

Dana Perls
Friends of the Earth

Dear Madame/Sir Chair,

On behalf of Friends of the Earth United States, I'd like to express our serious concerns about the unassessed and unregulated risks of synthetic biology, and outline several steps that should be reflected in the SBSTTA text and recommendations for the upcoming COP 15.

To act in accord with the convention and the precautionary principle, we need stronger global regulatory oversight and risk assessments specific to synthetic biology which include environmental, socio-economic and gender impacts. We are clear that synthetic biology is a new and emerging issue, has been for years, and we should not waste time debating this question any longer. The CBD must focus its efforts to establish guidelines for precautionary regulations.

In my comments, I will speak to the continued need for a moratorium on gene drive releases, and a new topic that should be considered a new and emerging issue: transient modification.

Gene drives

The CBD must continue to focus on gene drives and the environmental, health, and socioeconomic risks which could cause irreversible ecological damage across generations of a species. While there is also a risk assessment component, gene drives must also be within the CBD. There must be a moratorium on the environmental and commercial development or release of gene drives, and the UN must reiterate the commitment to the free prior informed consent of all potentially affected people before any research or development in this field is undertaken.

Transient Modification

The most recent AHTEG on Synthetic Biology raised concerns about transient modification biotechnologies. We urge parties to SBSTTA and CBD to take it up as a new and emerging issue. One example of this technology includes RNAi spray, a gene silencing pesticide designed to kill organisms by switching off or "silencing" genes essential for survival. This is significantly different from genetically engineering crops, as these gene-silencing pesticides constitute a vast open-air genetic experiment; any organisms that come into contact may be genetically modified and these modifications may be passed on to multiple generations. Gene silencing RNAi spray and other transient modification technologies could genetically modify organisms despite the product itself not being a living GMO. Future discussions under the CBD will need to resolve how transient modification and synthetic biology technologies can be assessed, safeguarded, and regulated to encompass the entirety of intended and unintended effects. Parties should request the CBD work to address the vast and novel environmental, health and socioeconomic concerns and complicated governance implications.

Horizon Scanning and Monitoring

Friends of the Earth supports a Multidisciplinary Technical Expert Group (MTEG) which includes expertise from women, indigenous people and local communities. We strongly recommend participatory technology assessments to ensure that SBSTTA is looking ahead at technologies which require early analysis and assessments about health, socioeconomic, and cultural impacts.

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Friends of the Earth International urges the adaption of the recommendations to be passed along to COP 15.

Thank you.