COPMOP2018 - PRRI Statement on Risk Assessment

Thank you Madam Chair,

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

Madam Chair, one of the key achievements of the Cartagena Protocol is international agreement on the principles and methodology for risk assessment, which built on many years of experience.

We welcome practical guidance on risk assessment that can help reduce the need to use limited research budgets for regulatory procedures, and we are therefore very pleased that over the years many guidance documents have been developed by a various international organisations.

Madame Chair, PRRI has followed with interest the discussion on possible specific issues of risk assessment that may warrant consideration, and we submit the following observations for consideration:

1. It is important to be careful with terminology. A 'need' for guidance would suggest that for certain cases the methodology of Annex III cannot be applied. PRRI is not aware of any such cases. Any multi-disciplinary group of qualified scientists should be able to apply the methodology of Annex III to all types of LMOs that are foreseeable in the near future.
2. Yet, we do agree that practical guidance is convenient for poor public research institutes and we therefore support a process of identification and prioritization of specific issues for which guidance would be welcome.
3. If such issues are identified, then the next step should be the identification of competent international organizations and intergovernmental and non-governmental bodies that are best equipped to produce guidance on such topics, as instructed by article 29 of the Protocol.
4. Finally, to simplify the process ahead, we submit that there is no scientific justification to suggest as a topic a broad and diverse category as organisms developed by genome editing.

Thank you Madam Chair