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**Risk assessment and risk management**

**Additional voluntary guidance materials to support case-by-case  
risk assessments of living modified organisms containing  
engineered gene drives**

**Note by the Secretariat**

1. The present addendum contains the draft additional voluntary guidance materials to support case-by-case risk assessments of living modified organisms containing engineered gene drives developed by the Ad Hoc Technical Expert Group on Risk Assessment at its second meeting, held from 27 February to 1 March 2024, pursuant to decision CP-10/10 of the Conference of the Parties serving as the meeting to the Parties to the Cartagena Protocol on Biosafety.
2. The present draft is issued without formal editing, owing to the limited time between the second meeting of the Expert Group and the deadline for documents for the twenty-sixth meeting of the Subsidiary Body on Scientific, Technical and Technological Advice. It will be edited after the present meeting and reissued in all official languages as a document for consideration by the Conference of the Parties serving as the meeting of the Parties to the Cartagena Protocol at its eleventh meeting.

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\* CBD/SBSTTA/26/1.

**Additional voluntary guidance materials to support case-by-case risk assessments of living modified organisms containing engineered gene drives**

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## 1. Objective and scope

In its decision [CP-10/10](#), the Conference of the Parties serving as the meeting of the Parties to the Cartagena Protocol on Biosafety agreed to develop additional voluntary guidance materials to support the case-by-case risk assessments of living modified organisms (LMOs) containing engineered gene drives (EGDs; EGD-LMOs) in accordance with annex III to the Protocol.<sup>1, 2</sup> The Conference of the Parties decided that this material should have a special focus on living modified mosquitoes (LMMs) that contain an EGD (EGD-LMMs) taking into account the current experience with the organism, the type of EGD and specific issues of risk assessment identified in annex I to decision [CP-9/13](#), including existing reports, general considerations of EGD-LMOs and existing national and regional risk assessment experiences. Decision [CP-10/10](#) also established an Ad Hoc Technical Expert Group (AHTEG) on risk assessment that is responsible to develop the additional voluntary guidance materials and requested the convening of the Online Forum on Risk Assessment and Risk Management to contribute to this process. The Subsidiary Body on Scientific, Technical and Technological Advice will consider the draft guidance materials prepared by the AHTEG at its twenty-sixth meeting (13–18 May 2024).

As a response, and with the financial support of the Government of Finland and the European Union, the Secretariat of the Convention on Biological Diversity commissioned the International Centre for Genetic Engineering and Biotechnology (ICGEB) to develop a detailed outline to support the development of the additional voluntary guidance materials on the risk assessment of EGD-LMOs. The AHTEG revised the outline, then developed the detailed content of the guidance materials. The objective is to facilitate a case-by-case risk assessment process for EGD-LMOs, thereby complementing annex III and existing guidelines, while considering the established roadmap.<sup>3</sup>

### 1.1. Structure

The additional voluntary guidance materials are developed in accordance with annex III to the Cartagena Protocol on Biosafety, in particular with its paragraph 8, which outlines the sequential steps of the risk assessment process.

These materials are structured into the following sections:

- (a) Section 1 on objective and scope provides an overview of decision CP-10/10;
- (b) Section 2 introduces EGD-LMOs, explains the precautionary approach and establishes the context of the document;
- (c) Section 3 provides details on engineered gene drive strategies, as well as opportunities and risk concerns;
- (d) Section 4 outlines the general risk assessment considerations for EGD-LMOs and addresses steps of the problem formulation approach, testing risk hypotheses, including sources and quality of information, modelling, comparators, tiered-based testing, limits of concern, weight of evidence and uncertainties;

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<sup>1</sup> Decision CP-10/10: <https://www.cbd.int/doc/decisions/cp-mop-10/cp-mop-10-dec-10-en.pdf>

<sup>2</sup> The Cartagena Protocol on Biosafety 2003. <https://bch.cbd.int/protocol/>.

<sup>3</sup> See decisions BS-IV/11 BS-V/12, on risk assessment and risk management, of the Conference of the Parties serving as a meeting of the Parties to the Cartagena Protocol, which support the drafting of and describe the objectives of the guidance on risk assessment of living modified organisms and monitoring in the context of risk assessment.



- (e) Section 5 considers recommendation of acceptability of risk and identification of risk management strategies;
- (f) Section 6 addresses monitoring of EGD-LMOs taking into account general surveillance and case-specific monitoring;
- (g) Section 7 describes related issues to risk assessment;
- (h) Bibliographic references are included in section 8;
- (i) Annexes on overview of modelling, uncertainties, the WHO guidance framework for testing genetically modified mosquitoes, taxonomic classification of Culicidae, mosquito vectors of diseases, current landscape for the development of EGD-LMOs for disease vector control and engineered gene drive systems; and
- (j) A list of terms with citations is included to assist the reader and does not constitute definitions or a glossary of terms.

## 2. Introduction

Advances in molecular and synthetic biology are enabling the engineering of living organisms with engineered gene drives. Such EGDs can be described as genetic elements that are sexually transferred to subsequent generations at a frequency greater than the 50% expected by Mendelian inheritance (Burt, 2003; Burt and others, 2018; Champer and others, 2021; Hay and others, 2021; Wang and others, 2022; Raban and others, 2023), thereby biasing their own inheritance. This preferential inheritance may allow EGD systems (i.e., the engineered gene drive along with any genetically linked cargo/payload genes) to rapidly spread in sexually reproducing populations<sup>4</sup>, increasing their prevalence. EGD systems can be designed either to suppress or reduce interbreeding target populations or to modify them with an altered genotype. Depending on the design of the EGD system, a genetic modification of interest could potentially spread through target populations or species and persist indefinitely, or be restricted in its spread or persistence.

Due to the nature of EGDs, EGD-LMOs may differ significantly from non-EGD-LMOs in their potential to spread, increase in frequency, persist in and/or suppress interbreeding target populations. EGD-LMOs may also differ from LMOs used in agriculture, as EGDs are generally designed to be applied in wild organisms (such as pests, disease vectors, invasive or endangered species), which commonly have higher genetic variability than domesticated organisms, and which may occur in receiving environments that are less well characterized and/or not managed by humans (Legros and others, 2021). It has also been noted that some EGD-LMOs may belong to species complexes that contain both vector and non-vectors species, where some combinations of which are capable of producing fertile interspecific hybrids. Such “semi-permeable” or “porous” species boundaries facilitate introgression and could plausibly lead to vertical EGD transfer amongst sibling species (Courtier-Orgogozo and others, 2018; Connolly and others, 2023b). Depending on the EGD system, the envisaged effect of an intentional release may encompass several generations of the recipient organism. In comparison to non-EGD LMOs, an additional difference may pertain to the potential inability to halt the spread of the EGD (and EGD-LMO) or to reverse its action and effects.

While research on EGDs and their applications in living organisms is advancing, applications may take some years of technological development to move to practical applications for intentional release into the environment. Some living modified insects that contain an EGD (EGD-LMO) have been tested experimentally in the laboratory, as well as cage facilities (e.g., Raban and others, 2020; Hammond and others, 2021), but to date (February 2024) none have been released in small-scale confined or open release field trials.

Irrespective of their intended applications, concerns have been raised that the intentional release of EGD-LMOs into the environment may have adverse, unexpected and/or irreversible effects. These effects could include direct and immediate effects, as well as indirect, cumulative and/or long-term effects. Therefore, discussions have been held at different levels amongst indigenous peoples and local communities and various stakeholders, including policy makers, risk assessors, risk managers, developers and potential applicants, to determine whether there is a need to develop new or additional guidance for the risk

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<sup>4</sup> Analogous gene drive systems have also been developed in asexually reproducing bacteria with a view, for example, to control antimicrobial resistance (Valderrama and others, 2019).

assessment of EGD-LMOs for intentional release into the environment (Simon and others, 2018; Keiper and Atanassova, 2020; Devos and others, 2020, 2021) .

Overall, it has been recognized that there are specific areas where further guidance is needed for the risk assessment of EGD-LMOs to ensure appropriate levels of safety. In 2016, the Secretariat of the Convention on Biological Diversity published general guidance on the risk assessment of LMOs,<sup>5</sup> which included mosquitoes among the examples of specific types and traits of LMOs. However, it did not contain specific guidance on EGD-LMOs. In addition, there are other guidance materials available that may provide relevant information to EGD-LMOs as well (NASEM, 2016; EFSA, 2020; WHO, 2021b).

## **2.1. Precautionary approach**

Principle 15 of the Rio Declaration on Environment and Development (United Nations, 1992) states that: “In order to protect the environment, the precautionary approach shall be widely applied by States according to their capabilities, where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation.”

Accordingly, Article 1 of the Cartagena Protocol provides as follows: “In accordance with the precautionary approach contained in Principle 15 of the Rio Declaration on Environment and Development, the objective of this Protocol is to contribute to ensuring an adequate level of protection in the field of the safe transfer, handling and use of living modified organisms resulting from modern biotechnology that may have adverse effects on the conservation and sustainable use of biological diversity, taking also into account risks to human health, and specifically focusing on transboundary movements”.

Additionally, Article 10, paragraph 6 of the Cartagena Protocol further articulates that "lack of scientific certainty due to insufficient relevant scientific information and knowledge regarding the extent of the potential adverse effects of a living modified organism on the conservation and sustainable use of biological diversity in the Party of import, taking also into account risks to human health, shall not prevent that Party from taking a decision, as appropriate, with regard to the import of the living modified organism in question as referred to in paragraph 3 above, in order to avoid or minimize such potential adverse effects.”

## **2.2. Establishing the context**

In most jurisdictions worldwide, the intentional release of LMOs into the environment is subject to risk assessment and regulatory approval. In this process, the role of risk assessors is to assess and provide scientific advice to risk managers on potential risks that the deployment of a LMO may pose to biodiversity, and human and animal health. Risk assessment evaluates the various potential adverse effects and their associated likelihood, taking into account the kinds and levels of exposure, to determine risks that might be associated with the use of a LMO for a particular purpose. The primary objective of a risk assessment is to identify and evaluate the potential risks of LMOs, while considering any relevant uncertainties and knowledge gaps. The outcome of the risk assessment serves as a foundation for informed decision-making regarding the use and the intended release of LMOs into the environment.

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<sup>5</sup> Guidance on risk assessment of living modified organisms and monitoring in the context of risk assessment, UNEP/CBD/BS/COP-MOP/8/8/Add.1., 14 September 2016. [www.cbd.int/doc/meetings/bs/mop-08/official/bs-mop-08-08-add1-en.pdf](http://www.cbd.int/doc/meetings/bs/mop-08/official/bs-mop-08-08-add1-en.pdf).

The risk assessment process starts by establishing the context and scope in a way that is consistent with the country's protection goals<sup>6</sup> (i.e., component of value that must be protected), the specific level of protection to achieve and relevant policies. Establishing the context and scope for a risk assessment, in line with national policies and regulations, as well as international obligations, may involve an information-sharing and consultation process with risk assessors, risk managers, decision makers, indigenous peoples and local communities, and various stakeholders prior to conducting the actual risk assessment.

Several publications have elaborated on challenges related to the risk assessment of EGD-LMOs for intentional release into the environment (e.g., NASEM, 2016; CSS–ENSSER–VDW, 2019; AHTEG, 2020<sup>7</sup>; Dolezel and others, 2020; Then and others, 2020a,b; EFSA, 2021; WHO, 2021b).

Challenges in the risk assessment of EGD-LMOs may arise due to large spatial and temporal scale, as well as the heterogeneity in key factors such as target population genotypes and likely potential receiving environments, making it more difficult to characterize variability. Additionally, a limited availability of knowledge and understanding regarding the behaviour in the laboratory versus the behaviour in the field over a large space and time may challenge the assessment. Genotype by environment interactions as well as evolutionary effects may contribute to the challenges in the risk assessment of EGD-LMO.

Agreed general principles of the risk assessment of LMOs are laid down in annex III of the Protocol paragraphs 3 to 6. Risk assessment:

- Is *science*-based. According to the Protocol, the risk assessment of LMOs shall be carried out in a scientifically sound and transparent manner, in accordance with annex III and taking into account recognized risk assessment techniques. Such risk assessment shall be based, at a minimum, on information provided in accordance with annex III, paragraph 9 of the Protocol and other available scientific evidence in order to identify and evaluate the potential adverse effects of LMOs on the conservation and sustainable use of biological diversity, taking also into account risks to human health;
- Is carried out on a *case-by-case* basis, meaning that they vary depending on the biology and ecology of the species under consideration; the introduced modifications and traits; the intended uses of the LMO (the scale and frequency of the intended release); the likely potential receiving environments (covering the likely potential receiving environments where the LMO will be released and spread), and the interactions amongst these variables. Thus, the potential adverse effects caused by a LMO on protection goals will vary depending on its characteristics, how it is used, and the environment in which it is present, and across time.
- Uses a *comparative* approach, whereby the level of risk is estimated through comparison with the non-modified recipient or parental organism in the likely potential receiving environment; and
- Is *transparent and iterative* when, examining previous conclusions in the light of new information. Hence, a risk assessment may be revisited when new information arises or a change in circumstances has occurred that could change its conclusions.

There are some additional approaches that are also used in practice and typically include:

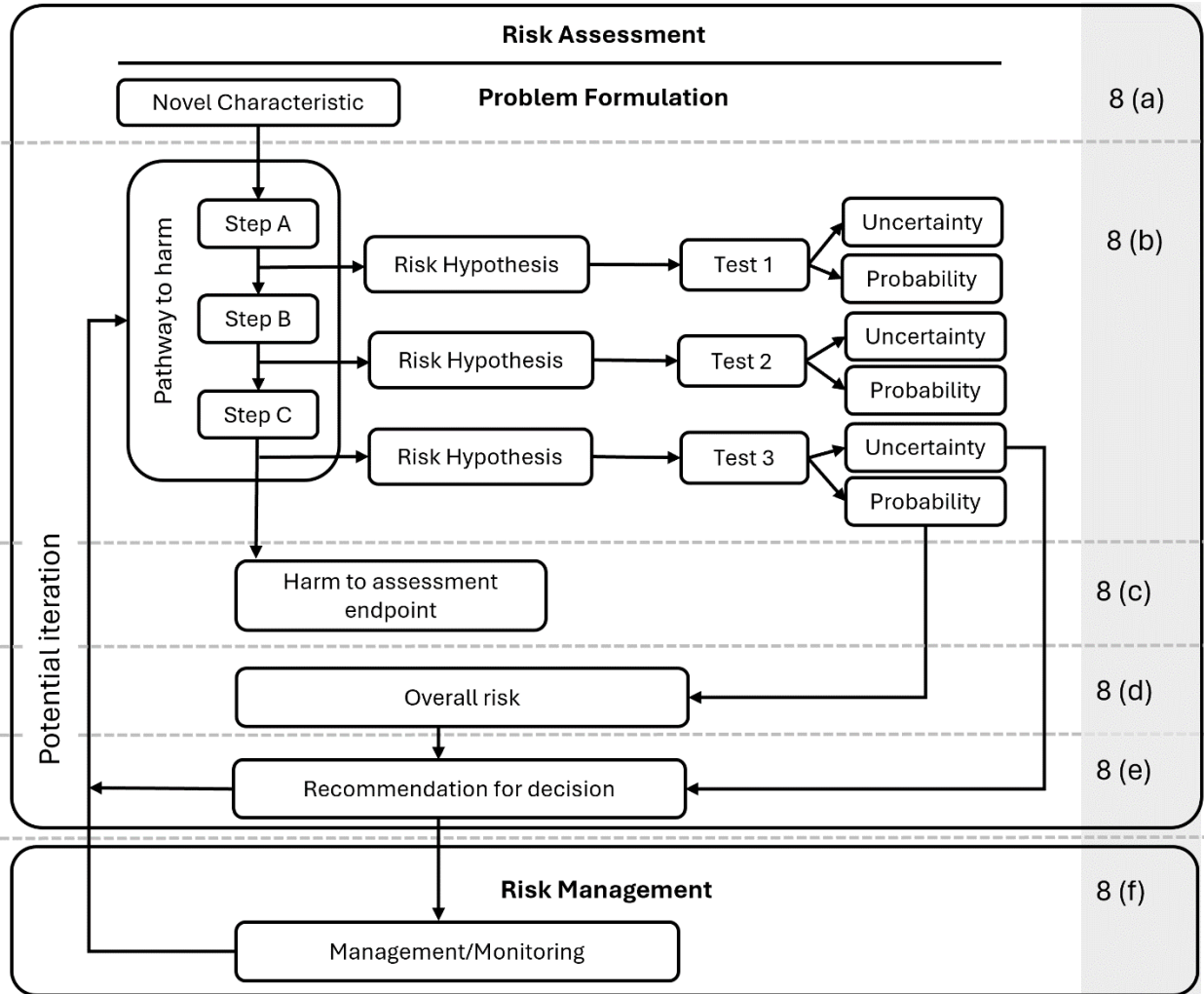
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<sup>6</sup> Also termed: general protection goals or generic endpoints.

<sup>7</sup> CBD/CP/RA/AHTEG/2020/1/4

- When appropriate, follow the *step-by-step* principle, in which the deployment of a LMO proceeds iteratively through multiple phases, with each phase involving a larger spatial and temporal scale and a higher degree of human, animal or environmental exposure and realism. Relevant information gathered under controlled, contained conditions would provide confidence that the LMO can safely progress to the next testing and release phase (NASEM, 2016; Hayes and others, 2018b; James and others, 2018; WHO, 2021b);
- Consider *familiarity*, as it plays a key role in setting the context for the risk assessment (OECD, 2023). Familiarity arises from knowledge of and experience with the biology of the non-LMO, the introduced trait, and the receiving environment (OECD, 1992);
- Evaluate risk hypotheses in a *tiered-based* test system because the likelihood of detecting potential hazards is higher in well-controlled lower tier studies than in more complex field studies (see section 4.2.4; Sanvido and others, 2012). By following this approach, tests are initially conducted representing worst-case scenarios of exposure and/or consequence and are then progressively made more realistic, as appropriate. In so doing, hazards are evaluated within different tiers that progress from worst-case exposure and/or consequence scenario conditions (e.g., framed in highly controlled laboratory environments), to more plausible scenarios (e.g., under semi-field or field conditions). The underlying rationale is that when risks are acceptable under high exposure conditions, they would be also acceptable at more realistic levels of exposure (e.g., if toxicity testing in a laboratory with high doses indicates no toxicity, there is no need for further testing at larger scales where doses will be much lower; EFSA, 2010);
- Use *problem formulation* as a way to frame the risk assessment process and does so by clarifying policy goals and scientific criteria for assessing risks and devising risk hypotheses that meet those criteria. It enables risk assessors to identify a spectrum of potential adverse effects derived from the deployment of an LMO and to devise (a) plausible pathway(s) to such harm and define the actual information needed to assess the likelihood of these potential adverse effects to occur and their seriousness.

The additional voluntary guidance materials introduce problem formulation as the first step of risk assessment, which is being widely applied by governments and relevant international organizations (e.g., NASEM, 2016; European Union, 2018; EFSA, 2020b; WHO, 2021b; CCA, 2023; OECD, 2023). The testing of the risk hypotheses of the plausible pathways to harm would be performed in the subsequent risk assessment steps consistent with paragraph 8 of annex III to the Protocol, as outlined in Figure 1. At each step of the plausible pathway to harm, more detailed information on probabilities and uncertainties are provided. In addition, participation and engagement of stakeholders and indigenous peoples and local communities can be included at all points in the process, as appropriate.



**Figure 1.** Risk assessment steps presented in this guidance and their linkage to paragraphs 8(a) to 8(f) in Annex III of the Protocol (shown in grey). Iteration in the light of new information may be performed to support decision-making. Steps A to C depict a single pathway to harm.

### 3. Engineered gene drives

Recent advances in molecular and synthetic biology, including the discovery of clustered regularly interspaced short palindromic repeats (CRISPR) and CRISPR-associated proteins (Cas) systems (referred to hereafter as CRISPR-Cas with CRISPR-Cas9 being a specific example), have delivered molecular tools, in combination with computational tools, that enable the design and development of a wide range of EGD systems in diverse organisms, with most initial focus on insects and rodents (Sanz Juste and others, 2023). Scientists are working to utilize gene drives, either by modifying, redesigning and re-purposing naturally occurring drive systems, or by designing and engineering novel systems, resulting in EGDs. The use of EGD-LMOs is proposed to address challenges related to disease vectors and improvement of human and animal health (e.g., mosquitoes and ticks), agricultural production and pests (e.g., various fruit flies, screwworm and beetles) and invasive species (e.g., rodents) and conservation of species, as well as help to rescue endangered species (Raban and others, 2020; Devos and others, 2022; Wells and Steinbrecher 2023a,b). EGD systems can be categorised into two main mechanisms, namely: over-replication mechanisms or interference mechanisms.

#### **Mosquitoes:**

Mosquitoes belong to the family of Culicidae in the Order Diptera. Culicidae is composed of at least 3,722 species (Harbach, 2023) under the 41 recognized genera (Foster and Walker, 2019). Currently, it is comprised of two subfamilies (annex IV namely, Anophilinae (3 genera) and Culicinae (38 genera). Mosquitoes exhibit four life stages, namely, the egg, larva, pupa and adult. Their life cycle is completed in aquatic (egg, larvae, and pupae) and terrestrial (adult) environments.

For a number of species, adult female mosquitoes require a blood meal (male mosquitoes do not bite) to provide the necessary nutrients for the successful development of viable eggs. Depending on the species, they blood feed on vertebrates such as amphibians, birds, mammals including humans, and reptiles (Clements, 1992). This behaviour presents major health risks to humans, livestock, and wild animals, as it can contribute to the transmission of pathogens from infected hosts (Foster and Walker, 2019). A non-exhaustive list of mosquitoes reported to transmit pathogens is presented in annex V.

