



# **ANNUAL REPORT OF THE SASA GM INSPECTORATE**

**GM Inspection and Enforcement Activities**  
*Covering the period 1 April 2006 to 31 March 2007*



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# CONTENTS

<b>Section No</b>	<b>Section</b>	<b>Page</b>
1	Summary	1
2	Introduction	3
3	The work of the GM Inspectorate during the reporting period	3
3.1	Monitoring the sale of conventional seed that may be at risk from adventitious GM material	3
3.2	Monitoring post-harvest conditions of GM research trials	6
3.3	Case by case investigations of potential enforcement cases	6
4	Detection of GMOs to underpin GM Inspection and Enforcement	6
5	Other Activities	7
5.1	Provision of advice	7
5.2	European Enforcement Project	8
Annex 1	The Regulatory Framework	9
Annex 2	Work Plan: 1 April 2006 - 31 March 2007	11
Annex 3	Summary Report of Biannual Audit of Conventional Seed - Spring 2006	12
Annex 4	Summary Report of Biannual Audit of Conventional Seed - Autumn 2006	14

## 1. SUMMARY

1.1 The GM Inspectorate is based at the Scottish Agricultural Science Agency (SASA) and has authority under part VI of the Environmental Protection Act 1990 for inspection and enforcement of the release and marketing of genetically modified organisms (GMOs). The work is undertaken on behalf of the Scottish Executive's Rural Affairs Department who have responsibility for the operation of EU Directive 2001/18/EC in Scotland, concerning the deliberate or unintentional release of GMOs.

1.2 This is the seventh report of the GM Inspectorate since taking over responsibility from the Health and Safety Executive (HSE) for inspection and enforcement functions in May 2000. The report covers the period 1 April 2006 to 31 March 2007.

1.3 The report describes the principal areas of work undertaken by the GM Inspectorate were; (1) audits of seed merchants and importers to ensure appropriate steps are being taken to prevent the adventitious presence of GM events in conventional seed and (2) the development of a GM diagnostic testing capability for GM material in seed.

1.4 There have been no field releases of GM crop plants that have been approved for either research trials or for cultivation during the reporting year. Monitoring of post-harvest conditions of the remaining active GM research trial consent 00/R13/9 was also undertaken during the year.

1.5 SASA and SEERAD's ongoing seed monitoring programme continued throughout the year. The scope of the audit programme is determined by an assessment of which crops are at risk of acquiring adventitious GM presence, based upon GM releases worldwide, the biology of the crops involved, and the implications for UK crops.

1.6 Biannual surveys of the Scottish seed industry were undertaken jointly in the spring and autumn of 2006. These surveys indicated that imported seed of crop species, considered to be at risk (beet, oilseed rape, maize and *Brassica oleracea* and some related species to these crops) was traded by c. 34 % of the merchants, processors or packers (MPP) registered in Scotland.

1.7 Whilst Scottish seed merchants did not import seed directly into Scotland, they nevertheless have a duty of care to ensure that non-GM seed was free of unapproved GM events. To establish that reasonable steps had been taken to achieve this, the Inspectorate visited a selected sample of nine seed merchants and carried out audits during the year. Four audits were conducted for spring-sown crops (oilseed rape, beet and maize). A further four audits (including one postal audit) were conducted for autumn-sown crops including winter-sown oilseed rape. On completion of the auditing procedure, the SASA Inspectorate had no reason to suspect the presence of GM material in any of the seed marketed by the nine companies. Reports covering the audits are given in Annex 3 and 4.

1.8 During the reporting year, no incidents concerning the marketing of unauthorised GM material within Scotland had been reported or come to the attention of the GM Inspectorate. The GM Inspectorate, therefore, had no grounds for carrying out enforcement sampling or testing.

1.9 The GM Inspectorate has regularly commented throughout the year on a range of GM issues from inspection, agronomic and scientific perspectives. These have included marketing consent dossiers, management of former deliberate release sites, developing proposals for the Executive's policy on co-existence measures and evaluation of GM related research proposals.

