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CONFERENCE OF THE PARTIES TO THE CONVENTION ON BIOLOGICAL DIVERSITY SERVING AS THE MEETING OF THE PARTIES TO THE CARTAGENA PROTOCOL ON BIOSAFETY
Fifth meeting
Nagoya, 11 - 15 October 2010
Item 17 of the provisional agenda*

STRATEGIC PLAN OF THE PROTOCOL

Compilation of submissions on the Strategic Plan of the Protocol

Note by the Executive Secretary

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* UNEP/CBD/BS/COP-MOP/5/1

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SUBMISSIONS FROM PARTIES AND OTHER GOVERNMENTS

EUROPEAN UNION

[23 MARCH 2009]
[SUBMISSION: ENGLISH]

Background

The Cartagena Protocol on Biosafety (hereinafter Protocol) was adopted in January 2000, it entered into force in September 2003. Over the past 5 years significant achievements have been made towards its implementation based on medium-term programme of work for the period from COP-MOP/2 to COP-MOP/5 adopted at COP-MOP/1 (decision No. BS-I/12). Many decisions on tools and mechanisms were adopted, Biosafety Clearing House became operational, more than 100 countries established legal and administrative framework within UNEP/UNDP – GEF Projects, regional and global cooperation among Parties and different stakeholders developed.

Nevertheless, significant challenges remain, especially as to compliance (Article 34), liability and redress under the Protocol (Article 27), risk assessment and risk management procedures (Articles 15 and 16), handling, transport, packaging and identification (Article 18) or capacity-building (Article 22). A prerequisite of a successful implementation of planned activities represents provision of sufficient financial resources including alternative mechanisms for funding and technical support especially of developing countries and countries with economy in transition,

Architecture

The Strategic Plan for the Cartagena Protocol should outline implementation priorities to support effective implementation of the Protocol. It is suggested that the Strategic Plan should be composed of an overarching mission/ vision, outcome-oriented strategic goals for different focal areas, as well as a set of specific activities (Work Programme).

I. Mission/Vision

Contributing to the 2010 biodiversity target (the post-2010 biodiversity target) by ensuring an adequate level of protection in the field of the safe transfer, handling and use of LMOs resulting from modern biotechnology that may have adverse effects on the

conservation and sustainable use of biological diversity, taking also into account risks to human health, and specifically focusing on transboundary movements.

II. Strategic Goals and Focal Areas

Focal Areas should include:

1. Promoting implementation, in particular

- Liability and Redress
- Risk Assessment and Risk Management
- Handling, transport, packaging and identification of living modified organisms and control of the transboundary movements
- Capacity Building

2. Promoting further ratification of the Protocol

3. Monitoring implementation and promoting compliance

4. Cooperation and synergy with other relevant instruments

Indicators for Measuring Success

- Broadening the number of Parties to the Protocol.
- Broadening the coverage of transboundary movements of LMOs undertaken in accordance with the Protocol.
- Increasing the number of Parties that have effective domestic biosafety frameworks in place in accordance with the Protocol.
- Operational BCH and information exchange.

III. Work Programme / Implementation Activities

Activities supporting the aim of the Protocol for the 10 year timeframe need to be identified for each of the above mentioned strategic goals on the basis of the COP/MOP decisions and experience gained during the Protocol implementation. These are to be identified during subsequent negotiations and compiled by the Secretariat.

JAPAN

[8 APRIL 2009]
[SUBMISSION: ENGLISH]

Views on a Strategic Plan for Implementation of the Cartagena Protocol on Biosafety
Government of Japan

1. APPLICATION OF THE ADVANCE INFORMED AGREEMENT PROCEDURE（Article 7）、NOTIFICATION（Article 8）
(1)National implementation experiences are scheduled to be reviewed at the sixth meeting of the COP-MOP based on the analysis of the second national reports in accordance with BS-IV/18.
2. RISK ASSESSMENT（Article 15）, RISK MANAGEMENT（Article 16）
(1)At its sixth meeting, the COP-MOP may consider convening meetings of technical expert group on risk management in order to exchange views on appropriate level of risk management for specific LMOs by the seventh meeting of the COP-MOP.
(2) Outcome of discussions by other bodies such as OECD Working Group on the Harmonisation of Regulatory Oversight in Biotechnology would be useful in considering risk assessment and management.
(3)Outcome of the meetings of the Ad Hoc Technical Expert Group is to be reported to the fifth meeting of the COP-MOP in accordance with BS-IV/11. COP-MOP may consider working on this issue if further work of necessity is identified at its fifth meeting.
3. HANDLING, TRANSPORT, PACKAGING AND IDENTIFICATION（Article 18）
(1)This matter is scheduled to be reviewed at COP-MOP6 in light of the review of experience based on the analysis of the second national reports in accordance with BS-IV/8.
(2)Outcome of the online conference is to be considered at the COP-MOP5 in accordance with BS-IV/10. COP-MOP may consider working on this issue if further work of necessity is identified at its fifth meeting.
4. INFORMATION SHARING AND THE BIOSAFETY CLEARING-HOUSE（Article20）
(1) The COP-MOP may consider promoting obligatory submissions to the Biosafety Clearing-House using existing tools such as the UNEP-GEF Biosafety Clearing-House project.
5. CAPACITY-BUILDING（Article22）
(1) Implementation of the Coordination Mechanism is scheduled to be reviewed at the sixth meeting of the COP-MOP in accordance with BS-IV/3, which requests the Executive Secretary to report on implementation of the Coordination Mechanism.
(2)Use of the revised set of indicators is scheduled to be reviewed at the sixth meeting of the COP-MOP in accordance with BS-IV/3, which requests the Executive Secretary to prepare a synthesis report on the experiences with and lessons learned from the use of the indicators.
(3) Performance of the roster is scheduled to be reviewed at sixth meeting of the COP-MOP in accordance with BS-IV/4 which requests the Executive Secretary to prepare a document for consideration.

6. PUBLIC AWARENESS AND PARTICIPATION（ Article23）
(1)The COP-MOP should implement the programme of work on public awareness, education and participation concerning the safe transfer, handling and use of living modified organisms which is to be considered at its fifth meeting.
(2)Implementation of the outreach strategy for the Cartagena Protocol on Biosafety (2008-2012) is scheduled to be reported by Executive Secretary in accordance with BS-IV/17, and therefore is to be reviewed, at the sixth meeting of the COP-MOP in accordance with BS-IV/17.
7. SOCIO-ECONOMIC CONSIDERATIONS（ Article26）
(1) This item is scheduled to be reviewed at the sixth meeting of the COP-MOP based on the second national reports in accordance with BS-IV/16.
8. LIABILITY AND REDRESS（ Article27）
(1)The group of the friends of the co-chairs on liability and redress decided at its first meeting held in Feb. 2009 to work towards legally binding provisions on administrative approach for liability and redress in the form of one supplementary protocol to the Biosafety Protocol. COP-MOP may continue to consider working on this issue if further work of necessity is identified at its fifth meeting.
9. SUBSIDIARY BODIES（ Article30）
(1) The need to establish an open-ended subsidiary body for scientific and technical advice under the Protocol is scheduled to be considered at the sixth meeting of the COP-MOP in accordance to BS-IV/13.
(2) However, ad hoc technical expert groups referred to in paragraph 1 of BS-IV/13 seem to be sufficient for addressing technical matters.
10. MONITORING AND REPORTING（ Article33）
(1) National reports are to be reviewed at sixth and eighth meetings of the COP-MOP in accordance with BS-I/9 which requests the Parties to submit reports every four years.
11. COMPLIANCE（ Article34）
(1)COP-MOP should give higher priority to promoting fulfilment of the Parties' obligation under the protocol rather than establishing new body such as subsidiary body for scientific and technical advice.

NORWAY

[20 MARCH 2009]
[SUBMISSION: ENGLISH]

Strategic Plan for the Cartagena Protocol on Biosafety (Notification 2008-129)

Submission of views from Norway

Vision/Mission

In accordance with the precautionary principle aim at ensuring the safe transfer, handling and use of living modified organisms that may have adverse effects on the conservation and sustainable use of biological diversity, taking also into account risks to human health.

Strategic goals and substantive issues to be dealt with in the future work of the Protocol

Liability and redress

Strategic goal: A legally binding regime on liability and redress for damage resulting from LMOs

The negotiations on international rules on liability and redress should be completed and the legally binding rules should be agreed upon at COP/MOP5 and implemented at the national level. Furthermore, a process should be decided by COP/MOP5 in order to make the non-legally binding guidelines of the liability and redress regime binding in the future.

Risk assessment and risk management

Strategic goal: Common approaches to risk assessment and identification of specific LMOs or traits that may have adverse effects on biological diversity, taking also into account risks to human health

Guidance on how to conduct risk assessment in special areas should be developed by the Ad hoc Technical Expert Group on Risk Assessment and Risk Management. This guidance should thereafter be implemented at national level. We also need to identify gaps in existing knowledge and possible measures to address this.

Furthermore, modalities for cooperation in identifying LMOs or specific traits that may have adverse effects on the conservation and sustainable use of biological diversity, taking also into account risks to human health, should be considered by the Parties in accordance with Article 16, para. 5. Thereafter the COP/MOP should consider and take appropriate measures regarding the treatment of such living modified organisms or specific traits.

Socio-economic considerations

Strategic goal: Consideration of possible socio-economic impacts arising from LMOs, also in relation to decisions on imports of LMOs

The Protocol encourages Parties to cooperate on research and information exchange on any socio-economic impacts of LMOs, especially on indigenous and local communities. At COP-MOP4 Parties considered a synthesis of views and available case-studies concerning

socio-economic impacts of LMOs prepared by the Secretariat on the basis of submissions from Parties. According to Decision BS-IV/16 Parties, Governments and other relevant international organizations should continue to share their research, research method and experience in taking into account socio-economic impacts of living modified organisms, through the Biosafety Clearing House.

The focus of future work should not be limited to Article 26.2, but COP/MOP should also address Article 26.1. In order to follow up Art. 26 para. 1 it should be discussed how such socio-economic impacts of LMOs may be reflected in decision-making on imports of LMOs.

Handling, transport, packaging and identification of LMOs (Article 18)

Strategic goal: Common approaches, practices and standards in the field of handling, transport, packaging and identification of LMOs

The Parties need to continue work on reviewing the experience gained with the use of sampling and detection techniques and on the need for and modalities of developing criteria for acceptability of, and harmonizing, sampling and detection techniques.

Further work on developing standards with regard to identification, handling, packaging and transporting is needed under the Protocol, without overlapping with the work of other organizations. It is important to fill identified gaps in the existence of such standards.

Follow-up of decision BSIII/10 on documentation accompanying living modified organisms intended for direct use as food or feed, or for processing, in commercial production and authorized in accordance with domestic regulatory frameworks. The COP-MOP should review and assess, at its fifth meeting, experience gained with the implementation of these documentation requirements with a view to considering a decision, at its sixth meeting, to ensure that documentation accompanying living modified organisms intended for direct use as food or feed, or for processing covered by paragraph 4 clearly states that the shipment contains living modified organisms that are intended for direct use as food or feed, or for processing, and includes detailed information as agreed upon.

It is also important that the review includes an examination of capacity-building efforts in developing countries.

Notification requirements

Strategic goal: Common approaches and harmonized implementation of notification requirements pursuant to Article 8

The Protocol requires Parties of export to notify, or require the exporters to notify, in writing, the competent national authority of the Party of import prior to the first intentional transboundary movement of LMOs for intentional introduction into the environment of the Party of import. COP-MOP should elaborate and develop modalities for the implementation of the notification requirements on the basis of Article 8 of the Protocol, taking into account the information on national implementation and experiences gathered through the national reports and the Biosafety Clearing-House.

In its decision BS-III/3, paragraph 7, the Conference of the Parties serving as the meeting of the Parties to the Protocol urged Parties and other Governments to integrate biosafety in their broader sustainable development strategies and approaches and programmes such as Poverty Reduction Strategy Papers, where available and when scheduled for revision, as well as those related to the goals and objectives agreed upon at major United Nations conferences and summits, including those agreed upon at the Millennium Summit that are described as the Millennium Development Goals. The parties should put increased emphasis on this issue.

These obstacles should be dealt with in the strategic plan and possible measures to remedy the situation should be identified.

THAILAND

[30 DECEMBER 2008]
[SUBMISSION: ENGLISH]

Thailand would like to include issues to be considered in preparation for a strategic plan for Cartagena Protocol on Biosafety as follows:

1. Risk assessment and management (article 15 and 16)

- Risk assessment and management should be considered as a high priority issues, especially for the development of practical guideline as a reference and trade facilitation, such as practical guideline on low-level presence of recombinant-DNA plant (LLP).

- Information on risk assessment and management should be shared and harmonized among parties to strengthen their capacities and to provide basic information for further development.

2. Handling, transport, packaging and identification (article 18)

Emphasis should be put on type of documents for identification of LMOs according to article 18 2 (b) and 2 (c), as well as considering needs and the development of standards for handling, transport, packaging and identification of LMOs.