Once the adults emerge, they shelter in vegetation, cavities and resting sites or forages a few dozen meters away from their larval habitats (Foster and Walker, 2019). Several factors influence adult dispersal such as larval predation risk (Alcalay and others, 2021), light (Wellington, 1974; Bailey and others, 1965), temperature (Reinhold and others, 2018; Marinho and others, 2016), and vegetation (Dufourd and Dumont, 2013). Depending on the species, mosquitoes may travel hundreds of kilometers via wind dispersal (Yaro and others, 2022), human transport (Eritja and others, 2017), or mass migration (Hume and others, 2003; Talapko and others, 2019) and international trade (Swan and others, 2022).

While the majority of research has focused on the role of mosquitoes as vectors of diseases, more recent studies have been investigating their roles in the ecosystem (Collins and others, 2019).

**Mosquitoes:****Mosquito-borne diseases**

Malaria and dengue are amongst the most significant mosquito-borne diseases (University of Washington, 2024). The dynamics of these diseases are the result of a complex interplay between a number of biological, demographic, environmental, cultural and socio-economic factors such as, insecticide resistance, land use, urbanization, globalization, climate change and limited access to health care.

*Malaria*

Almost half of the world's population is at risk of malaria. In 2022, WHO report states that of the global 247 million new cases and 619, 000 deaths in 2021, Africa shares the highest burden. Out of the recorded deaths, 77% are children where daily average deaths are about 1000 children under the age of five. In 2022, four countries in the African region, Nigeria (26.8%), Democratic Republic of Congo (12.3%), Uganda (5.1%) and Mozambique (4.2%) accounted for nearly half of all malaria cases globally (WHO, 2023a).

Out of the 500 *Anopheles* species described in the world, more than 30 species are recorded as vectors of the five human malaria pathogen species (*Plasmodium falciparum*, *P. vivax*, *P. ovale*, *P. malariae* and *P. knowlesi*) (WHO, 2023a). These *Anopheles* vectors tend to prefer to feed on humans (Jeyaprakasam and others, 2022, Piedrahita and others, 2022, Massey and others, 2016).

*Dengue*

WHO (2022b) reported that 3.9 billion people are at risk of getting dengue fever. From January to November 2023, more than 4.5 million dengue cases with more than 4,000 dengue-related deaths had been reported in 80 countries/territories by the European Centre for Disease Prevention and Control (2023). At least eleven *Aedes* species are recorded to vector the dengue virus (annex V).

*Aedes aegypti* is the primary vector of the dengue virus (annex V). Its current distribution includes the tropics and a number of sub-tropical regions, South-Eastern United States, the Middle East, Southeast Asia, the Pacific and Indian islands and Northern Australia (European Centre for Disease Prevention and Control, 2023). *Aedes albopictus* is considered the secondary vector of dengue viruses and has been included recently in the top 100 invasive species list of the Invasive Species Specialist Group (IUCN, 2024). Both are opportunistic feeders, but prefer human blood meals (Takken and Verhulst, 2013).

The control and reduction of mosquito-borne diseases is a recognized public health goal, and a range of novel strategies are currently being developed. Included in these are the development of *Anopheles* and *Aedes* mosquitoes bearing EGDs designed to reduce the transmission of diseases.



### 3.1. Engineered gene drive strategies

Strategies for EGD-LMOs can be differentiated based on: (1) the intended outcome; and (2) the potential for the genetic modification to spread in target populations by mating and persistence in the environment after release (table 1). Strategies aiming for population modification require the genetic modification of interest to persist in the population over an extended period (James and others, 2018).

Depending on the design of the EGD system (whose composition and mode of action are diverse), the genetic modification of interest could spread through interbreeding target populations (non-localised) and persist indefinitely (self-sustaining), or be restricted in its spread (localised) or persistence (self-limiting) (EFSA, 2022; WHO, 2021b; CCA, 2023) (table 1). While the binary divides between localised/non-localised and self-sustaining/self-limiting systems are informative, it is important to consider that there is a spectrum of spreading and persistence within and between each category (Alphey, 2014), which can be affected by ecological factors (Dhole and others, 2018, 2020; Backus and Delbourne, 2019). Moreover, some types of EGDs are not clearly distinct, and they can be used alone or in combination with other types of EGDs. EGD-LMO approaches and applications will likely continue to expand as gene editing tools become more refined (NASEM, 2016; Guichard and others, 2019; Holman, 2019). Consequently, the initial “prototype” EGDs reported in the scientific literature may not necessarily be representative of the EGD systems that are currently under development or progress to field testing, which aim to be more specific, stable and controllable systems (NASEM, 2016; Friedman and others, 2020; Raban and others, 2020).

Current research efforts also focus on the development of EGDs that would be confinable (i.e., limited in spread and/or persistence) and reversible (i.e., recallable from the environment) (e.g., Backus and Delborne, 2019; Li and others, 2020; Maselko and others, 2020; Sánchez and others, 2020b; Webster and others, 2020; Buchman and others, 2021; Hay and others, 2021; Kandul and others, 2021; Oberhofer and others, 2021; Terradas and others, 2021; Willis and Burt, 2021). Several approaches – some of which have already been tested experimentally under laboratory settings – have been proposed to restrict either spread of EGDs within a specified target population or geographic region, or their persistence (Raban and others, 2020). Examples include high threshold EGD systems such as underdominance (heterozygote inferiority) EGDs, tethered homing-based EGDs, and split rescue EGDs (Hay and others, 2021).

Other localisation approaches under development and/or investigation are EGD systems that target alleles that are only present in a genetically isolated (local) subpopulation of the target species or fixed in such isolated subpopulations (Sudweeks and others, 2019; Willis and Burt, 2021), and split homing-based EGDs, in which the Cas9 nuclease is separated from the guide RNA at different loci on chromosomes or lines of insects that would need to be crossed (Li and others, 2020; Kandul and others, 2021; Terradas and others, 2021). Nash and others (2019) evaluated the concept of integral EGDs that are based on multiple interacting components, each one of which could be tested separately or in combination. The modularity and interdependence of integral gene drive components may enable testing from self-limited to self-sustaining components in the field by modulating the propensity to spread in target populations (Nash and others, 2019).

**Table 1**

Possible elements to categorize engineered gene drive strategies

		Temporal scale	
		Self-limiting	Self-sustaining
Spatial scale	High threshold (non-spreading)	Spatially restricted ( <i>localized</i> ) and temporally restricted ( <i>transient</i> ) drives	Spatially restricted ( <i>localized</i> ) and temporally unrestricted ( <i>persistent</i> ) drives
	Low threshold (spreading)	Spatially unrestricted ( <i>non-localized</i> ) and temporally restricted ( <i>transient</i> ) drives	Spatially unrestricted ( <i>non-localized</i> ) and temporally unrestricted ( <i>persistent</i> ) drives

**Mosquitoes:**

**Engineered gene drive systems for living modified mosquitoes**

Currently, two distinct intended uses are being explored to control mosquito vector-borne diseases. EGDs for use in disease-transmitting mosquitoes are designed either to suppress target populations and potentially species, or to modify them with a new genotype (see table 2).

- Population suppression strategies aim to reduce a target population by imposing a substantial fitness cost via the inactivation of important genes involved in the survival (non-developing offspring) or reproduction of the target population (e.g., reducing fertility of offspring, bias of the sex ratio toward males), or through the introduction of a new gene or genes that reduce(s) lifespan or bias(es) sex ratios (Galizi and others, 2014, 2016; Buchman and others, 2018b; Simoni and others, 2020; James and others, 2018; Kyrou and others, 2018; Leitschuh and others, 2018). These suppression strategies are expected to result in population decline/reduction or even collapse (local elimination) over the period of a few generations and may in some cases aim for (global) eradication of a disease vector species (Comité scientifique du Haut Conseil des Biotechnologies, 2017). In the case of disease-transmitting mosquitoes, model predictions suggest that it is unlikely that population suppression strategies would completely eliminate a species in the field (North and others, 2019). Strategies aiming for population suppression from a single release would require the genetic modification of interest to persist, despite the fact that EGD-LMMs are expected to decrease to low numbers as the overall target population is reduced. Alternatively, repeated releases over time would be required to reach and maintain suppression.
- Population modification strategies are used to modify a current genotype with one that is designed to be less able to transmit disease (impaired vector competence), or that is more resistant to pathogen infection (disease refractory) (Franz and others, 2006; Mathur and others, 2010; Hedge and Hughes, 2017; Jupatanakul and others, 2017; Carballar-Lejarazú and James, 2017; Carballar-Lejarazú and others 2020; Buchman and others, 2019, 2021; Pham and others, 2019). These strategies can be based on the inactivation of a gene or genes that are required for the target organism to transmit the pathogen (e.g., a tendency to feed on humans in the case of mosquitoes), or that are involved in pathogen survival in the mosquito. They can also involve the introduction of a new gene or genes, such as those that produce molecules that block pathogen development, or that kill the pathogen in the mosquito (Gantz and others, 2015; Lejarazú and James, 2017; James and others, 2018; Hoermann and others, 2021). In order to be spread by an EGD, cargo/payload genes must be co-inherited with

the EGD (i.e., be genetically linked to it). Strategies aiming for population modification require the genetic modification of interest to persist (James and others, 2018).

Depending on the design of the EGD system (whose composition and mode of action are diverse), the genetic modification of interest could spread through interbreeding target populations (non-localised) and persist indefinitely (self-sustaining) or be restricted in its spread (localised) or persistence (self-limiting).

- Self-sustaining engineered gene drive systems can be described as those in which the genetic modification is intended to become stably established in target populations. They can be designed to spread a genetic modification of interest in target populations rapidly, widely and for an indeterminate time or until the target population is eliminated (Alphey, 2014). Since self-sustaining EGDs can be engineered to be spatially and temporally unrestricted (non-localised and persistent, respectively), they could move to any interbreeding target population that has vertical gene flow with the target population where the EGD-LMMs are released, within a relevant timeframe (Noble and others, 2018). Once established, such self-sustaining approaches are intended to be relatively stable and require only smaller and infrequent secondary releases.
- Self-limiting engineered gene drive systems can be described as those in which the genetic modification of interest is expected to be temporally limited (transient) and disappears from the target population in the absence of additional periodic releases. The number of generations over which the genetic modification of interest will remain apparent will vary according to the genetic control system employed. Conceptually, EGDs could be engineered to increase the frequency of the genetic modification of interest in a population for a limited number of generations, after which the frequency of the genetic modification of interest in the population decreases and is then lost from the target population. Genetic modifications of interest could either be those that change harmful population characteristics or suppress population density (Gould and others, 2008; Noble and others, 2019).

Inherent in many EGD systems is the requirement for individuals to be released above a certain threshold frequency before they will drive the genetic modification of interest through the target population (Alphey, 2014; Leftwich and others, 2018; Backus and Delborne, 2019; Dhole and others, 2020). This threshold refers to the proportion of EGD-LMM individuals with respect to the total target population that will reliably initiate spread of the genetic modification of interest. This threshold is determined as a combination of the action of the EGD system and its fitness load (Alphey, 2014; Leftwich and others, 2018).

- Low threshold (non-localised) EGDs may spread from very low initial population frequencies, requiring only a small number of EGD-LMM individuals to be released to spread (Noble and others, 2018). Such types of EGDs have a higher potential to spread into neighbouring populations for an indeterminate time (Alphey, 2014; Champer and others, 2016). The lower the threshold, the more likely that dispersal of low numbers of EGD-LMM individuals could be sufficient to initiate spread of the genetic modification of interest in neighbouring target populations.
- High threshold (localized) engineered gene drives only spread if the number of EGD-LMM individuals reaches a high proportion in the target population, requiring a larger introduction (or proportion) of EGD-LMM individuals to be successful, compared to threshold independent EGDs. These types of EGDs may enable local confinement. Simple population models predict spread to a high frequency in areas connected to the target area (in which the EGD-LMM individuals would be released broadly) but low levels of dispersal would be inhibited, as the genetic modification of interest fails to reach the threshold frequency needed for drive (Marshall and Hay, 2012). However, as dispersal to neighbouring populations increases, spatial restriction to the targeted population may not be assured (e.g., Marshall and Hay, 2012; Dhole and others, 2018, 2020; Champer and others, 2020c).

The degree of persistence and, in particular, the spread of a specific EGD in target mosquito populations represent key considerations in the case-by-case risk assessment of EGD-LMMs, given their inherent implications for exposure and hazard characterizations. For current examples of EGD-LMMs including their intended effect in terms of spread and persistence see annex VII.

**Table 2.**

Selected examples of engineered gene drive approaches in mosquitoes

		Potential for the EGD to spread and persist in target populations			
		Self-limiting ( <i>transient</i> )		Self-sustaining ( <i>persistent</i> )	
Intended outcome		High threshold ( <i>localised</i> )	Low threshold ( <i>non-localised</i> )	High threshold ( <i>localised</i> )	Low threshold ( <i>non-localised</i> )
Population suppression				Underdominance drives	Homing-based drives and Meiotic interference drives
Population modification	Split homing-based drives			Underdominance drives	Homing-based drives and Medea-like “rescue” (toxin & antidote) drives

### 3.2. Opportunities and risk concerns

The ability to engineer gene drives has sparked both enthusiasm and concerns (Esvelt and others, 2014; Brossard and others 2019; Deplazes-Zemp and others, 2020). Some examples of opportunities and risk concerns are given below.

#### 3.2.1. Opportunities

The use of EGDs could achieve goals that are otherwise challenging to attain, such as reaching parts of target populations that are missed by conventional methods, ensure high target specificity compared to most conventional methods, and provide ongoing effects with relatively little or no further input.

There is potential for the use of EGDs in achieving biodiversity protection and conservation goals, agricultural management, and/or positively impacting human and animal health (Neve, 2018; Leitschuh and others, 2018; Kelsey and others, 2020; Preston and others, 2019). Engineered gene drives may be one of the most promising tools to control invasive species, which are a significant driver of species extinctions (Bellard and others, 2016; Clavero and Garcia-Berthou, 2005). For example, EGDs could be used to limit the reproductive capabilities of invasive species that have adverse impacts on an ecosystem, where they may provide a more sustainable and/or targeted solution compared to traditional methods like chemical or physical control.

Engineered gene drives may also be leveraged for disease vector control, including for non-native diseases with significant adverse impacts, including extinction, on native species (e.g., avian malaria in Hawai’i). Specifically with regards to insect pests, some other control strategies, such as sterile insect technique, often require multiple releases of large number of organisms to overwhelm the target pest and achieve efficacy, which may not be feasible. In contrast, self-sustaining gene drives aim to allow for a small number of individuals to be released into the population. Thus, the use of EGDs aim to reduce disease-transmitting insect populations, which could benefit ecological and human health outcomes.

Gene drives may also be beneficial for the management of agricultural pests. Pests destroy more than 40% of the worldwide food supply (Oerke and others, 1994; Pimentel, 1997). The common methods to control

these pests are via chemical pesticides, which can be toxic to wildlife and humans. Engineered gene drives may offer a unique opportunity to alter pests to reduce their fitness or their pest potential, while requiring a limited release of individuals (dependent on the type of EGD) and with low levels of off-target toxicity compared to chemical approaches (Legros and others 2021). Given that rodent pests have proliferated further with recent shifts to conservation agriculture, rodents are organisms where gene drives could be useful and they are currently in research and development (Ruscoe and others, 2023, 2022). Gene drive development also shows promise for invasive weed and insect control and may contribute to reducing food supply breakdown. For example, the use of EGDs could also enable effective control of aphids, which are pests, as well as vectors for plant viruses, of agricultural plants in many countries (Legros and others, 2021; Guo and others, 2022).

Finally, a key opportunity for the use of EGDs is in the fight against malaria and other vector-borne diseases. This opportunity may help to improve human health in many developing countries and economies, particularly among children under the age of 5 years. Based on challenges experienced with vector control interventions to reduce mortality linked to the spread of diseases such as malaria and dengue, the need for additional methods to combat mosquito-borne diseases is widely recognized. Currently available methods to control mosquito vectors are based on the use of insecticides, bed nets, mass release of sterile males, housing improvements, addressing social determinants of health and elimination of mosquito larval breeding sites. Therefore, for both operational and economic reasons, there is a recognized need to add new, sustainable and cost-effective vector control tools. Recent research offers the possibility that LMMs, including EGD-LMM could be used as complementary tool to prevent pathogen transmission (WHO, 2021b; Fouet and others, 2020).

### 3.2.2 Risk Concerns

Unlike other LMOs, EGD-LMOs are specifically designed to disperse beyond their initial release locations and persist in target populations over extended periods and generations in order to control disease vectors, agricultural pests and invasive species, or rescue endangered species.

Concerns have been raised that EGDs may adversely impact biodiversity and human and animal health, lead to undesired side effects and uncontrolled spread, and alter organisms, populations or species and ecosystems in unwanted, unanticipated and irreversible ways with no current ability for recall (e.g., Esvelt, 2014; Simon and others, 2018; CSS–ENSSER–VDW, 2019; Cotter and others, 2020; Dolezel and others, 2020; Then and others, 2020a,b). Those unique characteristics necessitate a comprehensive assessment of ecological risks with a broader spatio-temporal scale (AHTEG, 2020<sup>8</sup>; Connolly and others, 2022).

A concern is that the release of a small number of EGD-LMOs, dependent on their design, could result in the genetic modification of interest spreading throughout the entire population of the targeted species in the wild. As a result, the potential ecological and health consequences of certain EGD-LMOs could be far-reaching (Kuzma and others, 2019). Moreover, some EGDs may raise novel risk assessment and risk management challenges (NASEM, 2016; Hayes and others, 2018a; Simon and others, 2018; CSS–ENSSER–VDW, 2019; AHTEG, 2020<sup>9</sup>; Devos and others, 2020, 2021; Dolezel and others, 2020; Then and

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<sup>8</sup> (CBD/CP/RA/AHTEG/2020/1/4)

<sup>9</sup> (CBD/CP/RA/AHTEG/2020/1/4)

others, 2020a,b; Connolly and others, 2021; EFSA, 2022). There is also evidence suggesting that some EGDs are functioning under different molecular mechanisms or behaviours to the intended design. For example, population reduction EGDs may potentially result in mixed populations with unpredictable chasing dynamics<sup>10</sup> (Champer and others, 2021a). Homing EGD systems designed to operate via the expected CRISPR-based homing process may instead function via an unintended meiotic mechanism at least in part, and in some studies, exclusively, via unintentionally decreasing the inheritance of the non-drive recipient chromosome (Verkuijl and others, 2022; Terradas and others, 2021; Xu and others, 2020; Li and others, 2020). Certain designs of EGD aim to reduce risks in terms of controllability by intended self-limiting or threshold dependent behaviour. Depending on ecological conditions and receiving population these design goals may not be realised in the wild, resulting in unlimited or low-threshold EGDs. Therefore, effective risk assessment and risk management protocols must be capable of addressing these concerns, ensuring a thorough evaluation of the potential impacts of EGD-LMOs.

The above-mentioned risk concerns and associated uncertainty have led some scientists, scientific and non-governmental organisations to call for the strict application of the precautionary approach on gene drive research, including field tests (NASEM, 2016; CSS–ENSSER–VDW, 2019; Cotter and others, 2020). Calls are also made for a better understanding of the potential ecological and evolutionary impacts associated with the intentional release of EGD-LMOs to inform risk assessment (e.g., NASEM, 2016; CSS–ENSSER–VDW, 2019; Giese and others, 2019; Rode and others, 2019; Dolezel and others, 2020). In parallel to this dialogue, established guidance for living modified mosquitoes provided a basis for developing further recommendations for the phased testing of EGD-LMOs (e.g., WHO, 2014, 2021b; NASEM, 2016; Hayes and others, 2018a; James and others, 2018, 2020), as well as recommendations for the responsible and sustainable deployment of the technology (James and others, 2018, 2020; Warmbrod and others, 2020), and engagement of all concerned Parties, stakeholders and indigenous peoples and local communities (NASEM, 2016; WHO, 2021b).

The preferential inheritance of a transgenic construct, along with the intended spatial and temporal scale of spread of the genetic modification(s) of interest, may lead to potential adverse effects across large spatial and/or temporal scales in specific cases. Moreover, EGDs may enable modifying target populations in the field, and expand the means to achieve population modification (including the spectrum and nature of novel cargo/payload genes, along with the diversity of target organisms). Further consideration in any future risk assessment is required to scrutinise whether the aspects mentioned above (or others) are potential novel adverse effects, and whether they may introduce additional factors into the risk assessment of some EGD-LMOs. The hazardous potential of any novel aspect identified will need to be assessed on a case-by-case basis using the problem formulation approach.

## **4. General risk assessment considerations for living modified organism containing engineered gene drives**

### **4.1. Problem formulation**

An explicit problem formulation is a key starting point for a robust risk assessment. It serves as a rigorous science-based analysis that defines the overall parameters for a risk assessment and facilitates the systematic

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<sup>10</sup> An outcome of a release of a suppression drive predicted by modelling whereby wild type individuals recolonise an area where the drive has locally eliminated the population (Champer and others, 2021).

identification of potential adverse effects, as well as routes of exposure or pathways to harm, whilst being transparent about the assumptions that have been made during the process (OECD, 2023). Problem formulation addresses novel characteristics, as well as both intended and unintended behaviour, of the EGD-LMO.

Problem formulation can be made operational through a five-step process involving:

- (a) The identification of protection goals and making them operational for use in risk assessment through the definition of assessment endpoints;
- (b) The identification of potential adverse effects on assessment endpoints (hazard identification);
- (c) The derivation of plausible pathways to harm<sup>11</sup> that describe how the intentional release of an EGD-LMO could be harmful;
- (d) The formulation of risk hypotheses about the likelihood and consequences of such events; and
- (e) The participation and engagement of stakeholders and indigenous peoples and local communities can be included at all points in the process, as appropriate.

For further information, see, e.g., U.S. EPA, 1998; Raybould, 2006, 2010; EFSA 2010; Wolt and others, 2010; Raybould and Macdonald, 2018; Devos and others, 2019; and OECD, 2023.