1.10 The GM Inspectorate participates in a number of enforcement groups that operate at a national and European level. These include the GM Enforcement Liaison Group within the UK, whose main aim is to ensure there is a consistent and effective approach to GM enforcement across government departments and enforcement agencies, and the European Enforcement Project (EEP) within Europe, who focus on contained use and deliberate release issues across the European Union (EU), European Economic Area (EEA) and European Free Trade Association (EFTA) members. A member of the GM Inspectorate spoke to the EEP annual meeting on planning enforcement investigations in Retz, Austria.

1.11 The GM Inspectorate regularly attends relevant conferences to maintain their technical competence and knowledge. Inspectors also attended conferences to discuss co-existence measures to ensure the viability of conventional and organic farming with genetically modified crops.

1.12 SASA's Diagnostics and Molecular Biology Section (DMB) provides a GM diagnostic service for the GM Inspectorate. During the reporting year the Section participated in a number of international projects. These were: three ISTA Proficiency Tests to detect GM events in unknown samples of Oilseed Rape, Maize and Soybean, three JRC Validation Studies of Real-time PCR methods to detect and quantify GM events MS8, Rf3 (Oilseed Rape), MIR 604 (Maize) and GTS-40-3-2 (Soybean) and one LGC Proficiency Test involving Real-time PCR.

1.13 As of the 15 February 2007, SASA was registered under the Quality Management Standard ISO 9001:2000. The GM Inspectorate's procedures and the Analytical Services that support their work conform to this standard.

## **2. INTRODUCTION**

The GM Inspectorate has authority under part VI of the Environmental Protection Act 1990 for inspection and enforcement of the release and marketing of genetically modified organisms (GMOs). The work is undertaken on behalf of the Scottish Executive's Rural Affairs Department who have responsibility for the operation of EU Directive 2001/18/EC in Scotland, concerning the deliberate or unintentional release of GMOs. A full description of the legal framework in which the Inspectorate operates is given in Annex 1.

The work of the GM Inspectorate is to ensure compliance of the GM legislation as set out in the Environmental Protection Act (1990) and the Genetically Modified Organisms (Deliberate Release) (Scotland) Regulations 2002. It is also the responsibility of the GM Inspectorate to identify and investigate potential infringements of the legislation on a case-by-case basis, and take action as appropriate.

## **3. THE WORK OF THE GM INSPECTORATE DURING THE REPORTING PERIOD**

The work plan agreed between the GM Inspectorate and SEERAD covering the period 1 April 2006 –31 March 2007 is given in Annex 2 of this report.

The report describes the two main work areas of the GM Inspectorate; (1) audits of seed merchants and importers to ensure appropriate steps are being taken to prevent the adventitious presence of GM events in conventional seed and (2) the development of a GM diagnostic testing capability for GM material in seed. Other duties that relate to past inspections of deliberate release field sites and background work that maintains the competence of the GM Inspectorate is also described.

### **3.1 Monitoring the sale of conventional seed that may be at risk from adventitious GM material**

Under Part VI of the Environmental Protection Act 1990, GMOs may not be imported, acquired, released or marketed unless the requirements for carrying out a risk assessment, giving notification and obtaining consent are satisfied. Before the marketing of seed occurs, seed producers, importers and merchants should ensure that they have taken reasonable steps to minimise the risk of adventitious GM presence in conventional seed. The GM Inspectorates<sup>1</sup> operate a monitoring and auditing programme to assist seed importers and merchants fulfil their duties.

The scope of the audit programme is determined by an assessment of which crops are at risk of acquiring adventitious GM presence, based upon GM

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<sup>1</sup> The GM Inspectorate at the Central Science Laboratory (CSL) is contracted by Defra to carry out the equivalent inspection and enforcement service for England and Wales. The CSL GM Inspectorate have an extensive seed audit programme

releases worldwide, the biology of the crops involved, and the implications for UK crops.

These species that are considered to be at risk from adventitious GM material were re-assessed during the winter of 2006. Quantitative risk analyses made available to the SASA GM Inspectorate showed that the risks from adventitious presence during seed production previously associated with beet and *Brassica oleracea* crops, including their closely related crops, are now considered to be significantly less. As a result of this reduced risk these crops will be removed from the 2007 seed monitoring programme.

