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Ms. Elizabeth Maruma Mrema
Executive Secretary
Secretariat of the Convention on Biological Diversity
413 Saint-Jacques Street, Suite 800
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Dear Madame Mrema,

We are writing to submit views and new or additional approaches, options or modalities on how to address digital sequence information on genetic resources under the Convention and the Nagoya Protocol on behalf of the wider team at Basecamp Research Ltd., a biodiversity research company based in London, UK.

An introduction to Basecamp Research:

Basecamp Research is a UK-based company that is aiming to become a bridge between biodiversity hotspots around the world *(with vast amounts of underexplored biology)* and users in the rapidly growing bioeconomy *(which has a critical need for access to more biodiversity)*. This requires communicating effectively with a wide range of stakeholders and having the technical expertise and infrastructure required to translate biodiversity into a commercially or research-ready format. Our ambition as a company is to be the facilitator of ethical DSI utilisation globally by rewarding the production of high-quality DSI, minimising bureaucracy and providing legal certainty.

The Convention, the Nagoya Protocol and Benefit Sharing are central to our work; we build ABS partnerships with biodiversity hotspots around the world and are implementing our own leading data infrastructure (BaseData™) that is capable of accommodating all of the potential future requirements highlighted in CBD/WG2020/3/4 “Digital sequence information on genetic resources”, including traceability of data and streamlined tracking of benefit sharing obligations.

At Basecamp Research we believe that, in the long-term, a robust ABS framework represents the greatest opportunity to achieve positive outcomes for all stakeholders in the ‘biodiversity to biotechnology’ value chain. We believe such an ABS framework for DSIs would lead to rapid advancements in both biodiversity protection and biotechnology innovation globally. However, we understand that this is an ongoing debate and we welcome continued discussion.

As the advancing technological landscape is rapidly reducing the need for users to access physical genetic resources, the discussion surrounding ABS with regards to DSI is increasingly important. We at Basecamp

Research have been following the debate surrounding the regulation of DSIs with great interest and we are happy to have the opportunity to submit our contributions for your consideration.

Contribution 1: Practical experience with ABS and DSIs:

In the course of our work at Basecamp Research, we frequently encounter both ABS and DSI from a commercial standpoint. Our position in between, and regular engagement with both biodiversity stakeholders and commercial users gives us a balanced view of the potential options to the wider community moving forward. We would be happy to contribute our perspective gained from our first hand experiences to this discussion.

Contribution 2: A demonstration of BaseData™, our infrastructure that enables DSI traceability:

At the core of our work at Basecamp Research is the construction of our DSI data platform, BaseData™. BaseData™ is being constructed from the ground up to facilitate future changes to regulations surrounding DSIs. We are able to do this because we have a growing team of world experts in this area, sufficient financial backing, and a long term ambition to realise the positive impact that this infrastructure could have for all stakeholders.

We recognise that the Open-ended Working Group has outlined a lot of the key options for regulating access to DSIs in Annex II of CBD/WG2020/3/4. As highlighted, to be effective, any new regulation on DSIs would therefore need to be accompanied by either significant upgrades in, or potentially entirely new, supporting technology platforms and database infrastructure. These upgrades are something that we at Basecamp Research are pioneering and we believe that we have the technical expertise to contribute to the wider implementation of these.

To be successful in the long term, these supporting technology platforms will need to incorporate many new features including legal certainty, DSI traceability, enforceability, scalability, user simplicity, availability, accessibility and reversibility. As raised in Section 15 of CBD/WG2020/3/4, open access does not necessarily mean free; ideally such a technology platform would include tiered access to allow for benefit sharing clarity for commercial users without hindering academic research and other areas of public good.

Summary

We believe that CBD-COP15 represents an enormous opportunity for us and the global community to move towards a new value chain that both motivates the protection of biodiversity and plays a foundational role in building the sustainable biotechnologies of the future. Our ambition at Basecamp Research is to facilitate this transformation.

We would welcome an invitation to visit the Secretariat in either Montreal or Geneva to discuss the potential of our infrastructure enabling DSI traceability and explain in further detail the points raised in this document and offer our views on DSI regulation from an industry perspective.

Yours Sincerely,

The Biodiversity Partnerships Team
Basecamp Research Ltd.
London, UK