While problem formulation is conceptually straightforward, its implementation can be challenging when protection goals and scientific criteria for assessing risks are not clearly defined. Hence, reaching a common understanding of the relevant protection goals and scientific criteria is a prerequisite for conducting risk assessment. Data collection and interpretation can then be directed towards evaluating the impact of any observed effect on what is to be protected.

Transparency in how a problem formulation approach is conducted is important. Thus, sufficient detail about the methods, data, assumptions and uncertainties should be reported to ensure transparency, facilitate an appropriate assessment of the quality of the problem formulation, ensure relevance, and enable reproducibility. Moreover, the problem formulation is an iterative process, enabling the revision of each step of the process as evidence becomes available. This process should also involve deeper engagement with stakeholders such as impacted communities at the relevant steps, to complement protection goals and draw upon knowledge (CCA, 2023).

#### **4.1.1. Identification and operationalization of the protection goals**

A crucial step in problem formulation is to identify protection goals and more specifically those that could possibly be harmed as the result of the deployment of an EGD-LMO. Protection goals can vary among jurisdictions, but their overall aim is to reduce or avoid potential harm caused by human activity to the environment and human, animal, plant, and soil health and water quality (OECD, 2023). As dictated by national policies and further clarified in annex I to the Convention on Biological Diversity<sup>12</sup>, protection goals encompass various aspects, such as biological diversity, genetic diversity, human and animal health, ecosystems, ecosystem functions and services, soil health, water quality and habitats. Examples of protection goals that focus on biodiversity conservation include species of conservation value or cultural values, including those of indigenous peoples and local communities, species in the IUCN Red List and

<sup>11</sup> Also termed: adverse outcome pathways.

<sup>12</sup> The Convention on Biological Diversity 1992, annex I. Identification and monitoring [www.cbd.int/convention/articles/?a=cbd-a1](http://www.cbd.int/convention/articles/?a=cbd-a1).

protected habitats and landscapes. Protection goals that focus on ecological functions include fertile soil, clean water and sufficient biological diversity to withstand environmental change. Sustainable ecosystems as protection goals include both biodiversity conservation and ecological functions.

National policies and legislative frameworks generally define protection goals broadly. Consequently, refinement is required to make them operational for use in risk assessment – they must be translated into specific, operational goals (termed hereafter as assessment endpoints) (Suter II, 2006; Nienstedt and others, 2012; Garcia-Alonso and Raybould, 2014; Devos and others, 2015, 2019; OECD, 2023). This process requires the delineation of what must be protected, where and over what time period and defining the maximum tolerable impact, also termed limits of concern. Three sequential steps can be followed to define assessment endpoints: (1) identify relevant species (ecosystem units), habitats/ecosystems and ecosystem services that could be at risk from the intentional release of an EGD-LMO; (2) identify service-providing units (populations or communities) – structural and functional components of biodiversity – that provide or support these ecosystem services; and (3) specify the level of protection for habitats/ecosystems and these service-providing units. The level of protection is then defined by the ecological entity of the service-providing unit and its attributes, as well as the maximum tolerable impact (EFSA, 2010a,b; Nienstedt and others, 2012; Devos and others, 2015, 2019). The assumption is that the general protection goal, represented by specific assessment endpoints, will be achieved through the protection of the habitats/ecosystems and service-providing units of ecosystem services.

Risk hypotheses for testing are subsequently established for identified assessment endpoints, which lead to measurement endpoints that define the relevant experimental data or evidence required for the assessment (Sanvido and others, 2012; Devos and others, 2015). Measurement endpoints determine the information to be collected to test the formulated risk hypotheses. Thus, measurement endpoints are used as indicators of potential harm, but they are not part of a definition of harm. Measurement endpoints are rather a measurable (quantifiable) biological characteristic that can be related to a particular assessment endpoint (see table 3; Sanvido and others, 2012).



**Table 3**

Matrix for an operational definition of environmental harm with some selected examples of its application (adapted from Sanvido and others, 2012).

1. Protection goals		2. Assessment endpoints					3. Measurement endpoints			
		Criteria for the operational definition of the protection goal					Criteria for the type of effect to be measured			
Area of protection		Ecological entity	Attribute	Unit of protection	Spatial scale of protection	Temporal scale of protection	Definition of harmful effect	Indicator	Parameters Early tiers	Parameters Higher tiers
Biodiversity conservation	Red List species Species of high conservation / cultural value	Mammals	Abundance				Relevant decrease in abundance	Selected species		
		Birds								
		Amphibians								
		(Valued) insects (e.g. butterflies)		Population	Non-agricultural habitats	10 years		Mortality	Abundance	
		(Valued) plants								
	Protected habitats	Habitats listed in legislation					Selected habitats			
Ecosystem services	Pollination	Pollinating insects	Ecological function	Guild	Arable land and non-agricultural habitats	Following cropping season	Relevant disturbance in ecological function	Direct or indirect indicator able to demonstrate failures in ecosystem function	Mortality	Abundance
	Pest regulation	Predators & parasitoids								
	Decomposition of organic matter	Soil invertebrates, soil microorganisms	Guild							
	Soil nutrient cycling (N, P)	Soil microorganisms								
	Soil structure	Soil invertebrates								
	Water regulation and purification	Fish								
		Aquatic invertebrates								
		Algae								

Protection goals and assessment endpoints are aimed at defining and targeting the initial processes in the risk assessment by helping frame relevant questions, especially during the problem formulation phase. Precisely defining the assessment endpoints is crucial to focus the risk assessment and guide subsequent analyses. The choice of the protection goals and assessment endpoints may change after an objective analysis of the characteristics of the EGD-LMO or as the risk assessment progresses and new information emerges.

Since some EGD-LMOs may spread across jurisdictional boundaries, regional approaches that would facilitate multi-country/international regulatory oversight and governance have been suggested (James and others, 2018; Rabitz, 2019; Kelsey and others, 2020). A point that would likely require further consideration is whether the risk assessment should therefore be framed only by the specific protection goals established by the jurisdictions that would host the intentional release, or address those of the entire area of potential spread to cover the potential for transboundary movements.

#### **4.1.2. Identification of potential adverse effects on the assessment endpoints**

This step involves the identification of any features of the EGD-LMO that may have potential adverse effects on the conservation and sustainable use of biological diversity in the likely potential receiving environment, taking also into account risks to human health. Additionally, this can include the identification of potential adverse effects on plant and animal health. The potential adverse effects caused by the intentional release of an EGD-LMO will vary depending on its characteristics, how it is used and the environment in which it is present. The question that risk assessors ask in this step is “what could go wrong, why and how?” This step is very important in the risk assessment process as the answers to these questions will determine what risk scenarios are considered in all subsequent steps. In this step, risk assessors postulate and identify scientifically plausible risk scenarios to predict if the EGD-LMO may have an adverse effect on the assessment endpoints. This is done by examining if any of the novel or altered characteristics of the EGD-LMO and/or its intended use could give rise to potential adverse effects in the likely potential receiving environment. The novel characteristics of the EGD-LMO to be considered should include any changes in the EGD-LMO, such as at the DNA-level, gene expression level and morphological and behavioural changes. The changes are then considered in the context of the comparators (e.g., the non-modified recipient or parental organisms, see section 4.2.3) in the likely potential receiving environment using the environmental conditions prior to the intentional release of the EGD-LMO as baseline.

Potential adverse effects may be direct or indirect, immediate or delayed, cumulative, local or long distance, as well as predicted or unpredicted. Direct or indirect effects on individual organisms that the EGD-LMO itself generates may be caused via predation, competition, habitat alteration, hybridisation (gene flow) and introduction of new parasites and diseases.

The ability of the EGD-LMO to (1) affect non-target organisms; (2) cause unintended effects on target organisms; (3) develop unintentional changes in fitness; (4) transfer genes to other organisms/populations, such as sexually compatible wild species; (5) become genotypically or phenotypically unstable; (6) lead to unintended phenotypes; and (7) affect the food web, could cause potential adverse effects.

**Mosquitoes:****Characterisation of the living modified mosquito containing an engineered gene drives and its likely potential receiving environments**

The characterisation of the EGD-LMM aims to identify any novel genotypic and phenotypic characteristics that may have adverse effects on biological diversity in the likely potential receiving environment, taking also into account risks to human health. Depending on the case, risk assessment takes into account the relevant technical and scientific details regarding the characteristics of the subjects outlined in paragraphs 9(a–h) of Annex 3 of the Protocol.

For the EGD-LMM case, this includes: the unmodified target mosquito and associated pathogen(s); the EGD-LMM (including the genetic modification); and the likely potential receiving environment (including interactions between the EGD-LMM and its likely potential receiving environments) in which the EGD-LMM will be released and spread.

Challenges in the characterisation of EGD-LMM may arise due to knowledge gaps in the biology of the parental species such as, life cycle, reproductive strategies, population dynamics and their potential cross-compatible species. Access to information on the functional role of the target organism in the various ecosystems and the potential genetic and behavioural diversity of the target species may be limited.

Challenges in the characterisation of the likely potential receiving environments may arise due to their diversity, limited environmental and ecological data and knowledge gaps in ecological interactions of the EGD-LMM.

Examples of characteristics that may require further consideration on a case-by-case basis are given below.

- (a) Characteristics of the unmodified target mosquito and associated pathogen(s)
  - (i) Biology, genetic diversity, species status (existence of a complex of species, species barriers, anatomy, physiology) and behaviour of the target mosquito population
  - (ii) Ecological niches occupied by a species at different stages of development
  - (iii) Species' contribution to biodiversity, ecosystem functions and services, and food webs
  - (iv) Seasonal dynamics of the target mosquito population
  - (v) Aquatic and terrestrial habitats
  - (vi) Reproductive biology of target mosquito populations
  - (vii) Interactions with other organisms
  - (viii) Contribution of the target population to disease transmission
  - (ix) Biological (including genotypic and phenotypic) characteristics of the pathogen
  - (x) Host-pathogen interactions
- (b) Characteristics of the EGD-LMM and associated pathogen(s)
  - (i) Vector species and disease targeted
  - (ii) Intended entomological objective (e.g., suppression or modification of the target mosquito populations)
  - (iii) Degree of spread of the EGD in target mosquito populations, from localized to non-localized
  - (iv) Degree of persistence of the EGD in target mosquito populations, from self-limiting to self-sustaining
  - (v) Threshold ratio of EGD-LMMs to be released relative to wild mosquito target populations, from low to high
  - (vi) Molecular and biological mechanisms underpinning the EGD in the LMM, such as
    - a. Nature of the genomic target sequence (e.g., within a conserved domain)
    - b. EGD and its design covering both the underlying mechanisms involved and their components
    - c. Stability and specificity of expression of the EGD system
    - d. Characteristics of any cargo/payload gene(s) linked to the EGD, and its/their function
    - e. Homing and/or transmission rate of EGD (e.g., efficiency of EGD ratio of non-homologous end joining to homologous repair and cleavage efficiency of the target sequence)
  - (vii) Effects of the genetic modification on the biology (e.g., genotype, phenotype) of the EGD-LMM

- (viii) Effects of the genetic modification on the pathogen, in terms of genotype and phenotype, in the EGD-LMM
- (ix) Effects of the genetic background on the EGD, including in sibling species
- (c) Characteristics of the likely potential receiving environments (including interactions between the EGD-LMM and its likely potential receiving environment)
  - (i) Geographic, demographic, entomological, seasonal and climatic characteristics of the likely potential receiving environment
  - (ii) Effects of the likely potential receiving environment (e.g., abiotic factors) on the EGD-LMM
  - (iii) Effects of the genetic modification on interactions with the target and non-target pathogens

## **Mosquitoes:**

### **Postulated adverse effects of living modified mosquitoes containing engineered gene drives**

Several publications have previously postulated adverse effects on broad protection goals (such as the environment, and human and animal health) associated with the intentional release of the EGD-LMMs (e.g., EFSA, 2013; NASEM, 2016; Roberts and others, 2017a; James and others, 2018, 2020; Collins and others, 2019; CSS–ENSSER–VDW, 2019; Rode and others, 2019; Teem and others, 2019; Dolezel and others, 2020; Smets and Rüdelsheim, 2020; Then and others, 2020a,b; EFSA, 2020; WHO, 2021b). Some of these previously postulated adverse effects to human and animal health and the environment associated with the intentional release of EGD-LMMs are summarized below.

The identification of adverse effects is inevitably hypothetical to some extent, as no EGD-LMM application has been submitted for regulatory approval in any jurisdiction globally as of February 2024.

#### **A. Postulated adverse effects to human and animal health include:**

- (a) Increased disease transmission;
  - (i) Increased abundance of disease-transmitting mosquitoes;
  - (ii) Increased competence for transmission of the pathogen or other vector-borne pathogens and thus the prevalence of other mosquito-transmitted diseases;
  - (iii) Altered mating, host seeking, or feeding behaviours, or geographic range (broader temperature tolerance) of disease-transmitting mosquitoes;
  - (iv) Reduced capability to control the target species by conventional methods;
- (b) Increased potential for resistance to evolve in the target organism;
  - (i) Reduced efficacy of the EGD-LMM in the target population(s);
- (c) Increased toxicity and/or allergenicity;
  - (i) Transmission of toxic or allergenic substances (related to the components of an EGD) either directly by biting or indirectly by exposure from such substances released into the environment (e.g., incidental exposure through inhalation or ingestion); and
  - (ii) Increased pathogen virulence in case of population modification.

#### **B. Postulated adverse effects to the environment (biodiversity, food webs, ecosystems and ecosystem services) include:**

- (a) Increased persistence and invasiveness potential;
  - (i) A competitive advantage of EGD-LMMs as compared to the wild type, causing increased persistence and invasiveness and leading to the displacement of other mosquito species;
- (b) Increased potential for resistance to evolve in the target organism;
  - (i) Management responses to reduced efficacy of the EGD-LMM;
- (c) Increased potential for vertical and horizontal gene transfer;
  - (i) Spread of the genetic modification of interest to non-target organisms through vertical and horizontal gene transfer that results in harm to the wider ecosystem;
- (d) Increased toxicity;
  - (i) Transmission of substances (related to the components of an EGD) that are toxic to non-target organisms that consume the EGD-LMM;
- (e) Adverse effects associated with the suppression of the target organism
  - (i) Suppression of the target organism that serves as food source (e.g., prey) for non-target organisms (e.g., predator);

- (ii) Suppression of the target organism may harm non-target organisms that rely on the species for the delivery of ecosystem services (such as pollination, biological control, decomposition);
- (iii) Invasion of the ecological niche vacated by suppression of the target organism of other mosquito species (niche replacement);
- (f) Decreased water quality
  - (i) Suppression of the target organism which results in reduced larval consumption of algae causing levels of algae to increase and their associated toxins produced from algal bloom. This in turn could lead to adverse effects on non-target organisms in the aquatic habitat, and negative effects on water quality;
- (g) Decreased genetic diversity in target populations.

The abovementioned postulated adverse effects represent areas of concern for further consideration in the risk assessment. Any adverse effect will need to be identified on a case-by-case basis using the problem formulation approach and assessed as part of the risk characterization (i.e., testing of risk hypotheses) process. Wider environmental mediators are also known to impact vectorial capacity and could be considered, in the context of conservation and sustainable use of biological diversity, considering the EGD-LMM capacity for spread and persist over time and space.

#### 4.1.3. Devising plausible pathways to harm

In the risk assessment process, it is important to define clear links or pathways between the EGD-LMO and potential adverse effects in order to focus on generating information that will be useful in the decision-making. Based on the available information on the biology and ecology of the species under consideration, the EGD design and strategy, the introduced traits, the intended uses of the EGD-LMO (the scale and frequency of the intentional release), the likely potential receiving environments (covering the likely potential receiving environments where the EGD-LMO will be released and spread) and the interactions amongst these variables, plausible pathways to harm<sup>13</sup> are constructed in the problem formulation process. Pathways to harm are used as a conceptual model to describe how the intentional release of an EGD-LMO could lead to possible harm to assessment endpoints.

A pathway to harm describes the plausible and necessary steps that would need to occur for the environmental release of an EGD-LMO to result in an adverse effect on the assessment endpoint (OECD, 2023). In effect, a causal chain of events is required for a hazard to be realised. Such a pathway can be the function of a simple linear chain of events, or a complex one that is branched. A risk assessment typically includes many pathways (Connolly and others, 2021), because the proposed activity may affect different protection goals and assessment endpoints, and could lead to different harms, or because a particular hazard could arise in different ways, or both. Moreover, there may be multiple interconnected pathways to be considered that may share some of the same steps.

When planning the risk assessment, one or more pathways to harm may be postulated for each potential adverse effect identified for an assessment endpoint (OECD, 2023). Different techniques may be used to postulate pathways to harm (e.g., Wolt and others, 2010; Roberts and others, 2017a; Hayes and others, 2018b; Teem and others, 2019). The nature and formality of this exercise, which may include stakeholder engagement, may reflect priorities based on policies and approaches of the responsible authorities. When devising pathways to harm, potential pathways to harm should be systematically explored in a broad fashion. In principle, only those pathways to harm that are plausible according to existing knowledge, expert judgement and at least potentially consequential should be carried forward into the analysis. However, if the validity or consequences of a pathway to harm cannot be sufficiently defined, one can expand efforts to consider existing knowledge and/or carry that pathway forward into

<sup>13</sup> Also termed: adverse outcome pathway. A pathway to harm is a causal or conditional chain of events that need to occur for a harm to be realized.

the analysis. Due consideration should be given to have both broad and detailed knowledge and expertise from different disciplines for the identification of potential pathways to harm.

Since it can be challenging to adequately devise multiple, complex pathways to harm over long time period, a wide area, and/or a heterogeneous environment, it is important that all potential pathways are reported transparently. Moreover, a rationale justifying why potential pathways to harm are not considered sufficiently plausible and/or consequential should be reported transparently.

The main aim of the pathway to harm approach is to focus the risk assessment process and to improve transparency in the risk assessment by making these pathways explicit and thereby amenable to comparison and independent review. This is typically achieved by using block diagrams to portray pathways to harm. Several authors (e.g., Roberts and others, 2017a; Teem and others, 2019; Romeis and others, 2020; Alcalay and others, 2021; Connolly and others, 2021; Kormos and others, 2023) reported some relevant pathways to harm associated with the intentional release of EGD-LMOs (mostly insects) that can be considered further when devising such pathways. Other types of conceptual models that may also be useful include fault trees and event trees (Hayes and others, 2018a,b; Hosack and others, 2023). Pictorial conceptual models, such as block diagrams showing pathways to harm, have many useful properties beyond improving transparency. They are relatively easy to construct allowing multiple models to be developed and recommended approach for tackling deep uncertainty (Section 4.2.7. “Uncertainties”), without excessive resource commitments. Moreover, they do not require specialised skills to develop or understand, and hence can be used to engage stakeholders, who may have different backgrounds and training, into the risk assessment by capturing the views and beliefs on relevant assessment endpoints and pathways.

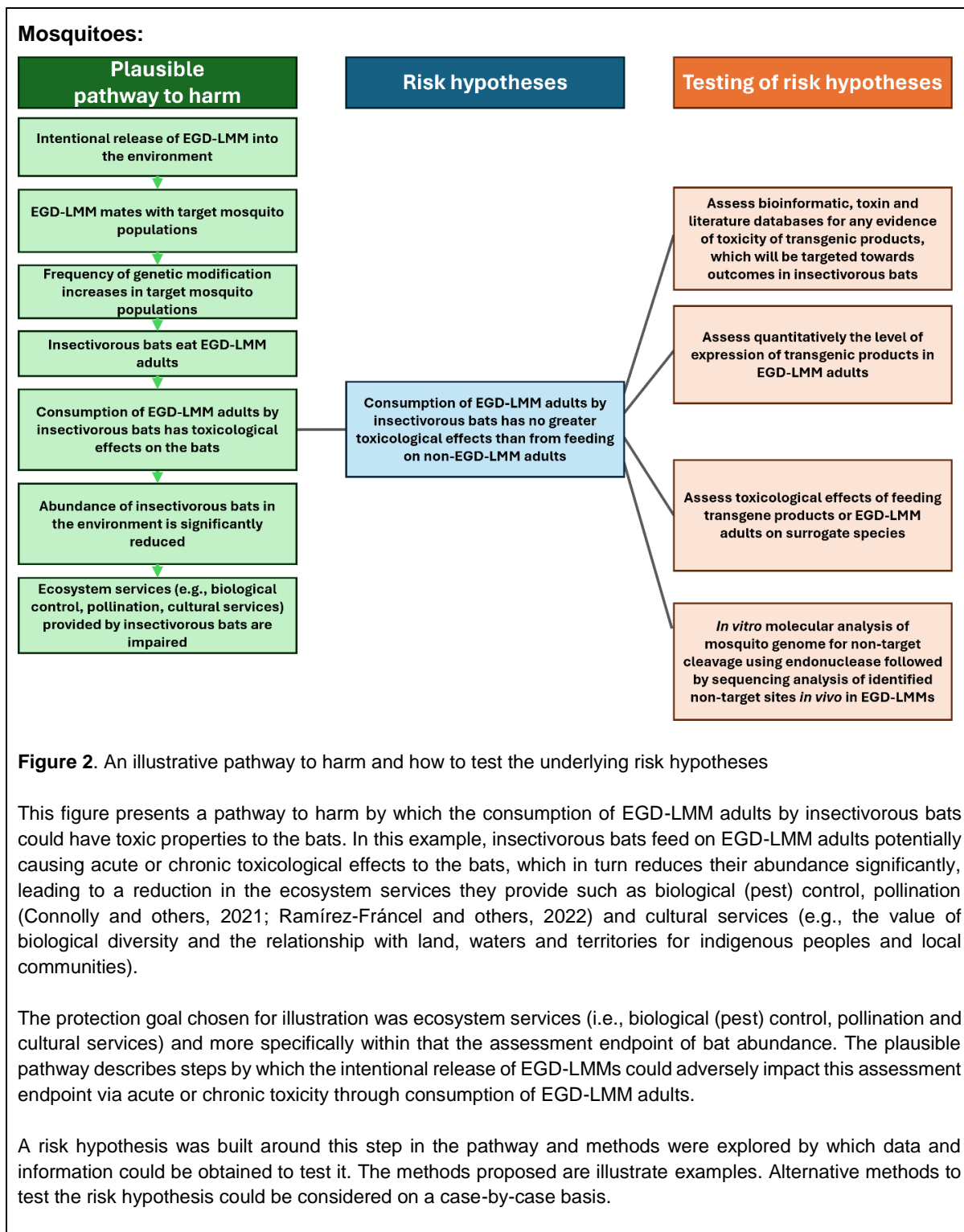
#### **4.1.4. Formulation of risk hypotheses**

Each step in a pathway to harm enables the formulation of risk hypotheses that can then be tested to characterise risk. For instance, if the protection goal is biodiversity, a risk hypothesis may assess how specific characteristics of the EGD-LMO could impact different assessment endpoints related to biodiversity. This could include assessing the consequences of the reduction of EGD-LMO abundance on predators, competitors or prey, as well as the potential replacement of ecological niches by other organisms within the likely potential receiving environment.