### 3.1.1 Biannual Surveys

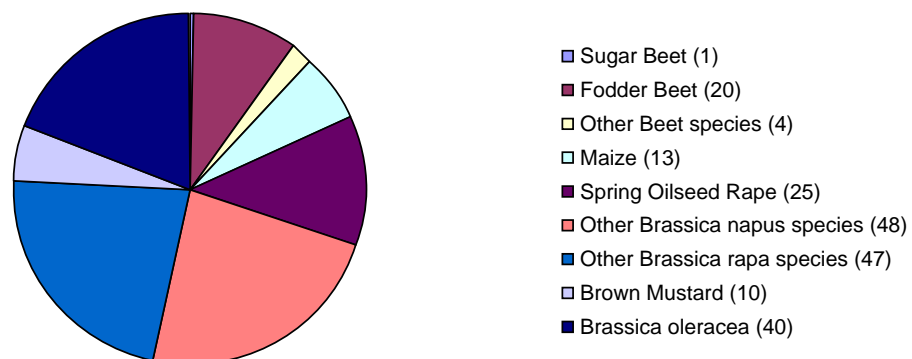
Scottish programmes start by surveying seed merchants to establish which companies are marketing seed of the relevant species and whether they import the seed directly into Scotland. Surveys are then followed up by auditing a selected number of merchants to provide evidence that they have taken appropriate steps to ensure that the seed being marketed does not contain GM material.

Biannual surveys of the Scottish seed industry are conducted jointly by SASA and EPHAS staff in the spring and autumn of each year. All the seed that was surveyed was imported via England. No Soya seed was traded in Scotland.

### 3.1.2 Spring 2006

On completion of the spring 2006 audit, out of the 176 Scottish registered seed merchants, processors and packers (MPPs), 16 did not reply. 57 (33%) of the MPPs who replied had traded in one or more of the species of interest. Companies that traded in spring crops (including related species) were as follows:

**Figure 1 Companies trading in spring sown crops**

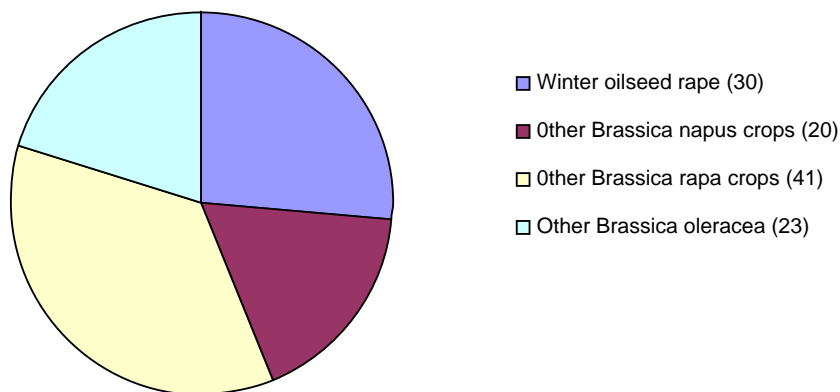


12 MPPs previously known to trade these species no longer did so. 10 MPPs who did not trade in the species of interest, according to the 2005 questionnaires, did so during the spring of 2006.

### 3.1.3 Autumn 2006

On completion of the autumn 2006 audit out of the 152 MPPs, 17 had failed to reply. 54 (40%) of the MPPs who replied had traded in one or more of the species of interest. These were as follows:

**Figure 2 Companies trading in autumn sown crops**



12 MPPs previously known to trade these species no longer did so. 9 MPPs who did not trade in the species of interest, according to the 2005 questionnaires, did so during the autumn of 2006.

### 3.1.4 Seed Audits

Four audits were conducted for spring-sown crops (oilseed rape, beet, maize and related *Brassica* sp.) and five for winter sown oilseed rape (and related *Brassica* sp.).

During the audits of the Scottish seed merchants the CSL GM Inspectorate were able to cross reference around 85% of the seedlots investigated during the spring round and 65% of the seedlots investigated during the autumn round (CSL aim to audit c. 90% of seed imported into England). The reason for the decline in ability to cross reference seedlot data was due to changes in the CSL GM Inspectorate's Seed Monitoring Programme which came into force in Autumn 2006. However during the audits the SASA GM Inspectorate was provided with satisfactory assurances and was satisfied that the Scottish seed merchants, processors and packers had demonstrated 'due diligence' in obtaining assurances from their suppliers.

The SASA Inspectorate had no reason to suspect the presence of GM material in any of the seed marketed by the nine companies.

