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COMPLIANCE COMMITTEE UNDER THE CARTAGENA PROTOCOL ON BIOSAFETY

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REVIEW OF CONSISTENCY BETWEEN INFORMATION IN NATIONAL REPORTS AND THE BIOSAFETY CLEARING-HOUSE

Note by the Executive Secretary

INTRODUCTION

1. The Cartagena Protocol requires Parties to make certain information available to the [Biosafety Clearing-House](#) (BCH). The type of information that must be made available is specified in various articles of the Protocol, including Article 20, paragraph 3. The Parties last reported on the implementation of the obligation to submit information to the BCH in their third national report.
2. In decision [CP-VIII/2](#), the Conference of the Parties serving as the meeting of the Parties to the Protocol urged Parties that had not yet completely done so to make all required information available to the BCH and keep the records up to date.
3. In line with the organization of work agreed at its [eighth meeting](#), the Compliance Committee is expected to review, at its fifteenth meeting, the consistency of information provided by Parties in their third national report with corresponding information that Parties are required to submit to the BCH. For this purpose, third national reports received were cross-checked with corresponding information made available in the BCH.
4. The present document provides, in section I, an overview of the extent of consistency between information in national reports and information in the BCH. Some general observations and suggestions for the consideration of the Committee are provided in section II.

I. EXTENT OF CONSISTENCY BETWEEN INFORMATION IN THIRD NATIONAL REPORTS AND INFORMATION IN THE BIOSAFETY CLEARING- HOUSE

5. In this exercise, the Secretariat considered the following types of information that the Protocol requires each Party to make available through the BCH:
 - (a) Decisions taken:
 - (i) Under Articles 7 to 10 on the intentional transboundary movement of living modified organisms (LMOs) for intentional introduction into the environment;
 - (ii) Under Article 11, paragraph 1 on LMOs approved for domestic use, including placing on the market, and that may be subject to transboundary movement for direct use as food or feed, or for processing;
 - (b) Summaries of risk assessments corresponding to the decisions referred to in subparagraph (a) above (Article 20(3)(c));

- (c) Bilateral, regional and multilateral agreements and arrangements (Article 14(2));
- (d) Notifications concerning unintentional transboundary movements (Article 17(1));
- (e) Illegal transboundary movements (Article 25(3));
- (f) Relevant laws, regulations and guidelines to implement the Protocol (Article 20(3)(a)).

6. Questions in the third national report that relate to the above types of information were identified and the responses of Parties and relevant comments provided in their report as “free text” were cross-checked with what was actually available in the BCH.

7. A summary of the findings of the review of consistency of information is presented below, while the details are provided in information document [CBD/CP/CC/15/INF/3](#).

8. For the purpose of the present document, third national reports received from 143 Parties before November 2017 have been considered and cross-checked with related information made available by that Party to the BCH.

9. Where the information provided in the third national report was restricted to a specific reporting period, the information in the BCH was considered for the same reporting period. Where the information in the third national reports did not specify a time frame, all corresponding records available in the BCH by March 2018 for that Party were considered.

10. Due to the volume of available laws, regulations and guidelines in the BCH, the exercise of verifying these records was undertaken over an extended period of time.

A. Information on decisions with respect to import or approval of living modified organisms

11. Article 20, paragraph 3(d), requires each Party to make its final decisions regarding the importation or release of LMOs available to the Biosafety Clearing-House. For the purpose of this exercise, the Secretariat considered the following types of decisions that the Protocol requires Parties to make available through the BCH:

(a) Decisions regarding the intentional transboundary movement of LMOs for intentional introduction into the environment of the Party of import (Articles 7-10);

(b) Decisions regarding domestic use, including placing on the market, of LMOs that may be subject transboundary movement for direct use as food or feed, or for processing (Article 11, para. 1).

1. Decisions regarding the intentional transboundary movement of living modified organisms for intentional introduction into the environment of the Party of import (Articles 7-10)

12. A total of 26 Parties reported, in response to question 39 of the third national reporting format, that they had taken a decision regarding intentional transboundary movements of LMOs for intentional introduction into the environment, in the reporting period. A total of 8 Parties reported that they had taken more than 10 decisions; 4 Parties had taken less than 10, and 14 Parties had taken less than 5 (table 1, first column).

