

Public Research & Regulation

Foundation with the objective to involve the public research sector in regulations and international agreements relevant to modern biotechnology

MOP3 - PRRI STATEMENT ON ARTICLE 18

Thank you Mme. Chairman,

I speak on behalf of the Foundation for Public Research and Regulation.

Mme. Chairman, with regard to the current discussion on handling, packaging and identification in article 18.2.b and article 18.2.c, we believe that there is no need for a stand-alone document to fulfil the identification requirements of articles 18.2 b and c of the Protocol. The information specified in these paragraphs is intended to identify the contents of the package containing LMO's, and should not function as a risk assessment document. As required by the Protocol, such risk assessment is done prior to transboundary movement, if intended for intentional introduction into the environment. Therefore, the documentation relevant for risk assessment will already have been reviewed by the competent authority, and would already have been approved for import by that authority, a decision that should be on the Biosafety Clearing House. Thus, the documentation accompanying the item needs only to identify it, and to demonstrate that the appropriate risk assessment, if required, has been completed. Such information is easily incorporated into a simple document or label accompanying the specific item or items, examples of which have been submitted to the Executive Secretary.

In addition, Mme Chairman, we believe that there is currently not enough experience with the actual functioning of the Protocol to start discussing further detailing the requirements of articles 18.2.b, article 18.2.c and article 18.3.

Mme. Chairman, the Foundation for Public Research and Regulation remains available if you wish to explore these issues further.

Thank you very much for your attention.