3. Information sharing and the Biosafety Clearing-House (article 20)

Parties should be urged to continuously share information, especially scientific and technical information on risk assessment and management through Biosafety Clearing-house. Funds should be allocated to support parties in developing and sustaining the operation of Biosafety Clearing-house both at central portal and national level.

4. Capacity-building (article 22)

Difference in capacities of parties would hinder process in implementing the Protocol; therefore, capacity building, through series of sub-regional workshops, trainings and exchange of information should also be considered to equalize implementing capacities of the parties.

5. Other issues to be continuously considered or introduced into strategic plan

- impacts of LMOs on agricultural and livestock sectors
- liability and redress
- socioeconomic consideration
- public awareness and participation

COMMENTS FROM PARTIES AND OTHER GOVERNMENTS

BENIN

[21 JANUARY 2010]
[SUBMISSION: FRENCH]

PROJET D'ÉLEMENTS DU PLAN STRATÉGIQUE DATE: 081209
PROTOCOLE DE CARTAGENA SUR LA PRÉVENTION DES RISQUES BIOTECHNOLOGIQUES

VISION *La diversité biologique est adéquatement protégée contre tout effet défavorable d'organismes vivants modifiés.*				
MISSION *Renforcer l'action à l'échelle mondiale pour assurer la manipulation, le transport et l'utilisation sans danger d'organismes vivants modifiés susceptibles d'avoir des effets défavorables sur la conservation et l'utilisation durable de la diversité biologique, compte tenu également des risques pour la santé humaine et* ***animale****.*				
Objectif stratégique	***Effets escomptés***	***Objectifs concrets***	***Résultats***	***Indicateurs***
1. Mettre en place les outils supplémentaires nécessaires à la pleine mise en œuvre du Protocole	La pleine **compréhension** et **application** du Protocole de Cartagena pour la prévention des risques biotechnologiques par les Parties		•	
		1.6 Elaborer des directives et des outils destinés à aider les parties à mettre en place des zones ou territoires sans OVM	**Les centres d'origine de ressources génétiques, les aires protégées et les zones spécifiques sont exempts d'OVM**	**Un nombre croissant de parties disposent des centres d'origine de ressources génétiques et d'aires protégées sans OVM**
2. Renforcer la capacité des Parties d'appliquer le Protocole	Des systèmes réglementaires, administratifs et d'échange d'information effectifs et efficaces sont mis	2.4 Renforcer les capacités pour la manipulation, le transport, l'emballage et l'identification des	• Les douaniers, **le personnel de laboratoire** et **les autres corps de contrôle** sont en mesure d'appliquer les exigences relatives à la manipulation, au transport, à l'emballage et à l'identification des organismes vivants modifiés	• Nombre de douaniers, **le personnel de laboratoire** et **les autres corps de contrôle** formés

	en place par les Parties aux fins de l'application du Protocole La prise de décisions est plus **rigoureuse** et plus transparente	organismes vivants modifiés	• Le personnel (**douanier, personnel de laboratoire et les autres corps de contrôle**) est formé et équipé pour l'échantillonnage, la détection et l'identification des OVM	• Nombre de Parties faisant rapport sur leur expérience de l'échantillonnage d'expéditions et de détection d'OVM dans leurs deuxième, troisième et quatrième rapports nationaux
				• **Nombre accru de documents en français dans le Centre d'échange pour la prévention des risques biotechniques**
		2.8 Renforcer les capacités de suivi des zone/territoires sans OVM	**Rapports des experts sur les études des zones/territoires sans OVM sont faits et disponibles**	**Nombre de rapports d'experts sur les zones/territoires sans OVM**
5) Accroître la disponibilité, **l'accès** et l'échange d'informations pertinentes dans le Centre d'échange pour la prévention des risques biotechnologiques				

BOTSWANA

[10 FEBRUARY 2010]
[SUBMISSION: ENGLISH]

The concerns on food products derived from LMOs seem to be ignored. It is therefore suggested to be given attention on the basis of identification and transboundary movements hence regulated accordingly.

BRAZIL

[01 FEBRUARY 2010]
[SUBMISSION: ENGLISH]

Brazilian Submission
Cartagena Protocol on Biosafety
Assessment and Review and Strategic Plan of the Cartagena Protocol

The Conference of the Parties to the Convention on Biological Diversity serving as the Meeting of the Parties to the Cartagena Protocol on Biosafety (COP-MOP), through its Decision BS-IV/15, requested the Secretariat to develop a sound methodological approach to contribute to an effective second assessment and review of the Protocol, and also invited Parties to make submissions on a strategic plan for the Protocol. In this context, draft recommendations and a draft strategic plan have been circulated for review by Parties, through Notification 2009-171.

ASSESSMENT AND REVIEW

Brazil supports the conclusions and recommendations put forward by the Secretariat with regards to the timing, scope and sources of information of the second assessment and review of the Protocol. In this regard, we agree with the process suggested in recommendations (a)-(f), under paragraph 72 of the reference document.
Furthermore, we believe that the concrete implementation aspects on which the process will focus (paragraph 70) are adequate.
Concerning recommendation (b), some amendments may be required on the proposed set of indicators that would inform the assessment and review process. The proposed indicators must not be policy prescriptive and need to reflect accurately the obligations of Parties under the Protocol.
In this context, it should be noted that the document circulated by the Secretariat refers predominantly to LMOs and LMO-FFPs, whereas the Protocol refers to three types of LMOs (LMOs for intentional introduction into the environment, LMO-FFPs and LMOs for contained use). The categories contained in the Protocol should be reflected in the suggested indicators.
Additionally, the indicators to assess the functioning of the Compliance Committee are inadequate. Parties raising concerns about their compliance are not an indicator of the effectiveness of the Committee. Additionally, the second proposed indicator suggests that the Committee does not have decision-making rules of procedure in place, when it does.
Finally, section D of the indicators seems to contradict the preferred methodology of focusing on implementation. It seems difficult to determine a methodology for assessing impacts of LMOs on biodiversity on a global level. Furthermore, "reported instances of adverse effects" on human health would force competent authorities to investigate any claim on adverse effects arising from LMOs, even those poorly substantiated allegations, thus imposing significant costs.
Concerning recommendation (g), the data gathering role of the Secretariat should be limited to compiling and analyzing information available through the BCH, second national reports and the Capacity Building Coordination Mechanism, as well as other relevant intergovernmental organizations.
On the issue of data analysis, inputs from the Compliance Committee should be

considered by COP-MOP in the assessment and review process, along with reports from the Secretariat and views from Parties. The establishment of an ad hoc experts group or other intergovernmental group to assess the information required by this process should be further considered. In any event, a report from such a group would complement the other reports by the Secretariat and the Compliance Committee.
On recommendation (i), it must be clarified what will be the process for identifying new or emerging aspects of biosafety.

STRATEGIC PLAN

Brazil supports the notion that a strategic plan would provide useful guidance to furthering the implementation of the Cartagena Protocol, both at the national and international levels. In this context, we outline below our preliminary comments to the draft plan circulated by the Secretariat.
The elaboration of the Strategic Plan for the Protocol should be based on a few principles. First, it should reflect the agreements reached by countries as reflected in the text of the Protocol itself and of relevant COP-MOP decisions. Second, it should emphasize the issue of building capacity of developing countries to implement the Protocol, which includes facilitating the transfer of necessary technologies. Third, the Strategic Plan should not prejudge the outcome of substantive deliberations of Parties concerning specific aspects of the Protocol, such as risk assessment and management and socioeconomic considerations.

Vision
The "vision" of the Strategic Plan should reflect the main components of the objective of the Protocol (Article 1). In this context, the concepts of conservation and sustainable use, risks to human health and transboundary movement should be incorporated in the vision" statement.

Mission
As with the "vision", the mission needs to reflect accurately the language in Article 1, which speaks of "contributing to ensure an adequate level of protection". Reference to the transboundary movement of LMOs should also be incorporated, consistent with Article 1.

Strategic objective 1
Operational objective 1.1
This objective should refer to "support tools on risk assessment and risk management". "Common approaches" is an open concept that may go beyond what is prescribed by Annex III of the Protocol.

Operational Objective 1.4
Article 26.1 states that only socioeconomic considerations arising from the impact of LMOs on the conservation and sustainable use of biological diversity may be taken into account in decisions of import. In this context, the current formulation of this operational objective is inadequate, for it does not reflect the text of the Protocol. Additionally, no COP-MOP decision has been taken in this regard. The text, thus prejudges COP-MOP

deliberations

The outcomes related to this objective are also inconsistent with Article 26 or relevant COP-MOP decisions. Concerning the first outcome, there are no decisions on the issue of guidelines on socioeconomic considerations. Therefore, this reference is inappropriate and should be removed.

Additionally, there has been no COP-MOP decision related to Article 26 calling for applying socioeconomic considerations "in manner that makes biosafety and international trade mutually supportive". This clearly goes beyond Article 26, which states that socioeconomic considerations arising from the impact of LMOs on the conservation and sustainable use of biological diversity may be taken into account in reaching a decision of import in a manner that is consistent with the international obligations of Parties. This second outcome is also inadequate and should be removed.

Strategic Objective 2
Expected impacts
On the first two expected impacts under this strategic objective, it should be clarified that they refer to regulatory, administrative and information exchange systems and decision making at the national level. There should also be an impact related to increased financing to support developing countries in implementing the Protocol, with a related operational objective on setting up mechanisms that aim at mobilizing new and additional financial resources from all sources.

Operational Objective 2.3
It should be clarified that risk management aims at controlling risks identified through risk assessment, in accordance with Article 16.

Operational Objective 2.4
On the first outcome, instead of referring to "enforce requirements" of handling, transport, packaging and identification, reference should be made to enabling customs/border officials to "implement the relevant provisions of the Protocol". The "requirements" mentioned in the current version of the text may go beyond the scope of the Protocol.

Operational Objective 2.5
On the second indicator of this objective, it should be noted that not only amended or new legal instruments are indicators of the implementation of the rules and procedures on liability and redress. Some legislations may not require any change in order to implement those rules and procedures. Therefore, this indicator should be reformulated.

Strategic Objective 3
The expression "expand the reach" of the Protocol is ambiguous. Since this expression seems to cover only operational objective 3.1 ("to achieve universal membership to the Protocol"), reference should be made to "achieving universal membership and promoting cooperation".

Strategic Objective 4
Operational Objective 4.1
There seems to be a certain degree of overlap between this operational objective and other objectives referring to national implementation. It also seems to imply that compliance mechanisms need strengthening, when there is no clear reference in COP-MOP decision that might suggest this. There is however a decision to improve the "supportive role" of the Compliance Committee. The Strategic Plan should have a reference to this concept of supportive role.

On the second outcome of this Operational Objective, it should be mentioned that the Compliance Committee is already able to review implementation of obligations and to propose appropriate measures. The only possible obstacle to a more thorough review by the Committee would be related to national reporting. Therefore, it does not seem adequate to suggest that changes in the procedures and mechanisms on compliance are called for.

Operational Objective 4.2
The process of assessment and review is linked to the notion of revising the text of the Protocol, its annexes and procedures. Therefore, having an operational objective that aims at improving the effectiveness of the Protocol suggests the need for such amendments, thus prejudging the outcome of the assessment and review process under Article 35, to be conducted by COP-MOP. This objective should only refer to "conducting regular and effective assessment and review processes".

The second outcome of this objective should also be changed, for it also implies the need to amend the Protocol. In the same line, the second indicator should be revised, for changes in national biosafety legislation may not necessarily point towards an improved effectiveness of the Protocol.

The above comments do not preclude additional comments on the documents mentioned before.

CANADA

[13 MAY 2010]
[SUBMISSION: ENGLISH]

Comments from Canada in response to Notification SCBD/BS/CG/jh/71409

General comments
The strategic plan includes operational objectives, outcomes and indicators, but no guidance as to actions to be taken to achieve the objectives. The performance indicators for the operational objectives and outcomes require additional explanation with respect to the process that will be used to collect the required information including description of: data collection (self-reporting or questionnaires to the Parties), data analysis, responsibility for reporting, format of report, report distribution and timeframes.

Quantitative performance indicators should monitor individual components. For example, in Objective 4.1, one of the performance indicators is the number of parties that have identified and addressed their non-compliance issues. Pooling the identification and remedial actions together in the same indicator will

result in misrepresentation and loss of information. A suggestion is to have one indicator for the number of parties that have identified non-compliance actions, and another indicator for the number of parties that have addressed their non-compliances actions. Individual monitoring should apply to all the quantitative indicators.

Background
Para 6: The progress column in the Table outlining the preliminary review of progress towards the goals of the CBD could provide more meaningful information in order to better identify gaps and attempt to address these elements in a new strategy. For example, under Goal 1, an impressive number of Parties are listed as having ratified the Protocol. Further analysis of this information would reveal that few major exporting jurisdictions have ratified. Another example, under Goal 2, is identification of the many countries that have initiated measures to implement the Protocol. In reality, Parties should not ratify if they are not able to meet the obligations. Reports from the Compliance Committee have repeatedly noted the failure of Parties to fully implement the Protocol. The recent consultant's report on effectiveness of the Protocol pointed out that so few Parties have implemented their obligations that effectiveness can not be assessed. Also under Goal 2, there is reference to 120 countries that have developed national frameworks and are in the process of operationalizing them. Are countries referred to here Parties? It is also unclear what is meant by "in the process of operationalizing". Identification of the gaps in the process and where they occur would provide more useful information for future planning. Under Goal 3 low levels of national reporting should also be identified. A solution for making this table more useful as a planning tool would be to introduce a new column, with the heading Challenges, where some of these gaps might be identified.

