

Bilateral biosafety bullies

How corporations use bilateral trade channels to weaken biotech regulations

GRAIN and the African Centre for Biosafety

Across the world, the use of bilateral trade instruments to prise open markets for genetically modified (GM) crops is escalating. To expand business overseas, the biotech industry needs stronger intellectual property rules and weaker biosafety standards. Bilateral trade deals are an effective way to get this. This report looks specifically at how the world's grain and oilseed traders, who account for the bulk of the world's GM crop production and trade today, use bilateral trade channels to prevent countries from building strong biosafety regulatory environments.



The agribusiness sector has been struggling to respond to worldwide opposition to genetically modified (GM) foods ever since farmers started sowing the laboratory-engineered seeds in the mid-1990s. Transnational corporations want weak and predictable international standards that do not restrict trade in their products. But social resistance to GM food is throwing up all kinds of complications. From the mushrooming of local “GM-free zones” and consumer boycotts of GM foods to national and even local GM labelling legislation, the regulatory landscape for agricultural biotechnology is in constant flux, with direct consequences for corporate bottom lines. The situation is particularly problematic for the small cartel that controls the global grain trade. Yet, rather than let go of GM crops in the face of such resistance, they are aggressively sabotaging any process through which governments might autonomously regulate GM food or feed trade. They are doing this together with the GM seed and pesticide companies, applying pressure wherever they can – in multilateral fora and, increasingly, through bilateral channels.

The growing use of bilateral spaces as a means to exert policy pressure is not unique to agricultural biotechnology. It is happening in all sectors, especially through the explosive rise in free trade agreements (FTAs), which are filling the vacuum left by the breakdown in global trade talks at the World Trade Organisation (WTO). Through bilateral trade deals and the oversight structures they create, corporations get direct, behind-the-scenes access to foreign governments, backed by the political clout of their home country’s flag. The resulting arrangements inevitably serve two basic needs of the corporations: strengthened ownership over assets (through intellectual property and investors’ rights) and regulatory standards tailored to their interests (through health and safety norms). This briefing looks at how and why corporations are relying increasingly on the bilateral trade arena to shape worldwide regulatory policy-making over GM food and feed.

The puppet masters

Just a handful of corporations control global trade in the world’s major agricultural crops. Three companies – Cargill (US), Archer Daniels Midland (US) and Louis Dreyfus (France) – control over 80% of the global grain trade. The concentration is particularly pronounced among the three GM crops that are traded internationally: maize, soybean and oilseed rape. World trade in soybeans, for example, is dominated by just four companies: Bunge, Cargill, ADM and Dreyfus.¹ When people think of GM foods they often think Monsanto, the seeds and pesticides producer. But the grain traders, who buy and sell the harvested crops, are also involved and actually wield much more influence.

Over the past few decades, the grain merchants have ruthlessly pushed an agenda of market liberalisation and expansion through the multilateral trade and finance institutions. Their parallel objectives are to secure a giant global market, free of barriers to the movement of their products, and favourable production conditions from national and local governments – access to subsidies, enforcement of intellectual property rights, enhanced public infrastructure, lax environmental and labour regulations, etc. The downward harmonisation of health and safety standards is a key component as well because, in order to maximise their profits, corporations need to be able to ship any product anywhere in the world without having to worry about differing requirements when it comes to things like labelling.

The commercial release of GM crops in the mid-1990s was an immediate boost to the big

grain and oilseed businesses. GM crops facilitate the expansion of export agriculture. This is especially true of the so-called “first generation” GM crops, engineered for pest and herbicide resistance, as they simplify crop management under monoculture conditions. In the Southern Cone of Latin America, for instance, the introduction of Monsanto’s herbicide resistant GM soybeans has enabled large landholders to convert vast tracts of the Argentine pampas and Brazilian rainforest to no-till industrial monoculture production. Soybean exports from the region took off, literally doubling world trade in soybeans and soybean products between 1995 and 2005.² The grain and oilseed corporations are also slowly but steadily moving directly into the development of GM products themselves, most often through joint ventures with GM seed companies, that will lower their costs and enhance their control over emerging markets, such as specialised animal feeds, low transfat crops and biofuels.

However, along with the big advantages that GM crops bring to the global grain merchants, there is also a downside. The widespread rejection of GM food and agriculture has led both to the creation of segregated markets for “GM-free” foods and to the enactment of laws governing trade in GM products. This has brought chaos and unpredictability – two of the things that corporations abhor most – into global food commodity chains. GM crops have thus disrupted corporate plans for uniform and unfettered global markets based on international standards tailored to their needs.