In practice, a careful first scrutiny of the pathway to harm can usually help to identify which of the risk hypotheses may be the most decisive or easiest to test, while minimising uncertainty. A particularly useful feature of this analysis is that it decisively determines with sufficient confidence if a critical step is highly unlikely or not. If one step in the pathway is highly unlikely this would cause the entire pathway to harm to be equally unlikely.

There may be cases for which the available evidence may not be sufficient to show that the pathway is blocked at any step. The testing of each step in the pathway to harm will help to assess the probability of each step to occur, the severity of outcomes and the associated level of uncertainty, and thus a hazard to be realised through the postulated pathway to harm. In some cases, evidence from a series of risk hypotheses may together produce weight of evidence to indicate rejection or acceptance of that pathway or uncertainty may be so high that no reliable conclusions can be drawn.

Some pathways to harm may need to be re-examined on a case-by-case basis, as new or altered pathways to harm may be identified as the scientific evidence base expands. Therefore, some pathways to harm are likely to be revised and updated periodically, with feedback from stakeholders and the wider scientific community.



**Mosquitoes:**

**Illustrative examples of some potential adverse effects of living modified mosquitoes containing engineered gene drives**

The illustrative examples of some potential adverse effects are provided in headings A to C below. These examples are not exhaustive and reflect elements that could be considered in the construction of a pathway to harm.

### **A. Potential adverse effects on biodiversity and ecosystem services (niche replacement, competition, disease transmission)**

#### *Competitive interactions*

In the case of population suppression (that can eventually be partial and lead to long-term mixed populations of wild type and EGD-LMMs), where the target mosquito population is in competition with a non-target species, its niche, in particular its aquatic habitat which is a rate-limiting resource for mosquito populations, could be filled by another non-target species, in a process known as niche expansion, or niche replacement (Connolly and others, 2021). If that non-target species is in competition, or predate, or is a species that provides ecosystem services, then this could lead to a reduction in those ecosystem services. If that non-target species is another disease vector, this could lead to increased or novel disease transmission. Niche replacement of one species of *Anopheles* with another has been observed in a number of instances when insecticide-based vector control measures have been applied (Qureshi and Connolly, 2021).

In the case of population replacement, reductions in the abundance of the species of pathogen in target mosquito populations could lead to niche expansion or replacement by non-target species of pathogens. This could potentially lead to increased or novel disease transmission.

#### *Predator interactions*

Where target mosquito populations make up a substantial component of the diet of a predator, with population suppression where less prey would be available, or with both population suppression and modification where a predator could avoid consumption of target mosquito populations containing the EGD, the predator would have reduced levels of nutrition from its typical predominant source. This could lead to compensatory consumption by the predator, and consequently, reduced abundance of non-target species that contribute valuable ecosystem services, leading to reduced ecosystem services (Connolly and others, 2021).

For population suppression, reduced abundance of target mosquito populations could also have indirect effects on the abundance or density of non-target species in the ecosystem with whom they share a predator, as a result of 'apparent competition' (Holt and Bonsall, 2017). Here, the predator consumes both the target mosquito population and another non-target species that has negative effects on biodiversity. Reduction in abundance of the target mosquito population leads to reduction in the abundance of the predator because of its reduced food resources. This reduction in the predator is also accompanied by increases in the density of the non-target species with concomitantly increased negative impacts on biodiversity.

Exposure of predators to suppression drives may however arise, when there is a failure in the drive to consistently suppress populations, e.g., if chasing dynamics occur, whereby local elimination would result in gaps in populations and wild-type rebounds to fill the localised empty niches (Champer and others, 2021).

### **B. Potential adverse toxic effects on water quality or human health**

The expressed components of the EGD or newly expressed endogenous products in EGD-LMMs could cause acute or chronic toxicological effects to non-target populations. For example, a predator could eat EGD-LMMs which cause acute or chronic toxicological effects to that species, which in turn reduced its abundance, leading to a reduction in ecosystem services provided by that predator. Alternatively, the accumulation of expressed products from the EGD could lead to toxicity in detritivores, which consume detritus in aquatic mosquito habitats, leading to negative effects on water quality for aquatic flora and fauna. Increased larval or pupal mortality of EGD-LMMs in aquatic habitats could lead to the accumulation of detritus and decreased water quality for other species, including humans and other animals (Connolly and others, 2021).

Apart from this direct potential toxicity, unintended alterations of the genome could lead to aberrant protein production (Tuladhar and others, 2019). Moreover, as unintended effects of genome editing machineries vary depending on the genetic background, they could change over time and space (Cancellieri and others, 2023) and this highlights the need to consider next-generation impacts.

### **C. Potential increased human and animal disease transmission, either from increased vectorial capacity or from competitive releases of other mosquito vector species**

The EGD could directly affect the vectorial capacity of the EGD-LMM by (a) affecting its vector competence for a particular pathogen, (b) causing an increase in the biting rate of the EGD-LMM on mammalian hosts, (c)



extending the longevity of EGD-LMM females or (d) decreasing the extrinsic incubation period of the EGD-LMMs.

The intended impact of the EGD on target mosquito populations could also cause potential adverse effects by increased or novel disease transmission. For example, in the case of population suppression, the EGD-LMMs could lead to competitive releases of a non-target species. If that non-target species were to be another disease vector, this could lead to increased or novel disease transmission. Niche replacement of one species of *Anopheles* with another has been observed in a number of instances when insecticide-based vector control measures have been applied (Qureshi and Connolly, 2021).

In the case of population replacement, reductions in the abundance of the species of pathogens in target mosquito populations could lead to niche expansion or replacement by non-target species of pathogens. This could potentially lead to increased or novel disease transmission.

#### **Gene flow**

There are two main mechanisms of gene flow, which are detailed below. Other mechanisms could include, for example, predation, competition and habitat alteration.

##### *Vertical gene transfer*

Vertical gene transfer (VGT) refers to the sexual transmission of genetic material between genetically distinct populations including the movement of genes from a population into other populations of the same species or other sexually compatible species. Some mosquitoes (e.g., most malaria vectors) belong to species complexes that contain both vector and non-vector species, some combinations of which are capable of producing fertile interspecific hybrids, making VGT to sibling species biologically plausible (Connolly and others, 2023b).

Vertical gene transfer is a natural process mediated by sexual reproduction through which (trans)genes can be transferred from parents to offspring. While VGT is not an adverse effect per se, it could serve as an “exposure pathway” that lead to potential adverse effects. Therefore, a consideration for the risk assessment of an EGD-LMM would include the evaluation of the potential for transfer of transgenes via VGT to sexually compatible mosquitoes to result in potential adverse effects on humans, animals and the environment, relative to the comparator.

A plausible consequence of the use of some EGD-LMMs in species complexes is VGT of the transgenes to both vector and non-vector sibling species. Depending on how the target organism and protection goals are defined, the potential adverse effects due to VGT may differ across the spectrum of such a complex. This would require further consideration in the risk assessment (Connolly and others, 2023b).

##### *Horizontal gene transfer*

Beside vertical gene transfer, genetic material can also be naturally transferred from one species to another (Houck and others, 1991) via a phenomenon called horizontal gene transfer making its consideration relevant in the case of EGD-LMOs (Courtier-Orgogozo and others, 2018).

#### **4.1.5. Participation of and engagement with stakeholders**

New technologies, such as EGDs, are likely to raise new questions, expectations and concerns among stakeholders, indigenous peoples and local communities, whose traditional knowledge, innovation, practices, livelihood and use of land and waters may be impacted by the technology. Therefore, risk

assessors should anticipate and plan for an expanded engagement process to ensure that the risk assessment has an appropriate scope and wide input from stakeholders.<sup>14</sup>

A particular stakeholder's perception of risk from the intentional release of an EGD-LMO may also depend on the stakeholder's personal and cultural relationship with the environment, for example, whether the environment is a resource to be utilized or stewarded (Hartley and others, 2023).

Active stakeholder participation, including consultations and engagement, on problem formulation (including the identification of both the protection goals that are relevant for the specific case and the assessment endpoints) can improve the value of risk assessment, as it may help to ensure that the process is meaningful and informative to the environmental decisions that affect them (NASEM, 2016).

Experience gained from consultations between developers and/or potential applicants and risk assessment bodies has shown that this could be potentially helpful to frame the problem formulation by clarifying policy goals (including protection goals), decision-making criteria and information requirements, advise on study designs and navigate the regulatory process. As the risk assessment involves an evolving technology, an early stage in the engagement process should include the development and distribution of explanatory materials to ensure that stakeholders and indigenous peoples and local communities have a sufficient understanding of the technology, its potential risks and how it will function in the environment.

Regulators and/or other government officials should use a wide variety of appropriate engagement methods and media to ensure that information is made available to interested stakeholders, indigenous peoples and local communities and other groups, in ways that are sufficient, accurate, easy to understand, accessible and culturally appropriate (Kokotovich and others, 2022).

## **4.2. Testing risk hypotheses to characterize (overall) risk(s)**

With risk hypothesis testing, the risk assessment moves from problem formulation to risk characterisation in order to estimate the overall risk posed by the EGD-LMO based on the evaluation of the likelihood and consequences of the identified adverse effects being realized. This is achieved through the testing of the risk hypotheses of the plausible pathways to harm, as they enable the characterization and analyses of potential adverse effects being realized, their likelihood and consequences and combine them into an estimation of the overall risk, taking into consideration any relevant uncertainty that was identified in each of the steps of the plausible pathway to harm and how it could affect the estimation of the overall risk of the EGD-LMO. Risk matrices, risk indices or models are typically used for this purpose (see table 4 below).

Likelihood should be expressed quantitatively, for example as a percentage, or, if this is not possible, qualitatively. For example, qualitative terms could include "highly likely", "likely", "unlikely", and "highly unlikely". The evaluation of the consequence of the potential adverse effects may be expressed qualitatively or quantitatively. For instance, qualitative terms, such as "major", "intermediate", "minor" or "marginal", may be used.

A characterization of the risk may also be expressed quantitatively, or, if this is not possible, qualitatively. Qualitative terms such as "high", "moderate", "low", "negligible" may be used if they are

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<sup>14</sup> Guidance on risk assessment of living modified organisms and monitoring in the context of risk assessment, UNEP/CBD/BS/COP-MOP/8/8/Add.1., 14 September 2016. [www.cbd.int/doc/meetings/bs/mop-08/official/bs-mop-08-08-add1-en.pdf](http://www.cbd.int/doc/meetings/bs/mop-08/official/bs-mop-08-08-add1-en.pdf).

defined in detail, together with the uncertainties that are associated with the particular risk assessment (Mastrandrea and others, 2011; Spiegelhalter and Hauke, 2011). A description of the risk characterization always needs to include the assumptions of certain scenarios or provide a range of estimates rather than a single number or ordinal value that has been used to characterize the overall risk of an EGD-LMO.

**Table 4**

Example of a risk matrix used to estimate the level of risk

		CONSEQUENCE ASSESSMENT			
		Marginal	Minor	Intermediate	Major
LIKELIHOOD ASSESSMENT	Highly likely	Low	Moderate	High	High
	Likely	Low	Low	Moderate	High
	Unlikely	Negligible	Low	Moderate	Moderate
	Highly unlikely	Negligible	Negligible	Low	Moderate
		<b>LEVEL OF RISK</b>			

Some risk hypotheses, despite being relevant for the assigned protection goals and assessment endpoints, may be difficult to test, or testing using available information may not produce desired reliability regarding the likelihood of a particular step in a pathway to harm. As part of the risk assessment, such uncertainty may be addressed and reduced through an iterative and tiered-based testing approach, by consideration of multiple lines of evidence (including modelling predictions) in a weight of evidence approach, and/or by new studies being undertaken (NASEM, 2016; Hayes and others, 2018b; James and others, 2018; EFSA, 2020; Romeis and others, 2020; WHO, 2021b). In general, some degree of uncertainty may still need to be addressed by risk managers and decision makers.

**4.2.1. Sources and quality of information**

The testing of risk hypotheses uses information from various sources, including, but not limited to, using existing information, previous risk assessment, information submitted in applications by developers, peer-reviewed literature, modelling, new empirical investigations, expert opinions, indigenous peoples and local communities, indigenous and traditional knowledge, innovation and practices, or any combination thereof. Information required for testing the risk hypotheses is likely to be specific for different species, traits and/or environments, and it will vary dependent on the risk hypothesis and measurement endpoints.

Reliability of data is based on the methods by which the information was obtained, especially the suitability of the experimental methods to provide findings that are clear and plausible. Reliable information can be obtained by using internationally recognised standards and test guidelines. Peer-reviewed data may also be a source of reliable information. It is therefore important to determine the

risk of bias, which refers to the likelihood that features of the study design or conduct of the study will give misleading results. The introduction of bias into studies can be due to methodological insufficiencies to prevent biases related to vested interests such as financial interests, academic interests, industry and interest group influence, or other biases related to the generation of the data.

Relevance relates to the ability of the information to test the risk hypotheses, and thus the extent to which information and/or tests are appropriate for a particular hazard identification or risk characterization. Information is considered relevant if it is linked to protection goals, assessment endpoints, and the identification and evaluation of potential adverse effects of the EGD-LMO. Information that is considered relevant to a risk assessment will vary from case-to-case depending on the organism being modified, the trait, nature of the modification of the EGD-LMO, on its intended use, intended receiving environment, and/or on the scale and duration of the environmental introduction.

In some regulatory frameworks, the criteria for evaluating the quality of scientific information are set out in policies developed by the competent authorities. Furthermore, risk assessors will bring professional expertise and will be capable of making determinations on the quality and relevance of information using their own experience and/or that of recognised scientific experts, according to national policies.

If sufficient relevant and reliable data are available to test the risk hypotheses, the risk assessor may conclude that there are adequate data to complete the risk assessment. Data can be judged as adequate if they are technically suitable to be included into the analysis and allow testing the hypotheses with the desired certainty. If further data are required, because existing data either inadequately corroborate the hypotheses of the identified risk or reject it, then the same criteria used to evaluate existing data may be used to design new studies (Raybould, 2020).

Information derived from experimental studies that are not directly applicable, fully conclusive, or of lower reliability may at times still be useful as supporting evidence as part of a weight of evidence approach that can contribute to understanding risk.

A prerequisite for the appraisal of evidence is that the information should be reported in a sufficiently detailed and transparent manner.

#### **4.2.2. Modelling**

Models will likely play an important role in the assessment of EGD-LMOs because they can be used to predict the effects of specific EGD-LMOs inside and outside laboratory conditions, and at spatio-temporal scales that are too large to study empirically prior to their intentional release (Golnar and others, 2021). Information gathered at one step within a phased release-strategy, can be used by modellers to predict outcomes in the next step and thereby help direct experimental studies and monitoring strategies within an iterative process of model-driven data collection and data-driven model prediction (Restif and others, 2012). Using outcomes observed at one step (e.g., physically confined laboratory) to predict outcomes in the next step (e.g., small-scale field trial), however, inevitably introduces uncertainty which should be acknowledged and wherever possible accounted for (Ickowicz and others, 2021).

In the risk assessment of EGD-LMO, challenges that may arise from assessing long term evolutionary change, their potential consequences in the target organism including those in different genetic backgrounds and the prediction of off-target effects in wild populations may be addressed by modelling.

Models can help to address uncertainty by highlighting how different model structures, or variation in model parameters, influence risk predictions, and thereby delineate the drivers of (un)acceptable outcomes for specific assessment endpoints. Models may enable analyst to: (1) identify parameters that have the most influence on the persistence, spread and effects of the EGD; (2) test and refine risk hypotheses; (3) simulate outcomes under different future scenarios, to help anticipate long-term evolutionary and ecosystem effects. In this manner, models can be used to potentially predict the behaviour and risks of EGD-LMOs, guide post-release environmental monitoring efforts and contribute to the weight of evidence in a risk assessment (EFSA, 2020; Golnar and others, 2021; WHO, 2021b).

A key contribution of modelling is its ability to predict the population dynamics of EGD-LMOs in the field (Eckhoff and others, 2017; North and others, 2019; North and others, 2020; Sanchez and others, 2020b; Beeton and others, 2022) and to address some of the challenges arising from potential evolutionary effects in the target organisms (Morozov, 2013). By considering parameters such as reproductive rates, dispersion patterns and genetic interactions, models may provide insights into the spread and persistence of the EGD-LMO within target populations and environments. Moreover, modelling could allow for the assessment of potential ecological and evolutionary impacts. By simulating interactions between the EGD-LMO and non-target species, as well as potential disruptions to ecosystems, models can quantify the risks and uncertainties associated with these potential impacts (Golnar and others, 2021). Furthermore, through simulations that incorporate various intervention approaches, such as different EGD mechanisms or parameter variations, models help identify optimal strategies that may minimize risks while also considering effectiveness of the EGD system (Connolly and others, 2021; Zapletal and others, 2020; Devos and others, 2022b). This information could then support decision-making processes and assist in the development of risk management plans.

When modelling the spread of an EGD-LMO, care should be taken to include – on a case-by-case basis – all relevant ecological processes. Realistic model predictions may require a range of ecological considerations such as confinement by interaction with other species, long-range migration, habitat heterogeneity over space, mating complexity, aestivation and local population structure to be included (Frieß and others, 2023; Combs and others, 2023; Kim and others, 2023; Olejarz and Nowack, 2024; Verma and others, 2023). Furthermore, to date most models have focussed on the spread of different EGDs to assess and predict EGD effectiveness, rather than how the EGD-LMO effects the environment. Additional modelling may therefore be needed to predict population dynamics of biodiversity potentially affected by the EGD-LMO (Frieß and others, 2023). See additional information in annex I.

Models use assumptions to simplify real world systems to help understand and predict outcomes in what would otherwise be overwhelmingly complex situations. These assumptions, together with the use of inappropriate parameter values, may limit the model's ability to accurately predict outcomes or recreate the full patterns of behaviour of a system's individual components. The accuracy of model predictions can be tested by comparing them to independent data, that is observed outcomes that were not used to train or parameterise the model. It is important that the assumptions used to guide the structure of the model and its parameters values are clearly documented so that users can gauge its limitations and the circumstances under which the model may or may not be fit for purpose. An interdisciplinary approach, including mathematical or statistical training, however, may be required to fully appreciate the limits or utility of a model. Users should also be aware that certain types of models can require significant computational resources to run which may limit their application under certain circumstances, such as real time decision support.

### 4.2.3. Comparators

When testing risk hypothesis, a comparative approach is often used, whereby the level of risk is estimated through comparison, most often with a non-LMO counterpart or parental organism that has a history of (safe) use for humans and/or animals and/or familiarity for the environment. A comparative approach is aimed at identifying the phenotypic and genotypic changes that may lead to potential adverse effects, and changes in the nature and levels of risk associated to the LMO. The differences identified between a particular LMO, and a comparator provide a starting point for determining if the intentional release of the LMO might result in potential adverse effects on the environment. When a relevant difference is identified between the LMO and a comparator, it is evaluated to determine if it is significant and has biological relevance related to protection goals.

The choice of comparators can have large effects on the relevance, interpretation and conclusions drawn from the risk assessment process. Therefore, comparators should be selected based on their capacity to generate information that is consistent and relevant for the risk assessment. Typically, the LMO is compared to a non-LMO with a genotype that is as closely related as possible to the LMO. However, there is no single concept of an appropriate comparator that is agreed upon internationally (OECD, 2023). In some instances, where the regulatory framework permits, an appropriate comparator may be another LMO. Furthermore, more than one comparator may be used in a risk assessment. For a given intentional release of an EGD-LMO, there may be a range of relevant comparators (such as the non-EGD-LMO of the same species with a genetic background as close as possible and relevant to that of the EGD-LMO, the target organism, or other disease vector/pest control systems) to inform a risk assessment and contextualize risks.

Different comparators may be relevant for different component properties of an EGD-LMO. Thus, more emphasis may need to be given to the purpose of risk assessment studies and comparisons when selecting relevant comparators. Given that some EGD-LMOs will operate at an ecosystem level, the definition of the

#### **Mosquitoes:**

##### **Choice of comparators for living modified mosquitoes containing engineered gene drives**

The mosquito line/strain used as a recipient organism for transformation may serve as a comparator for the risk assessment of EGD in Anopheles mosquitoes. Where successive passages are used to develop a strain of the EGD-LMM, the parental LM strain may be used as an additional comparator (Connolly and others, 2021).

As technologies for genetic modification continue to advance and as the range of organisms subject to genetic modification grows, risk assessors should consider the need to expand their concept of what constitutes a useful comparator for the risk assessment. To date, the focus has been on comparator organisms, but there may also be a need for comparator activities. For example, EGD-LMM designed for malaria control have modes of action that do not have exact comparators outside the realm of genetic modification, such as species suppression or species replacement.