The spring 2006 and autumn 2006 seed audit reports are at Annex 3 and 4.

### **3.2 Monitoring post-harvest conditions of GM research trials**

For the past six years the GM Inspectorate has been responsible for ensuring that releases of GM crop plants on 49 research trial sites were undertaken according to the conditions set out in their consents. These included inspections of the trials during growth periods and for prescribed periods after the trials completion. These consents have now expired except for a potato consent (00/R23/07) which is due to end in the autumn of 2007. A rotation check for this consent was satisfactorily completed in May 2006 to ensure that potato crops were not being grown on the relevant sites.

### **3.3 Case by case investigations of potential enforcement cases**

During the year, there have been no incidents that have either come to the attention of or been reported to the GM Inspectorate. Nor has the GM Inspectorate had any 'reason to believe' that any GMOs are posing an immediate risk to the environment that would require them to exercise their inspection powers including sampling or testing.

## **4 DETECTION OF GMOs TO UNDERPIN GM INSPECTION AND ENFORCEMENT**

The presence of GM material in both seed and plant material is detected using qualitative DNA-based (polymerase chain reaction {PCR}) analyses. These tests use a range of primers that detect common elements used in GMOs for both authorised and unauthorised events. Sequence Detection Systems (real-time PCR) are also available for quantitative PCR analyses.

Although the GM Inspectorate has not drawn any enforcement samples during the year, it is nevertheless important for SASA to maintain competence in the field of GM diagnostics. The Diagnostics and Molecular Biology Section (DMB), who provide a GM diagnostic service for the GM Inspectorate, does this by participating in international projects and ring tests. During the past year the GM Inspectorate, with the assistance of DMB, have participated in the following:

<b>Project date</b>	<b>Project</b>	<b>Outcome</b>
May 2006	6 <sup>th</sup> ISTA GMO Proficiency Test on Brassica napus L.	9 out of 10 unknowns were identified correctly. 1 result was inconclusive.
July 2006	JRC validation study of two quantitative real-time PCR methods for the detection and quantification of two oilseed rape (OSR) GM events Ms8 and Rf3	Validation reports published by the CRL on 29/01/2007
September 2006	7 <sup>th</sup> ISTA GMO Proficiency Test on Zea mays L. - VM	All 12 unknowns were identified correctly.
October 2006	JRC validation study of qualitative real-time PCR	Data submitted. Validation still ongoing by the CRL.

	method for the detection and quantification of soybean GM event <b>GTS 40-3-2</b> .	
January 2007	Conducted a JRC validation study of qualitative real-time PCR method for the detection and quantification of maize GM event MIR604. -RM	Validation reports published by the CRL on 04/04/2007
February 2007	A quantitative real-time PCR proficiency test (UNIQ PT, organised by the LGC, part of the Measurements for Biotechnology (MfB) programme)	All results were within the normal distribution range for quantitative real-time PCR.
March 2007	8 <sup>th</sup> ISTA GMO Proficiency Test on Glycine max L. Currently undergoing analyses.	11 of the unknowns were identified. Correctly. 2 results were inconclusive & 1 result was incorrect.

A member of the GM Inspectorate with experience in molecular testing has continued to develop PCR screening tests to detect unauthorised GM events in seed. Completed Methods have been documented and incorporated into the Agency's ISO 9001 accreditation scheme. The GM Inspectorate, with the assistance of the Diagnostics and Molecular Biology Section, will continue to develop these methods and participate in future validation experiments organised by the International Seed Testing Association and the Community Reference Laboratory.

SASA is a full member of the European Network of GMO laboratories (ENGL) and represents the UK at biannual meetings. ENGL is an enforcement network of GMO laboratories. The network provides up to date and detailed information on GMOs, particularly in the sampling, detection, identification and quantification of GMOs in the environment, food, feed and seeds.

## **5. OTHER ACTIVITIES**

### **5.1 Provision of advice**

Throughout the reporting year the GM Inspectorate has been in regular contact with policy divisions of the Scottish Executive (GM Co-ordination Team and EPHAS) and the Northern Ireland, England, Wales and Scotland GM Unit (NIEWS) in Defra. The GM Inspectorate has commented throughout the year on applications for consent to market GMOs and issues concerning the management of former release sites. During the year, assistance was given with the development of proposals for the Executive's policy on co-existence measures. The Inspectorate has also commented on Scottish, UK and EU policy documents and legislation. It has also assisted in the evaluation of some GM related research proposals.