Annex I, Context
p. 6: It should be noted in the Context section that few exporting countries are Parties; that many Parties have not implemented Protocol obligations through appropriate legislative measures; and that reporting levels are low. The low level of implementation has made it difficult to have a meaningful review of effectiveness. In order to assess the effectiveness of an instrument, a good understanding of the levels of compliance is required.

Annex I, Assumptions
Para 10: Some of the assumptions require validation. For example:

- If many Parties have not implemented the Protocol, can it be assumed they are incorporating MOP decisions into their domestic frameworks?
- The work of the Compliance Committee has shown that Parties will not submit timely national reports
- In the current economic climate, can it be assumed that "adequate and predictable financial resources will be available" and that there will be "a progressive increase in human resources at the international and national level"?

Monitoring, Review and Evaluation Para 13: The draft document proposes that the strategic plan will be implemented through a 10-year programme of work for the Protocol, supported by biennial work plans. The medium-term programme of work will, if necessary, be adjusted from time to time on the basis of experience gained in the implementation of the requirements of the Protocol and of the results of the periodic assessment and review of the effectiveness of the Protocol. A clause acknowledging the need for adjustment is a good addition. In light of some of the incorrect assumptions pointed out above, particularly with respect to implementation and effectiveness, this approach requires further consideration.

Draft Elements of the Strategic Plan, version 010310

Page 9-19:
Focal Area 1, Objective 1.2: Article 7.4 allows the MOP to create a list of LMOs not likely to have adverse effects. Recognizing this Article in the plan could ease the burden on developing countries. For the list that could have adverse effects, the requirements in Articles 10 and 15 for a case by case risk assessment would still need to be reflected in indicators, e.g. "timely risk assessments are conducted on a case-by-case basis". Another indicator might be "no incidents of releases with adverse effects on the conservation and sustainable use of biological diversity**".**

Operational objective 1.3: The expected outcome is *improved* scientific and technical advice and the proposed indicator is the number of scientific and technical guidance materials provided. Increasing the amount of guidance material could actually lead to deterioration in the quality of scientific and technical advice. Maintaining and improving the quality of scientific and technical guidance requires that the advice is impartial, originates from independent scientific and technical experts and is subjected to a peer review process.

Objective 1.4: The indicator suggested for the objective related to identification, handling, packaging and transportation of LMOs is the percentage of Parties following procedures. Rather than reporting on percentage of Parties, we propose reporting on the percentage of companies or the percentage of shipments by Party. This indicator will better inform on the actual number of shipments with documentation and will not produce skewed data for countries in which only some companies follow the procedures. In addition, the Strategic Plan should also indicate how the identification of the LMO will be verified e.g. random verification carried out by the importing countries? a certification system by the exporting country?

Focal Area 2: Objective 2.1: Neither Article 28 nor Article 22 call for "new and additional" financial resources. The proposed indicator "new and additional financial resources being mobilized for the implementation of the Protocol" is not appropriate.

Objective 2.3: One of the indicators suggests recording the number of Parties that have infrastructure including laboratories for monitoring, management and control. The operational objectives and outcomes should clarify that it is the responsibility of exporting Parties to conduct risk assessments and risk management plans. For consistency in approaches to addressing risk assessment and risk management, we propose using the same indicators as suggested above under operational objective 1.2 e.g. "timely risk assessments are conducted on a case-by-case basis" and "no incidents of releases with adverse effects on the conservation and sustainable use of biological diversity".

Focal Area 3, Objective 3.3, Communication and Outreach: An indicator should be included on "outreach to non-Parties who are large exporters of LMOs**".**

Focal Area 4: Compliance and effectiveness are two different things and might be best addressed by two separate focal areas.

Objective 4.1: Rather than have an objective "to strengthen the mechanisms for achieving compliance it would be clearer to say "to strengthen Party compliance with the Protocol". In this way the indicators would include a list of mechanisms used to achieve the outcomes. The first Outcome is for each Party to regularly monitor the implementation of its obligations…etc. Would an appropriate first outcome not be that "each Party fully implements its obligations**"**? Obligations first have to be implemented before they can be monitored and reported upon.

The outcomes relating to the Compliance Committee require clarification. The Compliance Committee already thoroughly reviews implementation of systemic non-compliance. Is there additional outcome anticipated? The Compliance Committee is a facilitative committee, which is evidenced by the nature of the procedures and the powers given to it. How can the supportive role of the Compliance Committee be improved? It should also be indicated whether the sufficient financial resources for compliance are to come from the national or the international level.

The indicator on the number of Parties identifying and addressing non-compliance issues requires explanation as to where the information will come from.
The number of Parties having an approved and functional national biosafety framework would be improved by substituting “framework” with "Laws implementing the Protocol”. The indicator “number of parties having in place a system for handling requests should include "for Advance Informed Agreement". This could be added to the end of the indicator.

Objective 4.2: Improved reporting by Parties is not an outcome related to effectiveness. This outcome is related to compliance and should be included under Objective 4.1. The associated indicator on number of national reports received should also go under Objective 4.1. The indicator “Number of parties modifying their national biosafety frameworks with the aim of adapting to new biosafety challenges” requires clarification. A suggested modification is “Number of parties modifying their national biosafety frameworks to correspond with amendments to the Protocol adopted to address new challenges".
The link between the number of subsidiary bodies established by the MOP and the effectiveness of the Protocol is unclear. A proposed new indicator for this objective is "Key LMO exporting countries become Parties to the Protocol."

Focal Area 5, Objective 5.1: In order to understand the link between the objective and the indicator on the amount of traffic to the BCH and the number of references to the BCH, an explanation is required as to how the traffic would be quantified and where and how the references to the BCH would be quantified.
The indicator "Number of non-Parties having published biosafety laws and/or regulations on the BCH." should be deleted. Non-Parties do not have obligations. Non-parties who submit information are doing so voluntarily and their actions can not be considered as a measure of the success/implementation of the Protocol.

CHINA

[16 MARCH 2010]
[SUBMISSION: ENGLISH]

03/17/2010 09:23 FAX 001

中华人民共和国环境保护部

MINISTRY OF ENVIRONMENTAL PROTECTION

115 Xizhimennei, Nanxiaojie, Beijing 100035, the People's Republic of China

FACSIMILE SHEET

Date: March 16, 2010	No. of Pages: 2
To:	From: MEP
Name: Ahmed Djoghlaf	Name: Zhang Jieqing
Dept.: the Secretariat of CBD	Dept.: Department of International Cooperation
Tel/Fax: +1 514 288 6588	Tel/Fax: 86-10-66556519/13

71158

Subject: Comments on the Draft Elements of a Strategic Plan of the Cartagena Protocol on Biosafety

Dear Mr. Ahmed Djoghlaf,

I am writing with reference to the Notification 2009-171 inviting comments on the above-mentioned Draft Elements.

We welcome the Secretariat undertakes to draft a Strategic Plan prior to the convening of the fifth Meeting of the COP-MOP of the Protocol. We would like to put forward the following comments for your consideration.

I. We propose to add some paragraphs on the possible challenges for the Protocol in 2010-2020 which could serve as the overall background for the Strategic Plan.

II. For the Strategic Objective 1,

-- For the Operative Objective 1.1, it is proposed to speed up the development of the technical guidance on risk assessment and risk management, and to encourage experience-sharing among the Parties, in particular between the developed countries Parties and the developing countries Parties.

-- For the Operative Objective 1.3, the negotiation on international rules and procedures on liability and redress of damage resulting from the transboundary movements of LMOs is going on, so it is not appropriate to predict when the rules and procedures will be adopted by the COP-MOP, neither when it will come into force.

-- For the Operative Objective 1.5, it is suggested to move two of the Outcomes, i.e. response measures and public participation, into the corresponding parts in Strategic Objective 2.

III. For the Strategic Objective 2, we propose to include an analysis on the implementation of the

Protocol as well as problems /difficulties for the Parties to improve the situations, and the reasons for these problems/difficulties. The analysis could provide solid basis for suggestions on future enhancement of the implementation.

-- For the seven Operative Objectives, there are duplications with those of Strategic Objective 1, for examples, Operative Objectives 2.2 and 1.3, 2.3 and 1.5. We propose to clarify the difference between the Strategic Objective 1 and 2.

IV. For the Strategic Objective 3, we propose that the Secretariat to enhance the cooperation with other relevant international organizations and conventions, especially for more financial support.

V. For the Strategic Objective 4, we propose to integrate it into the Strategic Objective 2, and to emphasize how to improve the capacities for the developing countries Parties to implement the Protocol.

VI. For the Strategic Objective 5, we propose to the Secretariat and the Parties to further support the BCH and increase their contributions, and to encourage more Parties to effectively use the BCH.

Thank you for the kind attention and cooperation.

Your sincerely,

Zhang Jieqing

Zhang Jieqing
Director, Division of International Organizations and Conventions
Department of International Cooperation, MEP

CUBA [17 MAY 2010]
[SUBMISSION: ENGLISH]

Comments made by the National Authority of Cuba on the Strategic Plan for the Cartagena Protocol, 2011- 2020.

GENERAL COMMENTS:

Work should be focused on the indicators, which are non-measurable in most cases, since they, basically, refer to either percentage of parties or number of parties without specifying figures.
A pattern that allows to measure percentage or number of parties should be taken as reference to determine if it is high, medium, or low.

Each expected impact, operational objective, result or indicator should be enumerated somehow to establish a horizontal logic.

SPECIFIC COMMENTS

Focal area 1. Further Guidance **development**

Page 10

Objective. 1.2 We feel that it is more tangible to refer to LMOs monitoring wholly and outline objectives, outcomes and indicators towards this aspect, whose gaps have been spotted by the parties.

Objective 1.3. More than fostering the mechanism, it would be creating a scientific and technical mechanism to the Protocol since it does not exist by the time. In keeping with this, the outcome would be the Mechanism created.

Objective 1.4 We reasonably think that a first part should be added to the objective in order to get clearer concepts concerning handling, transport, bottling and identification so as the parties have a greater capacity to implement requirements that are more concrete.

Page 11

Objective 1.5 The first indicator should be moved to the outcomes column. We feel that the Supplementary protocol and its entry into force classifies more as an outcome than an indicator.

Objective 1.6 The first indicator should be removed from here, for the second indicator contains it.

Page 12.

Objective 1.7. The first outcome should be removed from here, and insert transit in the second, since the objective covers transit issues in the guidelines.

Focal area 2. **Capacity building**

Pág. Page 13.

Objective.2.1 The first outcome should be removed due to ambiguity (or for not being clear)

Page 14.

Objective 2.2 The outcomes should be removed from here. We consider that it would be more coherent to the objective if the outcome were stated as follows: *the Biosafety national frameworks established by the parties taking into account the integration of Biosafety into the most relevant sectors*

Objectives. 2.3 (pág 14), 2.4, 2.5 (page 15) and 2.7 (page16) should be removed from this focal area. These objectives are already under analysis in the plan; they can either be found under focal area 1 or further down in the document (area 5).

This proposal is based on the fact that, the outcomes and indicators proposed herein, do not differ that much from those described for these same objectives under the other areas.
Moreover, the outcomes and indicators set forth in areas 1 and 5 intrinsically deal with capacity building, without which these actions cannot be achieved. We recommend removing them from here and insert what is appropriate of its content in focal areas 1 and 5 in which these objectives are dealt from their technical viewpoint.

Page 15

Objective 2.6 The first outcome should relate to the provision of guidelines and training materials for the parties. There should be guidelines in place, first, for the parties to have access to, then. The second indicator should be removed from this indicator since the first one contains it already. The third indicator does not measure the objective; it is not necessary to have an expert network set in the matter of public education to comply with the objective.

Focal area 3: Outreach and cooperation

Page 16.

Objective 3.1 The indicator should refer to the 100% of the parties. In this case, to be in accordance with the expected outcome, the only and possible indicator is that of the 100% of the parties, otherwise, a lesser percentage should be established if delimited in time: for instance, *80% of the parties to the Convention are parties to the Protocol for 2017.*

Focal area 5. Information sharing

Page 19.