However, there are comparator activities, such as large-scale insecticide applications, the release of Wolbachia-infected, self-limiting mosquitoes, or the release of a predator species, which may generate information that is consistent and relevant to the risk assessment process of EGD-LMMs and could be considered by risk assessors. Such comparators may provide information on the impacts of intended aims of population suppression or modification. However, there are limitations in the use of such comparators with regard to addressing unintended impacts. For example, pesticide application may provide information on impacts of population reduction, but not on risk of exposure of non-target organisms to suppression drives. Similarly, Wolbachia applications may provide certain relevant insights but are limited in relevance when taking into account that Wolbachia is a high-threshold approach. Moreover, it does not allow for assessing issues such as the potential risk of pathogen evolution in response to a population modification drive. Such comparators are also not relevant in assessment of next-generation effects of gene drive technologies and the

comparator may need to be broadened from endpoints that solely consider genetic and phenotypic changes to those that can be indicative of potentially harmful ecosystem impacts. At the population and system level, multiple comparators may be needed to allow robust comparisons across a range of factors that are not sufficiently covered by any single comparator (EFSA, 2022).

The choice of comparators will depend on the risk hypothesis to be tested and other factors, such as the availability of appropriate comparators and specific regulatory requirements (OECD, 2023). For EGD-LMOs targeting non-domesticated or wild species, there may be limited information available on potential comparators. Further, decades of experience and research on invasive species and biological control agents have provided insight into the complexities, dynamics and effects that new organisms in ecosystem may have and the often low predictability of these effects.

It is important to consider that an alternative to the comparative approach may become necessary when considering EGD-LMOs where appropriate comparators do not exist. In such situations, the characterization of an EGD-LMO may be similar to that carried out for alien species, where the whole organism is considered a novel genotype in the receiving environment.

potential for evolutionary responses post-release.

Depending on the intended outcome of the EGD-LMM application and focus of the comparison, relevant comparators may include: (1) the LMM (without an EGD) of the same species with a genetic background that is as close as possible to that of the EGD-LMM; (2) the target (non-modified) organism; and (3) other disease vector/pest control systems (e.g., species-specific genetic control methods involving the release of insects, insecticides, insecticide treated bed-nets) to enable comparisons at both the organismal and (management) systems level.

The selection of comparators may need to consider issues relevant to offspring of the EGD-LMM and include comparisons with heterozygotes and homozygotes of the EGD-LMM, where relevant.

**Mosquitoes:****Stepwise testing**

The stepwise testing approach may leave some uncertainty before open field testing or field implementation of some LMOs, including some EGD-LMMs, as it may be challenging to collect data from experimental systems that would be fully applicable to field conditions. Mathematical modelling may help to fill this gap in data. Moreover, greater use of models to address the long temporal scale and wide spatial scale of specific EGD-LMM applications, and monitoring may be needed.

The WHO framework (WHO, 2021b, section 1.5; also see annex III of the present document) advocates a phased testing approach for LMMs:

- (a) Phase 1: Small-scale laboratory studies for efficacy and safety testing, followed by testing in larger population cages in an indoor setting;
- (b) Phase 2: Leading to physically-, ecologically- or genetically-confined field trials, or small-scale isolated releases;
- (c) Phase 3: Staged open-field releases; and
- (d) Phase 4: Post-implementation surveillance.

The WHO recognises that the characteristics of persistence and spread for self-sustaining, non-localizing, low-threshold EGD-LMMs could make it difficult to distinguish the specific transition between Phases 2 through 4 (WHO 2021b, section 1.5.1). Moreover, for self-sustaining, non-localizing, low-threshold EGD-LMMs the WHO does not consider phase 2 semi-field testing to be a required step in the development pathway (WHO, 2021b, section 3.8.2). This means that the data obtained in phase 1 or 2 becomes a major driver for the decision to proceed to field testing or release (WHO, 2021b, section 3). The WHO recommends that initial small-scale releases of EGD-LMMs should focus on the assessment of the biological function and activities of the EGD-LMMs, including their potential effects on native mosquitoes and the local ecosystem. While noting that absolute ecological containment cannot be guaranteed for EGD-LMMs, it advises that initial small-scale releases should aim for some level of isolation. (WHO, 2021b, section 1.5.1).

Gathering relevant data for self-sustaining and low threshold (independent) EGDs in open release trials may be challenging due to their spatially and temporally unrestricted nature and the inability for be recalled. Since self-sustaining EGDs are designed for widespread and long-standing control, spatially and/or temporally restricting their spread would not necessarily be in keeping with the intended outcome of their intentional release. Therefore, the utility of prior field testing of a related self-limiting strain may be considered as an intermediate step to reduce uncertainties in risk assessment (e.g., Benedict and Robinson, 2003; James and others, 2018). Self-limiting EGD systems may enable localised and temporally restricted spread of the genetic modification of interest, resembling other self-limiting approaches for disease vector/pest control.

**4.2.4. Tiered-based testing**

Tiered testing starts by testing conservative risk hypothesis (in which the likelihood of detecting potential hazards is high) and only moves to more realistic tests if trigger values are exceeded (Romeis and others, 2008; Sanvido and others, 2012). According to the tiered approach, information collected in lower tiers directs the extent and nature of any experimentation conducted in higher tiers: hazards are evaluated within different tiers that progress from worst-case exposure scenario conditions, framed in highly controlled laboratory environments, to more realistic scenarios under semi-field or field conditions. Progression to larger-scale experiments in higher tiers aims to provide increasingly refined estimates of exposure. Within each tier, all relevant information is gathered to determine whether there is enough evidence to conclude the risk assessment at that tier. The conclusion can only be made if any residual uncertainty has been defined; otherwise, additional investigations to generate further information at (a) higher tier(s) are conducted. Should potential hazards be detected in early tier tests or if unacceptable uncertainties concerning possible hazards remain, additional information is required to confirm whether the observed effect might still be detected at more realistic rates and routes of exposure (Devos and others, 2019).



#### 4.2.5. Limits of concern

A comprehensive and consistent progression from one tier to another requires the definition of limits of concern that either trigger additional studies (if the initial assessment indicates a potential for harm) or a decision to stop further testing (Raybould, 2011). Limits of concern may be set conservatively and categorically (more, few, no more than, no less than, etc.) early in the risk assessment. They are only set precisely (quantitatively) if a conservative assessment indicates the potential for harm. Limits of concern are directly related to whether the studies are performed in the laboratory or in the field. For laboratory studies, limits of concern are conservative trigger values (i.e., low values) which if exceeded indicate potential harm and the need for exposure assessments and determination of field-scale effects (Raybould, 2011). For field studies, the lower limit will usually be defined by a threshold effect, i.e., the lowest effect to cause environmental harm (Perry and others, 2009). Knowing in advance the size of the effect to be determined is crucial because this information will enable an assessment of the ability of the study to detect harm. Limits of concern are estimated from literature data, modelling and existing knowledge (Perry and others, 2009; Dolezel and others, 2017, 2018).

#### 4.2.6. Weight of evidence

The weight of evidence approach can be defined as a process in which information is integrated to determine the relative support for possible answers to a question (EFSA, 2017). Concretely, it means using a combination of information derived from several independent sources to give sufficient evidence to fulfil an information requirement. This approach is helpful, when: (1) the information from a single piece of evidence alone is not sufficient to fulfil an information requirement; and (2) individual studies using similar methodologies provide different or conflicting conclusions. The weight given to the available evidence depends on factors such as the quality of the data, consistency of results, epistemic uncertainty and variability, nature and severity of effects and relevance of the information. The weight of evidence approach requires the use of scientific judgment and, therefore, it is essential to provide adequate and reliable documentation.

#### 4.2.7. Uncertainties

Uncertainty is an inherent element of scientific analysis and risk assessment, and it is especially important in risk assessment involving technologies, such as EGD-LMO applications. The proposed intentional release of EGD-LMOs is likely to raise questions of uncertainty and unpredictability, including questions regarding their potential unintended effects on biodiversity. Consequently, caution and an assessment of uncertainty are imperative for the effective risk assessment of EGD-LMOs (Devos and others, 2021b; Connolly and others, 2022; Rabitz and others, 2022).

Uncertainty in risk assessment arises in the language, input data, models and parameters of the assessment. It may also arise in the context of the problem and in the values, intentions and behaviour of human beings. Risk assessors can encounter three types of uncertainty:

- (a) Linguistic uncertainty: the uncertainty created by language that is either deliberately or inadvertently imprecise;
- (b) Epistemic uncertainty: the uncertainty created by imperfect knowledge about something that is in principle knowable, and therefore in principle reducible with additional research and observation;
- (c) Variability: the uncertainty caused by randomness that is often associated with the inherent diversity or heterogeneity in a population over space and time.

Each identified uncertainty should be categorized based on its *nature*, including: (1) lack of information or incomplete knowledge; and/or (2) biological or experimental variability. Uncertainty resulting from

lack of information or incomplete knowledge includes, for example, an incomplete understanding of off-target effects, long-term ecological impacts, potential for EGD to evolve and develop resistance to control measures or a limited knowledge of EGD persistence in natural populations (Frieß and others, 2019; Cisnetto and others, 2020; Kuzma, 2019; Frieß and others, 2023). Lastly, uncertainties resulting from biological or experimental variability may involve variations in EGD efficiency and stability, as well as discrepancies in ecological or intergenerational responses (Then and others, 2020b; Rabitz, 2022).

The various forms of uncertainty should be considered and described for each identified risk and under the estimation of the overall risk. In addition, when communicating the results of a risk assessment, it is important to describe, either quantitatively or qualitatively, those uncertainties that may have an impact on the overall risk, as well as on the conclusions and recommendations of the risk assessment in a way that is relevant for decision-making.

Uncertainties originating from lack of information can be reduced or eliminated with more or better data obtained through further testing or by requesting additional information from the developers of the EGD-LMO. However, in cases of incomplete knowledge or inherent variability, the provision of additional information will not necessarily reduce the uncertainty. More information will not necessarily contribute to a better understanding of potential adverse effects.

In cases where uncertainty cannot be addressed through the provision of more information, appropriate risk management measures and post-market environmental monitoring of the EGD-LMO in the likely potential receiving environment, as outlined in subparagraphs 8 (e) and 8 (f) of annex III to the Protocol, can be employed. Furthermore, uncertainties associated with specific adverse effects may not allow for the estimation of the overall risk and thus complicating the final recommendation regarding the acceptability of risk.

Consideration and communication of uncertainty may improve the understanding of the risk assessment outcomes, strengthen the scientific validity of the assessment and provide transparency in the decision-making process. Relevant considerations include the source and nature of uncertainties, focusing on those that can significantly impact the risk assessment conclusions.

See additional information in annex II.

## 5. Recommendation of acceptability of risk and identification of risk management strategies

Following the risk characterisation, risk assessors prepare a report summarizing the risk assessment process, identified individual risks and related uncertainties and the estimated overall risk. Further, they provide (a) recommendation(s) as to whether or not the risks are acceptable or manageable and, where necessary, identification of risk management options that could be implemented to manage the risks associated with the EGD-LMO. This recommendation is made based on the overall risk identified in the context of the scientific criteria for risks that were identified in the problem formulation of the risk assessment, considering established protection goals, assessment endpoints and risk thresholds and what uncertainty remains after potential management of risks.

In making a recommendation regarding the overall risk of the EGD-LMO, it is important to include, where necessary, identification of strategies to manage these risks and information on uncertainty regarding the level of risk. These measures shall be imposed to the extent necessary. The need, feasibility and efficacy of the management options, including the capacity to enact them, should be considered on a case-by-case basis. If such measures are identified, the preceding steps of the risk assessment may need to be revisited to evaluate how the application of the proposed risk management measures would change the outcome of the steps including the capacity to undertake them.

Further, while the risk assessor provides a recommendation as to whether or not the risks are acceptable or manageable, the ultimate decision about whether or not to approve the EGD-LMO release is a prerogative of the decision makers (also see section 7).

## 6. Monitoring

Uncertainty, in its various forms, is an important consideration in risk assessment of modern biotechnologies, such as EGD-LMO applications. In accordance with annex III of the Cartagena Protocol on Biosafety, subparagraph 8(f), “where there is uncertainty regarding the level of risk, it may be addressed by requesting further information on the specific issues of concern or by implementing appropriate risk management strategies and/or monitoring the living modified organism in the receiving environment”. Furthermore, Article 16 of the Protocol and in particular, paragraph 2 (which deals with risk management) and 4 (which deals with observation requirements) are relevant with respect to the implementation of risk management. Further, Article 7 (Identification and monitoring) of the Convention on Biological Diversity establishes that Parties shall, as far as possible and as appropriate, monitor the components of biological diversity important for its conservation and sustainable use, and

### Mosquitoes:

#### Risk management strategies

Where a risk has been identified that warrants a response through mitigation of the EGD-LMM, risk assessors may consider recommending such strategies as monitoring the EGD-LMM to ensure that the technology is functioning as intended and to identify unintended adverse effects. The feasibility of any strategies for halting additional releases or destroying the EGD-LMMs that have been released, as well as mitigation methods if an unanticipated adverse effect occurs, should be considered before any uncontained releases are carried out.

Planning of mitigation measures (such as an alternative set of control measures that could be employed) and the integration of other population control methods may also be considered.

Monitoring during and after the environmental release of the EGD-LMM may also be considered to enable estimating that mitigation reduces identified risks (see section 6).

Apart from monitoring, the risk management may need to consider the recall or suppression of the drive. The question of countermeasures has been discussed by Rode and others (2020).

identify processes and categories of activities which have or are likely to have significant adverse impacts, and monitor their effects through sampling and other techniques.

Remaining uncertainties in the risk assessment due to long term evolutionary change, their potential consequences in the target organism including those in different genetic backgrounds and the prediction of off-target effects in wild populations could be addressed by monitoring.

Monitoring of LMOs refers to the systematic observation, data collection, and data analysis during and after the intentional release of a LMO into the environment and in accordance with the objectives of the Protocol. It should be noted that monitoring efforts should be imposed to the extent necessary to prevent adverse effects. Furthermore, where there is uncertainty regarding the level of risk, it may be addressed by implementing appropriate monitoring of the EGD-LMO in the receiving environment.

Monitoring can be categorised as case-specific monitoring and general surveillance monitoring. Case specific monitoring is hypothesis driven and should be targeted at the assessment endpoints and protection goals identified in the risk assessment conclusions as being at risk, or where levels of unresolved uncertainty were identified in relation to potential risks associated with the EGD-LMO. While case-specific monitoring may be conducted to address uncertainty in the level of risk for effects anticipated in the risk assessment, general surveillance monitoring is used to account for effects, especially residual or unresolved or unanticipated risks and typically forms the basis for the monitoring plan. General surveillance monitoring is carried out without any pre-conceived hypothesis to detect effects that were not anticipated in the risk assessment. Should any such effects be observed, they are studied in more detail to determine whether the effect is adverse and whether it is associated with the deployment of an EGD-LMO.

In certain situations, statistical or process-based models may be used to simulate outcomes under a proposed sampling design and thereby calculate its statistical power (Arnold and others, 2011). In this regard, clear triggers for management responses, based on modelling, for particular monitoring results/events may be considered.

Monitoring measures may be implemented to trace and identify any direct or indirect, immediate, delayed or unforeseen adverse effects on the environment, taking into account human health, of LMOs as or in products after they have been intentionally released into the environment. Additionally, this can also include potential adverse effects on plant and animal health. Monitoring data may feed back into the risk assessment process.

Environmental monitoring may be a means to:

- (a) Address/Reduce uncertainties;
- (b) Confirm assumptions made during the risk assessment, including efficacy and safety for human, animal and plant health and the environment;
- (c) Validate conclusions of the assessment on a wider spatio-temporal level of application;
- (d) Determine the causal link between an environmental change observed and the specific use of an EGD-LMO;
- (e) Evaluate whether risk management strategies are efficacious and being implemented effectively;
- (f) Detect effects that were not anticipated in the risk assessment including cumulative, and long-term adverse effects; and
- (g) Establish a causal link between EGD-LMOs and any observed adverse effects.

In addition, monitoring can be considered to also serve as an early warning system that could lead to the activation of additional risk management actions. Hence, monitoring results inform decision making about continued testing and implementation of the EGD- LMO and its ongoing use and management.

## 6.1. Considerations for monitoring

A monitoring plan is developed either by competent national authorities based on relevant national biosafety laws, regulations and policies and recommendations derived from the risk assessment, or by the developer/applicant and evaluated and agreed upon by national authorities. This plan should be relevant to uncertainties identified in the risk assessment and the level of risk posed by the specific EGD-LMO. The plan should relate to the context and scope of the risk assessment and may utilise related monitoring data and activities, including from other countries/areas, as appropriate.

### Mosquitoes:

#### Considerations for monitoring

There is substantial experience with releasing insects for genetic and biological disease vector/pest control, including their monitoring. It may be advisable/appropriate to draw on the experience from current insect disease vector/pest control strategies that involve the release of insects, seek precedence for more or less similar situations, and use this experience to inform the monitoring of EGD-LMMs. However, caution is required as the systems compared differ in various aspects.

### 6.1.1. What to monitor

Indicators (e.g., species, soil, water, unintended persistence) and parameters (components within a given indicator such as species density) should be capable of reliably signalling a change as proximal to the adverse effect occurring as possible. Parameter prioritisation may relate to ease of sampling and collection of required material as well as assaying for the parameter. Consideration should be given to the interrelation of the indicator with a pathway to harm i.e., the indicator should signal an adverse effect relevant to a step or steps within a causal pathway considered in the risk assessment and thereby tie back to the assessment endpoints and protection goals. Pre-exposure baseline data and reference points may be available or collected for the chosen indicators and parameters.

Other considerations may include time to develop signal, temporal and spatial variability of the indicators (e.g., seasonality of occurrence), signal sensitivity (i.e., signal-to-noise ratio appropriate for the early and effective verification and determination of adverse effect), throughput, cost, and impact of natural and human induced changes to the environment. Depending on the EGD strategy, the genetic and phenotypic stability may need to be assessed over multiple generations under confined conditions as part of the risk assessment, as well as in the field as part of monitoring.

Methods could be considered whereby existing surveillance data collected for other purposes such as integrated vector management , ecosystem or wildlife management could be analysed for sources of signal determination.

Particularly for human health-related pathways to harm, resistance development to the drive mechanism and pathogen resistance could be considered in the monitoring plan, as appropriate.

### 6.1.2. How to monitor

Methods are dependent on and directly applicable to case-specific indicators and parameters chosen (see previous section on “what to monitor”), their inherent variability, specificity, sensitivity, and ability to signal change resulting in an adverse effect. Monitoring methodology should describe sufficient information on sampling, collecting, and analysing the samples as well as the data resulting from

undertaking the method. Monitoring data could be collected from various sources including but not limited to surveys, questionnaires, field observations, ongoing/existing monitoring for other considerations such as public health, invasive species, biocontrol, disease surveillance, integrated vector management, resistance to pesticides etc. Methodology for both collection and analysis could differ for areas outside the expected spread and dispersal range versus within the expected release environment. In addition, monitoring methodology should also consider effective identification and detection of EGD-LMOs in the likely potential receiving environment.

Considerations could include:

- (a) The nature of the effect being measured (e.g., acute/short term, chronic/long term, immediate or delayed, direct or indirect);
- (b) The range or amplitude of change required to signal an adverse event;
- (c) Analytical methodology (i.e., molecular methods, trapping/sampling/collection methods, adaptive methods);
- (d) Statistical methodology (e.g., sample size, power, etc.)
- (e) Weight of evidence of the data type;
- (f) Replicability and standardisation of studies, questionnaires, methods;
- (g) Ease of use in various environments and/or countries (including resource considerations such as capacity, personnel training, equipment, logistics, sample and reagent availability and shipping);
- (h) Potential for scaling and use of high-throughput methods;
- (i) Cost and duration for carrying out the monitoring activities, including identification of who will cover the costs;
- (j) Potential for method improvement, ability to include new techniques or methods over time;
- (k) Ability for real-time feedback into models, future risk assessments and/or decision making to stop the monitoring or alter the monitoring plan; and
- (l) Pre-exposure baselines for informing the monitoring.

### **6.1.3. Where to monitor**

Monitoring sites should be chosen based on the specific case and indicators and parameters being sampled and measured as well as specifics of the intended receiving environment and ongoing land use and management practices. Initial sites should be such that indicators have the potential to be exposed to or impacted by the presence of the EGD-LMO and relevant to the pathway to harm. Monitoring site locations, size, density/ distribution, and timing should be determined prior to release based on the biology and life cycle of the EGD-LMO, its potential spread, dispersal, and establishment; the likely potential receiving environment including geography, land use, and local wild population size, density and distribution; seasonality (migration, impact of rain or temperature), etc.

In cases where species are used as indicators, their biology, life cycle, abundance, seasonality, interactions with other ecosystem features including the EGD-LMO and other organisms should be considered. In addition, specific monitoring of environmental effects may need to take place in representative areas where the EGD-LMO is intentionally released. The spatial and temporal scale of specific monitoring will need to be adapted according to the spatial and temporal distribution of the EGD-LMO in the environment.

Consideration should be given to protected areas, biodiversity hotspots, wildlife reserves, genetic centres of origin and access and availability throughout the duration of monitoring i.e., through the different times of the year and for all the years that are required (long term).

Other considerations could include the potential for change in management practices or land use and their impact on the indicator/parameter over the duration of monitoring, statistical power based on the number and density of measurement sites, baseline data sources or control/reference sites versus treatment sites, and impact of modelling approaches on site choice, density, and duration.

#### **6.1.4. How long to monitor**

Duration of monitoring would be related to factors such as frequency, number, and periodicity of observations or measurements required to reliably encounter the change in a parameter (time to signal observation), the type of changes that are being sought to be measured (e.g., short term or long term, immediate or late onset i.e., time to signal generation), the life cycle, generation time, and biology of the EGD-LMO as well as of the indicator (of a species), duration of the release and effect of the release on the environment over time. Duration should be sufficient to provide data that supports decision making (i.e., providing data to further assess the identified uncertainty and level of risk). The anticipated time scale of the effect of the EGD-LMO is an additional parameter for consideration. Conditions for stopping, extending, or altering the monitoring plan including duration should be described *a priori*.

