | 0 |
| India | 0 | 0 | 0 | 3 | 0 | 0 |
| Indonesia | 0 | 3 | 0 | 3 | 0 | 0 |
| Ireland | 0 | 0 | 0 | 0 | 0 | 0 |
| Italy | 1 | 0 | 0 | 0 | 0 | 0 |
| Japan | 3 | 3 | 3 | 3 | 0 | 0 |
| Latvia | 0 | 0 | 0 | 0 | 0 | 0 |
| Lithuania | 0 | 0 | 0 | 0 | 0 | 0 |
| Luxembourg | 0 | 0 | 0 | 0 | 0 | 0 |
| Malta | 0 | 0 | 0 | 0 | 0 | 0 |
| Mexico | 3 | 2 | 0 | 3 | 0 | 0 |
| Paraguay | 3 | 0 | 0 | 0 | 0 | 0 |
| Philippines | 0 | 3 | 0 | 3 | 0 | 0 |
| Poland | 0 | 3 | 0 | 0 | 0 | 0 |
| Portugal | 0 | 3 | 0 | 0 | 0 | 0 |
| Romania | 2 | 3 | 0 | 0 | 0 | 0 |
| Serbia | 2 | 0 | 0 | 0 | 0 | 0 |
| Slovakia | 0 | 3 | 0 | 0 | 0 | 0 |
| Slovenia | 0 | 0 | 0 | 0 | 0 | 0 |
| South Africa | 3 | 3 | 0 | 3 | 0 | 0 |
| Spain | 0 | 3 | 0 | 0 | 0 | 0 |
| Sweden | 0 | 0 | 1 | 0 | 0 | 0 |
| UK | 0 | 1 | 0 | 0 | 0 | 0 |
| US | 3 | 3 | 3 | 3 | 0 | 3 |
| Uruguay | 3 | 3 | 0 | 0 | 0 | 0 |

Risk categories explained

0. No known commercial growth of a GM version of the crop in that country, and no authorisation for commercial GM growth.
1. Commercial growth of a variety of that crop has been approved in that country, but none currently grown. Or no commercial growing approved but reports of concerns with contamination.
2. Significant concerns over reports of contamination with GM crops in that country.
3. Commercial growing of GM crops has been approved in that country.

Countries not listed are understood not to have approved commercial growing of GM crops.

Figure 2 provides a list of products that can potentially come from the GM-risk source materials.

Figure 2. GM-risk products

| Soya | Maize (corn) | Rapeseed oil (canola) | Cotton |
|--------------------|----------------------------|------------------------------|----------------------|
| Soya beans | Maize flour | Rapeseed | Cottonseed oil |
| Soya flour | Maize starch | Rapeseed oil | Cotton seed cake |
| Soya oil | Maize meal | Rapeseed cake | Cotton seed expeller |
| Soya milk | Popcorn | Rapeseed expeller | |
| Soya meal | Sweetcorn | Rape meal | |
| Full fat soya | Maize flake | | |
| Soya sauce | Maize grits | | |
| Miso | Maize gluten | | |
| Tamari | Cornflakes | | |
| Shoyu | Corn syrup | | |
| Soya bean curd | Corn syrup powder | | |
| Tofu | Dextrose syrup | | |
| Nigiri tofu | Dextrose | | |
| Tempeh | Cornstarch | | |
| Soy nuts | Puffed corn | | |
| Soya bean expeller | Corn gems | | |
| Soya bean cake | Pregelatinised corn starch | | |
| Soya mill | Polenta | | |
| Soya lecithin | Corn meal | | |
| Bean burger | Tortilla | | |
| | Cornflour | | |

References used:

www.nature.com/nature/focus/gm/map.html
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