13. These responses were cross-checked against decisions submitted by these Parties to the BCH regarding LMOs for intentional introduction into the environment, during the reporting period indicated in each national report, that were further specified to involve a transboundary movement (table 1, second column).¹

14. Table 1 below summarizes the findings. Table 1 of document CBD/CP/CC/15/INF/3 presents a list of the decisions in further detail.

¹ These decisions may be submitted as decisions taken according to the domestic regulatory framework (as provided for in Article 9(2)(c)) or the procedure provided for in Article 10.

Table 1. Summary of the consistency of information regarding decisions taken pursuant to Articles 7-10

<i>In the current reporting period, how many decisions has your country taken regarding intentional transboundary movements of LMOs for intentional introduction into the environment? (third national report, question 39)</i>	<i>Number of decisions in the BCH from these Parties</i>	<i>Comments by Parties and notes by the Secretariat</i>
8 Parties > 10 decisions	1 Party > 10 (Mexico) 4 Parties < 10 (Brazil, Colombia, Spain and Uruguay) 3 Parties = 0 (Burkina Faso, Pakistan and Paraguay)	<ul style="list-style-type: none"> • <i>Spain</i>: the compilation of the information received from several government entities may delay the transfer of information. • <i>Pakistan</i>: the approval was for the import of GM cotton and corn hybrids to be planted for the assessment and evaluation of environmental safety and performance in the agro-climatic conditions of the country. The confined and field trials of GM corn hybrids are under way to establish the economic value of the GM corn crops and impacts on agricultural communities of the country.²
4 Parties < 10 decisions	2 Parties < 10 (South Africa and Vietnam) 2 Parties = 0 (Indonesia and Uganda)	<ul style="list-style-type: none"> • <i>Uganda</i>: all applications so far received have been for confined field trials and contained use. <p><i>Note by the Secretariat</i>: Uganda has not published information under the category of decisions for contained use in the BCH either.</p>
14 Parties < 5 decisions	4 Parties < 5 (Honduras, Japan, Slovakia and Sudan) 10 Parties = 0 (Cameroon, Costa Rica, Denmark, Guatemala, Mozambique, Netherlands, Norway, Panama, Philippines and Romania)	<ul style="list-style-type: none"> • <i>Slovakia</i>: experimental introduction of GMOs into the environment is decided by each Member State (of the European Union) independently, decisions regarding placement on the market involve all European Union Member States, as authorized products are granted free movement throughout the territory of the European Union. In the current reporting period, [Slovakia has] received two applications on field trials with genetically modified maize NK603 x MON810 and MON89034 x NK603 (imported from a country outside the European Union) and sugarbeet H7-1 (imported from a European Union Member State,

² More information concerning the submission to the BCH of decisions on contained use and field trials is presented in [CBD/CP/CC/15/3](http://www.cbd.int/doc/decisions/cbd-cp-cc-15-3.pdf).

<p><i>In the current reporting period, how many decisions has your country taken regarding intentional transboundary movements of LMOs for intentional introduction into the environment? (third national report, question 39)</i></p>	<p><i>Number of decisions in the BCH from these Parties</i></p>	<p><i>Comments by Parties and notes by the Secretariat</i></p>
		<p>under European Union legislation not considered an import).</p> <p><i>Note by the Secretariat:</i> The one record uploaded by <i>Slovakia</i> effectively corresponds to the stated two applications for the import of living modified maize. It may be pointed out that the other record, for the importation of “sugarbeet H7-1”, was uploaded to the BCH by <i>Slovakia</i> but was not identified by this exercise because it was indicated as not involving a transboundary movement.</p> <ul style="list-style-type: none"> • <i>Cameroon:</i> the decisions for field trials following the AIA procedure were communicated to the notifier, but not to the BCH. • <i>Guatemala:</i> the decisions were communicated to the notifier, but not to the BCH. • <i>Philippines:</i> a total of 15 approved importations, 4 of which were for field trials and 11 for propagation. • <i>Norway:</i> a GMO which has been approved by the Directive for placing on the market in the European Union is also approved for that purpose in Norway, unless the competent authority in Norway considers it to constitute a risk [...] and therefore has decided to restrict or prohibit its placing on the market in Norway. This only applies to directive 2001/18/EC and not to the regulation 1829/2003/EC as the latter regulation has not been implemented in Norway. In contrast to applications for marketing of LMOs, applications for experimental release into the environment is subject to a national procedure.