#### **6.1.5. How to report data/findings**

Monitoring data and results should be reported on the agreed upon frequency, to the agreed parties and in the appropriate format that is described in a monitoring plan. Goals for reporting generally include reporting potential adverse effects, verifying prior observations and conclusions, reaffirming product safety and efficacy, addressing any remaining uncertainty in pathways to harm, providing data for re-evaluation of models or risk assessments, addressing any need to change, extend, or stop existing risk mitigation procedures, and supporting decision making in any of these areas including the need for emergency measures.

Reporting requirements are described by national competent authorities based on applicable laws and should provide frequency and format of the information to be reported as well as mitigation measures used.

Results and data may be shared with other stakeholders in formats appropriate to those audiences for transparency. Confidentiality of the data and information should respect national and international laws and agreements.

#### **Mosquitoes:**

##### **Specific guidance for the monitoring of releases of living modified mosquitoes containing engineered gene drives**

Monitoring of EGD-LMMs begins before the release occurs and continues during and following the release. Monitoring should be considered at multiple levels: for the presence of the released EGD-LMM and transgenic construct in the local population of the target mosquito species; and for environmental effects, taking into consideration human health, as they pertain to assessment endpoints and protection goals and pathways to harm identified in the risk assessment. Some monitoring may be needed regardless of the species of mosquito and the genetic modification employed; however, the mechanism underlying the EGD and the specific genetic modifications used to implement that mechanism may necessitate the need for additional types of monitoring. The monitoring plan should take into account both these generic and specific information needs (Rasic and others, 2022).

Clear description of specific monitoring is even more important for EGD-LMMs than for non-EGD LMMs, as the potential adverse effects of intentional releases may not be spatially or temporally constrained and any changes

to the transgenic construct may require rapid management intervention. Spatial and temporal scales will be greater with most EGD-LMM applications than non-EGD-LMM applications, and reversibility may depend on the nature of the EGD. Large-scale and long-term impact is particularly relevant to self-sustaining EGDs because temporal/spatial scales are increased. Consequently, EGDs will require monitoring to be dynamic and spatially explicit, tracking spread and persistence over space and time, including areas beyond the expected range of the release, and possibly across jurisdictional boundaries.

#### **Release and post-release monitoring**

During the release of the EGD-LMM, monitoring or inspection should ensure compliance with the release conditions laid down in the authorization. Monitoring will also provide data on the efficacy of the EGD system, as well as on the identified pathways to harm in the risk assessment and any other requirements determined by the regulatory authorities for release. Post-release data can also be used to inform the generation of baseline data for the post-release monitoring.

Monitoring mosquito populations and intended phenotypic change within the designated release and dispersal area will support the primary indication that the product (e.g., the EGD-LMM) has been established within the release area and the size of the native population of target vector mosquitoes is decreasing (for population suppression applications) or that the construct is spreading through the target population (for population modification applications). Monitoring for EGD-LMM outside the designated release area could identify dispersal range (temporal and spatial) of the EGD-LMMs. These data could provide guidance for potential mitigation measures as well as information useful for validating and updating models used to inform risk assessment.

After the planned release(s) of the EGD-LMM have been completed, the monitoring plan is expected to include data to support spread and dispersal information described in the risk assessment as well as safety and efficacy of the product based on its intended use (including product failure such as loss of drive or uncoupling of the drive element or failure of the effector). Moreover, it will provide data on any outstanding unresolved risk related concerns outlined by competent authorities in the initial monitoring plan. Results of initial post-release monitoring should be evaluated to determine frequency and duration of any additional monitoring and reporting period if extended, and whether the monitoring and risk mitigation plan should be updated.

## **7. Related issues**

### **7.1. Risk assessment and assessing the benefits as components of the decision-making process**

A critical element in the conclusion of risk assessment is a recommendation as to whether or not the risks, including strategies to manage the risks, are acceptable or manageable as outlined in annex III 8(e) of the Cartagena Protocol on Biosafety. Paragraphs 3 to 6 provide general principles of risk assessment, but no specific guidance on how to decide on risk acceptability and assess potential benefits are included.

Appropriate risk assessment and benefit analysis should also take into account potential benefits and potential risks associated with other existing alternatives to control mosquito vectors that are based on the use of insecticides and elimination of mosquito larval breeding sites. In considering the potential of new technologies, it is necessary to evaluate their potential risks and potential benefits in the context of the current situation. Therefore, when testing new strategies, they should be weighed against the risks to human health and the environment posed by maintaining the status quo, which includes both ongoing disease and insecticide exposure. This includes present user practices and habits, such as use of pesticides and integrated pest management, as well as others that may not directly affect the targeted organism population size. Such measures include vaccination campaigns, distribution of insecticide-treated mosquito nets, information campaigns regarding stagnant waters as breeding grounds for mosquitoes, and use of repellents, among others.



## 7.2. Consideration of the benefits to human health

According to guidance framework for testing genetically modified mosquitoes published by the WHO (2021b), a new product should be assessed in the regulatory review process on the basis of both the benefits and risks (also see annex III). The primary potential benefit of a Genetically Modified Mosquito (GMM)/Living Modified Mosquito (LMM) would be the improvement of human health. In this regard, efficacy data will be an integral part of the decision-making regarding benefits in order to ensure measurable reductions in the incidence or prevalence of infection or disease relative to conventional control.

Decision makers may consider that other contextual factors should also be taken into account, factors such as severity of the health problem being addressed by the new technology, and the availability and effectiveness of alternative disease control methods/measures. Some of these factors are discussed in detail in the 2021 WHO guidance framework for testing genetically modified mosquitoes.

According to the WHO, the risk of novel technologies such as GMMs may be considered in the context of relevant alternatives, such as the risk of no action or the risk of conventional control methods. “Causes more harm” than current practice has been proposed as a reasonable benchmark for decision-making on GMM-based vector control systems. Moreover, other considerations may include conducting a “cost-effectiveness analysis”, which expresses benefit as a measurement of a particular health gain.

There may be potential benefits of using GMM in the fight against malaria and dengue given their public health burden. The number of deaths due to malaria, especially in sub-Saharan Africa, highlights that the use of current approaches (pesticides, impregnated mosquito nets, etc.) have not completely eliminated the burden. In 2022, the WHO World Malaria Report states that the number of confirmed malaria cases in West Africa was 67.1 million with 28,200 deaths total of which 20,600 deaths were children under five years of age. In 2023, WHO reported more than 4.5 million cases of dengue and more than 4,000 dengue-related deaths.

## 7.3. Socio-economic, cultural and ethical considerations

Living modified organisms containing engineered gene drives may have socio-economic, cultural, traditional, religious, or ethical concerns that may be considered in the decision-making process. Article 26, para 1 of the Cartagena Protocol addresses socio-economic considerations and states that “The Parties, in reaching a decision on import under this Protocol or under its domestic measures implementing the Protocol, may take into account, consistent with their international obligations, socio-economic considerations arising from the impact of living modified organisms on the conservation and sustainable use of biological diversity, especially with regard to the value of biological diversity to indigenous and local communities.” In this regard, Parties may take into account their own domestic measures when identifying potential benefits and potential adverse effects of EGD-LMOs on the conservation and sustainable use of biodiversity, also focusing on the value of biodiversity to indigenous peoples and local communities. “The Guidance on the Assessment of Socio-Economic Considerations in the Context of Article 26 of the Cartagena Protocol on Biosafety” that was adopted in annex 1 to [CBD/CP/MOP/9/10](#) provides voluntary guidance to support decision-making. These issues may include economic (e.g., effects on income); social (e.g., effects on food security); ecological (e.g., effects on ecosystem functions); cultural/traditional/religious/ethical (e.g., effects on seed saving and exchange practices); and human health-related (e.g., effects on nutritional status).

Voluntary guidelines (i.e., Akwé: Kon Guidelines) for the conduct of cultural, environmental and social impact assessment regarding developments proposed to take place on, or which are likely to impact on, sacred sites and land and waters traditionally occupied or used by indigenous peoples and local communities, were adopted by Parties to the Convention in decision [VII/16](#) and provide useful guidance. In particular, the potential adverse effects of EGD-LMOs on the land, waters and territories, sacred sites, wild species of fauna and flora, and on the relationship of indigenous peoples and local communities with Mother Nature and the reciprocity between them, may be considered. Assessment of such issues could draw on biocultural community protocols and customary laws of indigenous peoples and local communities, which take into account community identities, histories, territorialities, traditional or indigenous knowledge, practices, innovations and traditional technologies depending on national circumstances of indigenous peoples and local communities. The knowledge and value systems of indigenous peoples and local communities are helpful when considering the behavior of relevant species and their interaction with other species.

Living modified organisms containing engineered gene drives may increase dependency on technology, alter biological components and may adversely impact biodiversity, cultural, and ethical values of indigenous peoples and local communities, socio-economic situations, and the reciprocal relationship with Mother Nature in the long term. The possibility of conflicts with non-target species such as wild species that are valuable for indigenous peoples and local communities should be assessed before releasing EGD-LMOs into the environment.

#### **7.4. Free, prior and informed consent of indigenous peoples and local communities**

In decision [14/19](#), Parties to the Convention noted the conclusions of the AHTEG on Synthetic Biology that, “given the current uncertainties regarding engineered gene drives, the free, prior and informed consent of indigenous peoples and local communities might be warranted when considering the possible release of living modified organisms containing engineered gene drives that may impact their traditional knowledge, innovation, practices, livelihood and use of land and waters”. As such, it is highly recommended to obtain prior and informed consent, or national equivalents, of potentially affected indigenous peoples and local communities before considering introducing EGD-LMOs into the environment, including for experimental releases and research and development purposes. Relevant guidance for the development of mechanisms, legislation or other appropriate initiatives to ensure the “prior and informed consent”, “free, prior and informed consent” or “approval and involvement” of indigenous peoples and local communities when accessing their knowledge, innovations and practices, for fair and equitable sharing of benefits arising from the use of their knowledge, innovations and practices, and for reporting and preventing unlawful appropriation of traditional knowledge, has been adopted as the Mo’otz Kuxtal Voluntary Guidelines by Parties to the Convention in decision [XIII/18](#).

It is thus important to ensure the full and effective participation of potentially affected indigenous peoples and local communities and ensure the free, prior and informed consent is sought when considering the possible release of EGD-LMOs according to national legislation and international obligations, as appropriate.

### **7.5. Consideration of public awareness, education and participation (e.g., full and effective participation of indigenous peoples and local communities), and access to information and risk communication**

Public awareness, education and participation, and access to information about the risk assessment of EGD-LMOs and their potential adverse effects or activities, including biosafety related communication, is essential to ensure effective participation of indigenous peoples and local communities.

Indigenous knowledge, innovations and practices integrated with accessible and understandable science for effective communication including use of local and indigenous languages for risk communication may be useful for scientists and decision makers in regulation of EGD-LMOs. In addition, it should be added that communication should be done in a transparent manner that avoids creating a communication gap between e.g., scientists and the public (the deficit model concept).

Inclusion of public awareness, participatory process, including full and effective participation of indigenous peoples and local communities in the risk assessment process while ensuring the inclusion of their knowledge and value systems are important elements. It is also important to consider appropriate means to make data available in order to facilitate independent analysis of the risk assessment. Article 14 1(a) of the Convention states that: “each contracting Party, as far as possible and as appropriate, shall introduce appropriate procedures requiring environmental impact assessment of its proposed projects that are likely to have significant adverse effects on biological diversity with a view to avoiding or minimizing such effects and, where appropriate, allow for public participation in such procedures.” Public awareness, education and participation is addressed in Article 23 of the Protocol.

### **7.6. Comparisons of novel and alternative strategies**

The control of vector-transmitted human diseases, invasive species and (agricultural) pests demands the development of a wide range of complementary strategies, currently in use or under development. These strategies can inform risk assessment, benefit analysis, risk-benefit analysis and decision-making for EGD-LMOs. Such comparisons shall reflect all existing alternative practices and habits (see section 7.1).

In addition to alternatives listed above, ethical governance of gene drives may also consider the range of alternative ways of formulating and framing the problems that the gene drive technology is addressing. This alternative framing of the problems (e.g., disease control, invasive species control) will encourage discussion on a range of alternative approaches. These alternative approaches may cause fewer potential risks, may be more actionable in the short-term, and more sensitive to local needs and resources.

Additional long-term human health impacts such as unintended evolution of pathogens, reduced capability to control target organisms with conventional methods, increased human and animal disease transmission, and compatibility with other vector control methods can also be considered in the comparisons.

The comparison of novel strategies with alternative interventions and current measures available should take into account the sources and nature of uncertainties regarding potential risks and potential benefits. The sources and nature of uncertainty that could not be addressed during the early steps of the risk assessment can be described in relation to how they could affect the conclusions of the risk assessment.

For risk assessment where uncertainties have been identified, they shall be made transparent to the decision makers. In such cases, it may also be useful to provide an analysis of alternative options to assist the decision makers. The outcome of the risk assessment should be evaluated in regard to a broad range of comparators for the decision-making process.

### **7.7. Transboundary movements**

If the EGD-LMM were released in the field without any isolation, it would be expected that EGD-LMM would spread to target mosquito populations distal to the release site. The rate of spread of the EGD-LMM would depend on the (1) dispersal of the target mosquito population, (2) threshold frequency with which the EGD is required to establish in distal target mosquito populations, (3) the fitness costs of the EGD incurred on the EGD-LMMs, (4) reproductive capacity, and (5) release sites.

For some EGD-LMMs, sufficient isolation may not be possible because of dispersal brought about by long-distance windborne migration (Huestis and others, 2019), or human-assisted transport links by road or water. Gene drives may eventually spread beyond release sites and establish across national borders, raising issues of transboundary movements and international governance. Regional approaches that would facilitate multi-country/international regulatory oversight and governance have been suggested (James and others, 2018; Rabitz, 2019; Kelsey and others, 2020).

### **7.8. Consideration of liability and redress elements**

In the event of adverse effects being realized, the costs entailed may include those of potential response measures that may be undertaken in accordance with provisions of the Nagoya-Kuala Lumpur Supplementary Protocol on Liability and Redress to the Cartagena Protocol on Biosafety as appropriate for some Parties. The Supplementary Protocol applies to damage resulting from living modified organisms that find their origin in a transboundary movement as well as to damage within the limits of national jurisdictions. Damage is defined as an adverse effect on the conservation and sustainable use of biological diversity, also taking into account risks to human health that is measurable or otherwise observable, taking into account, wherever available, scientifically established baselines recognized by a competent authority that takes into account any other human-induced variation and natural variation, and is significant.

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## Annex I

### Further information on modelling

Almost all risk assessments will utilize at least one of the following four types of models:

- Conceptual models: qualitative representations of the system components, and the interactions between these components, that are thought to be most relevant to the risk assessment problem (see Section 4.1.3 “Devising plausible pathways to harm”);
- Qualitative mathematical models: a special type of conceptual model that predicts how the relevant system’s components will change – i.e., increase, decrease or remain unchanged – without specifying by how much, when one or more of the components is subject to a sustained change;
- Process-based models: use mathematical descriptions of the system to predict how, and by how much, the magnitude of the relevant system variables will change in time and/or space;
- Statistical models: use special types of mathematical descriptions to describe the properties and behaviour of system components that are inherently variable, with a particular emphasis on describing the observed patterns in data.

#### Conceptual models

All risk assessments begin with implicit mental models of the problem at hand. The principal aim of a conceptual modelling exercise is to improve transparency in the risk assessment by making these implicit models explicit and thereby amenable to comparison and independent review. In the problem formulation, this is typically achieved by using block diagrams to portray plausible pathways to harm. EGD-LMO relevant examples of this type of conceptual model can be found in Alcalay and others (2021), Connolly and others (2021), and Kormos and others (2023). Other types of conceptual models that may also be useful in steps 1 and 2 of a risk assessment include fault trees and event trees (Hayes and others, 2018a; 2018b; Hosack and others, 2023).

Many conceptual modelling techniques, including fault trees and block diagrams, use linear representations of a system, and are not therefore well suited to situations where feedback has an important influence on how a system responds to change. In these situations, qualitative mathematical models are a useful complement.

#### Qualitative mathematical models

Qualitative mathematical models possess the same useful properties of pictorial conceptual models; they are transparent, relatively easy to construct and hence a cost-efficient way to explore the effects of different model structures (an important type of epistemic uncertainty) and are a good way to engage with diverse stakeholder groups and indigenous peoples and local communities. In addition, they provide information that may be helpful in systems where negative (positive) feedback – a process in which an initial change in a system variable will cause it to return to (move away from) its original value – is an important feature (Levins, 1998).

Qualitative mathematical modelling describes systems using signed digraphs that portray the system as a series of nodes (system variables) linked by edges that depict interactions between the system variables that have either a positive or negative effect on the nodes they join. Once constructed, the signed digraph enables the analyst to study the stability properties of the model, predict the direction of



change following a sustained change to one or more of the system's variables and estimate the sign determinacy – an indication of the confidence in the qualitative model predictions (see for example Dambacher and others, 2003).

Training in quantitative mathematical methods is required in order to fully understand the theory, assumptions and utility of qualitative mathematical modelling. Levins (1998) provide a good introduction, whilst Puccia and Levins (1986) provide a comprehensive description of the method and the underlying mathematics. Examples of its use that are relevant to EGD-LMO risk assessment include Hayes and others (2014) and Hosack and others (2023).

### **Process-based models**

Process-based models represent systems using one of three types of mathematical equations: (i) a recursion equation which describes the value of variables in the next time unit as a function of their value in the current time unit; (ii) a difference equation that specifies how much variables change between time points; and (iii) a differential equation which describes the rate at which variables change in time (Otto and Day, 2007).

Process-based models enable analysts to identify the equilibrium properties of the system, and predict how its variables will change, in both direction and magnitude, if the system is perturbed. A large number of process-based models have been used to describe systems that are relevant to EGD-LMO risk assessment, ranging from relatively simple models of populations in containment (e.g., Facchinelli and others, 2019) to more complex models that predict how multiple populations in the wild might vary in time and space (e.g., Beeton and others, 2022). None of the current EGD-LMO process models, however, approach the complexity of the large, whole-of-ecosystem models, that are employed in other domains (Fulton, 2010).

When building process-based models, analyst must make important choices about: (i) which real-world processes and components to include in the model, and which to exclude; (ii) how to mathematically describe the processes that are included; (iii) the values or probability distribution models of the parameters; (iv) the resolution of the model in time and space (e.g., are predictions made on daily, monthly or yearly time steps); (v) the parameter's initial values; and, (vi) the rules that govern what happens at the model boundaries. Among these choices, the first will usually have the greatest influence on the risk predictions and must therefore be taken carefully.

Guidance on this matter generally recommends simpler models – with the least number of uncertain parameters – rather than larger models, particularly if predictive accuracy is the ultimate goal. In addition, simpler models are better to understand and interpret. Hilborn and Mangel (1997), however, caution that simpler models may under-represent true uncertainty, and biological theory may dictate a more complex model with more realistic features as a better choice because this allows for a wider range of biologically plausible outcomes. In an EGD-LMO risk assessment data on observed outcomes may be unavailable prior to (or even soon after) the assessment is completed. The predictive accuracy of the process-models used within the assessment may therefore be unknown at the time when decisions regarding field release are to be made. In these circumstances the complexity of the process models must be guided by the range of plausible outcomes identified by the plausible pathways to harm and the ecological processes that enable these outcomes. The genetic, demographic and ecological phenomena that become increasingly relevant as EGD-LMOs progress through a stage-release protocols, and examples of how these phenomena are (or currently are not) addressed within EGD-LMO models, are discussed in a number of recent reviews (Comb and others, 2023; Frieß and others, 2023).

## Statistical models

A primary aim of a statistical model is to accurately reproduce the variation that exists in real world phenomena. Statistical models enable the analyst to infer the variation that exists in a larger population from the variation observed in a (usually much) smaller sample, and thereby accurately predict the probability of all possible outcomes, including those outcomes that were not observed in the sample, but which actually exist in the wider population. An important distinction in this context is the variation in a sample that is created by the imperfections in the way we observe and measure things (measurement error), and the variation created by a combination of environmental forces acting on, and the innate variability within, the things we observe (process error). Accurate inference about variability in population-level parameters – such as the parameters of a process-based model – requires that these two sources of variability are separated in what are often termed “hierarchical models” (Clark, 2007; Bolker, 2008). EGD-LMO relevant examples of this approach can be found in Ickowicz and others (2021) and Hosack and others (2023).

The use of modern modelling techniques to EGD-LMO risk assessment requires a high degree of training in the process-based models used to represent ecological and biological systems, the probabilistic theory used to assign probability distribution models to the parameters of these models, as well the computational methods that enable inference about population-level variability in the presence of measurement error. Furthermore, biosafety regulators without this training may find it difficult to judge the scientific quality and validity of any specific modelling approach, although guidance on these issues is currently available (Augusiak and others, 2014; Calder and others, 2018).

## Annex II

### Further information on uncertainty

Guidance on how to identify and address the different types of uncertainty is available from many sources: Hayes and others (2007a) provide a non-technical introduction highlighting examples relevant to LM fish. The EFSA GMO Panel (2013) provides a similar introduction within the context of LM animals. EFSA (2018) recommends a suite of procedures for assessing uncertainty in scientific assessment. Good textbooks on how to address uncertainty within quantitative (probabilistic) risk assessment include Morgan and Henrion (1992), Cullen and Frey (1999), and Bedford and Cooke (2001).

