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Dr. Giovanni Ferraiolo
Biosafety Division / BCH
Secretariat of the Convention on Biological Diversity
413 St-Jacques, Suite 800,
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Dear Dr. Ferraiolo,

The Public Research and Regulation Initiative (PRRI) very much appreciates your kind agreement to let a member of PRRI to the third meeting of the Informal Advisory Committee on the Biosafety Clearing-House Montreal, Canada, 4 - 5 October 2007.

Unfortunately, the PRRI member who was scheduled to attend your meeting has had some changes in her schedule and cannot make it in time to Montreal. I therefore take this opportunity to share with you and the IAC some of thoughts of the Steering Committee of PRRI regarding the Biosafety Clearing House (BCH) of the Cartagena Protocol on Biosafety (CPB).

PRRI is of the view that a well-functioning BCH is essential for the functioning of the Cartagena Protocol on Biosafety. In addition, we believe that a well-populated BCH can be very conducive to public research in biotechnology. This will particularly be the case if the BCH provides public researchers with clear and accurate information about

- which biosafety rules apply in countries,
- the relevant competent authorities of countries, and
- the risk assessments on which those competent authorities have based their decisions regarding GMO applications.

Having said this, we note with great regret that the above points of essential information are still only to a limited extent available through the BCH. Further, we understand from several PRRI members that some of the information may not be up to date, and that other information, such as identification of competent authorities, does not always clearly indicate the entry point for submission of notifications for field trials. PRRI will use the opportunity of MOP4 to call upon all Parties and non-Parties to comply, in the interest of public research in modern biotechnology, with their obligation under the Protocol to provide the BCH with up to date, accurate information about their rules, competent authorities and risk assessments.

While PRRI recognizes that over the years, the BCH has grown into an impressive and very promising instrument, PRRI believes that on some points the system of the BCH could be improved in order to make the information that is entered into the BCH more understandable and more easily accessible. One of the areas where adjustments and fine-tuning would be helpful is the topic of 'Risk Assessments' of the BCH.



As you will see, a "browse all" shows that there is one entry from Belgium, two from Colombia, one from Germany, one from Ireland, one from Japan, ten from the Netherlands, and literally hundreds from New Zealand. This leads to a first conclusion that only a handful of Parties have entered risk assessment information into the BCH and that New Zealand should be commended for its phenomenal effort to enter information in the BCH that is relevant to risk assessment.

A closer look at the information available in the BCH also shows that

- the risk assessment information is of very mixed origin, because in some cases it is related to contained use, in some cases related to decisions on releases, in some cases related to import of FFPs, and in some cases more general risk assessment research;
- In some cases the information is presented according to the format provided and in other cases only a decision document or an (EFSA) opinion is attached.
- In cases where the formats are used, the fields are entered in a different way from one case to the other, possibly due to lack of clarity of terminology and duplication in entry fields.

With this introduction, PRRI offers the following suggestions for consideration by the IAC:

1. Clarify in the BCH the different categories of risk assessment (contained use, R&D release, commercial release, FFP, general RA research), and make the BCH searchable on those categories by entering the information with controlled vocabularies.
2. Clarify whether the term 'risk assessment report' in Annex II is the same as "risk assessment summary" in article 20
3. Make the RA information more searchable by using to the extent possible controlled vocabularies.
4. Make the BCH searchable on inserted genes and traits
5. Avoid duplication in the entry fields.

Finally, PRRI recommends that while the IAC examines the database technical issues of these suggestions, a more in-depth discussion of these issues would better be conducted in a setting with experts with substantial experience in conducting and reviewing risk assessments.

PRRI stands ready to assist the IAC and CBD Sec in these endeavours, and in case you have any queries, please do not hesitate to contact Piet van der Meer, at pietvandermeer@cs.com.

Em. Professor Marc van Montagu

A handwritten signature in black ink, appearing to read 'Marc van Montagu', written in a cursive style.

Chairman of the Steering Committee of the Public Research and Regulation Initiative