

13th June 2013

ANIAME (Mexico)	Box 215, Oakbank, Manitoba R0E 1J0, Canada	Grain and Feed Trade Association (Worldwide)
APPAMEX (Mexico)	Meggie LI Secretary of ISO/TC34/SC4	Grain Trade Australia
Associação Brasileira das Indústrias de Óleos Vegetais	Standards and Quality Center State Administration of Grain No.11 Baiwanzhuang Street Xicheng District 100037 Beijing PR.China	National Grain and Feed Association (USA)
Associação Nacional dos Exportadores de Cereais (Brazil)		National Corn Growers Association (USA)
Australian Grain Exporters Association	Dear Madam Secretary LI: Dr Raymond D. Shillito, as AOCS delegate to ISO/TC 34/SC 4 has contacted the IGTC asking for our perspectives on the sampling of grain for the presence of GMOs. As part of that discussion he made us aware of Resolution 570 (09-2013) developed at the last ISO/TC34/SC4 meeting which is to consider revision of ISO 24333:2009 Cereals and cereal products – Sampling.	North American Export Grain Association
Canada Grains Council		Paraguayan Chamber of Cereals & Oilseeds Exporters (CAPECO)
Centro de Exportadores de Cereals (Argentina)	The International Grain Trade Coalition (IGTC) members have opposed several initiatives to create unique sampling plans for GMOs. We strongly believe existing standards are sufficient to sample grains for GMOs in a representative manner and are commercially viable and feasible. There is no need for a separate system for GMO analysis.	Russian Grain Union
China Chamber of Commerce of Import and Export of Foodstuffs, Native Produce & Animal By- Products	We do not therefore support the revision of this ISO standard to include unique sampling plans for the determination of the presence of adventitious GM material in non-GM product since existing sampling methods, such as those described in ISO24333, are adequate and have been successfully used over the last 10 years in sampling grain for the presence of GM material. On the basis of this experience we strongly recommend the removal of restrictions in the use of the ISO24333 standard for sampling to determine the adventitious presence of GM material that are specified in section 1 (Scope) of the standard.	Solvent Extractors' Association of India
China National Association of Grain Sector		Soybean Processors Association of India
COCERAL (Europe)	Each year about 300 million tonnes of grain are moved from areas of surplus to areas of deficit to meet global food security requirements. This grain is moved in high volumes at low cost. The IGTC fears any new approach to sampling grain that is not feasible within the global grain handling and transportation infrastructure and current standards address sampling requirements adequately.	US Grains Council
Corn Refiners Association Inc. (United States)		US Wheat Associates
	The IGTC has 22 members that include more than 8000 organizations operating in more than 80 countries that are involved in the national and international movement of grain.	

Our members have invested significant resources to develop and operate the global infrastructure necessary to move grain quickly and efficiently. Sampling is an important component of the grain movement. We urge that the existing standard ISO24333 that has proved to be effective and commercially viable continues to be used without significant modification, except that it is also endorsed as suitable for sampling for the presence of adventitious presence of GM materials.

Sincerely

A handwritten signature in black ink, appearing to read 'D. Stephens', with a stylized flourish at the end.

Dennis Stephens
Secretary