#### Linguistic uncertainty

Linguistic uncertainty occurs for many reasons but principally because words can be vague and ambiguous, and our interpretation of a qualitative proposition depends on the context in which it is made (Regan and others, 2002). For these reasons the same word or phrase can mean different things to different people (EFSA, 2018). Linguistic uncertainty is prominent in qualitative risk assessment because terms such as “small effect”, “low likelihood” or “negligible risk” are open to interpretation, hence current guidance almost always recommends that these terms are carefully defined (see for example EFSA GMO Panel, 2013) and where-ever possible language-based misunderstandings minimized through careful facilitation of expert input (Carey and Burgman, 2008).

Qualitative expressions of uncertainty are problematic for two reasons. First, the effect of the uncertainty on the risk assessment is confounded by linguistic uncertainty. This makes it difficult for decision makers to gauge how precise the risk prediction is, or how far it may be from a true value. Secondly, there is no principled way to combine qualitative expressions of uncertainty around individual components of a risk calculation into an overall expression of uncertainty. For these reasons, current guidance recommends that wherever possible expressions of epistemic uncertainty or variability should be quantified to the extent that is scientifically achievable (EFSA, 2018).

For EGD-LMOs quantification of uncertainty could be more challenging than in other LMO risk assessment because of their potentially larger spatio-temporal footprint could lead to exposure in more variable, heterogenous environments, and because of the relevant paucity of empirical data on their behaviour in the wild. It is a misconception, however, to assume that quantifying uncertainty requires extensive data. Uncertainty can be quantified by expert judgement (via formal elicitation) for any well-defined question or quantity provided there is at least some relevant evidence (EFSA, 2018).

Guidance on how to quantify uncertainty through expert elicitation is available from several sources. For example, Burgman (2005) provides a helpful introduction, Morgan (2014) provides an excellent overview of key issues, whilst O’Hagan and others (2006) provide a comprehensive treatment. EFSA (2014) provides guidance on three approaches within the context of a food safety risk assessment, but the methods discussed are applicable to other domains. Hayes and others (2018b) and Hosack and others (2023) provide examples of how to use elicitation to conduct probabilistic risk assessment for living modified mosquitoes.

## **Epistemic uncertainty**

Risk assessment of EGD-LMOs will initially encounter epistemic uncertainty in the Problem Formulation phase, when identifying potential adverse effects (Section 4.1.2.) and when devising plausible pathways to harm (Section 4.1.3.). Both steps rely on conceptual models to identify how things may go wrong if EGD-LMOs are released in the environment, and these models (like all models) will be subject to structural uncertainty (See annex I).

In this context, model structure uncertainty is manifested in two ways: (i) is the conceptual modelling exercise complete – i.e., has the risk assessment identified all the plausible pathways to harm; (ii) are the conceptual models adequate – i.e., do the identified plausible pathways to harm accurately capture all of the critical processes and intermediate events between release of the EGD-LMO and harmful outcomes. These sources of uncertainty are common to all risk assessments. Again, however, the paucity of experience, and potentially large spatial and temporal footprint, may accentuate them in an EGD-LMO risk assessment.

Structural uncertainty in the conceptual models that underlie a problem formulation approach can be addressed procedurally and methodologically. Ensuring that relevant stakeholders, indigenous peoples and local communities and experts are consulted when plausible pathways to harm are identified and described is a recommended procedure. Carefully comparing the adverse effects identified in an EGD-LMO problem formulation with those described in (a) the biosafety regulations of relevant authorities, (b) relevant guidance developed by respected international authorities such as EFSA (2013, 2020) and the National Academy of Sciences Engineering and Medicine (NASEM, 2016); and (c) documents produced by the scientific community - such as Benedict and others (2018), David and others, (2013), Hayes and others (2018b), James and others (2020), Rode and others (2019), Teem and others (2019), and Connolly and others (2021) – will also help ensure that potentially relevant pathways have not been inadvertently overlooked.

In addition to these recommended procedures, Hayes and others (2007b, 2014) describe a variety of hazard identification methods that risk analysts can employ to help ensure that all plausible pathways have been comprehensively evaluated and described. These techniques encourage analysts to think “outside the box” and provide a framework that supports them to apply their expertise and imagination in a systematic manner to identify potential pathways to harm.

It is difficult to assess if the structural uncertainty in the conceptual models that underlie a problem formulation has been comprehensively addressed. In particular, the number of plausible pathways to harm identified in the problem formulation is not of itself an infallible guide to how complete this part of the risk assessment is. Nonetheless, a problem formulation for a complex, new technology such as EGD-LMOs that only identifies very few, or very simple, pathways will likely be viewed with some scepticism. Ultimately, reviewers and decision makers must use their expertise, experience and judgement to decide if this source of uncertainty in the problem formulation stage of an EGD-LMO risk assessment process has been adequately addressed.

## **Variability**

Variability, often also referred to as aleatory uncertainty, occurs in LMO risk assessment because many of the relevant environmental and demographic processes or variables within the plausible pathways to harm will be inherently variable in time and space. It is possible that some of the sources of variability could in theory be explained with a very detailed mechanistic model or more precise measurements but

in practice this may be unnecessary. Simply characterizing the variation, and propagating its effect through a risk assessment, is often a sufficient and much more cost-effective strategy.

The effect of variability on risk assessment predictions can be captured in several ways. A common approach is to repeat the risk calculations many times whilst allowing the parameters of the risk assessment's process-based models (See annex I) to vary with each repetition in a realistic manner. The realism is achieved by carefully assigning an appropriate probability distribution to each uncertain parameter. The choice of probability distribution is guided by theory, the observed variation in the parameter or by expert belief. Xu and others (2010), for example, use a very flexible probability distribution (the beta distribution) to capture expert beliefs in the variability of key mosquito life history parameters, including survival rates and fecundity. Similarly, Hosack and others (2021) used the common (but in this case transformed) normal distribution to capture expert's beliefs about how the parameters that govern the vector competence of living modified mosquitoes varies as the mosquitoes become increasingly habituated to laboratory conditions.

Probabilistic representations of variability in risk assessment models, and the associated methods necessary to propagate their effect on risk estimates, requires training and a good understanding of probability theory. Analysts wishing to employ these methods in EGD-LMO risk assessment should either complete training in the underlying theory and techniques or seek assistance.

### **Deep uncertainty and the “unknown unknowns”**

Deep uncertainty arises in situations where epistemic uncertainty or variability is so large that analysts do not know, or the parties to a decision cannot agree on: (i) the appropriate models to describe the interactions among a system's variables; (ii) the probability distributions to represent uncertainty about key variables and parameters in these models; and/or (iii) how to value the desirability of alternative outcomes (Institute of Medicine, 2013). Risk assessment for EGD-LMOs that are designed to spread over large (continental) scales or persist for long (decades) periods of time, may encounter this type of uncertainty. Then and others (2020), for example, argued that the “next generation effects” that may occur when EGD-LMOs replicate with genetically diverse target populations, within complex ecosystems, and effects triggered by genome  $\times$  environment interactions, may introduce a high level of uncertainty into EGD-LMO risk assessment.

Current guidance for addressing deep uncertainty within risk assessment recommends that analysts compare or combine predictions from multiple models that are consistent with available knowledge (Cox, 2012). Alternatively, analysts may use scenario analysis to identify possible future states of the world by describing hypothetical, but conceptually feasible pathways to harm during the problem formulation, and through the use of multiple single value – e.g., best-case/worst-case - or deliberately imprecise – e.g., order of magnitude – model parameter estimates (Spiegelhalter and Hauke, 2011). The emphasis in these situations may switch away from a reliance on the risk predictions and more towards the identification of risk management strategies that are effective across many (ideally all) scenarios, and towards the identification of post-release monitoring strategies that enable rapid feedback and learning about actual outcomes (Institute of Medicine, 2013).

Risk assessment models typically have many parameters (See annex I) which may be understood to a greater or lesser extent; the variation in fecundity and mortality rates in an EGD-LMO population may be well understood, whereas inter-specific competition coefficients and long-range dispersal rates may be poorly understood. In these circumstances a mixed strategy that combines probabilistic assessments

of variability for well characterised parameters, within scenarios that reflect possible best-case/worst-case situations for poorly characterised parameters may be advisable.

However, there is no operational definition for when a lack of consensus about an appropriate model or the range of values a parameter may take becomes a case of deep uncertainty (Institute of Medicine, 2013). Ultimately risk analysts, reviewers and biosafety regulators must judge if the models and parameter estimates used within a risk assessment are plausible, consistent with theory and defensible in light of the available evidence base.

Finally, it is important to recognise that a rigorous and systematic analysis of uncertainty within a risk assessment requires specialist skills and computing resources, and the number of plausible pathways to harm that might be imagined during the problem formulation stage will always be subject to practical constraints. Furthermore, multiple models and scenario analyses cannot protect against the deepest form of uncertainty – the “unknown unknowns” – that is the ignorance that lies beyond the things we know that we don’t know. Current guidance on this topic, however, is very clear: decision makers should understand that by definition the “unknown unknowns” can be neither quantified or described in any type of risk assessment and must therefore act accordingly (EFSA, 2018).

## Annex III

### World Health Organisation Guidance framework for testing genetically modified mosquitoes

The WHO published, the second edition of its ‘Guidance framework for testing genetically modified mosquitoes’ (WHO), in which it refers to LMMs as “genetically modified mosquitoes (GMMs)” and to EGD-LMMs as “gene drive modified mosquitoes (GDMMs)”. The WHO recommends that a safety criterion for moving an EGD-LMM from laboratory to field testing is “a well-reasoned justification that the GDMMs will do no more harm to human health than wild mosquitoes of the same genetic background and no more harm to the ecosystem than other conventional vector control interventions.” (WHO, 2021b, section 3.7).

As a matter of comparison (the use of EGD-LMO is not a biological control approach), the WHO points out that a biologically relevant precedent already exists in trials of biological control agents, which also are expected to spread and persist in the environment, are capable of transboundary movement, and, moreover, cannot be recalled once released (WHO, 2021b, section 5.3.5). Before the field release of biological control agents, the International Plant Protection Convention, overseen by the Food and Agricultural Organization of the United Nations, advocates rigorous science-based environmental risk assessment based on International Standards for Phytosanitary Measures. Numerous jurisdictions have established national regulatory systems based on this approach.

Here, a relevant example of field release of biological control agent that also involved transboundary movement is the release of the neotropical parasitoid *Apoanagyrus (Epidinocarsis) lopezi* (Hymenoptera: Encyrtidae) from South America in 22 countries in Africa to successfully control the damaging accidental introduction of the cassava mealybug *Phenacoccus manihoti*. In a similar vein, in Australia, Vietnam, and Indonesia, rigorous environmental risk assessment was conducted ahead of studies in the field of *Wolbachia*-infected *Aedes aegypti* which, although not regulated as GMMs, were incapable of being recalled once released into the environment (WHO, 2021b). Note that for an introduced *Wolbachia*, in principle it could be ‘recalled’ returning to the initially uninfected state by a ‘swamping’ strategy bringing the infection frequency below a given threshold but this seems implausible except for small and isolated populations (Turelli and Barton, 2017).

The WHO sees environmental risk assessment ahead of any proposed field releases as essential, recognizing that this would occur at institutional and national levels, and is typically underpinned by national biosafety legislation that, in the case of 172 countries, is itself derived from the Cartagena Protocol on Biosafety to the Convention on Biological Diversity (WHO, 2021b, section 5). In the context of self-sustaining, non-localizing, low-threshold GDMMs, the WHO advises that considerations to move from physically confined indoor testing to field testing involve (i) thorough environmental risk assessment informed by laboratory and insectary trials of the gene drive mosquitoes, (ii) entomological, epidemiological, and ecological data from the proposed field locations and (iii) mathematical modelling simulating the behaviour of the gene drive system at the field location (WHO, 2021b, section 1.5.1).

## Annex IV

Taxonomic classification of Culicidae<sup>15</sup>

Subfamily	Tribe	Genera
Anophilinae		<i>Anopheles</i> (An.), <i>Bironella</i> (Bi.), <i>Chagasia</i> (Ch.)
Culicinae	Aedeomyiini	<i>Aedeomyia</i> (Ad.)
	Aedini	<i>Aedes</i> (Ae.), <i>Armigeres</i> (Ar.), <i>Eretmapodites</i> (Er.) <i>Haemagogus</i> (Hg.), <i>Heizmannia</i> (Hz.), <i>Opifex</i> (Op.), <i>Psorophora</i> (Ps.), <i>Udaya</i> (Ud.), <i>Zeugomyia</i> (Ze.)
	Culicini	<i>Culex</i> (Cx.), <i>Deinocerites</i> (De.), <i>Galindomyia</i> (Ga.)
	Culisetini	<i>Culiseta</i> (Cs.)
	Ficalbiini	<i>Ficalbia</i> (Fi.), <i>Mimomyia</i> (Mi.)
	Hodgesiini	<i>Hodgesia</i> (Ho.)
	Mansoniini	<i>Coquillettidia</i> (Cq.), <i>Mansonia</i> (Ma.)
	Orthopodomyiini	<i>Orthopodomyia</i> (Or.)
	Sabethini	<i>Sabethes</i> (Sa.), <i>Wyeomyia</i> (Wy.), <i>Phoniomyia</i> (Ph.), <i>Limatus</i> (Li.), <i>Trichoprosopon</i> (Tr.), <i>Shannoniana</i> (Sh.), <i>Runchomyia</i> (Ru.), <i>Johnbelkinia</i> (Jb.), <i>Isostomyia</i> (Is.), <i>Tripteroides</i> (Tp.), <i>Malaya</i> (Ml.), <i>Topomyia</i> (To.), <i>Maorigoeldia</i> (Mg.)
	Toxorhynchitini	<i>Toxorhynchites</i> (Tx.)
	Uranotaeniini	<i>Uranotaenia</i> (Ur.)

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<sup>15</sup> Adapted from Foster and Walker (2019).



## Annex V

## Non-exhaustive list of mosquito vectors of diseases

Host	Mosquito species	Disease	Pathogen	Reference(s)
Human	<i>Aedes aegypti</i>	Chikungunya	Virus	WHO, 2022a
		Dengue fever	Virus	WHO, 2023b
		Mayaro fever**	Virus	Celone and others, 2021
		Lymphatic filariasis	Nematode	WHO, 2023c
		Rift Valley fever	Virus	Gregor and others, 2021
		Urban yellow fever	Virus	Shinde and others, 2022; WHO, 2023e
		Zika fever	Virus	Kauffman & Kramer, 2017
	<i>Ae. africanus</i>	Zika fever	Virus	Haddow and others, 1964
	<i>Ae. albopictus</i>	Chikungunya	Virus	WHO, 2022a
		Dengue fever		WHO, 2019
		Jamestown Canyon virus	Virus	Paupy and others, 2009
		Lymphatic filariasis	Nematode	WHO, 2023c
		Mayaro fever	Virus	Celone and others, 2021
		Potosi virus	Virus	Paupy and others, 2009
		Zika fever	Virus	Kauffman & Kramer, 2017; WHO, 2019, 2022b
	<i>Ae. atropalpus</i>	La Crosse encephalitis	Virus	Giunti and others, 2023
		West Nile fever	Virus	Giunti and others, 2023
	<i>Ae. bromeliae</i>	Dengue fever	Virus	Foster and Walker, 2019
		Yellow fever	Virus	
	<i>Ae. cantans</i>	Tahyna virus**	Virus	Cai and others, 2023
	<i>Ae. caspius</i>	Tahyna virus	Virus	Calzolari and others, 2022
	<i>Ae. cinereus</i>	Rabbit fever (Tularemia)	Bacteria	Petersen and others, 2009
	<i>Ae. communis</i>	Sindbis fever	Virus	Wilkman and others, 2023
	<i>Ae. dorsalis</i>	California encephalitis	Virus	Foster and Walker, 2019
	<i>Ae. excrucians</i>	Sindbis fever	Virus	Wilkman and others, 2023
	<i>Ae. furcifer</i>	Dengue fever	Virus	Foster and Walker, 2019
	<i>Ae. hensilli</i>	Zika fever	Virus	Duffy and others, 2009
	<i>Ae. japonicus japonicus</i>	Cache Valley fever**	Virus	Waddell and others, 2019
	<i>Ae. luteocephalus</i>	Dengue fever	Virus	Foster and Walker, 2019
		Yellow fever	Virus	
		Zika fever	Virus	Epelbion and others, 2017
	<i>Ae. melanimon</i>	California encephalitis virus	Virus	Foster and Walker, 2019
<i>Ae. niveus</i>	Lymphatic filariases	Nematode	Foster and Walker, 2019	
<i>Ae. opok</i>	Dengue fever	Virus	Foster and Walker, 2019	
<i>Ae. polynesiensis</i>	Chikungunya	Virus	Richard and others, 2016	

	Dengue fever	Virus	Foster and Walker, 2019
	Lymphatic filariasis	Nematode	
<i>Ae. pseudoscutellaris</i>	Dengue fever	Virus	Foster and Walker, 2019
	Lymphatic filariasis	Nematode	Foster and Walker, 2019
<i>Ae. rotumae</i>	Dengue fever	Virus	Foster and Walker, 2019
<i>Ae. scapularis</i>	Cache Valley fever**	Virus	Waddell and others, 2019
<i>Ae. scutellaris</i>	Dengue fever	Virus	Foster and Walker, 2019
<i>Ae. sollicitans</i>	Cache Valley fever**	Virus	Waddell and others, 2019
<i>Ae. taeniorhynchus</i>	Cache Valley fever**	Virus	Waddell and others, 2019
<i>Ae. taylori</i>	Dengue fever	Virus	Foster and Walker, 2019
<i>Ae. triseriatus</i>	La Crosse encephalitis	Virus	
	Cache Valley fever**	Virus	Waddell and others, 2019
<i>Ae. vexans</i>	Tahyna virus	Virus	Cai and others, 2023; Mravcova and others, 2023
<i>Ae. vittatus</i>	Yellow fever**	Virus	Sudeep and Shil, 2017
<i>Anopheles gambiae</i>	Malaria	Plasmodium	Djihinto and others, 2022
	Lymphatic filariasis	Nematode	Foster and Walker, 2019
<i>An. arabiensis</i>	Malaria	Plasmodium	Djihinto and others, 2022
	Lymphatic filariasis	Nematode	Foster and Walker, 2019
<i>An. Barbirostris</i>	Lymphatic filariasis	Nematode	Foster and Walker, 2019
<i>An. coluzzii</i>	Malaria	Plasmodium	Djihinto and others, 2022
<i>An. funestus</i>	Malaria	Plasmodium	Djihinto and others, 2022
<i>An. stephensi</i>	Malaria	Plasmodium	Djihinto and others, 2022
<i>Anopheles punctipennis</i>	Cache Valley fever**	Virus	Waddell and others, 2019
<i>An. quadrimaculatus</i>	Cache Valley fever**	Virus	Waddell and others, 2019
<i>Coquillettia richiardii</i>	Sindbis fever	Virus	Wilkman and others, 2023
<i>Culex annulirostris</i>	Murray Valley encephalitis	Virus	Braddick and others, 2023
<i>Cx. antennatus</i>	Rift Valley fever	Virus	Tantely and others, 2015
<i>Cx. nigripalpus</i>	St. Louis encephalitis	Virus	Curren and others, 2018
<i>Cx. pipiens</i>	Rift Valley fever	Virus	Foster & Walker, 2019
	St. Louis encephalitis	Virus	Curren and others, 2018
	Usutu virus	Virus	Braack and others, 2018;
	West Nile fever	Virus	Colpitts and others, 2012
<i>Cx. quinquefasciatus</i>	Lymphatic filariasis	Nematode	Foster & Walker, 2019
	St. Louis encephalitis	Virus	Curren and others, 2018
	West Nile fever	Virus	Colpitts and others, 2012
<i>Cx. rubinotus</i>	Banji virus	Virus	Braack and others, 2018; MacIntyre and others, 2023
<i>Cx. stigmatosoma</i>	West Nile fever	Virus	Colpitts and others, 2012
<i>Cx. tarsalis</i>	St. Louis encephalitis	Virus	Curren and others, 2018

		West Nile fever	Virus	Colpitts and others, 2012
	<i>Cx. thriambus</i>	West Nile fever	Virus	Colpitts and others, 2012
	<i>Cx. tritaeniorhynchus</i>	Japanese encephalitis	Virus	Lessard and others, 2021
	<i>Cx. univittatus</i>	West Nile Virus	Virus	Cornel and others, 1993
	<i>Cx. vishnui</i>	Japanese encephalitis	Virus	Maquart and others, 2022
	<i>Haemagogus janthinomys</i>	Mayaro fever	Virus	Hoch and others, 1981; Periera and others, 2021; Celone and others, 2022
		Yellow fever	Virus	Celone and others, 2022
	<i>Hg. leucocelaenus</i>	Yellow fever	Virus	Da Silva and others, 2020
	<i>Hg. lucifer</i>	Yellow fever	Virus	Foster and Walker, 2019
	<i>Mansonia annulifera</i>	Lymphatic filariasis	Nematode	Foster and Walker, 2019
	<i>Ma. uniformis</i>	Lymphatic filariasis	Nematode	Foster and Walker, 2019
Other Animals	<i>Ae. albopictus</i>	Eastern equine encephalitis virus	Virus	Little and others, 2021
		Canine heartworm	Nematode	Morchon and others, 2012
	<i>Ae. circumluteolus</i>	Wesselsbron virus	Virus	Foster and Walker, 2019
	<i>Ae. mcintoshi</i>	Wesselsbron virus	Virus	Foster and Walker, 2019
	<i>Cx. tarsalis</i>	Western equine encephalitis virus	Virus	Eldridge and others, 2004
	<i>Cx. tritaeniorhynchus</i>	Tembusu Virus	Virus	Hamel and others, 2023
	<i>Cx. taeniopus</i>	Venezuelan equine encephalitis virus	Virus	Torres and others, 2017
	<i>Culiseta melanura</i>	Eastern equine encephalitis virus	Virus	Armstrong and Andreadis, 2010
	<i>Psorophora confinnis</i>	Venezuelan equine encephalitis virus	Virus	Torres and others, 2017