## **5.2 European Enforcement Project**

The GM Inspectorate participates in a European Enforcement Project concerned with inspection and enforcement issues of GMOs in contained use and deliberate release. This group consists of GM Inspectorates from EU (members and applicants), EEA and EFTA States. Whilst funding for the project was formally stopped in June 2003, some of the work of the group has continued including notification of GM incidents in other Member States and publication of scientific papers.

A joint paper on breaching GM Regulation was given by a member of the SASA Inspectorate and the Dutch GM Inspectorate (VROM Inspectie<sup>2</sup>) at a plenary meeting of the Group in Retz, Austria during 18 and 19 May 2006.

*SASA GM Inspectorate*  
10 October 2007

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<sup>2</sup> VROM: Netherland Ministry of Housing, Spatial Planning and the Environment.

## **THE REGULATORY FRAMEWORK**

In the UK the EU Directive 2001/18/EC is implemented via the Environmental Protection Act (1990) and the Genetically Modified Organisms (Deliberate Release) (Scotland) Regulations 2002. These provide a statutory safety procedure, involving risk assessment, and the need for prior approval before any GMO can be released or marketed. This is a devolved responsibility. The Executive consents to the release of GM crops for research and development purposes in Scotland. Defra acts as a clearing house for applications for deliberate release; provides the secretariat for the Advisory Committee on Release to the Environment (ACRE) (see below); and coordinates the international presentation of UK policy.

The EU Directive recognises two classes of release depending upon their purpose: Part B releases for research and development and Part C releases for placing on the market. In the UK, Part B consents are granted, on a case-by-case basis, after a detailed risk assessment has been submitted to the Northern Ireland, England, Wales and Scotland GM Unit (NIEWS)<sup>3</sup> in Defra and considered by ACRE, a statutory Advisory Committee, consisting of independent scientific experts who advise on the risks to human health and the environment from the release of GMOs. The committee advises Scottish Ministers on whether an application for a release in Scotland should be allowed. Ministers also take advice from the Health and Safety Executive, the Food Standards Agency and Scottish Natural Heritage as appropriate. Consents set out the conditions and limitations governing releases. Part C releases are granted at the EU level and are effective throughout the EU.

Compliance with the above legislation regulations is established by official inspection, to ensure that releases are being conducted in accordance with the conditions of consents. Non-compliance with consent conditions can lead to enforcement action including, where necessary, the prosecution of consent holders. SASA took responsibility for the inspection and enforcement of the deliberate release and marketing of GMOs in Scotland in May 2000. At that time, the Central Science Laboratory (CSL) was contracted by Defra to carry out the equivalent inspection and enforcement service for England and Wales.

In April 2004, a new approval procedure, under Regulation EC/1829/2003 was introduced. The scope of this regulation is the marketing of any GMO whose produce, or derived products, that are intended for food or feed, including the cultivation of crop plants that are intended for these uses. The majority of marketing applications, will in future, be processed through this new regulation. The regulation provides a single unified approval process for food and feed uses, which will not then require approval under Part C of Directive 2001/18/EC. The initial application is made through the competent authority of a member state but the lead responsibility for processing the applications rests with a central body, the European Food Safety Authority (EFSA). For applications including cultivation an environmental risk assessment in keeping with the requirements of 2001/18/EC is required, and EFSA is obliged to consult the 2001/18 competent authorities concerning environmental risk assessments. The Foods Standards Agency will lead on these applications in the UK, while the role of ACRE is to advise on the environmental risk assessments

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<sup>3</sup> Formerly the Joint Regulatory Authority

provided with applications for cultivation. Allied to this regulation are new traceability and labelling rules, EC/1830/2003, which include a threshold of 0.9%, above which the adventitious presence of material from an EU authorised GMO in a non-GM product triggers traceability and labelling of the product.

Enforcement of these regulations (1829/2003 and 1830/2003) in Scotland is the responsibility of Local Authority Environmental Health (food) or Trading Standards (feed) Departments.

**WORK PLAN: 1 APRIL 2006 – 31 MARCH 2007**

Check on follow-on cropping until the post-harvest conditions of all Part B consents under EU Directive 2001/18 have been completed.