15. Some Member States of the European Union make reference to the third national report submitted by the European Union or point out that decision-making regarding intentional transboundary movements of LMOs for intentional introduction into the environment is regulated at the European Union level. They further note that decision-making on the intentional introduction of LMOs for the purpose of field trials (experimental release) is regulated at the national level. The European Union reported that it had taken no decisions, in the current reporting period, with respect to first intentional transboundary movements of LMOs for intentional introduction into the environment. While several European Union Member States report having taken decisions on intentional transboundary movements of LMOs for intentional introduction into the environment, including for field trials, only Slovakia and Spain have submitted these decisions to the BCH.

16. Several other Parties that reported a higher number of decisions than those actually made available in the BCH commented in their third national report that they took decisions on import of LMOs for field trials; yet, these decisions have not been uploaded to the BCH.

17. The inconsistency between the number of decisions on intentional introduction into the environment reported and the number of such decisions available in the BCH (the latter being lower) might be due to some Parties having included in their report decisions on contained use also. The reporting format for the third national reports did not include a question on the number of decisions taken on import of LMOs for contained use.

18. Finally, one Party (Malaysia) did not report any decisions regarding intentional transboundary movements of LMOs for intentional introduction into the environment in the reporting period but nevertheless had one such record registered under this category in the BCH for the importation of living modified carnations.

2. *Decisions regarding domestic use, including placing on the market, of living modified organisms that may be subject to transboundary movement for direct use as food or feed, or for processing (Article 11, para. 1)*

19. Article 11, paragraph 1, of the Protocol provides that “a Party that makes a final decision regarding domestic use, including placing on the market, of a living modified organism that may be subject to transboundary movement for direct use as food or feed, or for processing shall, within fifteen days of making that decision, inform the Parties through the Biosafety Clearing-House”. In responding to question 55 of the third national report on the decisions taken in this regard, 22 Parties reported that, in the current reporting period, they had taken more than 10 decisions regarding domestic use, including placing on the market, of LMOs-FFP; 4 Parties reported having taken less than 10 decisions; and 8 Parties reported having taken less than 5 decisions (table 2, first column).

20. The responses were cross-checked against country decisions submitted to the BCH (table 2, second column). Table 2 below summarizes the findings. See [CBD/CP/CC/15/INF/3](#), table 2, for a list of the decisions in further detail.

Table 2. Summary of the consistency of information regarding decisions taken pursuant to Article 11, paragraph 1

<i>In the current reporting period, how many decisions has your country taken regarding domestic use, including placing on the market, of LMOs-FFP? (third national report, question 55)</i>	<i>Number of decisions in the BCH from these Parties</i>	<i>Comments by Parties</i>
22 Parties > 10 decisions	<p>7 Parties > 10 decisions (European Union, Malaysia, Mexico, New Zealand, Republic of Korea, Turkey and Viet Nam)</p> <p>2 Parties < 10 decisions (Netherlands and Uruguay)</p> <p>13 Parties = 0 decisions (Austria, Belgium, China, Czechia, Denmark, Finland, Japan, Kenya, Paraguay, Philippines, Slovakia, South Africa, Sweden)</p>	<ul style="list-style-type: none"> • <i>Austria</i>: national decisions taken to introduce safeguard measures for some LMOs to prohibit the cultivation and in some cases the import and placing on the market of LMOs based on concerns regarding the conclusions of the risk assessments conducted at the European Union level for these applications. An overview of these decisions is made available through a link to Austria's national BCH. • <i>Japan</i>: approved LMOs have been notified to the BCH. • <i>Kenya</i>: the information is only shared through the National BCH portal, which is linked to the international BCH.
4 Parties < 10 decisions	<p>1 Party < 10 decisions (Brazil)</p> <p>3 Parties = 0 decisions (Indonesia, Romania and Zambia)</p>	<ul style="list-style-type: none"> • <i>Romania</i>: decisions are included in the report of the European Union
8 Parties < 5 decisions	<p>1 Party < 5 decisions (Norway)</p> <p>7 Parties = 0 decisions (Plurinational State of Bolivia, Cuba, Luxembourg, Pakistan, Sudan, Swaziland and Zimbabwe)</p>	<ul style="list-style-type: none"> • <i>Luxembourg</i> – there were three instances where placing on the market of an LMO was refused (date and LMO information provided). • <i>Pakistan</i> - four applications approved recently. Information to be submitted to the BCH shortly. • <i>Swaziland</i> - decision on LMO-FFP referred to in the report was an informal agreement made prior to the (Biosafety) Act being operational.

