COPMOP2018 - PRRI Statement on Review and Assessment

Thank you Madam Chair,

I speak on behalf of the delegation of the Public Research and Regulation Initiative, PRRI.

Madam Chair, Article 16 of the Convention underlines that transfer of biotechnology is essential to the goals of the Convention, and article 19 instructs that the Parties shall engage in biotechnology transfer.

The Biosafety Protocol aims to contribute to that objective, because it offers countries that do not yet have biosafety regulations in place a mechanism for informed decisions on the import of LMOs.

Madam Chair, regular review of regulatory frameworks is a good practice in most modern regulations, and we welcome this discussion on review of the Biosafety Protocol.

To be meaningful, such review should address three topics: effectiveness, efficiency and unintended effects, based on actual experience.

Madam Chair, to address the effectiveness of the Protocol, we need to ask the question how many countries that do not yet have biosafety regulations in place have used the AIA procedures to make informed decisions on the import of LMOs. Madam Chair, a quick look at the BCH and the national reports teaches us that that has not happened very often.

To address the efficiency of the implementation of the Protocol, Madam Chair, we should look at the burden on authorities and applicants. Here too, a look at the national reports can be helpful. It appears that there have been very few AIA applications for transboundary movements to countries that do not yet have domestic regulations in place.

Madam Chair, as regards unintended effects of the Protocol, we note with concern that the discussions under the MOP regularly go beyond the scope of the Protocol. For example, article 17 deals with accidental releases of LMOs that are likely to have significant adverse effects, i.e. we are talking about highly specific activities. Yet, the discussions under article 17 about a detection-manual go far beyond those highly specific cases and could seriously, and without reason, hamper public research.

Finally, Madam Chair, we believe that it is essential for the review to take into account the experience with LMOs accumulated over the last decades, with regard to the possibility of identifying LMOs not likely to have adverse effects as referred to in article 7.4.

Thank you Madam Chair