The easy solution to this mess would of course be for the grain and oilseed traders to withdraw their support for GM crops. They dwarf their counterparts in the biotech supply industry and their power is such that they could end the production of GM crops overnight if they simply refused to handle them. But, for these corporations, the long-term payoff from GM crops, which promises greater worldwide integrated production for export, overshadows the downside. So the crop traders are instead linking hands with their counterparts in the agricultural input industry – led by Monsanto, Syngenta, DuPont and Bayer – and putting all their weight into finding another solution that will keep global trade flows open to GM products.

WTO versus CBD: which safety standards?

The strategy of the grain and oilseed traders and the biotech industry, which together form the GM lobby, first became visible at the World Trade Organisation (WTO) with the enactment of the Sanitary and Phytosanitary (SPS) Agreement, which came into force in January 1995. Under it, governments cannot restrict the handling, transport and packaging of GM foods with regard to safety or health unless they have a sufficient ‘scientific basis’ for this step.³ This is because the SPS Agreement is founded on the US-pushed principle that any GM product should be regarded as ‘substantially equivalent’ to its non-GM counterpart unless proven otherwise. Social, cultural or economic considerations – which much of the global opposition to GM crops is rooted in – are deemed unscientific and therefore banned from playing a role in setting health or safety standards. This framework puts the industry in complete control because the corporations have at their disposal both the scientists to define in an extremely biased and narrow fashion the ‘scientific basis’ that alone may justify any restriction on GM trade, and the public relations machinery to communicate and publicise their findings. Moreover, the SPS Agreement is subject to the WTO’s overall rules on dispute resolution, which can be extremely harmful to a nation. For instance, if a WTO member adopts GM food labelling legislation that is deemed weak on ‘scientific basis’, it could wind

up facing crippling duties on its textile exports. The mere threat of trade sanctions through the WTO has caused Sri Lanka, Bolivia, Croatia, and, most recently, India, to back down from enforcing GM labelling regulations.⁴ The European Union's restrictive GM crop standards were also challenged as 'non-scientific' by the US; the US won but the EU is unlikely to suffer much since Brussels, unlike many developing countries, is skilful at skirting trade sanctions.

Box: How the Biosafety Protocol was sabotaged

Ever since the Biosafety Protocol was adopted in January 2000, it has been mired in negotiations over its highly contested article 18(2)(a). The article arose as a last minute concession to GM exporters and it enabled the cartel of international grain traders to continue with their unrestricted trade in bulk shipments of crops contaminated by GMOs, provided that these shipments carried a warning (which in practice is virtually meaningless) that they "may contain" GMOs.

While this was a severe blow for those importing countries that were arguing for more serious information about food shipments, it was only meant to be operational until the First Meeting of the Parties to the Protocol, when members were supposed to thrash out more detailed rules. However, the grain trade cartel was determined from the beginning to prevent this from ever happening.

The major cereal and oilseed traders and the biotechnology industry came together to form the International Grain Trade Coalition (IGTC) to lobby for their interests within the BSP negotiations.⁵ Although these companies have developed their own processes for segregating GM from non-GM commodities whenever it interests them to do so,⁶ the IGTC has always claimed that the documentation requirements within the Protocol are completely impractical.

Early on, the IGTC began looking at bilaterals as a way to trump any documentation requirements that might emerge from the Protocol negotiations. In 2003, the IGTC's Dennis Stephens wrote a paper encouraging GM exporters to use Article 24 of the Protocol to bring about greater clarity to documentation requirements for grain destined for food, feed and processing.⁷ Article 24 of the Protocol is concerned with the rights of Parties to enter into 'free trade agreements and arrangements' with non-Parties.

In 2004, Mexico, a Party to the Protocol, entered into an arrangement for the implementation of Article 18.2 (a) with its North American Free Trade Agreement (NAFTA) partners, the United States and Canada, both of which are non-Parties to the Protocol.⁸ The NAFTA arrangement mimics, pretty much word for word, the proposals of the IGTC, particularly where it comes to thresholds and the 'adventitious presence' of GMOs.⁹ The IGTC began immediately to promote the deal as a template for an interim solution to Article 18(2)(a).¹⁰

After several contentious meetings, it was only in March 2006, in Curitiba, Brazil, that the parties to the Protocol finally agreed on a solution to Article 18(2)(a).¹¹ Interim documentation requirements for the next six years for trade in GMOs between Parties to the Protocol were adopted. But this agreement was only achieved after an enormous concession was made, once again, to the GM exporters. At the insistence of Mexico, the agreement expressly excludes the Protocol's documentation requirements from applying to trade between Parties and non-Parties that occurs within the scope of bilateral, multilateral or regional agreements or arrangements.