21. European Union Member States indicated that decisions regarding domestic use, including placing on the market, of an LMO that may be subject to transboundary movement for direct use as food or feed, or for processing are taken at the European Union level and that the European Union report should be consulted for further information on the respective decisions.

22. Two Parties, Colombia and Honduras, reported not having taken any decisions regarding domestic use, including placing on the market, of an LMO that may be subject to transboundary movement for direct use as food or feed, or for processing, in the reporting period, but they had 57 and 1 such records, respectively, in the BCH. No comments were provided in this regard in the national report.

B. Information on risk assessments

23. Decisions as regards the import of LMOs for intentional introduction into the environment and the approval of LMOs for domestic use, including placing on the market, that may be subject to transboundary movement for direct use as food or feed, or for processing, are expected to be made on the basis of a risk assessment. A Party taking such a decision is required to make the summaries of its risk assessments available in the BCH. It was not possible to assess the consistency of information provided in the national reports with information provided in the BCH as there is no specific question in the reporting format on whether risk assessments corresponding to the categories of the decisions above have been submitted to the BCH.³

24. It is encouraging, however, to note that all decisions regarding transboundary movements of LMOs for intentional introduction into the environment and decisions regarding LMOs approved for domestic use that may be subject to transboundary movement for direct use as food or feed, or for processing that have been submitted to the BCH during the reporting cycle include a summary of the corresponding risk assessment.

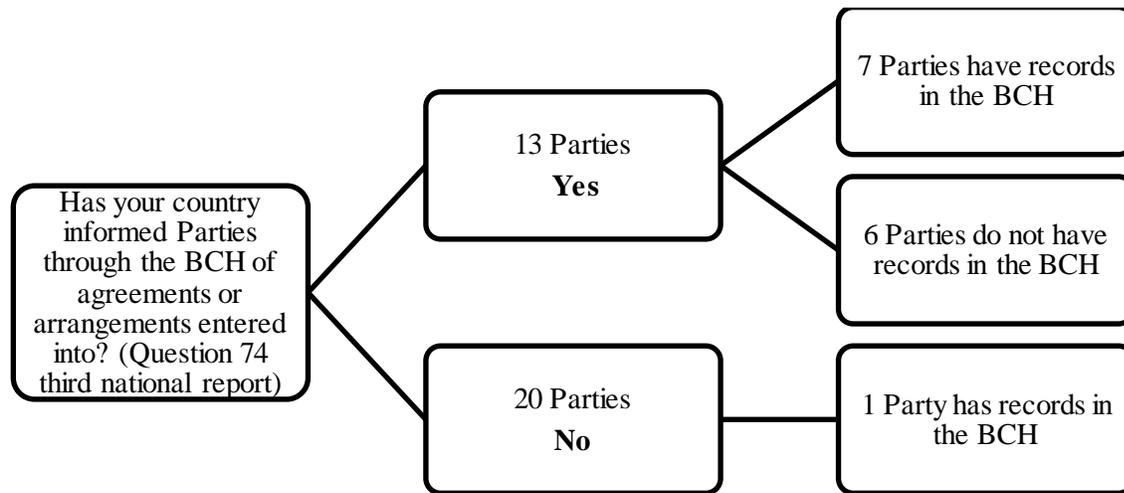
C. Information on bilateral, regional and multilateral agreements and arrangements

25. In accordance with Article 14 of the Cartagena Protocol, Parties may enter into bilateral, regional and multilateral agreements and arrangements regarding intentional transboundary movements of LMOs, consistent with the objective of the Protocol. They are required to inform other Parties of any such agreements and arrangements through the BCH.

26. In question 72 of the third national report, 33 Parties reported that they had entered into bilateral, regional or multilateral agreements or arrangements. All of those Parties also responded to question 74 on whether they had made that information available to the BCH. A total of 13 Parties reported that they had informed other Parties through the BCH of the agreements or arrangements. A total of 20 Parties reported that they had not done so (see figure below).

³ It is noted that question 91 of the reporting format for the third national reports applies to any type of risk assessment, irrespective of the type of decision for which the risk assessment was conducted.

