

# *Public Research & Regulation*

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

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## **MOP3 - PRRI STATEMENT ON OTHER TECHNICAL ISSUES**

Thank you Mr. Chairman,

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

Mr. Chairman, with regard to other scientific and technical issues that are relevant to the implementation of the Protocol, we submit for your consideration two points that are important for public research.

The first point is the need to start defining exemptions for LMOs that are not likely to have adverse effects on the conservation and sustainable use of biological diversity, taking also into account risks to human health, in accordance with article 7 paragraph four of the Protocol. We believe that it is crucial for the functioning of the CPB that when sufficient familiarity has been gained to conclude that certain LMOs are not likely to have adverse effects on human health and the environment, those LMOs may be exempted from the AIA procedure to avoid that scarce Government resources be used on processing such cases. Those scarce resources are better used to focus on new cases that may have complex safety questions. Biosafety is not helped with needless duplication. It is worthwhile to note that since the adoption of the CBD in 1992, over 1 billion acres have been planted with LMO crops by millions of farmers in developing and developed countries, consumed in billions of meals, and there have been no verifiable reports of adverse effects to human health or biodiversity. This does not mean that LMOs by themselves are inherently safe, but it does indicate that the current risk assessment methodology and practice are effective and that the familiarity gained can be used to start identifying LMOs that would not require AIAs in case of transboundary movements.

The second point is the need to provide guidance to decision makers on how potential benefits can be taken into account in decision making. Based on PRRI members experience, it is clear that decision makers are often struggling with the question about how to balance potential benefits and potential risks in decision making, and often decisions are postponed for that reason, which is highly regrettable.

Mr. 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