The Biosafety Protocol thus provides a clawback clause and loophole for exporters not to comply with the documentation requirements established in the domestic laws of importing countries. It opens the door for them to turn to bilateral fora and trade agreements to undermine domestic regulations on the grounds that the Protocol itself excludes its own documentation requirements from applying to bilateral or regional trade arrangements.

The IGTC has not shied away from encouraging its members to pursue this loophole to maximum effect. In its post-Curitiba circular to members, the IGTC wrote: "As Parties may enter into arrangements with Parties or non-Parties containing documentation requirements different than [those contained in the Protocol] (such as are contained within the Mexico/United States/Canada Trilateral Arrangement), industry should not provide detailed documentation requirements until the requirements have been agreed upon bilaterally or regionally."¹² Meaning, keep exporting as usual and force bilateral settlements.

While the WTO has its SPS Agreement, the Convention on Biological Diversity has a Biosafety Protocol (BSP). The BSP, adopted in Cartagena in January 2000, governs the international movement of GMOs for food and feed with a view to protecting biodiversity. Although the Protocol has major underlying weaknesses (see grain.org/articles/?id=9), it does have an important strength: in contrast to the SPS Agreement's operating principle of "substantial equivalence", the Biosafety Protocol's baseline rule is the "precautionary principle". This means that if the potential consequences of the introduction of a GMO are severe or irreversible, in the absence of full scientific certainty, the burden of proof falls on the proponent. The two agreements are thus ideologically and diametrically opposed. While the SPS Agreement is ideal for the GM lobby, the Protocol contains all kinds of pitfalls.

The GM lobby has done everything it can to undermine the Biosafety Protocol and ensure that the WTO SPS Agreement becomes the main point of reference for international trade in GMOs. It is in this context that bilateral trade agreements outside the WTO have gained importance, with the GM lobby working ferociously, alongside other corporations, to get exactly what they want from them and to turn them into a critical part of their strategy. They have been successful, because practically all of these deals reinforce the supremacy of the WTO SPS Agreement to the detriment of the Biosafety Protocol.¹³ The lobby got a big boost in March 2006 when the parties to the BSP agreed that countries not Parties to the Protocol, such as the world's three major GM exporters (US, Canada, Argentina), shall be exempt from the Protocol's documentation requirements on trade in GM products when they have made separate bilateral or regional arrangements (*see Box*). With this concession, the door is now open for an onslaught of bilateral pressures to make any restrictions on GM trade illegal. If this happens, as is likely, the Biosafety Protocol will be rendered completely ineffective.

Bilateral bullying in action

On 7 April 2006, India's Minister of Commerce Kamal Nath set off alarm bells in the boardrooms of the transnational grain and oilseed merchants. In a supplement to the country's Foreign Trade Act, the Minister issued rules requiring importers to declare, certify and obtain approval for the import of any products containing GMOs. This was only the reaffirmation of a law on the books since 1989, which had never really bothered the industry because, as one representative from Cargill put it, 'There was no one to stop the import at the point of entry'.¹⁴ Now it looked as if the Indian government might be getting serious.¹⁵

This was a cause for real alarm. Over the last ten years India has grown from importing no soybean oil at all to becoming the world's second largest market. The big soybean oil traders, such as Cargill, which had the most at stake, leapt into action. The soybean industry immediately warned that the new law would halt imports and lead to domestic oil shortages, even as others pointed out that alternatives, such as mustard and palm oils, were readily available and that Indian exports of non-GM soy were at record levels.¹⁶