1. Provision will be made for emergency inspections should any unforeseen events resulting from previous or accidental releases of unauthorised GM plants. This will include liaison with ERAD policy divisions and other UK agencies and institutions in remedying the situation and preventing the realisation of harm.
2. Audit consents holders, when necessary, for GM plants marketed in Scotland under Directive 2001/18/EC.
3. Audit Scottish seed importers and merchants to verify whether they can demonstrate due diligence to ensure the non-GM seed which they import or obtain, and supply, is free of unauthorised GM material.
4. Discuss with Scottish Local Authorities (Environmental Health and Trading Standards) communication lines and establish boundaries of responsibilities for potential enforcement action should adventitious GM crops or their produce, be discovered prior to marketing.
5. Develop sampling and testing procedures for GM presence in line with the European Commission's recommendations on sampling and detection of GM seeds in seed lots. This includes development of quantitative PCR methods. This work will be done in liaison with SASA's Diagnostic and Molecular Biology Section (DMB), European Enforcement Project - Deliberate Release Group (EEP-DR), European Network of GM Laboratories (ENGL) and the International Seed Testing Association (ISTA).
6. Attendance as required at ACRE meetings.
7. Liaison with the Scottish Executive and the NIEWS GM unit in Defra in the development of standards, technical guidance, risk assessment and publications in connection with inspection and enforcement functions.
8. Participate in the EEP-DR and liaise between this group and the ENGL via DMB.
9. Complete SOPs for all Inspectorate Activities in line with the Agency's timetable for acquiring ISO 9001 accreditation.

## **SUMMARY REPORT OF BIENNIAL AUDIT OF CONVENTIONAL SEED - SPRING 2006**

Version: 1

Status: Final

To assess compliance with Part VI Environmental Protection Act and the Genetically Modified Organisms (Deliberate Release) (Scotland) Regulations 2002 the SASA GM Inspectorate, in conjunction with EPHAS staff, audited four Scottish seed merchants during June/July 2006 to verify that:

- all reasonable steps had been taken by them to ensure that the seed marketed was free from the presence of adventitious GM material and that,
- the merchants were able to demonstrate due diligence in making sure that the seed they marketed was compliant with the Council Directive 2001/18/EC and the EU Interim Measures for the adventitious presence of GM material in conventional seed.

The seed monitoring programme covered seed marketed in Scotland over the period of autumn 2005 to spring 2006. The survey results are summarised below:

A total of 176 Scottish MPP\* were surveyed, of which 36 (20%) had failed to reply. Out of the 140 MPP who did reply, only 57 had traded in, or intended to sell, one or more of the species of interest (spring crops including related species). The results were as follows: 1 in sugar beet, 20 in fodder beet, 4 in related *Beta vulgaris* crops, 13 in maize, 25 in spring oilseed rape, 48 in related *Brassica napus* crops, 47 in related *Brassica rapa* crops, 10 in brown mustard and 40 in *Brassica oleracea* crops. No MPP had traded in soya. Twelve MPP previously known to trade the species of interest according to last year's questionnaires no longer did so. Ten MPP who did not trade the species of interest according to the last years questionnaires now do so. The conclusions from the four seed audits are summarised in Table 1.

<b>Company Audited</b>	<b>Conclusions</b>
<ul style="list-style-type: none"> <li>• <i>Alexander Inglis &amp; Son Ltd</i></li> <li>• <i>Duncan Simpson Ltd</i></li> <li>• <i>John Watson Seeds Ltd</i></li> <li>• <i>Robert McCoull Agricultural Merchant</i></li> </ul>	<p><i>As a result of the audit procedure, seed sold by the merchants listed was found to be in compliance with the European Council Directive 2001/18/EC. There was no evidence to suspect that any of the seed marketed by the merchants was contaminated with the adventitious presence of GM elements.</i></p>

Table 1 Conclusions of SASA GM Inspectorate Seed Audit

The information gathered by the GM Inspectorate at SASA was forwarded to the CSL GM Inspectorate, based in York. The CSL GM Inspectorate were able to verify

the seed lot details by cross referencing the Scottish information with the details of seed lots imported via or produced in England. The SASA GM Inspectorate had no reason to suspect the presence of adventitious GM material in any of the seed marketed by the four companies. Therefore all seed encountered in the spring 2006 audit programme was found to be in compliance with the EC Directive 2001/18/EC.

