

In the name of God



Islamic Republic of Iran CPB NFP

Executive Secretary,
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Dear Sir/Madam

September 15, 2019

Reference to Notification No. 2019-075 dated 6 September 2019; I would like to appreciate the executive secretary for the well prepared note (CBD/POST2020/WS/2019/7/2 dated 11 July 2019) and the secretariat for synthesizing the views of parties in note CBD/CP/LG/2019/1/INF/1 dated 20 June 2019. However we would like to emphasis on more explicit reflection of the followings in the final draft document to be prepared for COP-15 and BS/COP MOP-10.

1- As the CBD and CPB members are different, we suggest that the biosafety component of the “Post-2020 Global Biodiversity Framework” is prepared and presented for approval by BS/COP MOP-10 as “Poast-2020 Global Biosafety Framework” or “Implementation plan for the CPB Post-2020” annexed to the “Post-2020 Global Biodiversity Framework”.

2- Article 16.1 of CBD that emphasizes on access to and transfer of technology including biotechnology, it is therefore expected that the issue is considered in the post-2020 global biodiversity framework, in order to share the benefits of modern biotechnology with developing countries and countries with economies in transition.

3- Without accurate understanding of modern biotechnology and genetic engineering, implementation of CPB is not possible. Therefore, an important element of a “specific action plan for capacity-building on biosafety covering the CPB” should be capacity building for genetic engineering and conduction of training courses and workshops on technical assistance for the production of LMOs.

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4- Balance of “Benefits” and “Potential Negative Impacts” of modern biotechnology should be considered in the “Post-2020 Global Biodiversity Framework”. According to Article 1 of Cartagena Protocol on Biosafety, the objective of CPB is “to contribute to ensuring an adequate level of protection in the field of ... that may have adverse effects on conservation and sustainable use of biological diversity, taking into account human health”. It shows that there may be some LMOs that may have adverse effects and some LMOs that may not have adverse effects on conservation and sustainable use of biological diversity, taking into account human health. On the other hand, paragraph 4 of Article 7 of CPB addresses the “LMOs being not likely to have adverse effects on the conservation and sustainable use of biological diversity taking also into account risks to human health” to be identified by COP MOP. Considering the fact that there is no scientifically verifiable report on the adverse effects of many of the approved LMOs in use during the past 23 years across the globe, we therefore believe that it is the time for definition of LMOs that are “not likely to have adverse effects on biodiversity, taking also into account risks to human health”. It is therefore suggested to consider this issue in the biosafety component of the “Post-2020 Global Biodiversity Framework”. The minimum expectation is to include this issue in the agenda.

5- We suggest the following wording for a biosafety target:

“By 2030, all Parties possess and maintain the regulatory framework and the capacity to regulate, manage or control the risks associated with the use and release of LMOs which are likely to have adverse environmental impacts that may affect the convention and sustainable use of biological diversity, taking into account the risks to human health, as well as to have capacity to identify LMOs which are not likely to have adverse impacts on conservation and sustainable use of biological diversity, taking into account human health.”

With my best personal wishes.
Sincerely yours;

Behzad Ghareyazie
CPB National Focal Point,
Islamic Republic of Iran