It did not take long for the soybean traders to get their way. Their first victory was a reprieve from the Genetic Engineering Approval Committee (GEAC) on 2 May 2006, giving them the right to import GM soybean oil on an interim basis as long as they presented country of origin certification and testing data to the relevant authorities. Then, on 8 May, the Director General of Foreign Trade suspended implementation of the supplement until 7 July, on the grounds that he needed to give importers time to adjust to the requirements. Two weeks later,

the Ministry of Environment and Forests let the soybean oil importers off the hook for GEAC approval by issuing a notification limiting the GEAC to the 'regulation of organisms or products where the end product is a living modified organism'. This was followed by another extension from the Director General of Foreign Trade allowing shipments bearing issued bills of landing on or before 6 July to dock at Indian ports without the necessary documentation beyond the 7 July deadline. And then finally on 21 July, the Director General of Foreign Trade essentially killed the supplement by suspending its application until March 2007, pending review. No reasons were given for the suspension.¹⁷

The soy traders would probably never have achieved this dramatic policy U-turn had they not had the heavy hand of the world's most powerful government working in their interest. The supplement was issued just after the US and India had finalised a number of bilateral trade talks aimed at protecting US corporations from non-tariff trade barriers, such as restrictions on GM imports and other SPS measures.

One of the most important outcomes of these talks was the setting up, in July 2005, of the US-India Trade Policy Forum with the goal of doubling trade flows within three years. The US put India's new GM regulations squarely on the table in the lead-up to the Forum's third ministerial-level meeting in Washington on 22 June 2006. At a pre-ministerial meeting of the Forum's Focus Group on Agriculture in New Delhi on 30 May 2006, the two sides "discussed in detail the SPS conditions on ... trade in biotech products with specific reference to the notifications issued by the Ministries of Commerce and Health."¹⁸ A week later, to drive its message home, the US officially raised concerns about India's GM regulations during a meeting of the WTO's Committee on Technical Barriers to Trade. The US warned that it would also raise the issue with the WTO's SPS Committee and requested that India "suspend indefinitely the implementation of these measures ... in order to avoid potential trade disruption." The Indian government responded by pointing out that they had already explained to the US in the bilateral talks that this was simply a new notification of an existing measure. But they then added that, through bilateral talks with the US, they had agreed to suspend implementation of the regulation until 7 July and would continue to address US concerns bilaterally.¹⁹

The following week, during a pre-ministerial press conference, Karan Bhatia, the Deputy US Trade Representative, told journalists that the US government was working through the Forum to change India's new GM laws.

"I think what I can tell you in that area is that these are bio-tech regs that we're well aware of. We have got these under discussion with the Indians. I don't have anything to share for you in the way of outcomes but I would say that bio-tech is a significant area of conversation that we've got with the Indians undergoing through the Trade Policy Forum," said Bhatia. "We have been engaged in, I'd say, discussions with them as to whether the bio-tech regulations are going to serve their intended purposes and whether they could usefully be modified, let's put it that way."²⁰

India is not the only country to change its GM regulations after "discussions" with the US government and its corporations. In 2004 China caved in to US pressure and dropped its restrictions on GM soybeans, giving the US a "political commitment" not to disrupt future soybean shipments.²¹ Thailand, too, backed down from strict GM labelling legislation in

2004 when the US warned that the legislation would affect their free trade agreement (FTA) negotiations. But the US is not the only country pursuing bilateral pressures; the use of bilateral trade instruments to serve corporations and prise open markets for GM crops is escalating throughout the world.

Bilateral bulldozers

The push to regulate – or rather, prevent the regulation of – GM food through bilateral instruments is not happening in isolation. It is part of a much larger trend in international relations. With global trade talks going nowhere, and geopolitics tightly entwined with business opportunities (or losses), the US and other powerful countries have been quietly hammering out bilateral free trade and investment deals that achieve what they and their transnational corporations have not been able to secure at the multilateral level.

There are now over 2,200 bilateral investment treaties in force and the number of bilateral free trade agreements (FTAs) is rising by the month. Agricultural trade, including GM crops, is a big issue within these FTAs. The GM lobby has been bringing its agenda into these deals and, indeed, it is starting to move faster and harder in this direction.²²