Figure. Consistency of information reported in response to question 74 of the third national report and records available in the Biosafety Clearing-House



27. All Parties that reported having entered into bilateral, regional or multilateral agreements or arrangements but did not submit their agreements or arrangements to the BCH have provided additional information in their national report concerning these agreements or arrangements. Table 3 of document [CBD/CP/CC/15/INF/3](#) provides these further details.

28. In most cases, the missing records cited are well known regional and multilateral agreements, such as the constituting agreements concerning the European Union, the West African Economic and Monetary Union, the Common Market for Eastern and Southern Africa, the Economic Community of West African States, the East African Community, the Southern African Development Community, and the Association of Southeast Asian Nations. One Party describes a non-binding initiative for regional cooperation on biosafety issues. Two Parties make reference to cooperation agreements with partners for the provision of technical assistance or training, while another Party also mentions cooperation, capacity-building and information exchange agreements without citing the stakeholders involved. Two Parties mention bilateral agreements that include relevant biosafety components. Finally, another Party notes that it has entered into a “few” specific bilateral agreements without providing the names of the agreements to which it refers.

29. Five Parties that had uploaded records under this category did not report having entered into bilateral, regional and multilateral agreements and arrangements under the relevant question in the third national report. Although the relevant question in the third national report does not restrict answers to agreements and arrangements undertaken during the reporting period only, three Parties published their records outside the reporting period. This may explain why these Parties responded negatively to question 72 of the third national report. The remaining two Parties published domestic legal instruments as “agreements and arrangements”, which seems to be a miscategorization. Further details on these cases are also provided in table 3 of document [CBD/CP/CC/15/INF/3](#).

D. Unintentional transboundary movements

30. Article 17 of the Protocol states that:

“each Party shall take appropriate measures to notify affected or potentially affected States, the Biosafety Clearing-House and, where appropriate, relevant international organizations, when it knows of an occurrence under its jurisdiction resulting in a release that leads, or may lead, to an unintentional transboundary movement of an LMO that is likely to have significant adverse effects on the conservation and sustainable use of biological diversity, taking also into account

risks to human health in such States. The notification shall be provided as soon as the Party knows of the above situation”.

31. Question 101 of the third national report, asks each Party how many times in the current reporting period it has received information concerning occurrences that led, or may have led, to unintentional transboundary movement(s) of one or more LMOs to or from territories under its jurisdiction.

32. Five Parties reported having received information in this regard in response to question 101. In the follow-up questions,⁴ these Parties specified that they had not notified the BCH of these occurrences. There are indeed no records of such occurrences in the BCH from these Parties. Table 4 of document [CBD/CP/CC/15/INF/3](#) provides further details with comments from the national report of the Parties concerned.

33. It is noted that question 101 is formulated more broadly than Article 17 and also relates to situations in which a Party is notified of unintentional transboundary movements into its territory. A number of Parties that reported in the affirmative to question 101 described in their comments that these occurrences related to an unintentional transboundary movement directed into their country. Parties do not have the obligation to notify the BCH of such occurrences under Article 17. Other Parties clarified that the movement did not concern an LMO as defined under the Protocol or that the LMO did not pose any potential significant adverse effect and were therefore not notified to the BCH.

E. Illegal transboundary movements

34. Article 25, paragraph 3, of the Protocol provides that each Party shall make available to the BCH information concerning cases of illegal transboundary movements pertaining to it.

35. Question 186 of the third national report asks how many times, in the current reporting period, a Party has received information concerning cases of illegal transboundary movements of an LMO to or from territories under its jurisdiction. A total of 126 Parties reported never having received such information, while 17 Parties reported having received such information in a number of cases. Only 5 of the 17 Parties have records in the BCH containing information concerning cases of illegal transboundary movements. Table 3 below summarizes the consistency of the relevant information provided by these 17 Parties. Table 5 of document [CBD/CP/CC/15/INF/3](#) provides further details.

Table 3. Consistency of information reported with regard to illegal transboundary movements and corresponding records provided in the Biosafety Clearing-House

<i>In the current reporting period, how many times has your country received information concerning cases of illegal transboundary movements of an LMO to or from territories under its jurisdiction? (third national report, question 186)</i>	<i>Number of records available in the BCH from these Parties</i>
7 Parties > 10 times	2 Parties < 10 records (Belgium, European Union) 5 Parties = 0 records (Austria, China, Germany, Hungary, Latvia)
2 Parties < 10 times	2 Parties = 0 records (France, United Kingdom)
8 Parties < 5 times	3 Parties < 5 records (Japan, Netherlands, Norway) 5 Parties = 0 records (Denmark, Egypt, Mali, Tonga, Zambia)

⁴ Questions 102-104 of the reporting format for the third national report.