Objective 5.1 The word *Quantity* should be replaced by *Increase*

CZECH REPUBLIC

[25 FEBRUARY 2010]
[28 APRIL 2010]
[SUBMISSION: ENGLISH]

Comments on the draft Strategic Plan to the CPB

(Notiication No. 2010-058)
Milena Roudná, National UNEP/GEF Project Coordinator, Czech Republic

Recommendations for the changes:
Annex 1 – I. Context, page 6, ad 5, add the following or correct (in bold):
This draft **S**trategic **P**lan and …have been prepared on the basis of ….decisions taken ….at its last four meetings**, and through general discussion and comments received.**
II., page 7, ad 6 – last sentence – **formulation** of strategic objectives need to be **in accordance** with those in the Table (pages 9-19) and reformulated as follows:
The focal areas underlying the five strategic objectives are as follows: 1. **Implementation of the Protocol**; 2. Capacity **B**uilding; 3. **Outreach and Cooperation**; 4. Compliance **and Review;** 5. Information Sharing.
Ad 7, second bullet: The operational objectives …..in order to **implement** impacts
Ad 8, in the last sentence delete *for example*: Some of the actions will be undertaken by Parties …
III., ad 10, (a): …. MPO decisions into their **national/regional** frameworks
(i.e. to use corresponding terminology)
c) – delete text in the parenthesis: Parties ……required information to the BCH
IV. , page 8 , ad 12 **–** last sentence, last line (to be text quite clear):
…and technical/capacity building support**, as well as of two** programme assistants
V., page 8, ad 13, last but one sentence:
Information will be drawn **mainly** from national reports **and from other available sources** to generate the data necessary for the analysis.
i.e. delete *among other things*

Draft Elements of the Strategic Plan – Table, pp. 9 - 19

Strategic Objective – **Focal Area 1** (page 9)
Further Guidance Development – this is more a tool how to reach strategic objective not strategic objective as such – recommendation (in line with content):
Implementation of the Protocol (see page 7, II. Ad 6)

Expected Impacts
P. 13 – Expected Impacts **arrange in a logical way**, as follows (and complete add 2):
(1) Increased safety in …
(2) Effective and efficient regulatory, administrative **and monitoring** frameworks….
(3) Necessary mechanisms put in place ….
(4) More transparent and expeditious decision-making
(5) Full use of information exchange system
P. 19 - Expected Impacts arrange in a logical way, as follows:
(1) Transparency in the development …
(2) Increased compliance …
(3) Informed decision making
(4) Enhanced public awareness of biosafety

Operational Objectives

Focal Area 1, p. 9-12 - **arrange in a logical way**, as follows:

1.1 Scientific and technical advice
1.2 LMOs or traits that may have …
1.3 Risk assessment and risk management
1.4 Handling, transport, packaging and identification
1.5 Transit, contained use …
1.6 Liability and redress

Focal Area 2, p. 13-16 (proposed changes p. 15-16) - **arrange in a logical way**, as follows:

2.1 Coordination and support
2.2 National Biosafety Framework
2.3 Risk assessment and risk management
2.4 Handling, transport …
2.5 Liability and redress
2.6 Information sharing
2.7 Biosafety education and training
2.8 Public awareness …

Outcomes

P. 11:

Each Party takes ….necessary to implement the rules and procedures on liability and redress **at national level**

i.e. delete *, at the domestic level,*

P. 13:

Compare bullet 3rd and bullet 5th – recommendation to **delete bullet 3**: Parties have adequate …

Similar appears among Indicators – p. 13 – last but one bullet: Number of Parties that have predictable and reliable funding ….

Moreover, what means predictable financial resources, especially in our period and current economic situation? Who can guarantee them?

P. 16:

Outcomes related to 2.7 - **arrange in a logical way**, as follows:

(1) Increased access to information …
(2) Tools to facilitate implementation ..
(3) Information on BCH …

P. 18:

Outcomes related to 4.2 – second bullet:

The Protocol, including its procedure and annexes, is **amended** if new challenges are ….

i.e. replace adapted by amended

delete *by Parties* as the precise rules of procedure exists under which conditions Protocol can be amended - COP/MOP role etc. not Parties as such ?

Indicators

P. 11 – second bullet:

Percentage of Parties …having in place **national** administrative … (terminology)

P. 13 *predictable and reliable funding ?*

P. 14 – second bullet related to 2.3:

Number of risk assessment ….that are in **compliance** with the Protocol

P. 15 – second bullet related to 2.5: Number …in the field **of** liability and redress

Third bullet related to 2.6:

Number of Parties authorities with a network of biosafety and communication experts –

Questionable, not too realistic

P. 16 – second bullet related to 2.7: Amount of **traffic to the BCH** … ? – see as well **p. 19**

P. 17 – second bullet related to 3.3:

Percentage of Parties that have in place **national communication strategies on biosafety …-**

Maybe desirable, but not too realistic – such strategy can be a part of National Biosafety Strategy or of other related national strategic documents, depending on each Party conditions/situation.

P. 18

Second bullet related to 4.2:

Number of Parties …..with the aim **to meet new** biosafety chalanges (delete *of adapting to new).*

4th bullet to 4.2:

Number of subsidiary bodies …

Can this be really an indicator of success ? efficiency, synergy …?

Comments Made 25 February 2010

The last version of the proposed Strategic Plan has several positive elements, nevertheless some parts need to be restructured-reformulated.

Positive elements:

Arragement in the form of a Table

Vision and Mission - briefly and clearly defined

Comments to other parts:

Strategic Objectives - positive: restricted number - most important objectives, in some cases formulation can be improved

Expected Impacts - generally well defined, only small changes recommended (deletion of some details, which are not necessary)

Operational Objectives - in some cases better structuring or formulation recommended (e.g. 1.5)

Outcomes - more logical arrangement and re-definition in some cases needed, as well as deletion of some not necessary details

Indicators - most problematic part which needs to be redrafted - restructured:

need to measure progress

existing indicators not clearly defined (expresions such as "numerous" etc.; instead existing expressions use: percentage of Parties/ number of Parties)

missing logistic in precisely given terms (e.g. national biosafety legislation by 2015 - on the other hand documents for which the existing legislation represents the prerequisite required in a shorter horizon - e.g. national communication strategy, mechanism for ensuring public participation in decision-making, capacity-building action plan)

some of existing indicators have more character of outcomes (reallocation to corresponding part)

to be fully functional, indicators in SP need to be in correlation with indicators used in other related documents.

General comments:

Due to the character of the document - as strategic one - to delete all details which are not necessary (explanations in sentences, examples in parenthesis, some adjectives)

On the principle of synergy, i tis recommended to use results of other conventions or specialized groups, in this case especially results of the 6th Coordination Meeting for Governments and Organizations Implementing and/or Funding Biosafety Capacity-building Activities and the 7th Meeting of Liaison Group on Capacity-building for Biosafety (February 2010, Cambodia).

ECUADOR

[15 APRIL 2010]
[SUBMISSION: SPANISH]

PROYECTO DE ELEMENTOS DEL PLAN ESTRATÉGICO FECHA: 081209

PROTOCOLO DE CARTAGENA SOBRE SEGURIDAD DE LA BIOTECNOLOGÍA

VISIÓN

La diversidad biológica está adecuadamente protegida de cualquier efecto adverso de organismos vivos modificados.

MISIÓN

Fortalecer la acción mundial para garantizar la transferencia, manipulación y utilización seguras de todos los organismos vivos modificados que puedan tener efectos adversos en la conservación y utilización sostenible de la diversidad biológica, teniendo también en cuenta los riesgos para la salud humana.

Objetivo estratégico	***Efectos esperados***	***Objetivos operacionales***	***Resultados***	***Indicadores***
1. Establecer otros instrumentos necesarios para llevar el Protocolo plenamente a la práctica	Aplicación plena del Protocolo de Cartagena sobre Seguridad de la Biotecnología por las Partes Mejora del desempeño de las Partes para alcanzar los objetivos generales de conservación y utilización sostenible de la diversidad biológica	1.1 Desarrollar más a fondo y producir instrumentos basados en las ciencias sobre enfoques comunes de evaluación del riesgo y gestión del riesgo para las Partes	• Se pone a disposición de las Partes y otros interesados orientación sobre evaluación del riesgo y gestión del riesgo que aborda nuevos avances en la tecnología moderna • Las Partes y otros Gobiernos establecen y adoptan enfoques comunes de evaluación del riesgo y gestión del riesgo, según proceda	• Se produce, y proporciona a las Partes y otros Gobiernos, una cantidad importante de instrumentos y documentos de orientación sobre evaluación del riesgo y gestión del riesgo. Sugerimos plantearse el indicador asi: Instrumentos y documentos producidos y proporcionados a las Partes y otros Gobiernos, de orientación sobre evaluación del riesgo y gestión del riesgo • Una cantidad importante de Partes adoptan enfoques comunes de evaluación del riesgo y gestión del riesgo. Sugerimos plantearse el indicador asi: Enfoques comunes de evaluación del riesgo y gestión del riesgo adoptados por las Partes. Comentario: Para lograr esto hay que hacer un gran esfuerzo para establecer proyectos donde participen los países que pueden tener enfoques comunes. Por ejemplo al momento existe un proyecto donde participan algunos países andinos sobre evaluación de riesgo en nuestra región, pero a Ecuador nunca se le preguntó si quería o podía participar. Por lo tanto, la experiencia ganada será solo para algunos países de la región y luego se pretenderá que enfoques de evaluación se armonicen, pero sino hay un diálogo entre todas las partes interesadas es difícil llegar a estos acuerdos. • Se reducen al mínimo los posibles efectos adversos de los OVM en la diversidad biológica Sugerimos plantear en indicador así: Efectos adversos de los OVM en la diversidad biológica reducidos al mínimo. Comentario:Es muy subjetivo, cómo se puede tener constancia de esto, talvez a través de sistemas nacional de bioseguridad que marchen y se fortalezcan. Creo que no esta planteado como indicador
		1.3 Adoptar y aplicar normas y procedimientos de responsabilidad y compensación por daños resultantes de los movimientos transfronterizos de organismos vivos modificados	• Normas y procedimientos internacionales de responsabilidad y compensación por daños resultantes de los movimientos transfronterizos de organismos vivos modificados adoptados, ratificados por las Partes y en vigor • Cada Parte adopta la medidas administrativas y jurídicas necesarias para aplicar, en el nivel nacional, las normas y procedimientos de	• Adopción de normas y procedimientos internacionales de responsabilidad y compensación por daños resultantes de los movimientos transfronterizos de organismos vivos modificados • Entrada en vigor de las normas y procedimientos internacionales de responsabilidad y compensación antes de la séptima reunión de la Conferencia de las Partes que actúa como reunión de las Partes en el Protocolo • Un número **mayor** sacar esta palabra de Partes han establecido marcos nacionales administrativos y jurídicos que incorporan normas y procedimientos de responsabilidad y compensación por daños resultantes de los movimientos transfronterizos de organismos vivos modificados El tema de responsabilidad y compensación es muy importante, sin embargo se ha visto lo difícill poder establecer normas en este sentido debido a que "el daño" de los OVMs

			responsabilidad y compensación	no se ha dado, no es cuantificable ni previsible. Por lo tanto, creo que en general este indicador es de muy difícil ejecución y que muchos países van a requerir de apoyo para lograr fortalecer y/o establecer medidas administrativas y jurídicas dentro de esta temática.
		1.4 Aclarar los factores socioeconómicos básicos que se pueden tomar en cuenta al adoptar decisiones sobre importación de organismos vivos modificados	• Se elaboran directrices apropiadas respecto a las consideraciones socioeconómicas relativas a los organismos vivos modificados, que son utilizadas por las Partes • Las consideraciones socioeconómicas son aplicadas, según proceda, por las Partes de una manera en que la seguridad de la biotecnología y el comercio internacional se apoyen mutuamente	• Número de Partes que notifican experiencias positivas al tomar en cuenta las consideraciones socioeconómicas en la adopción de decisiones sobre la importación de organismos vivos modificados Hay muy pocas experiencias de procesos de toma de decisión que hayan establecido consideraciones socioeconómicas, por lo difícil de incluir este parámetro de forma sustentada y técnica. Definitivamente sería un aporte si se logra tener directrices aplicables y sustentadas y no basadas en análisis teóricos no aplicables a la realidad de nuestros países.
		2.1 Establecer mecanismos eficaces para desarrollar, coordinar y supervisar las actividades de creación de capacidad	• Se establece un enfoque más cohesivo y un mecanismo eficiente para la creación de capacidad relacionada con la seguridad de la biotecnología • Mejor comprensión de las necesidades de creación de capacidad de las Partes que son países en desarrollo y de las Partes con economías en transición • Las Partes cuentan con recursos financieros y técnicos adecuados y previsibles que les permiten cumplir con sus obligaciones conforme al Protocolo de manera integrada y sostenible • Cada Parte adopta y aplica estrategias y planes de acción nacionales de creación de capacidad exhaustivos	• Todas las Partes han evaluado sus necesidades de capacitación y creación de capacidad institucional y han presentado la información al Centro de Intercambio de Información sobre Seguridad de la Biotecnología (CIISB) antes de 2011 • Por lo menos el 50% de las Partes han desarrollado planes de acción de creación de capacidad para aplicar el Protocolo antes de 2012 (asi es como una meta) Sugerimos plantear el indicador asi: Número de Partes han desarrollado planes de acción de creación de capacidad para aplicar el Protocolo antes de 2012 • Por lo menos el 50% de las Partes han establecido programas de capacitación para el personal que se ocupa de cuestiones relacoinadas con la seguridad de la biotecnología y para la capacitación a largo plazo de los profesionales de la seguridad de la biotecnología. (asi es como una meta) Sugerimos plantear el indicador así: Número de Partes que han establecido programas de capacitación para el personal que se ocupa de cuestiones relacoinadas con la seguridad de la biotecnología y para la capacitación a largo plazo de los profesionales de la seguridad de la biotecnología • Las Partes han establecido mecanismos nacionales de coordinación para las iniciativas de creación de capacidad en seguridad de la biotecnología. (esta como actividad cumplida). Sugerimos plantear el indicador así: Número de Partes que han establecido mecanismos nacionales de coordinación para las iniciativas de creación de capacidad en seguridad de la biotecnología • Mejor coordinación y colaboración entre las Partes y las entidades que ejecutan o financian los esfuerzos de creación de capacidad en seguridad de la biotecnología (ES ACTIVIDAD) • Se aprovechan y se usan más eficazmente los recursos y oportunidades existentes Sugerimos plantear así: Porcentaje de aprovechamiento y uso eficaz de los recursos y oportunidades existentes • Las redes e instituciones regionales y nacionales existentes colaboran más estrechamente para hacer avanzar la creación de capacidad en seguridad de la biotecnología En el caso de Ecuador el tema de capacitación es prioritario, ya que no tenemos establecido un Sistema Nacional de Biosequridad, no tenemos regulaciones que realmente manejen el tema de evaluación y gestión de riesgo, por eso requerimos urgentemente ampliar el número de personas capacitadas que manejen estos temas y dinamicen este proceso en el país.
		2.2 Asegurar que todas las Partes hayan establecido marcos nacionales de seguridad de la biotecnología para la aplicación del Protocolo	• Las decisiones respecto a la seguridad de un organismo vivo modificado se basan sobre normas reglamentarias y administrativas bien establecidas • Las cuestiones relativas a la seguridad de la biotecnología y la aplicación del Protocolo de	• Todas las Partes han establecido políticas y leyes nacionales sobre seguridad de la biotecnología, incluidos sistemas para la inspección, supervisión y aplicación de dichas leyes, antes de 2015(TAL COMO ESTÁ ES UNA META) • La mayoría de las Partes aplica de manera efectiva sus leyes y reglamentos sobre seguridad de la biotecnología. (TAL COMO ESTÁ ES UNA META) Número de Partes que aplica de manera efectiva sus leyes y reglamentos sobre seguridad de la biotecnología • Todas las Partes han designado un centro focal nacional y autoridades nacionales competentes.