At the beginning of the process corporations work with their home country governments to identify precise negotiating objectives. The GM lobby is no stranger to such a strategy, for the Biotechnology Industry Organization (BIO) has for some time been actively lobbying the Office of the US Trade Representative (USTR) on bilateral trade agreements. In comments submitted to the USTR on the US–Korea FTA negotiations, BIO called on the US to seek the removal of certain aspects of Korea’s draft regulations for the implementation of the Biosafety Protocol and to challenge Korea’s labelling laws on GM as being inconsistent with the WTO’s SPS Agreement.²³ BIO submitted similar demands for the US FTA talks with Malaysia. More detailed biosafety policy goals for the US–Malaysia deal were put forward by the US Chamber of Commerce and AMCHAM Malaysia (The American Malaysian Chamber of Commerce), which called on US negotiators to secure a commitment from Malaysia to accept the “mutual recognition” of GMOs approved in other countries or in international testing organisations. Citing concerns with positions taken by Malaysia’s Ministry of the Environment, the US business community is pushing Washington to make sure that the FTA will “clarify the roles and responsibilities for biotechnology policy within the Malaysian government, gain consistency in Malaysia’s international biotechnology trade positions, and confirm the Malaysian Biotechnology Corporation as the government’s lead agency for biotechnology policy.”²⁴

BIO also insisted on clarification of ministerial responsibility as a condition for US approval of China’s accession to the WTO. It described China’s prior notice system as “burdensome” and argued that “China needs to have an event-based approvals process, rather than a commodity-based one, to create a timely and science-based approval process.” In the bilateral negotiations on Russia’s accession to the WTO, BIO asked the US to get commitments from Russia to “approve several outstanding applications for agricultural biotechnology products” and to remove the City of Moscow’s ban on GM products in schools. According to BIO: “Past experience has shown that the time to resolve these matters is before negotiations are concluded.”²⁵

Washington is all ears to the GM lobby as it negotiates FTAs. The US President is actually required by Congress to consult corporate groups as part of his “fast track” negotiation authority. But the umbilical cord goes down to the level of specific firms. As David Spooner of the US Commerce Department put it when he visited Monsanto headquarters in May 2006, “We’re very able to advocate for *individual companies*, or industries, with foreign governments.”²⁶

The irony in the case of BIO, however, is that while it is supposed to articulate US negotiating goals for a given bilateral trade deal, its membership is composed of biotech corporations in 33 countries. These include Malaysia, Russia and Korea, with whom the US is currently negotiating trade agreements. So when BIO lobbies the US government on the US–Malaysia FTA, is its Malaysian member speaking or just the US companies? (Its member from Malaysia is the Malaysian Biotechnology Corporation, owned and operated by the Malaysian government!) These crosscutting links, in fact, make the whole process somewhat farcical.

So what does all this add up to? Bilateral trade agreements typically have an individual chapter on SPS matters. Under US FTAs, both sides are expected to profess allegiance to the WTO’s SPS provisions – a commitment not to regulate GM without a sound “scientific basis” (which in Washington’s view can never exist). But an increasing number of FTAs take things further and set up joint SPS committees where biosafety concerns can be raised and dealt with on an institutionalised bilateral basis. The committees generally do not have dispute settlement powers; these are left to the WTO. However, they do bring US trade policy hawks and corporations directly into foreign countries’ SPS decision-making circles, thereby ensuring that US market concerns are taken into account in determining domestic safety regulations. For example, they allow the exporting party to challenge the importing party’s risk assessment procedures based on their own ‘scientific evidence’.²⁷ They also lock the two countries into an on-going cooperation in which policy-makers from the two capitals are expected to agree on common positions in relevant international processes, such as CODEX Alimentarius, the WTO or the Biosafety Protocol.

US corporations are well aware of the benefits that these committees can provide. The Californian Farm Bureau Federation made a specific request to the US government to form an SPS Committee as part of the FTA with Australia. It argued that, “While technical regulators and scientists would of course be active participants, a policy level committee would help ensure that the technical and policy priorities are consistent and compatible.” The FTA had an immediate impact on Australia’s SPS regulations for pork. Upon completion of the FTA, the Australian authorities announced a highly controversial “resolution of technical issues” that had previously kept US pork imports out of the market because of concerns about the transmissibility of several major swine diseases.²⁸ Australia is now one of the top destinations for US pork.

As part of the FTA, “Australia must give US representatives the same rights as Australians to participate in the development of Australia’s standards and technical regulations,” say Patricia Randal and Louise Southalan of the Australia Fair Trade and Investment Network. “The AUSFTA even states that the Australian government will recommend that Australian non-governmental bodies should also let US government representatives have the same rights as Australian citizens to participate in Australian NGO processes for developing standards for

Australia (Article 8.7).’’²⁹

According to Inti Montenegro de Wit, of the Quechua Aymara Association for Nature and Sustainable Development (ANDES), the US–Peru FTA process was instrumental in shaping Lima’s recent law on biotechnology. “By synchronizing Peru’s sanitary and fitosanitary regulatory measures with those in the US,” the FTA has opened the doors to the “deregulation” of GMOs in Peru.³⁰

SPS committees were established under US FTAs with Morocco, Chile, Peru and Colombia. The Canada–Costa Rica FTA has one too. The Australia and Thailand FTA has an SPS and Food Standards Expert Group with the added possibility of forwarding unresolved matters to an FTA Joint Commission for resolution.

