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October 16, 2017

Secretariat of the Convention on Biological Diversity

413, Saint Jacques Street, suite 800
Montreal QC H2Y 1N9
Canada

Re: Digital Sequence Information and the Nagoya Protocol

Dear Secretariat:

The Enzyme Technical Association (ETA) is a trade association that represents manufacturers and marketers of enzyme products in North, Central, and South America. It has been in existence since 1970, and maintains an active role in assisting in the development of regulations and policies that affect the enzyme industry. ETA represents the majority of the enzyme product industry in the Americas.

The ETA would like to provide its perspective on the possible inclusion of digital sequence information into the Convention on Biological Diversity.

The members of ETA support the objectives of the Convention on Biological Diversity (CBD) and the Nagoya Protocol and commend the Secretariat on their objective and steadfast support for sustainable development and protection of biological diversity. Industrially produced enzymes contribute to sustainable practices in several industries. For example, feed enzymes allow for the more efficient use of agricultural products as animal food, lowering the amount of plant matter that needs to be grown and thereby reducing water and fertilizer use. Laundry enzymes allow for low temperature clothes washing, which lowers fuel consumption and air pollution.

ETA is deeply concerned that there have been international discussions proposing to expand the scope of the Nagoya Protocol and the Convention on Biological Diversity to include digital sequence information (DSI) and its use as a component of the Protocol's access and benefit sharing obligations. ETA does not believe that digital sequence information is within the scope of CBD because the definition of genetic resources is genetic material and not abstract information. Expanding the scope to include DSI would challenge the agreement as it is now understood and implemented.

ETA is opposed to the expansion of the scope of the Convention and the Protocol to include digital sequence information and supports the position of the International Chamber of Commerce.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ann Begley", is written over the typed name.

Ann M. Begley
Secretary & General Counsel
Enzyme Technical Association