			Seguridad de la Biotecnología están integradas en los restantes sectores pertinentes, especialmente los sectores de agricultura, medio ambiente/diversidad biológica, salud y ciencia y tecnología	TAL COMO ESTÁ ES UNA META) Número de Partes que han designado un centro focal nacional y autoridades nacionales competentes • Todas las Partes han establecido comités nacionales de seguridad de la biotecnología u órganos similares. TAL COMO ESTÁ ES UNA META) Número de Partes que han establecido comités nacionales de seguridad de la biotecnología u órganos similares • Por lo menos el 50% de las Partes han establecido normas y procedimientos administrativos claros para manejar las notificaciones y solicitudes de aprobación de importación o liberación de OVM. (TAL COMO ESTÁ ES UNA META)Número de Partes que han establecido normas y procedimientos administrativos claros para manejar las notificaciones y solicitudes de aprobación de importación o liberación de OVM. • Todas las Partes cuentan con sistemas para proteger la información confidencial. sugerimos: Número de partes que cuentan con sistemas para proteger la información confidencial.
		2.6 Mejorar la capacidad en el nivel nacional, regional e internacional que faciliten los esfuerzos para aumentar la concienciación del público y promover la educación y participación respecto a la transferencia, la manipulación y la utilización seguras de organismos vivos modificados	• Las Partes tienen acceso a materiales de orientación y capacitación sobre concienciación, educación y participación del público respecto a la transferencia, la manipulación y la utilización seguras de los OVM • Las Partes cuentan con capacidad para promover y facilitar concienciación, educación y participación del público respecto a la seguridad de la biotecnología	• Todas las Partes habrán establecido estrategias nacionales de comunicación sobre seguridad de la biotecnología antes de 2012. (TAL COMO ESTÁ ES UNA META) • Todas las Partes han creado sitios web y archivos con funciones de búsqueda nacionales sobre seguridad de la biotecnología. (TAL COMO ESTÁ ES UNA META) • Por lo menos el 50% tienen centros de recursos nacionales o secciones en las bibliotecas nacionales existentes dedicados a materiales de educación sobre seguridad de la biotecnología. (TAL COMO ESTÁ ES UNA META) • Todas las Partes habrán establecido mecanismos para garantizar la participación del público en la adopción de decisiones respecto a los OVM antes de 2012. (TAL COMO ESTÁ ES UNA META) • Se han desarrollado instrumentos de apoyo (p. ej., plantillas, juegos de herramientas), que utilizan los puntos focales nacionales, educadores y comunicadores, sobre seguridad de la biotecnología. (TAL COMO ESTÁ ES UNA ACTIVIDAD) instrumentos de apoyo desarrollados (p. ej., plantillas, juegos de herramientas), que utilizan los puntos focales nacionales, educadores y comunicadores, sobre seguridad de la biotecnología • Se han preparado y compartido estudios de casos y prácticas óptimas sobre concienciación, educación y participación del público respecto a la transferencia, la manipulación y la utilización seguras de los OVM • Se ha establecido una red de expertos en educación y comunicación sobre seguridad de la biotecnología antes de 2011
3) Ampliar el alcance del Protocolo y promover la cooperación	Aumento del apoyo político para la aplicación del Protocolo Aumento del apoyo de las organizaciones, convenios e iniciativas pertinentes, y colaboración con los mismos, para la aplicación del Protocolo	3.1 Lograr una membresía universal en el Protocolo	• Todas las Partes en el Convenio sobre la Diversidad Biológica se convierten en Partes en el Protocolo • Reconocimiento mundial del Protocolo de Cartagena sobre Seguridad de la Biotecnología como el principal instrumento en la esfera de la transferencia, la manipulación y el uso de organismos vivos modificados resultantes de la biotecnología moderna; • Se facilita el cumplimiento del Protocolo	• Por lo menos el 50% de aquellos que no son Partes se convierten en Partes dentro del año posterior a la adopción de este Plan Estratégico (TAL COMO ESTÁ ES UNA META) • Todas las Partes en el Convenio sobre la Diversidad Biológica se convierten en Partes en el Protocolo antes de 2015 Este indicador es irreal, hay Partes del Convenio de Diversidad Biológica, como Argentina, que no se convertirá en Parte del Protocolo antes del 2015, el Protocolo tiene grandes retractores como los grandes países productores de OVMs, por lo tanto es conveniente reorientar este indicador, talvez lo interesante sería que los Países que no son Parte por lo menos reconozcan al Protocolo como un instrumento clave el manejo de este tema, que colaboren con el BCH, entre otras actividades, pero si se mantiene así este indicador, es poco probable su cumplimiento.
			• Aumento de la concienciación respecto al Protocolo y su visibilidad	• Número de programas nacionales de concienciación nacional sobre seguridad de la biotecnología

		3.3 Elevar el perfil del Protocolo	• Todas las Partes han diseñado y aplicado estrategias de educación y comunicación que originan una mayor conciencia acerca de los asuntos relacionados con la seguridad de la biotecnología y el uso y la manipulación seguros de los organismos vivos modificados entre el público general, especialmente los agricultores • Los asuntos relacionados con la seguridad de la biotecnología y las actividades pertinentes del Protocolo son cubiertas regularmente por los medios de comunicación tanto locales como internacionales • Se incluye la seguridad de la biotecnología en los contenidos curriculares pertinentes de las instituciones académicas o educativas	• Número de sitos web o bases de datos nacionales sobre seguridad de la biotecnología • Cantidad y diversidad de materiales de concienciación y educativos sobre seguridad de la biotecnología y el Protocolo disponibles, a los que el público puede acceder en formato impreso y electrónico, inclusive por conducto del CIISB, sitios web nacionales y otros canales de comunicación Para la difusión del Protocolo es imprescindible tener los medios técnicos y económicos para realizar campañas en instituciones, grupos relacionados como los agricultores, colegios, escuelas, etc. Para eso se necesita de proyectos concretos como fue el Proyecto del BCH que logró a través de sus seminarios difundir la importancia del Protocolo y del BCH. Sin embargo este proyecto culminó y con él estas actividades de difusión. Se debería dar continuidad de este tipo de proyectos, o cómo a partir del Protocolo se estimula de forma concreta esta actividad.
5) Mejorar la disponibilidad e intercambio de información pertinente por conducto del Centro de Intercambio de Información sobre Seguridad de la Biotecnología	Transparencia en el desarrollo y uso de OVM; Adopción de decisiones fundamentada, Mejora de la concienciación del público Mayor cumplimiento de los requisitos nacionales	5.1 Aumentar la cantidad y calidad de la información enviada al CIISB y recuperada del mismo	• Se reconoce al CIISB como el repositorio de información más autorizado sobre seguridad de la biotecnología • La información enviada al CIISB es precisa, completa y oportuna • Un número mayor de países envían y recuperan información • Los informes de evaluación de riesgo se comparten de manera oportuna por conducto del CIISB • Facilitación del acceso a recursos y experiencias relacionados con la seguridad de la biotecnología	• Mayor reconocimiento y visibilidad para el CIISB y la SCDB • Relación entre informes de evaluación de riesgo y cantidad de decisiones sobre OVM • Aumento de la cantidad de publicaciones que contiene el Centro de Recursos de Información sobre Bioseguridad (CRIB) • Mayor cantidad de visitantes en el CIISB • Aumento en la cantidad de referencias al CIISB • Capacidad de los interesados de reconocer o recordar la marca y la imagen del CIISB Debería fortalecerse la lista de expertos, que se maneja dentro del CIISB, ya que al contar con una lista adecuada de expertos, ésta se podría convertir en una herramienta de apoyo a países en sus proceso de evaluación y gestión de riesgo. Definitivamente el CIISB es la mejor herramienta con la que cuenta el Protocolo, por este motivo su fortalecimiento es vital, un indicador importante sería que la actualización de la información sea continua, que exista un mecanismo eficaz para que las Partes (y no Partes) nutran al CIISB de forma continua para que en realidad este sea un Centro de Intercambio autoirizado y reconocido.

EGYPT

[30 APRIL 2010]
[SUBMISSION: ENGLISH]

On the whole, the SP is quite thorough and adequate. It has responded to experiences of Parties during the last 6 years and reflected the current concerns on implementation of the Protocol. Two comments may be made:

- Special mention should be made of the need for further studies on the methodologies for risk assessment for the more" problematic" LMOs such as aquatic organisms, trees, viruses and pharma-plants including the long term un-intended effects on complex ecosystems and their services to the planet.
- An additional indicator for focal area 5 (information sharing) which contributes towards further transparency, capacity building and compliance measures may be added relating to the percentage of detailed risk assessment studies on which basis decisions are made being posted or hyperlinked by Parties on the BCH.

Further comments will me made during discussion at the meeting.

EUROPEAN UNION

[14 JANUARY 2010]
[SUBMISSION: ENGLISH]

Response to Notification 2009-171: 2nd (detailed) submission from the EU and its Member States on draft elements for a Strategic Plan for, and the report on methods for the evaluation of the effectiveness of, the Cartagena Protocol on Biosafety

Background

At the end of January 2010, the EU and its Member States sent a short initial response to Notification 2009-171.

In accordance with decision BS-IV/15, this notification invited Parties to provide, no later than 30 January 2010, comments on the draft elements for a Strategic Plan prepared by the Executive Secretary on the basis of suggestions from Parties. (The EU and its Member States had submitted suggestions concerning the draft Strategic Plan on 12 March 2009)

In our submission of January 2010, the EU and its Member States acknowledged the considerable work undertaken by the Executive Secretary to draw up that draft document, including elements for a methodology for the second evaluation of the effectiveness of the Protocol. We appreciated the presentation of the draft Strategic Plan in the form of a table organized in columns reflecting a hierarchy of norms, ranging from strategic objectives to sets of indicators capable of assessing progress on each strategic objective.

We also considered the mission and vision envisaged for the Strategic Plan to be precisely, concisely and clearly defined, and that the strategic and operational objectives covered the main issues that we had identified as important.

Given the short period between the reception of the draft document and the deadline for Parties to give comments, the EU and its Member States informed the Secretariat that we intended to send more detailed comments later on, after having had enough time to study and discuss the document more deeply.

Detailed comments on the draft document presented by the Executive Secretary in response to decision BS-IV/15

1st part of the document: draft Strategic Plan

The EU and its Member States confirm their appreciation of the draft Strategic Plan in the form of a table organized in columns, as well as the precision, conciseness and clearness of the mission and vision envisaged for the Strategic Plan.

We support the **vision** proposed by the Secretariat.

Regarding the **mission**, we suggest to adapt the wording in line with the objective of the Protocol defined in its Article 1: "To strengthen global action in ensuring *an adequate level of protection in the field of* the safe transfer, handling and use of living modified organisms that may have adverse effects on the conservation and sustainable use of biological diversity, taking also into account risks to human health".