As with previous years, some seed suppliers remain unwilling to supply letters of assurance stating that the CSL GM Inspectorate's guidance for seed importers and producers had been followed. Through close liaison with the CSL, the SASA GM Inspectorate had been informed that these suppliers do in fact provide satisfactory assurance to the CSL GM Inspectorate with regard to the seed production/GM absence. The SASA GM Inspectorate will continue to stress that, whilst GM presence is not covered by the seeds legislation, there is still a need for merchants to obtain appropriate assurance from their suppliers in order to demonstrate their duty of care in supplying seed which is compliant with EC Directive 2001/18/EC.

GM INSPECTORATE  
October 2006

## **SUMMARY REPORT OF BIENNIAL AUDIT OF CONVENTIONAL SEED - AUTUMN 2006**

Version: 1

Status: Final

To assess compliance with Part VI Environmental Protection Act and the Genetically Modified Organisms (Deliberate Release) (Scotland) Regulations 2002 the SASA GM Inspectorate, in conjunction with EPHAS staff, audited four Scottish seed merchants during November 2006 to verify that:

- all reasonable steps had been taken by them to ensure that the seed marketed was free from the presence of adventitious GM material and that,
- the merchants were able to demonstrate due diligence in making sure that the seed they marketed was compliant with the Council Directive 2001/18/EC and the EU Interim Measures for the adventitious presence of GM material in conventional seed.

The seed monitoring programme covered seed marketed in Scotland over the period of spring 2006 to autumn 2006. The survey results are summarised below:

A total of 152 Scottish MPP\* were surveyed, of which 17 (11%) had failed to reply. Out of the 135 MPP who did reply, only 54 had traded in one or more of the species of interest (spring crops including related species). The results were as follows: 30 in winter oilseed rape, 20 in related *Brassica napus* crops, 41 in related *Brassica rapa* crops and 23 in *Brassica oleracea* crops. Twelve MPP previously known to trade the species of interest according to last year's questionnaires no longer did so. Nine MPP who did not trade the species of interest according to the last years questionnaires now do so. The conclusions from the four seed audits are summarised in Table 1.

<b>Company Audited</b>	<b>Conclusions</b>
<ul style="list-style-type: none"> <li>• <i>Carrs Billington Agriculture (Sales) Ltd</i></li> <li>• <i>Galloway and Macleod Ltd</i></li> <li>• <i>John Guthrie Ltd</i></li> <li>• <i>Seed Logistics Ltd</i></li> <li>• <i>L.S.Smellie &amp; Sons Ltd</i></li> </ul>	<p><i>As a result of the audit procedure, seed sold by the merchants listed was found to be in compliance with the European Council Directive 2001/18/EC. There was no evidence to suspect that any of the seed marketed by the merchants was contaminated with the adventitious presence of GM elements.</i></p>

Table 1 Conclusions of SASA GM Inspectorate Seed Audit

The information gathered by the GM Inspectorate at SASA was forwarded for verification to the CSL GM Inspectorate, based in York. Due to the introduction of a

more risk-based approach to seed auditing in England, changes to the timing and nature of data collection has occurred. About 65% of the seed lot details were verified by cross-referencing the Scottish information with details of seed imported via or produced in England. Of the seedlots that were cross-referenced, SASA GM Inspectorate had no reason to suspect the presence of adventitious GM material in any of the seed marketed by the four companies. Therefore the verified seed encountered in the autumn 2006 audit programme was found to be in compliance with the EC Directive 2001/18/EC.

As with previous years, some seed suppliers remain unwilling to supply letters of assurance stating that the CSL GM Inspectorate's guidance for seed importers and producers had been followed. Through close liaison with the CSL, the SASA GM Inspectorate had been informed that these suppliers do in fact provide satisfactory assurance to the CSL GM Inspectorate with regard to the seed production/GM absence. The SASA GM Inspectorate will continue to stress that, whilst GM presence is not covered by the seeds legislation, there is still a need for merchants to obtain appropriate assurance from their suppliers in order to demonstrate their duty of care in supplying seed which is compliant with EC Directive 2001/18/EC.

GM INSPECTORATE  
October 2007