Note: \*Known/competent vector; \*\*Wild infection

## Annex VI

### Current landscape for development of living modified mosquitoes containing engineered gene drives for disease vector control

Target vector-borne disease	Target mosquito vector species	EGD threshold for field releases	EGD persistence in target populations	EGD spread in target populations	Mechanism underpinning EGD	Intended impact on target populations	Stage of EGD development	References
Malaria	<i>An. gambiae</i> s.l.	Low	Self-sustaining	Non-localised	Homing	Suppression	Modelling, Strains generated and tested in insectary in target species	Hammond and others 2021; Kyrou and others 2018; North and others, 2019
					Homing	Modification	Modelling, Strains generated and tested in insectary in target species	Carballar-Lejarazu and others, 2023
					Homing with sex ratio distorter	Suppression	Modelling, Strains generated and tested in insectary in target species	Simoni and others, 2020
					Homing based on integral and modular mechanism	Modification, potentially in conjunction with population suppression	Modelling, Strains generated and tested in insectary in target species	Nash and others, 2019; Hoermann and others, 2021; Ellis and others, 2022; Hoermann and others, 2022
					Y drive	Suppression	Modelling only	Deredec and others, 2011

				Localised	Double drive, Homing	Suppression or modification	Modelling only	Sudweeks and others, 2019; Willis and Burt, 2021
	<i>An. funestus</i>	Low	Self-sustaining	Non-localised	Homing	Suppression	CRISPR-Cas9- mediated genomic insertion of transgenes via homology directed repair in target species	Li and others, 2018; Quinn and others, 2021
	<i>An. stephensi</i>	Low	Self-sustaining	Non-localised	Homing	Modification	Strains generated and tested in insectary in target species	Gantz and others, 2015; Pham and others, 2019
					Toxin antidote rescue system, Homing	Modification	Strains generated and tested in insectary in target species	Adolfi and other, 2020,
Dengue, Yellow fever, Chikungunya, Zika viruses	<i>Ae. aegypti</i>	Low	Self-sustaining	Non-localised	Medea (Maternal effect dominant embryonic arrest	Modification	Modelling	Legros and others, 2013
		High	Self-sustaining	Localised	Two-locus underdominance	Modification	Modelling	Edgington and Alphey, 2017, 2018; Sánchez and others, 2020
			Self-limiting	Localised	Homing Split drive	Modification	Modelling, Strains generated and tested in <i>Drosophila</i> model system, Mosquito strains generated and tested	Li and others, 2020; López Del Amo and others, 2020; Terradas and 2021; Anderson 2023

					Toxin antidote rescue system	Modification	Modelling	Legros and others, 2013
<i>Wuchereria bancrofti</i> lymphatic filariasis, West Nile virus, St. Louis encephalitis	<i>Cx. quinquefasciatus</i>	High	Self-limiting	Localised	Homing, Split drive	Modification	Strains generated and tested in insectary in target species	Harvey-Samuel and others, 2023
Potentially multiple other vectors (e.g., <i>Anopheles</i> , <i>Aedes</i> , or <i>Culex</i> species from South America or Asia Pacific regions)	Potentially multiple other diseases (e.g., malaria or arboviral infections from South America or Asia Pacific regions)	Low	Self-sustaining	Non-localised	Medea (Maternal effect dominant embryonic arrest)	Modification	Modelling, Strains generated and tested in <i>Drosophila</i> model system only	Chen and others, 2007; Buchman and others, 2018a
					Toxin antidote rescue system	Modification	Modelling, Strains generated and tested in <i>Drosophila</i> model system only	Oberhofer and others, 2019, 2020b
		High	Self-limiting	Localised	Toxin antidote rescue system, Split drive	Modification or suppression	Modelling, Strains generated and tested in <i>Drosophila</i> model system only	Gould and others, 2008; Akbari and others, 2013; Champer and others, 2020a, 2020b; Oberhofer and others, 2020a and others, 2021
					One-locus underdominance	Modification or suppression	Modelling, Strains generated and tested in <i>Drosophila</i> model systems only	Reeves and others, 2014, Buchman and others, 2018b, 2021; Dhole and others, 2018, 2019

## Annex VII

### Engineered gene drive systems

#### A. Homing

Here, an EGD results in germline expression of both the CRISPR-Cas9 endonuclease and guide RNAs, which together recognize and cleave specific sequences in the genome (Burt and others, 2018; Connolly and others, 2023). This EGD is inserted precisely into its genomic target location on one of a pair of homologous chromosomes of an LMM. In germline cells, the guide RNA and Cas9 act in concert to cause a double-stranded break in the target DNA site of the homologous chromosome that does not contain the EGD. Homology-directed repair mechanisms are activated by germline cells to repair the double-stranded break. These use the homologous chromosome containing the EGD as a repair template. The flanking sequences on either side of the EGD, along with the EGD itself, are repaired into the double-stranded break at the target site of the homologous, formerly wild-type, chromosome. This process of homing creates pairs of parental homologous chromosomes that are typically homozygous for the EGD, leading to super-Mendelian inheritance of the EGD in progeny. Thus, once introduced into mating populations of mosquitoes, the EGD is expected to increase in frequency, or drive, and spread in target mosquito populations.

#### B. Y-drive

This form of gene drive is also known as meiotic drive. As is the case in humans, male mosquitoes possess both X and Y chromosomes in their cells, while female cells possess two parental copies of the X chromosome only. The EGD is located on the Y chromosome, so it is only inherited by male mosquitoes. The EGD also expresses a DNA endonuclease in male germline cells that cleaves a genomic target site on the X-chromosome. This means that sperm with X chromosomes produced by the male mosquito are cut and become inviable; only Y-bearing sperm survive. When an EGD-LMM male mates with a wild-type female, only progeny possessing an X from their mother and Y from their father can be produced. So far, such system has only been tested in laboratory (Simoni, 2020) or via modelling (Metchanun and others, 2022).

#### C. Toxin-antidote rescue system

A variety of toxin-antidote EGD systems consist of a genetically linked pair of transgenes, one encoding a toxin and the other an antidote (Hay and others, 2021). Expression of the EGD in LMMs results in the death of gametes or progeny that do not contain the EGD, leading to an increase in the frequency of EGD-LMMs relative to wild type mosquitoes. For example, the *cleave and rescue* (ClvR) or *toxin antidote recessive embryo* (TARE) systems use germline expression of the Cas9 nuclease and a guide RNA to introduce cuts into an endogenous mosquito gene required for viability. Cellular end-joining repair mechanisms produce loss-of-function mutations in this endogenous gene. When expressed in the germline, it creates loss-of function mutations in essential endogenous genes in the EGD-LMM. The antidote portion of the EGD supplies a recoded version of the endogenous gene that cannot be cleaved by the Cas9/guide RNA combination. Offspring who do not inherit the EGD will not survive because they do not possess the rescuing recoded version of the endogenous gene. Therefore, individuals possessing the EGD increase in frequency relative to wild type mosquitoes and spread in the population.

#### D. Maternal effect dominant embryonic arrest

The *maternal effect dominant embryonic arrest* (Medea) gene drive system consists of two genetically linked components: a maternally expressed toxin and an antidote expressed in the zygote. The toxin consists of maternally expressed microRNAs that inhibit expression of an endogenous mosquito gene required for early embryogenesis. The antidote consists of a transgenic version of the same endogenous mosquito gene required for early embryogenesis, but which has been recoded so that it cannot be inhibited by the microRNA. When this antidote transgene is expressed in the early embryo, it rescues the loss of expression of the endogenous mosquito gene so that the embryos survive. Offspring of Medea EGD-LMM mothers that do not inherit the EGD die because they cannot express the rescuing transgene antidote, while those that do inherit the EGD express the rescuing transgene antidote and survive, leading to an increase in the frequency of EGD-LMMs relative to wild type mosquitoes and spread of the EGD through target populations (Hay and others, 2021).

### **E. Underdominance**

Underdominance is a form of gene drive that has been proposed for population modification of mosquito vectors, which allows for localised spread in target mosquito populations (Wang and others, 2022a). Because of its requirements for high release thresholds, it can be thought of as a form of localised gene drive. In one-locus underdominance, heterozygotes for the EGD are less fit than either wild types or homozygotes of the EGD, typically leading to self-limiting characteristics. In two-locus underdominance, mosquitoes carrying none or both of two different EGDs are fitter than those carrying only one of the two EGDs, typically producing self-sustaining gene drive.

### **F. Split drives**

Split drives are a type of engineered gene drive consisting of two or more unlinked components inserted at different sites in the genome, which are only capable of increasing in frequency and spreading in target mosquito populations when coupled with each other. (Champer and others, 2019b; Li and others, 2020; Noble and others, 2019; Oberhofer and others, 2020a). They have principally been considered for mosquito population modification. Some modelling indicates that such EGD-LMMs would increase in frequency in target mosquito populations but persist for only a limited time before declining in frequency due to dissociation of both EGD elements. However, evidence also suggests that split-drives may persist beyond the intended design aim and behave like full gene drives (Teradas and others, 2023).

### **G. Double drives with private alleles**

Double drives are comprised of two separate elements to produce a functional EGD (Willis and Burt, 2021). The first element of the EGD encodes Cas9 that, when expressed alongside a guide RNA that recognises a specific genomic target locus, or ‘private allele’, that is present in target mosquito populations but not in other mosquito populations, causes homing of that EGD element at that target genomic locus. A separate genetically unlinked element of the EGD encodes a guide RNA that recognises a second genomic target site. Alongside Cas9 expressed from the first element, this allows homing of the second EGD element that can be used in either population suppression or population modification applications. Together both elements act in EGD-LMMs as a ‘double drive’ EGD for homing both at the genomic target locus required for population suppression or modification and at the genomic target locus restricted to the target mosquito population. This means the double drive EGD would be localised, acting as a self-sustaining, low-threshold EGD in target mosquito populations but a self-limiting, high-threshold split drive in non-target mosquito populations. By contrast, they act as a split drive in non-target populations. Modelling shows that such



designs can restrict the spread and impact of the construct even if there is a relatively modest level of genetic differentiation between target and non-target populations (Willis and Burt, 2021).

#### **H. Secondary drive**

Examples of secondary drives including reversal drives, immunizing drives (Esvlet and others, 2014; Girardin, Calvez & Debarre, 2019), overwriting drives and e-CHACR, ERACR (Xu and others, 2020). Such mitigation strategies remain unproven. If considering the use of secondary drives, consideration of potential novel genetic rearrangements is necessary, with evidence that interaction of the two systems may occur with unintended genetic effects, adding yet more unpredictability and complexity to potential outcomes (Xu and others, 2020).

## List of Terms<sup>16</sup>

#	Term	Draft definition(s)	Source
	<i>Applicant</i>	<p>An individual or organisation that applies for approval or authorisation of a regulated activity to a responsible government agency or regulatory body. The <i>applicant</i> may be the <i>developer</i>.</p> <p>Related definition: <i>developer</i></p>	N/A (original)
	<i>Assessment endpoint</i>	<p>An expression of the environmental value that is to be protected, operationally defined as an entity (e.g., a species, population or habitat) and an attribute of that entity (e.g., abundance, distribution, mortality) that can be measured or modelled.</p> <p>Related definition: <i>measurement endpoint</i></p>	Adapted from: EFSA GMO Panel, 2010; NASEM, 2016; OECD, 2023; World Health Organisation , 2001
	<i>Cargo/payload gene</i>	<p>A functional gene or cassette that is linked to the <i>engineered gene drive insert</i> that is not necessary for the engineered gene drive to function but aims to spread the linked gene/cassette throughout a <i>target population</i>.</p> <p>Related definitions: <i>engineered gene drive, target population</i></p>	Alphey and others, 2020 – publication by the gene drive research community proposing a list of standardised definitions. The words “engineered” and “target” have been added to the published definition to link other definitions in this list of terms.
	<i>Confinement measures</i>	<p>A set of measures intended to prevent or minimise the unintentional release of organisms, such as a living modified mosquito (see <i>living modified organism</i>) containing an <i>engineered gene drive</i>, from a designated area into the surrounding environment. This may include studies conducted in physical confinement (also termed “containment”), with measures including physical barriers such as indoor laboratories, insectaries, or population cages. In outdoor settings, large cages may be used, and additional ecological confinement measures may include</p>	Adapted from explanatory text in: World Health Organisation, 2021b

<sup>16</sup> This list of terms is meant to assist the reader and does not constitute definitions or a glossary of terms.

	<i>geographical/spatial and/or climatic isolation.</i>	
	<i>Related definitions: <a href="#">engineered gene drive</a>, <a href="#">living modified organism</a></i>	
<i>Developer</i>	<i>An entity/entities undertaking research and development activities aimed at producing new or improved products (goods or services) or processes.</i>	Derived from descriptions of Beekman and Rüdelsheim, 2020; OECD, 2015
<i>Ecosystem</i>	<i>A dynamic complex of plant, animal and micro-organism communities and their non-living environment interacting as a functional unit.</i>	Article 2 (Use of terms) of the Convention on Biological Diversity
<i>Ecosystem services</i>	<i>Benefits people obtain from <a href="#">ecosystems</a>; four categories of ecosystem services are distinguished, where the supporting services are regarded as the basis for the services of the other three categories. These four categories of ecosystem services are: provisioning, regulating, cultural and supporting services.</i>	Reid, 2005 and Devos and others, 2015.
	<i>Related definition: <a href="#">ecosystem</a></i>	
<i>Engineered gene drive (EGD)</i>	<i>A <a href="#">gene drive</a> system that is created through the application of recombinant DNA techniques.</i>	Adapted from: Alpey and others, 2020; Australian Academy of Sciences, 2017.
<i>Habitat</i>	<i>The place or type of site where an organism or population naturally occurs</i>	Article 2 (Use of terms) of the Convention on Biological Diversity
<i>Harm</i>	<i>Actual injury or damage to the receiving environment or human or animal health. A <a href="#">harm</a> may also be referred to as an “adverse effect”.</i>	Adapted from: Cartagena Protocol (Article 15) (SCBD, 2000); ISO

			14791:2019; World Health Organisation, 2021b
	<i>Hazard</i>	<i>A source of potential <b>harm</b>.</i>	ISO 14791:2019; Office of the Gene Technology Regulator, 2005
		<i>Related definition: <b>hazard</b></i>	
	<i>Hazard identification</i>	<i>A step in the <b>risk assessment</b> process involving the identification of potential sources of <b>harm to protection goals</b>, and the causal pathway giving rise to that <b>harm</b>.</i>	Adapted from: Office of the Gene Technology Regulator, 2005; World Health Organisation, 2021b
		<i>Related definitions: <b>harm, protection goals, risk assessment</b></i>	
	<i>High-threshold</i>	<i>Modelling indicates that gene drive systems may have a threshold level, which refers to the ratio of gene-drive-bearing organisms to wild-type organisms that must be exceeded for the gene drive to spread throughout a <b>target population</b>. For <b>high-threshold</b> drives, this ratio is relatively high (compare <b>low threshold drive</b>), and in theory, they are likely to demonstrate restricted spread.</i>	Adapted from: Alphey and others, 2020; Australian Academy of Sciences, 2017; World Health Organisation, 2021b
		<i>Related definitions: <b>low threshold drive, localised drives, target population</b></i>	
	<i>Integrated pest management</i>	<i>The careful consideration of all available pest control techniques and subsequent integration of appropriate measures that discourage the development of pest populations. It combines biological, chemical, physical and crop specific (cultural) management strategies and practices to grow healthy crops and minimize the use of pesticides, reducing or minimizing risks posed by pesticides to human health and the environment for sustainable pest management.</i>	Food and Agriculture Organization of the United Nations, 2024
	<i>Interference mechanisms</i>	<i>A gene drive mechanism in which the transgenic construct biases its transmission by interfering with the inheritance or function of wild-type genes. A reported example is a meiotic drive.</i>	Adapted from: NASEM, 2016; World Health Organisation, 2021b

<i>Limits of concern</i>	<i>The level of environmental protection set for a <b>measurement endpoint</b>, expressed as the minimum ecological effects deemed biologically relevant and of sufficient magnitude to cause <b>harm</b>.</i>	EFSA GMO Panel, 2010
	<i>Related definitions: <b>measurement endpoint</b>, <b>harm</b></i>	
<i>Living modified organism (LMO), Living modified mosquito (LMM)</i>	<i>Any living organism that possesses a novel combination of genetic material obtained through the use of modern biotechnology.</i>	Cartagena Protocol Article 3(g) (SCBD, 2000)
<i>Low-threshold</i>	<i>Modelling indicates that gene drive systems may have a threshold level, which refers to the ratio of gene-drive-bearing organisms to wild-type organisms that must be exceeded for the gene drive to spread throughout a target population. For <b>low-threshold</b> drives, this ratio is relatively low (compare <b>high threshold drive</b>), and in theory, a low initial release of gene-drive bearing individuals would be sufficient for the drive to spread throughout a large target population.</i>	Adapted from: Alphey and others, 2020; Australian Academy of Sciences, 2017
	<i>Related definitions: <b>high threshold drive</b></i>	
<i>Measurement endpoints</i>	<i>A measurable indicator of change in an <b>assessment endpoint</b>, e.g. the density and abundance of a species</i>	Suter II, 2006
	<i>Related definitions: <b>assessment endpoint</b></i>	
<i>Open release trial</i>	<i>A field trial or series of sequential field trials of increasing size, duration and complexity, conducted at a single site or multiple sites, and may involve <b>confinement measures</b>. The trials will aim to collect data including entomological and epidemiological efficacy, dispersal, trait behaviour and ecological interactions.</i>	WHO 2021b
	<i>Related definition: <b>confinement measures</b></i>	
<i>Over-replication mechanisms</i>	<i>A gene drive mechanism in which the transgenic construct biases its transmission by replicating more often</i>	Adapted from: MacFarlane and others, 2023; WHO 2021b

		<i>than other genes. Homing endonuclease genes are reported to achieve drive using this mechanism.</i>	
	<i>Pathways to harm</i>	<i>A scientifically plausible description of the necessary sequence of steps for a <b>harm</b> to be realised. These pathways are constructed during the problem formulation process.</i>	Adapted from: EFSA, 2020; OECD, 2023
		<i>Related definitions: <b>harm</b></i>	
	<i>Protection goals</i>	<i>Components of the environment (e.g., biological diversity, genetic diversity, human and animal health, habitats, <b>ecosystems</b>, <b>ecosystem functions</b> and services, soil health, water quality) that are valued and need to be protected from <b>harm</b>. They are usually identified in the relevant laws or policies of a jurisdiction and establish the context for the environmental <b>risk assessment</b>.</i>	Adapted from: Convention on Biological Diversity, annex I; EFSA GMO Panel, 2010; OECD, 2023
		<i>Related definitions: <b>habitat</b>, <b>harm</b>, <b>risk assessment</b></i>	
	<i>Regulator</i>	<i>A regulatory entity or government body with responsibility for regulating certain activities, e.g., for activities with EGD-LMOs, a regulator may have responsibility for issuing regulatory approvals and authorisations, monitoring compliance, and enforcement of regulatory conditions.</i>	N/A
	<i>Risk</i>	<i>The likelihood of a <b>hazard</b> causing <b>harm</b>.</i>	EFSA, 2016b
		<i>Related definitions: <b>harm</b>, <b>hazard</b></i>	
	<i>Risk assessment</i>	<i>A process that evaluates the potential <b>risks</b> associated with certain <b>hazards</b>. It involves four steps: <b>hazard identification</b>, <b>hazard characterisation</b>, <b>exposure assessment</b>, and <b>risk characterisation</b>.</i>	EFSA, 2016a; World Health Organisation 2021b
		<i>Related definitions: <b>hazard</b>, <b>hazard identification</b>, <b>risk characterisation</b></i>	
	<i>Risk assessor</i>	<i>The entity that conducts the <b>risk assessment</b> e.g., for an EGD-LMO regulatory application, a <b>risk assessor</b> would review the scientific data and information submitted by the <b>applicant</b></i>	N/A

	<p>to evaluate the <i>risks</i> associated with the proposed regulated activity and may make recommendations for <i>risk management</i>.</p> <p>Related definitions: <i>applicant, risk, risk assessment, risk management</i></p>	
<i>Risk characterization</i>	<p>The final step of the <i>risk assessment</i> process, with estimation of the overall <i>risk</i> posed to <i>protection goals</i> based on the likelihood and consequences of adverse effects being realised.</p> <p>Related definitions: <i>protection goals, risk, risk assessment</i></p>	Adapted from: World Health Organisation, 2021b
<i>Risk hypothesis</i>	<p>For each postulated <i>pathway to harm</i>, corresponding <i>risk hypotheses</i> are formulated that will enable the <i>risk assessor</i> to determine whether the pathway is likely to occur.</p> <p>Related definitions: <i>pathway to harm, risk assessor</i></p>	Adapted from: OECD, 2023
<i>Risk management</i>	<p>The management of <i>risks</i> identified by the <i>risk assessment</i> through the implementation of appropriate measures for reducing <i>risk</i> to an acceptable level.</p> <p>Related definitions: <i>risk, risk assessment</i></p>	Adapted from: EFSA, 2016; World Health Organisation, 2021b
<i>Risk manager</i>	<p>The entity that defines and/or implements <i>risk management</i> measures. In certain jurisdictions, e.g., the European Union, the <i>risk manager</i> makes regulatory decisions (see also <i>regulator</i>).</p> <p>Related definitions: <i>regulator, risk management</i></p>	
<i>Signal</i>	<p>A measurable change in an indicator or parameter of interest that can be linked to an adverse change in the environment</p>	Adapted from: Tofelde and others, 2021

	<i>Target population</i>	<i>An individual population or interbreeding populations of the target organism on which the specifically designed characteristics of the EGD-LMO are intended to act.</i>	Adapted from: World Health Organisation, 2021b; EFSA, 2016a; Connolly and others, 2023b
	<i>Vector</i>	<i>Agent which carries and transmits an infectious pathogen into another living organism.</i>	Adapted from: World Health Organisation, 2020