Before commenting on the content of the table, and having in mind that all aspects of modern biotechnology related to the Protocol should be taken into account in the Strategic Plan, we believe that it is necessary to include a **preamble** describing the **assumptions** made. Indeed, several of the objectives and outcomes proposed depend on decisions that will be taken (or not) at future COP-MOP meetings; some of the indicators will be measurable only in the event of the adoption of such decisions. We consider that this should be made clear in the introduction to the Strategic Plan.

Adoption of decisions and related measures to be taken will partly depend on budgetary considerations. In our view this justifies including **budgetary estimates** with the proposed actions, and prioritizing the proposed actions and, therefore, the strategic objectives. This should then also provide a better view of the sense of urgency to fulfil the mission of the Protocol.

Taking into account the budgetary reality and our wish to focus clearly on the main general strategic objectives that can ensure the achievement of the mission and of the overarching goal of the Protocol, the EU and its Member States propose to reconsider and simplify the clustering of **Strategic Objectives** under 3 main headings:

1. enabling Parties to protect biodiversity by fulfilling their obligations under the Protocol;
2. coordination and information exchange;
3. expanding the reach of the Protocol.

We would suggest to keep most of the current content, substance and elements of the table, but to restructure it in accordance with this new presentation. We would furthermore propose some deletions, additions, shifting and redrafting of the current text (see below for some clarification).

We also suggest a supplementary general restructuring: to **merge** the columns " **Expected Impacts**" and "**Operational Objectives** ", which in our view largely overlap. It seems to us that there is no real added value in having two separate columns.

On the basis of those principal suggestions for the restructuring of ideas, a possible further restructuring could be to address:

- under Strategic Objective 1 as defined above:
  a) capacity-building
  b) compliance
  c) liability and redress

- under Strategic Objective 2:
  a) BCH
  b) risk assessment and risk management
  c) identification, transport, handling, and packaging

- under Strategic Objective 3:
  a) outreach and participation
  b) awareness raising

In addition, we would appreciate it if the plan would, wherever possible, specify the entity or entities responsible for all specific actions or objectives.

We hold the view that selected **indicators** should be clear, measurable and consistent. In this light, we think some of the indicators currently proposed should be reconsidered or , as appropriate, deleted ; additional clear and measurable indicators might be proposed.

In this respect:
- We notice that there is a lack of logic in some deadlines proposed: in particular, the establishment of biosafety legislation, a prerequisite for any other implementation measures, would have to take place, according to the current draft text, later then other procedures like the establishment of an action plan, national communication strategy and mechanism for public participation.
- Indicators that are to be measured at a precise moment in time should always relate to the "*number* of Parties", or "*percentage* of *Parties*", but not, e.g., to an "*increased number* of Parties " (Regular/frequent assessment, but not the indicator itself, would evaluate the progress in those numbers, or the achievement of a particular goal).
- Since progress in indicators should generally be assessed over time, the timeline should then remain open. When a fixed deadline is defined, it should, in our view, be linked to Parties' ratification date, to reflect the fact that new Parties may need time to fulfil the requirements of the Protocol.

- We recommend to check if all indicators mentioned are in the right column: are some of them not outcomes and vice-versa?
- Moreover, indicators should correspond to outcomes, and vice-versa. In this respect, some indicators seem to be missing, while, on the other hand, we feel that some of the outcomes for which no measurable indicators can be envisaged could be deleted.
- It could be good to mention tools and information sources that will enable the measurement of the indicators, together with where they can be found, to ensure that the proposed indicators are indeed measurable.
- As proposed in the draft Strategic Plan, we expect that national reports will provide a significant amount of the information needed to substantiate on the indicators. However, a considerable proportion of Parties have yet to submit their first national report. We therefore suggest, as a supplementary tool, an annual survey, which could be easily and rapidly answered (yes-no questions, or numerical answers), based on a few general questions prepared by the Secretariat, that would follow national developments in the implementation of activities related to the Protocol.

Last but not least:
The link with the Strategic Plan of the CBD should obviously be emphasized in the Strategic Plan of the Cartagena Protocol, although it is currently not possible to do so in detail since the Strategic Plan of the CBD is still under review.

It goes without saying that the various remarks and proposals made above do not prejudge the position that the EU will develop in relation to a more advanced draft Strategic Plan.

2nd part of the document: elements for a methodology for the second evaluation of the effectiveness of the Protocol

- In view of the relative youth of the Protocol and of the limited implementation of its requirements to date, the EU and its Member States agree to principally focus on the effectiveness of implementation of the Protocol during the second assessment process.
- We would nevertheless appreciate, on the basis of that second assessment, initiating a review of the indicators used, so as progressively to introduce "outcome-oriented" indicators to evaluate the effectiveness of procedures in reaching their expected impact and in contributing to the main objective of the Protocol.
- We also agree with the timing of the second assessment, but draw attention to the fact that COP-MOP 6 could potentially take place in the first half of 2012 and that national reports should be submitted 12 months before the COP-MOP.
- The EU appreciates the fact that the proposed indicators for the second assessment period would be chosen with the objective of making it easier to obtain relevant data from national reports, Compliance Committee reports and from the monitoring of the capacity-building action plan, thus avoiding a supplementary data-gathering burden.

- However, as mentioned before in view of the still relatively low proportion of Parties that have submitted their national reports to date, we suggest, in line with our comments on the draft Strategic Plan, that national developments in implementation could in addition be monitored through an annual survey based on fewer and easier questions to answer, prepared by the Secretariat.
- We are of the opinion that the assessment process should also provide information relevant to the causes of lack of implementation where this exist and provide for the development of recommendations on how to make the Protocol become more effective.
- In view of the low level of national reports and the need to obtain relevant data both on implementation and the reasons for non implementation, we reiterate our earlier suggestion to mandate an independent expert study, with clearly defined terms of reference, to gather relevant and reliable data and to make recommendations on how to improve the situation. These recommendations would be a contribution to the COP-MOP, whose role it is, pursuant to Article 35 of the Protocol, to undertake an evaluation of the effectiveness of the Protocol, including an assessment of its procedures and annexes.
- Beside those considerations, the EU supports the aim of establishing a close link between potential changes in the Strategic Plan, the program of work, national reports, and the assessment and review process.
- With that in mind, it seems to us that the indicators for the assessment process should be aligned with the indicators under the Strategic Plan.
- We notice that some of the indicators proposed for the second evaluation of effectiveness would require the development and/or availability to Parties of new technical tools before they could be measured (e.g. to identify illegal transboundary movements, especially of LMOs that are not officially on the market in any country).
- Moreover, we feel that several of the indicators proposed for the second assessment would need redrafting as many of them are not easily measurable or might be redundant.

Finally, we gratefully thank once again the Secretariat of the Protocol for having undertaken the hard and complex process of elaborating the draft Strategic Plan aiming at an effective functioning of the Protocol in the next decade. We hope our present submission shows our firm will to actively participate in the elaboration of this long-term project and our readiness to collaborate in this heavy but necessary task.

HONDURAS

[01 FEBRUARY 2010]
[SUBMISSION: SPANISH]

PROYECTO DE ELEMENTOS DEL PLAN ESTRATÉGICO FECHA: 081209

PROTOCOLO DE CARTAGENA SOBRE SEGURIDAD DE LA BIOTECNOLOGÍA

MISIÓN

Fortalecer la acción mundial para garantizar la transferencia, manipulación y utilización segura de todos los organismos vivos modificados que puedan tener efectos adversos en la conservación y utilización sostenible de la diversidad biológica, teniendo también en cuenta los riesgos para la salud humana.

Objetivo estratégico	***Efectos esperados***	***Objetivos operacionales***	***Resultados***	***Indicadores***
1. Establecer otros instrumentos necesarios para llevar el Protocolo plenamente a la práctica	Aplicación plena del Protocolo de Cartagena sobre Seguridad de la Biotecnología por las Partes	1.1 Desarrollar más a fondo y producir instrumentos basados en las ciencias sobre enfoques comunes de evaluación del riesgo y gestión del riesgo para las Partes	• Se pone a disposición de las Partes y otros interesados que aborda nuevos avances en la tecnología moderna • Las Partes y otros Gobiernos establecen y adoptan enfoques comunes de , según proceda	• Se produce, y proporciona a las Partes y otros Gobiernos, una cantidad importante de instrumentos y documentos de orientación sobre evaluación del riesgo y gestión del riesgo. • Una cantidad importante de Partes adoptan enfoques comunes de evaluación del riesgo y gestión del riesgo • Se reducen al mínimo los posibles efectos adversos de los OVM en la diversidad biológica
2. Desarrollar a fondo y fortalecer la capacidad de las Partes para aplicar el Protocolo	Las Partes establecen sistemas reglamentarios, administrativos y de intercambio de información efectivos y eficaces para aplicar el Protocolo Adopción de decisiones más expeditiva y transparente Las Partes cuentan con capacidad para llevar a cabo evaluaciones de	2.3 Fortalecer a las Partes para llevar a cabo evaluaciones de riesgo adecuadas desde el punto de vista científico y transparentes y para regular, gestionar y controlar los riesgos de los OVM	• Hay recursos, incluidos los recursos humanos, requeridos para evaluar y gestionar los riesgos de los organismos vivos modificados disponibles en el nivel nacional, subregional o regional • Se han establecido marcos de infraestructura y administrativos para la evaluación y gestión de los riesgos de los organismos vivos modificados en el nivel nacional, subregional o regional • Se han desarrollado materiales de capacitación y orientación técnica adecuada desde el punto	• Número de personas capacitadas satisfactoriamente en evaluación del riesgo y gestión del riesgo por medio de eventos de capacitación en persona así como de capacitación a distancia • Número de informes de evaluación de riesgo producidos que son compatibles con el Protocolo

	riesgo adecuadas desde el punto de vista científico, habiéndose establecido todas las estrategias necesarias Mayor seguridad en el movimiento transfronterizo, la manipulación y el uso de organismos vivos modificados		de vista científico sobre evaluación del riesgo y gestión del riesgo, que son utilizados por las Partes	
5) Mejorar la disponibilidad e intercambio de información pertinente por conducto del Centro de Intercambio de Información sobre Seguridad de la Biotecnología	Transparencia en el desarrollo y uso de OVM; Adopción de decisiones fundamentada, Mejora de la concienciación del público Mayor cumplimiento de los requisitos nacionales	5.1 Aumentar la cantidad y calidad de la información enviada al CIISB y recuperada del mismo	• Se reconoce al CIISB como el repositorio de información más autorizado sobre seguridad de la biotecnología • La información enviada al CIISB es precisa, completa, segura y oportuna • Un número mayor de países envían y recuperan información • Los informes de evaluación de riesgo se comparten de manera oportuna por conducto del CIISB • Facilitación del acceso a recursos y experiencias relacionados con la seguridad de la biotecnología	• Mayor reconocimiento y visibilidad para el CIISB y la SCDB • Relación entre informes de evaluación de riesgo y cantidad de decisiones sobre OVM • Aumento de la cantidad de publicaciones que contiene el Centro de Recursos de Información sobre Bioseguridad (CRIB) • Mayor cantidad de visitantes en el CIISB • Aumento en la cantidad de referencias al CIISB • Capacidad de los interesados de reconocer o recordar la marca y la imagen del CIISB

JAPAN [04 MARCH 2010]
[SUBMISSION: ENGLISH]

The Government of Japan submits comments A to G as follow:

A. Vision
(Comment)
"Biological diversity is adequately protected ~~from can adverse effects of~~ in the field of the safe transfer, handling and use of living modified organisms".

(Rationale)
The same expression as Article1 "Objective" of the Protocol

B. 2.1 "Outcomes" item 4
(Comment)
"Adoption and implementation of comprehensive national capacity building strategies and action plans by each Party aiming to build its capacity to implement the Protocol"

(Rationale)
Parties who already have legal and institutional capacities to implement the obligation of the protocol need not to adopt strategies and action plans.

C. 2.1 "Indicators" item 2 and 3
(Comment)
"At least 50% of the Parties aiming to build capacity have developed national capacity-building action plans for implementing the Protocol by 2012"

"At least 50% of the Parties aiming to build capacity have put in place training programmes for personnel dealing with biosafety issues and for long-term training of biosafety professionals"

(Rationale)
To be consistent with the modification in "Outcomes"

D. 2.6 "Indicators" item 2 and 3
(Comment)
"All parties have in place national websites and searchable archives, national resource centres or sections in existing national libraries dedicated to biosafety educational materials".

(Rationale)
Item 2 and 3 should be integrated because websites and searchable archives have the same function as resource centers or libraries in regions where internet is widely used. It is not necessary to have both cyber and real resource centers.

E. 3.1 "Outcomes" item 2
(Comment)

"Global recognition of the Cartagena Protocol on Biosafety as the main instrument in the field of the safe transfer, handling and use of living modified organisms resulting from modern biotechnology that may have adverse effects on biological diversity"

(Rationale)
There are some other main instruments regarding safe use of living modified organisms such as Codex Alimentarius Commission for food safety. Therefore, it should be clarified that this focuses on biosafety.

F. 3.3 "Outcomes" item 2
(Comment)
"by the general public, in particular those who handle LMOs including farmers ".

(Rationale)
As other people such as researchers and transporters handle LMOs, it is not appropriate to refer only to farmers.

