

GISAID Comment on the Fact-Finding and Scoping Study Undertaken for the Secretariat of the Convention on Biological Diversity

Draft for Peer Review from 7. November 2017

The Emergence and Growth of Digital Sequence Information in Research and Development: Implications for the Conservation and Sustainable Use of Biodiversity, and Fair and Equitable Benefit Sharing

Comment

GISAID respectfully draws attention to the reference to the document “*Optimal Characteristics of an influenza genetic sequence data sharing system under the PIP Framework*” by the PIP Advisory Group Technical Working Group (TWG)¹ at the end of Endnote No. 1.

GISAID feels obliged to point out that this is a very controversial document with serious flaws (see, for example, the [invited comment](#)²), lacking consensus of the membership of the TWG even to the extent of forcing one eminent member of the influenza community to resign prior to finalization, due to undue manipulation of the content of the TWG document and obvious bias against GISAID, which was specifically excluded from membership in the TWG. Even a prominent member state organization requested the removal of commentary to this document as it was incorrectly attributed to its organization.

More importantly some aspects of the TWG document, including certain ‘best practices’, are in direct contradiction of one of the key tenet of the PIP FW, namely choice of Member States (MS) as to where to deposit genetic sequence data.^{3,4} Since the TWG document misrepresents the choices of MS and the practice of their WHO designated laboratories⁵ it is, at the very least, likely to be unhelpful in the context of the CBD Scoping Study and potentially misguide a reader as to the relative merits of different mechanisms for sharing DSI.

We respectfully request that the particular text in the last sentence of Endnote 1 including the URL be removed.

¹ http://www.who.int/influenza/pip/advisory_group/twg_doc.pdf

² http://www.who.int/influenza/pip/advisory_group/gisaid.pdf

³ PIP Framework (Section 5.2.2) ‘*use of public-domain or public-access databases such as Genbank and GISAID respectively*’ (24 May 2011)

⁴ [Statement](#) by WHO Assistant Director General (11 October 2011)

⁵ Global Influenza Surveillance and Response System ([GISRS](#))