SPS is also increasingly present in the EU’s bilateral trade agenda, even though the EU is known for being cautious about GM foods. The EU’s 1995 FTA with Mexico established a Special Committee on SPS as did the EU’s 2002 FTA with Chile. The latest draft of the EU’s FTA with East and Southern Africa commits the parties to “endeavour to harmonize their standards” in accordance with the WTO SPS Agreement and to “develop a joint mechanism for coordination, consultations and exchange of information as regards notification and application of SPS measures; including the establishment of an ESA–EU SPS Sub-Committee, which shall be responsible for reviewing, prioritizing and ensuring that the programmes resulting from this Agreement are effectively implemented.” Similarly, the EU’s draft FTA with the Pacific countries devotes a full article to biosafety capacity-building to “ensure that the biosecurity legislation and practices of the Pacific Parties are consistent with the [WTO’s SPS Agreement].”

The meaning of it all?

It is clear that the GM lobby would never put all its eggs into one basket. Corporations, like governments, do not play only one card to get what they want. So it is with their efforts to keep regulations on worldwide trade in GM seeds, food and animal feed as light as possible. The WTO SPS Agreement provides a basic “hands off” policy line that the US in particular but also the EU, Canada and others active on the bilateral FTA front are clearly committed to. The Biosafety Protocol, which allows more interventionist rules, is a problem for the biotech industry so, as we have seen, it has been skilfully weakened by new provisions that allow parties to ignore it if they have signed a bilateral agreement on the same matter.

This does not mean that all biosafety policymaking will now shift to bilaterals. The corporations and the GM exporting governments will always use as many tools and fora as they can simultaneously. But with nothing happening at the WTO and the CBD protocol now stripped of its independence, bilateral trade agreements are clearly going to become much more important avenues for industrialised countries to keep biosafety regulations in developing countries down to a minimum. This is clear so far within the North–South FTAs. How it will play out in the rising number of South–South FTAs, including regional integration instruments, is another matter.

The entry of GM food and farming has been a fundamental concern among people’s movements trying to keep FTAs out of their countries, whether you look at Thailand, Korea,

Ecuador, Costa Rica, Honduras or southern Africa. Where they have been signed, FTAs with the United States in particular work as Trojan horses not only to impose patents on life but also to override national rules on the testing, field release and labelling of GM crops and food. They can thus quickly undermine successes that people have achieved in forcing their governments to keep GM crops and foods out of their countries. With the Biosafety Protocol now pretty much rudderless in the rising tide of bilateral deal-making, it is clear that much more work has to be done to support social movements in their broad-based struggles against FTAs.

About GRAIN

GRAIN is an international non-governmental organisation which promotes the sustainable management and use of agricultural biodiversity based on people's control over genetic resources and local knowledge. For more information visit: <http://www.grain.org>

GRAIN and the African Centre for Biosafety, *Bilateral biosafety bullies - How corporations use bilateral trade channels to weaken biotech regulations*, GRAIN Briefing, October 2006, <http://www.grain.org/briefings/?id=199>

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 - ²⁵ Letter from James Greenwood, CEO of BIO, to the Senate Committee of Finance and the House Committee on Ways and Means concerning negotiations with the Russian Federation on its accession to the WTO, 9 June 2006. <http://www.agribusinesscenter.org/headlines.cfm?id=1012> Emphasis added.
 - ²⁶ See, for example, the mandate of the SPS Committee under the US–Colombia FTA: <http://tinyurl.com/yzm55t>
 - ²⁷ http://www.usmef.org/TradeLibrary/News04_1029a.asp
 - ²⁸ Patricia Ranald and Louise Southalan, "Ten Devils in the Detail": <http://evatt.labor.net.au/publications/papers/123.html>
 - ²⁹ Inti Montenegro De Wit, "FTA means deeper poverty in Peru: GMO's arrive, democracy doesn't," August 17, 2006: http://www.bilaterals.org/article.php3?id_article=5553
- [Full references also available at: <http://www.grain.org/briefings/?id=199>]