G. 4.2 "Outcomes" item 2
(Comment)
"The protocol, including its procedures and annexes, is adapted by Parties ~~to~~ if new challenges are brought about by new developments in the field of modern biotechnology "

(Rationale)
New developments would not always lead to adaptation of the Protocol.

REPUBLIC OF KOREA [2 MARCH 2010]
[SUBMISSION: ENGLISH]

Vision, Mission, Strategic Objectives and Expected Impacts is well-defined.

Some Suggestions :

1. (Strategic Objectives 1) include financial affairs for achieving each strategic objectives.
2. 2. (Strategic Objectives 5) provide comparable basic statistics(number of LMO approval, a LMO approval present for each country, etc.) using the information that accumulated BCH Central Portal and try to make use of information sharing for each country.

MEXICO

[05 FEBRUARY 2010]
[11 MAY 2010]
[SUBMISSION: SPANISH]

El Gobierno de México, en respuesta a la Notificación Ref: SCBD/BS/CG/jh/71409 que da atención a la Decisión BS-IV/15 de la Cuarta Conferencia de las Partes que actúa como Reunión de las Partes del Protocolo de Cartagena sobre Seguridad de la Biotecnología (COP-MOP 4), mediante la cual solicita emitir observaciones a la versión del 29 de marzo de 2010 del Proyecto del Plan Estratégico del Protocolo de Cartagena sobre Seguridad de la Biotecnología (2011-2020), en el que se retoman los comentarios hechos por algunos Países, entre ellos México, a la versión del 8 de diciembre de 2009 del mismo Proyecto; reconoce el esfuerzo del Secretariado en conjuntar el documento UNEP/CBD/BS/COP-MOP/5/16, con base en las ponencias y los elementos derivados del informe sobre la evaluación del Protocolo, así como en las observaciones enviadas por algunos Países.

Tomando en cuenta que el documento representa un avance significativo para el desarrollo del Plan Estratégico 2011-2020, el Gobierno de México desea aportar los siguientes insumos desarrollados de manera coordinada entre los Puntos Focales del Convenio sobre Diversidad Biológica y el Protocolo de Cartagena sobre Seguridad de la Biotecnología:

Con relación al PROYECTO DE ELEMENTOS DEL PLAN ESTRATÉGICO, nos permitimos presentar los siguientes comentarios generales, que pueden aplicar a varios componentes del documento (se precisan ejemplos para ilustrar cada punto):

1. **México reitera que el documento debe circunscribirse cuidadosamente al ámbito del Protocolo de Cartagena sobre Seguridad de la Biotecnología.** Sirva como ejemplo de lo anterior, el mismo puesto a consideración para la versión anterior: la Visión propuesta por el Secretariado, a la letra dice: "La diversidad biológica está adecuadamente protegida de cualquier efecto adverso de organismos vivos modificados", quedaría circunscrita al objetivo y ámbito del PCB, de acuerdo a la siguiente propuesta:

   "El Protocolo de Cartagena contribuye sustancialmente a garantizar un nivel adecuado de protección a la diversidad biológica de organismos vivos modificados que puedan ocasionar efectos adversos."

2. Debido a que en esta ocasión, entendemos que por la premura del tiempo, no pudimos contar con la versión en español, **México reitera que la traducción al español debe presentar traducciones precisas.** Esta observación se basa, por lo dicho al principio del presente punto, en la versión anterior traducida al español.

3. **México reitera** lo manifestado respecto a la columna de ***"Outcomes"***, en el sentido de que en algunos casos se identifica claramente al responsable de generar los mismos y en otros casos no, por lo que de nueva cuenta se sugiere identificar responsables cuando resulte procedente.

4. México considera que la nueva versión continua sin esclarecer del todo la relación entre los ***"Expected Impacts"*** que señala el documento y los ***"Operational Objetives"*** asociados, esto principalmente porque en la tabla sigue perdiéndose el formato de correspondencia.

5. México reitera que puede ser prematuro presentar como ***"Outcomes"*** dentro de la propuesta de Plan Estratégico, temas que se encuentran aún en procesos de negociación. Como ejemplo está el contenido del ***"Operational Objetive 1.5"***, donde se alude al tema de Responsabilidad y Compensación.

6. Se reitera que en general, para varias de las actividades del Protocolo, como por ejemplo los programas de creación de capacidades y concienciación, se debería hacer explícita la interacción de los temas de seguridad de la biotecnología con las cuestiones de biodiversidad. Para ilustrar este comentario, sería que para establecer los riesgos al medio ambiente y la diversidad biológica, se puede tener en cuenta los indicadores de biodiversidad en general y quizá indicadores específicos para agro ecosistemas que maneja el CBD, lo cual contribuiría a dar mayor claridad sobre los objetivos comunes a los que contribuyen ambos instrumentos.

7. En vista de que algunos ***"Indicators"*** se repiten en cada una de las áreas focales, México considera que habrá que analizar la conveniencia de mantener en algunas áreas, pero eliminar en otras, para que sea un documento más sencillo, pero sobre todo puntual. Para ejemplificar lo anterior podemos citar el *indicador* ***"Number of Parties with focal points registered on the BCH",*** mismo que se repite para los ***Objetivos Operacionales "2.2 National Biosafety Frameworks", "4.1 Compliance with the Protocol"*** y ***"5.1 BCH effectiveness".*** En este caso en específico, consideramos que si bien dicho indicador aplica para el ***Objetivo Operacional 2.2,*** no es necesariamente indicador para los otros dos, por lo que se sugiere la eliminación en éstos.

Además de estos comentarios generales, nos permitimos poner a su amable consideración los siguientes comentarios puntuales a la matriz:

1. Se reitera, respecto al **"Operational Objetive" 1.1** agregar como **Indicador** el número de documentos relevantes ya existentes (por ejemplo de la OCDE o la FAO) traducidos o disponibles a través de links del BCH a las páginas de las organizaciones que los crearon.

2. Se reitera, respecto al **"Operational Objetive" 2.2** la sugerencia de añadir al primer texto de **"*Outcomes",*** la siguiente propuesta de redacción: "Las decisiones respecto a la seguridad de un organismo vivo modificado se basan en evaluaciones de riesgo adecuadas desde el punto de vista científico como se establece en normas reglamentarias y administrativas".

3. Se reitera, respecto al segundo **"Outcome"** del mismo Objetivo Operacional **2.2** la sugerencia de agregar: "las cuestiones relativas a la seguridad de la biotecnología…, salud, ciencia y tecnología **y aduanas**".

4. Respecto del **"Operational Objetive" 2.3,** se sugiere cambiar el indicador: "Number of Parties that have infrastructure, including laboratories for monitoring, management and control available" por "Number of Parties that have infrastructure, including **reliable** laboratories for monitoring, management and control available"

5. Se reitera la sugerencia de añadir en el **"Operational Objetive" 2.4** como **"Outcome"** el siguiente: "Laboratorios nacionales y regionales certificados con capacidad de detección de OVMs". Además incluir entre los "**Indicators"**: "Número de laboratorios certificados en operación".

6. Respecto al mismo **"Operational Objetive" 2.4,** se sugiere cambiar el **"Indicator":** "Percentage of Parties that have established or have reliable access to detection laboratories", por: "Percentage of Parties that have established or have access to reliable detection laboratories".

7. Se reitera la sugerencia de añadir como **"Indicators"** del **"Operational Objetive" 2.6**: "Número de usuarios de OVMs que han recibido capacitación sobre seguridad de la biotecnología impartidos por agencias gubernamentales".

8. Se reitera la recomendación de añadir en el **"Operational Objetive" 4.2** como **"Outcome"** el siguiente: "Derivado de una decisión de la Conferencia de las Partes se establece a qué OVMs no se les aplicará el procedimiento de acuerdo fundamentado previo, conforme al artículo 7 párrafo 4 del Protocolo de Cartagena."

Con relación al ANEXO II "MULTI-YEAR PROGRAMME OF WORK OF THE CONFERENCE OF THE PARTIES SERVING AS THE MEETING OF THE PARTIES TO THE CARTAGENA PROTOCOL ON BIOSAFETY UP TO 2020", reiteramos los siguientes comentarios generales:

Para cada una de las siguientes actividades se puede desglosar una serie de acciones, que correspondan a las diferentes COP MOP, lo anterior en función de los avances en la implementación del Protocolo de Cartagena y de la experiencia que se genere y documente en función de la misma.

1. Identificación de OVMs conforme al artículo 7 párrafo 4 del PCB y así como los OVMs correspondientes, de conformidad con el artículo 16 fracciones a) y b).

2. Intercambio de información e investigación sobre los efectos socioeconómicos de OVMs.

3. Fortalecimiento de mecanismos de creación de capacidades, conforme el artículo 22 del PCB.

Generación de insumos para atender esta Notificación.

Los insumos que se presentan en este documento fueron desarrollados de manera coordinada entre los Puntos Focales del Convenio sobre Diversidad Biológica y del Protocolo de Cartagena sobre Seguridad de la Biotecnología. En seguimiento a la Notificación Ref: SCBD/BS/CG/jh/71409 , el Punto Focal del Protocolo de Cartagena solicitó su opinión al documento, vía electrónica, a las instancias que conforman a la Comisión Intersecretarial de Bioseguridad de los Organismos Genéticamente Modificados (CIBIOGEM), integrada por la Secretaría de Agricultura, Ganadería, Desarrollo Rural, Pesca y Alimentación; Secretaría de Medio Ambiente y Recursos Naturales; Secretaría de Salud; Secretaría de Hacienda y Crédito

Público; Secretaría de Economía; Secretaría de Educación Pública, así como el Consejo Nacional de Ciencia y Tecnología. Asimismo, solicitó sus observaciones a los órganos de consulta de la CIBIOGEM: **Consejo Consultivo Científico,** conformado por un conjunto de expertos de diferentes disciplinas relacionados con la biotecnología moderna y bioseguridad de los OVMs, así como al **Consejo Consultivo Mixto,** integrado por representantes de los sectores privado, productivo y social de nuestro país.

Comments received 05 February 2010

El Gobierno de México, en respuesta a la Notificación Ref: SCBD/BS/CG/jh/69854 que da atención a la Decisión BS-IV/15 de la Cuarta Conferencia de las Partes que actúa como Reunión de las Partes del Protocolo de Cartagena sobre Seguridad de la Biotecnología (COP-MOP 4) que invita a presentar comentarios sobre el Proyecto de Elementos de un Plan Estratégico del Protocolo de Cartagena sobre Seguridad de la Biotecnología; agradece el esfuerzo del Secretariado en conjuntar el documento UNEP/CBD/BS/COP-MOP/5/../Add/1, con base en las ponencias y los elementos derivados del informe sobre la evaluación del Protocolo.

Asimismo, y considerando que este documento constituye un buen avance para el desarrollo del Plan Estratégico 2011-2020, el Gobierno de México pone a su consideración los siguientes insumos desarrollados de manera coordinada entre los Puntos Focales del Convenio sobre Diversidad Biológica y el Protocolo de Cartagena sobre Seguridad de la Biotecnología:

Con relación al PROYECTO DE ELEMENTOS DEL PLAN ESTRATÉGICO, nos permitimos presentar los siguientes comentarios generales, que pueden aplicar a varios componentes del documento (se precisan ejemplos para ilustrar cada punto):

8. México considera que el documento debe circunscribirse cuidadosamente al ámbito del Protocolo de Cartagena sobre Seguridad de la Biotecnología. Para ejemplificar un caso en el que podría delimitarse mejor el alcance, consideramos que la Visión propuesta por el Secretariado, a la letra dice: "La diversidad biológica está adecuadamente protegida de cualquier efecto adverso de organismos vivos modificados", quedaría circunscrita al objetivo y ámbito del PCB, de acuerdo a la siguiente propuesta:

   "El Protocolo de Cartagena contribuye sustancialmente a garantizar un nivel adecuado de protección a la diversidad biológica de organismos vivos modificados que puedan ocasionar efectos adversos."

9. Notamos que la traducción al español difiere en algunos casos del significado de la versión original en inglés, por ejemplo, en la versión en inglés se habla de *"potential adverse effects"*, mientras la versión en español lo traduce como: "posibles efectos adversos". Sugerimos por lo tanto presentar traducciones más precisas.

10. Asociado a la columna de **Resultados**, en algunos casos se identifica claramente al responsable de generar los mismos y en otros casos no, por lo que se sugiere identificar responsables cuando resulte procedente.

11. Consideramos que no queda del todo clara la relación entre los **Efectos Esperados** que señala el documento y los **Objetivos Operacionales** asociados, particularmente porque en la tabla se pierde el formato de correspondencia.

12. Se considera que puede ser prematuro presentar como **Resultados** dentro de la propuesta de Plan Estratégico, temas que se encuentran aún en procesos de negociación. Como ejemplo está el contenido del **Objetivo Operacional 1.3**, donde se alude al tema de Responsabilidad y Compensación.

