



Antananarivo, May 31st 2019

to

Secretariat of the Convention on Biological Diversity

Dear Secretariat,

We are pleased to submit our view on Digital Sequence Information (DSI).

DSI should be considered as derived from genetic resources, so they fall within the scope of the Nagoya Protocol. Indeed, without genetic resources, there will be no DSI.

It is therefore necessary to integrate into the ABS national regulation, that as soon as the research relates to genetic studies, clear and precise devices are essential on the use of the DSI, their capitalization in databases or their transfer to third parties.

In particular, the MAT that will be established for access to resources, for which a genetic study is being considered, must specify that the DSI thus obtained derived from which resource from which country(ies).

It is also conceivable to design a specific permit for the access and use of DSI.

It is, of course, necessary to have capacity building in the field of DSI to establish these national regulations. The main principles should be shared between supplier countries, especially megadivers ones (in Africa, Asia, Latin America, etc.) because the resources used to generate DSI could come from different origins.

Best regards,

Lolona RAMAMONJISOA RANAIVOSON
ABS National Focal Point
MADAGASCAR