36. Five European Union Member States that reported having received information on illegal transboundary movements referred to the European Union report for further information. Denmark and the United Kingdom further mentioned that the cases were dealt with according to European Union procedures. The European Union reported that it had received information on more than 10 cases but submitted records related to two only cases to the BCH during this reporting period, both for insect-resistant rice.

37. China and Mali reported having received information concerning cases of illegal transboundary movements but did not inform the BCH. They indicated in the comments box of the third national report, however, that the movements were related, for Mali, to the presence of Bt cotton on the border with Burkina Faso and, for China, to the discovery of non-approved genetically modified maize in imports from the United States of America. There was no additional clarification as to why this information was not provided to the BCH.

F. Information on relevant laws, regulations and guidelines

38. Under Question 20 of the third national report, Parties were asked whether their country's biosafety framework/laws/regulations/guidelines had been submitted to the BCH. In response, 81 Parties responded in the affirmative; 43 Parties reported that they had partially submitted this information and 18 Parties reported that they had not submitted any records. One Party did not respond to the question.

6. In order to verify whether the information provided by a Party through its third national report concerning national laws, regulations and guidelines corresponded with the information actually made available by that Party in the BCH, the Secretariat first reviewed and extracted all references made to relevant laws, regulations and guidelines provided in the free text of the third national report, in particular in relation to question 21. The information from the third national report was then cross-checked with the list of laws, regulations and guidelines actually made available to the BCH. More information is provided in table 6 of document [CBD/CP/CC/INF/3](#). Table 4 below provides an overview of the findings.

39. Out of the 81 Parties that reported having made all their biosafety framework/laws/regulations/guidelines available to the BCH, 18 Parties appear to be missing some documents in the BCH, as compared to the documents mentioned in the free text of their national reports. Two Parties that declared having submitted all relevant documents, had not attached any documents or provided any working links in any of the records published in the BCH. Some Parties only uploaded the draft biosafety framework developed under the UNEP-GEF project.

40. Several Parties that have records in the BCH on laws/regulations/guidelines have not uploaded documents containing the actual text of those laws/regulations/guidelines or otherwise have provided links to such documents that are not functional. In some cases, links provided lead to other websites that require further searching, registration or special software to obtain the text of the laws/regulations/guidelines.

41. Of the 18 Parties that reported not having submitted any laws/regulations/guidelines to the BCH, 17 Parties indeed did not submit any records or had only submitted the draft biosafety framework developed under the UNEP-GEF national biosafety framework project. The one remaining Party had in fact submitted instruments to the BCH.

42. The Secretariat considered the responses of these 17 Parties to question 14 of the third national report. Under this question, Parties reported on whether they have introduced the necessary legal, administrative and other measures for the implementation of the Protocol. Two Parties from Africa (Rwanda and Somalia) and one Party from the Western Europe and Others Group (Luxembourg) reported that a domestic regulatory framework was fully in place in their country. Three Parties from Africa (Congo, Gabon and Mauritius), three Parties from Asia (Bahrain, Iraq and Lebanon) and one Party from Latin America and the Caribbean (Jamaica) indicated that a domestic regulatory framework was partially

in place. This would seem to suggest that relevant domestic laws, regulations or guidelines have been developed in the countries concerned but have not been duly submitted to the BCH.⁵

43. Finally, it should be noted that the one Party that did not answer question 20 had made records available in the BCH.