13. Percibimos que, en general, la columna de **Indicadores** está redactada en términos subjetivos que podrían dificultar su evaluación. Tales como *"cantidad importante", "se reduce al mínimo", "cantidad y variedad de instrumentos"*. Particularmente, en los **Indicadores** del **Objetivo Operacional 2.3** se menciona: "número de personas capacitadas *satisfactoriamente* en evaluación de riesgo y gestión del riesgo por medio de eventos de capacitación en persona así como de capacitación a distancia". Sin embargo, puede resultar complicado definir cómo establecer si una persona fue capacitada satisfactoriamente. Consideramos que esto podría sortearse con Indicadores asociados a resultados esperados de una capacitación considerada satisfactoria. Por ejemplo, en este caso el indicador puede ser "número de personas capacitadas que aplican o aplicaron la evaluación del riesgo y la gestión del riesgo derivado de programas de la capacitación en los Países Parte".

14. Se sugiere el uso de un lenguaje neutral. Por ejemplo en el caso del **Indicador** del **Objetivo Operacional 1.4** se propone que se le dé igual fuerza a las experiencias positivas y negativas, en tanto que ambas son enriquecedoras, por lo que se propone la siguiente eliminación: "Número de Partes que notifican experiencias ~~positivas~~ al tomar en cuenta las consideraciones socioeconómicas en la adopción de decisiones sobre la importación de organismos vivos modificados."

15. En general, para varias de las actividades del Protocolo, como por ejemplo los programas de creación de capacidades y concienciación, se debería hacer explícita la interacción de los temas de seguridad de la biotecnología con las cuestiones de biodiversidad. Otro ejemplo para ilustrar este comentario, sería que para establecer los riesgos al medio ambiente y la diversidad biológica, se puede tener en cuenta los indicadores de biodiversidad en general y quizá indicadores específicos para agro ecosistemas que maneja el CBD, lo cual contribuiría a dar mayor claridad sobre los objetivos comunes a los que contribuyen ambos instrumentos.

Además de estos comentarios generales, nos permitimos poner a su amable consideración los siguientes comentarios puntuales a la matriz:

9. Al **Objetivo Operacional 1.1** se sugiere agregar como **Indicador** el número de documentos relevantes ya existentes (por ejemplo de la OCDE o la FAO) traducidos o disponibles a través de links del BCH a las páginas de las organizaciones que los crearon. Se sugiere también eliminar el tercer Indicador propuesto, ya que su cuantificación es poco factible y no tiene relación con este Objetivo Operacional.

10. Sería deseable añadir el siguiente **Resultado** al **Objetivo Operacional 1.3**: "Documentar y evaluar experiencia adquirida en la atención de casos de responsabilidad y compensación por daños resultantes de movimientos transfronterizos de OVMs."

11. En el **Objetivo Operacional 2.2** se sugiere añadir al primer texto de **Resultados,** la siguiente propuesta de redacción: "Las decisiones respecto a la seguridad de un organismo vivo modificado se basan en evaluaciones de riesgo adecuadas desde el punto de vista científico como se establece en normas reglamentarias y administrativas".

    Asimismo, en el segundo **Resultado** de éste Objetivo Operacional 2.2 se sugiere agregar: "las cuestiones relativas a la seguridad de la biotecnología…, salud, ciencia y tecnología **y aduanas**"

12. Se sugiere añadir en el **Objetivo Operacional 2.4** como **Resultado** el siguiente: "Laboratorios nacionales y regionales certificados con capacidad de detección de OVMs". Además incluir entre los **Indicadores**: "bases de datos de laboratorios certificados en operación" y "Países Parte con laboratorios certificados para la detección de OVMs".

13. Se sugiere añadir como Indicador del **Objetivo Operacional 2.6**: "Los usuarios de OVMs han recibido capacitación sobre seguridad de la biotecnología impartidos por agencias gubernamentales".

14. En el **Objetivo Operacional 3.3** se sugiere añadir como **Indicador**: "El número y nivel de programas de educación formal específicos en bioseguridad o que incluyan temas de bioseguridad".

15. Se recomienda añadir en el **Objetivo Operacional 4.2** como **Resultado** el siguiente: "Derivado de una decisión de la Conferencia de las Partes se establece a qué OVMs no se les aplicará el procedimiento de acuerdo fundamentado previo, conforme al artículo 7 párrafo 4 del Protocolo de Cartagena."

16. En el **Objetivo Operacional 5.1** se sugiere mover los Indicadores 1 y 3 al Objetivo Operacional 5.2. Adicionalmente en el Objetivo Operacional 5.1 añadir como **Indicador** "el número de ligas o conexiones a otras fuentes de información relevante".

Con relación al ANEXO II "PROGRAMA DE TRABAJO DE LA CONFERENCIA DE LAS PARTES QUE ACTÚA COMO REUNIÓN DE LAS PARTES EN EL PROTOCOLO DE CARTAGENA SOBRE SEGURIDAD DE LA BIOTECNOLOGÍA HASTA 2020", nos permitimos presentar los siguientes comentarios generales:

Para cada una de las siguientes actividades se puede desglosar una serie de acciones, que correspondan a las diferentes COP MOP, lo anterior en función de los avances en la implementación del Protocolo de Cartagena y de la experiencia que se genere y documente en función de la misma.

4. Documentar y evaluar experiencia adquirida en la atención de casos de responsabilidad y compensación por daños resultantes de movimientos transfronterizos de OVMs.

5. Identificación de OVMs conforme al artículo 7 párrafo 4 del PCB y así como los OVMs correspondientes, de conformidad con el artículo 16 fracciones a) y b).

6. Intercambio de información e investigación sobre los efectos socioeconómicos de OVMs.

7. Fortalecimiento de mecanismos de creación de capacidades, conforme el artículo 22 del PCB.

Generación de insumos para atender esta Notificación.

Los insumos que se presentan en este documento fueron desarrollados de manera coordinada entre los Puntos Focales del Convenio sobre Diversidad Biológica y del Protocolo de Cartagena sobre Seguridad de la Biotecnología. En seguimiento a la Notificación Ref: SCBD/BS/CG/jh/69854, el Punto Focal del Convenio sobre Diversidad Biológica solicitó, vía electrónica, a un grupo aproximado de 150 actores representantes de los sectores académico, industrial, de gobierno y ONGs involucrados en el tema; comentarios sobre el documento. Consideramos que la premura y las fechas (periodo vacacional) en las que se planteó dicha solicitud contribuyeron a que la respuesta y participación de estos actores fue muy limitada. Lo anterior nos incentiva a tomar medidas para fortalecer y enriquecer los mecanismos de concienciación y participación pública.

MONGOLIA

[11 FEBRUARY 2010]
[SUBMISSION: ENGLISH]

I have read the Draft Elements of a Strategic Plan of the Cartagena Protocol on Biosafety.

I have not any comments and I have following idea;

It was going to "Operational Objectives 2.4 column Indicators third point"

"Parties that is developing country have etalon materials which would be able detection LMOs/GMOs"

NEW ZEALAND

[28 MAY 2010]
[SUBMISSION: ENGLISH]

New Zealand Comments and Suggested Changes

New Zealand offers the following comments on the Strategic Plan document UNEP/CBD/BS/COP-MOP/5/16 to inform the Secretariat's review which will result in a revised Strategic Plan for the Cartagena Protocol on Biosafety (the Protocol).

General comments

New Zealand notes the fact that effective implementation of the Protocol is an ongoing concern. Considerable effort has gone into capacity building which has had the laudable result of developing a number of draft biosafety frameworks; this seems to have had little impact however on encouraging reporting and implementation of operational regimes.

In the ongoing absence of reporting by many Parties, it is still not possible to accurately determine the nature of impediments to effective implementation i.e. does it result from lack of capacity or simply from conflicting priorities. Over 40 Parties still lack any form of a functional biosafety regulatory framework

and most developing country Parties have little or no capacity to undertake risk assessments and develop risk management schemes.

If the effective implementation of the Protocol is an overarching objective of any new strategic plan New Zealand is of the view that urgent further work to evaluate capacity needs is required. This would include assessing how capacity issues are being addressed and evaluating support provided to date to identify whether current approaches are effective in meeting the needs of Parties that as yet have been unable to meet their obligations under the Protocol. To this end we support many of the measures proposed in new focal area 2, in particular those which encourage Parties to report so that effective assessments can be made of progress in implementation but also of reasons which prevent progress.

Specific comments

Focal Area 1

1.2 Coordination and support

We are curious as to how it is proposed that information will be captured about whether Parties have "predictable and reliable funding" and "use resources effectively" (the last two indicators)?

1.3 Risk Assessment and risk management

We are curious as to what data is proposed to be used for the indicators i.e. how will the Secretariat know that guidance documents are being used and Parties are adopting "common approaches" (and what that means in practice?).

1.4 LMOs or traits that may have adverse affects

We are concerned that the number of reports is seen as an effective indicator, rather than in the quality and accuracy of those reports.

1.5 Scientific and technical advice

Again, we are concerned that there is an emphasis on the number of scientific and technical guidance materials produced, as an indicator, and that that does not necessarily reflect improved scientific and technical advice (the expected 'outcome') or improved uptake of technical advice as reflected in improved and/or increased implementation. The CBD and its processes produce many reports, and much paper and we are keen to see an emphasis on the quality of reports.

1.5 Liability and redress

Given the need for Parties to ratify any supplementary Protocol on 'liability and redress' we wonder whether the proposed indicator of entry into force prior to CoP-MoP 7 as being perhaps overly optimistic?

We also note a general concern that limited capacity building efforts should not be redirected from working to improve basic implementation of the Protocol and regulatory frameworks (protecting biosafety from damage in the first instance) to developing liability frameworks (e.g. ambulances at the bottom of the biosafety cliff). We note in this regard the expected 'outcome' regarding implementation of any new 'liability and redress' regime and feel that this should not be at the expense of existing biosafety obligations and implementation, notably operational objectives 1.1 (National Biosafety Frameworks), 1.3 (Risk assessment and risk management) and 2.2 (Handling, transport, packaging and identification).

Focal Area 2

2.1 Coordination and support

We are curious as to how it is proposed that information will be captured about whether Parties have "predictable and reliable funding" and "use resources effectively" (the last two indicators)?

2.2 Handling, transport, packaging and identification

We suggest the first indicator is amended to reflect that customs officers and laboratory staff are trained in sampling, detection and identification of LMOs. We also suggest that it is the percentage of these officials trained that is the most reliable indicator rather than their number (a more populous Party may have significantly more persons trained than a lesser populated Party but the percentage of their border/customs officials they represent may actually be less).

2.6 Biosafety education and training

Again we are concerned that an indicator for "improved biosafety education and training programmes" (the outcome) is the "number of biosafety training materials and online modules available". Once again there is a possible disconnect between the necessary quality and quantity.

We note that reference here, or elsewhere, to a need to periodically assess the effectiveness of the Biosafety Roster of Experts may be worthwhile.

Focal Area 3

3.1 Ratification of the Protocol

As a general comment, while New Zealand appreciates the aspirational goal of universal ratification we believe that focus should be directed to ensuring existing Parties effectively implement the Protocol rather than on trying to increase membership. How will non-Parties be encouraged to ratify if they do not see effective implementation amongst existing Parties?

NIGER [14 APRIL 2010
[SUBMISSION: ENGLISH]

Mobiliser les ressources financières pour assister les pays les moins avancés
À mettre en place un mécanisme efficace de gestion et d'évaluation des risques

Assurer une formation continue des acteurs intervenant Dans la biosécurité à l'usage du BCH

NORWAY

[01 FEBRUARY 2010]
[SUBMISSION: ENGLISH]

The Draft Elements of a Strategic Plan of the Cartagena Protocol on Biosafety (Notification 2008-129)

Comments from Norway:

We are pleased to find that several of the views submitted by Norway (letter dated March 20 2009) are reflected in the current draft. However, we would kindly ask you to consider including the also the following topics in the strategic plan, as previously submitted:

Risk assessment and risk management

Strategic goal: Common approaches to risk assessment and identification of specific LMOs or traits that may have adverse effects on biological diversity, taking also into account risks to human health

Guidance on how to conduct risk assessment in special areas should be developed by the Ad hoc Technical Expert Group on Risk Assessment and Risk Management. This guidance should thereafter be implemented at national level. We also need to identify gaps in existing knowledge and possible measures to address this.

Furthermore, modalities for cooperation in identifying LMOs or specific traits that may have adverse effects on the conservation and sustainable use of biological diversity, taking also into account risks to human health, should be considered by the Parties in accordance with Article 16, para. 5. Thereafter the COP/MOP should consider and take appropriate measures regarding the treatment of such living modified organisms or specific traits.

Subsidiary bodies

Strategic goal: Improved mechanisms for providing advice to COP/MOP on scientific and technical issues relating to the implementation of the Protocol

The Parties should consider mechanisms for providing scientific and technical advice to the COP-MOP according to cost estimates and efficiency considerations for various potential mechanisms prepared by the Executive Secretary. The possible options include designation or establishment of a permanent subsidiary body, or use of subsidiary bodies/mechanisms that may be created on an ad hoc basis. On the basis of that information, COP-MOP should take a decision on the need for, and the nature and functions of, any subsidiary body that may provide to COP-MOP advice on scientific and technical issues relating to the implementation of the Protocol.