Table 4. Consistency of information related to measures to implement the obligations under the Cartagena Protocol

<i>Has your country's biosafety framework/laws/regulations been submitted to the BCH? (third national report, question 20)</i>	<i>Number of Parties that published the instruments mentioned in third national report in the BCH</i>	<i>Q 14 Domestic framework fully in place/ partially in place; temporary or draft measures</i>
81 Parties = yes, all submitted	61 Parties published all instruments named in report 18 Parties have not published all instruments named in the report 2 Parties have not published any instrument named in the report	
43 Parties = partially	<i>These data could not be verified for lack of specificity of information provided in the national report</i>	
18 Parties = no, not submitted	17 Parties did not publish any instrument or only their UNEP-GEF NBF	3 Parties reported domestic framework fully in place (Rwanda, Somalia, Luxembourg) 7 Parties reported domestic framework partially in place (Congo, Gabon and Mauritius, Bahrain, Iraq and Lebanon, Jamaica) 7 Parties reported having no framework, temporary measures only or draft measures
	1 Party published a record	

II. CONCLUSIONS AND SUGGESTIONS

44. The BCH is a pivotal mechanism for facilitating the exchange of information and assisting Parties in taking informed decisions and complying with their obligations. The purpose of the review of consistency between the national reports and the information made available by Parties to the BCH is to ensure that all required information that is available is being duly shared, thereby assisting Parties in implementing the Protocol.⁶ In accordance with decision [BS-V/1](#), the review also allows the Committee to determine if Parties are faced with difficulties complying with their obligations under the Protocol, so that the Committee can provide any support to the Parties concerned.

45. Overall, Parties have made great strides and efforts to provide detailed information in national reports. The review of consistency shows that the information provided in the third national reports and in the BCH is largely consistent, especially with regard to laws, regulations and guidelines. There are,

⁵ The remaining 7 Parties reported under question 14 having no framework, temporary measures only or draft measures.

⁶ Article 20, paragraph 1.

nevertheless, a number of instances in which information that should be submitted to the BCH has not been made available. Parties are, however, increasingly making use of text boxes in their national report to provide additional information which has helped in the understanding of the data reported.

46. It is noted that, in certain cases, the review of consistency between information provided in the national report and the BCH would be facilitated by improving the formulation of questions in the reporting format or by adding questions. The Subsidiary Body on Implementation at its second meeting will consider the revised format for the fourth national reports, in which some of these issues may be addressed. More structural changes could be included in the reporting format for the subsequent national reports following the final evaluation of the current [Strategic Plan for the Cartagena Protocol](#). The Committee may wish to consider this issue further under agenda item 7.

47. In addition to the review of consistency of information provided in the national reports and the BCH, as foreseen in the organization of work of the Committee, the Secretariat has regularly verified the completeness of data in the BCH, a task that has been carried out with dedicated staff resources. This includes verification of records submitted to the BCH with the purpose of assisting BCH national focal points in maintaining accurate and complete information in the BCH. Unfortunately, due to prolonged staffing vacancies, the Secretariat has been unable to undertake this task on a regular basis over the past year. The Committee may wish to note the importance of securing the necessary staff at the Secretariat as a matter of priority to follow up on this issue.

48. Statistical tools for the analysis of specific categories of information in the BCH are limited. Much of the work, particularly with regard to this consistency exercise, has been carried out manually, though solutions based on information technology (IT) may be more resource-efficient in the long run. Currently, there is no dedicated IT staff assigned full-time to the BCH. The Committee may wish to note the importance of allocating sufficient IT resources to support the work of the Protocol. Adequate IT support may also contribute to facilitating the submission of information to the BCH and the reporting under the Protocol.

49. In the light of the review of consistency contained in the present document, the Committee may wish:

(a) To emphasize the importance of the ongoing support provided by the Secretariat to BCH national focal points in their efforts to maintain complete and accurate records in the BCH and note the importance of continuing Secretariat staff support to focal points in their efforts;

(b) To recall decision CP-VIII/2, whereby the Executive Secretary is requested to continue making improvements to the Biosafety Clearing-House, taking into account the needs of its users, with a view to facilitating the submission of information, and note the importance of allocating sufficient resources for further improving the BCH with a view to facilitating implementation of this decision.

50. The Committee may also wish to consider recommending to the Conference of the Parties serving as the meeting of the Parties to the Protocol at its ninth meeting that it:

(a) Note with appreciation the efforts made by Parties to comply with their obligations under the Protocol to make information available to the BCH and to provide details in their national reports in this regard;

(b) Urge Parties to make all required information available in the BCH;

(c) Remind Parties of decision BS-VII/1, whereby they are encouraged, (i) when submitting to the BCH information required under the Protocol, to upload the actual documents that contain the information or, in case where they provide a link to a website to access a document, ensure that the link is functional and up to date and that the information is easily accessible, and (ii) to ensure that the information they make available to the Biosafety Clearing-House is up to date and consistent with their national reports.
