



Public Research & Regulation Initiative
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To:
Dr. Ahmed Djoghlaif
Executive Secretary
Convention on Biological Diversity
Montreal, Canada
Fax: +1.514.288-6588

Re: SCBD/BCH/CG/WDY/jh/60095 27 September 2007

30 November 2007

Dear Dr. Djoghlaif,

In response to the invitation to submit views and information in preparation for MOP4 concerning Handling, Transport, Packaging and Identification of living modified organisms (Article 18), the Public Research and Regulation Initiative (PRRI) hereby submits the following thoughts for consideration by the MOP.

Article 18 Paragraphs 2(b) and 2 (c) deal with Living modified organisms for contained use and Living modified organisms for intentional introduction into the environment. The MOP invites information on experience gained with the use of a commercial invoice or other documents required or utilized by existing documentation systems, or pursuant to national requirements (decision BSIII/ 8, paragraph 1).

Research in modern biotechnology typically involves sending research material between research labs in countries and between countries for further development and testing in contained facilities and field trials. Researchers thereby routinely, with great care and using their scientific knowledge and experience take care of handling, transport, packaging and identification of all kinds of organisms, including LMOs.

The appropriate way for packaging, handling and labeling often has to take into account requirements resulting different regulations and guidelines, such as internal biosafety procedures, regulations for pathogens, transport regulations, phytosanitary regulations etc. In addition, transport, packaging, handling and labeling of organisms have to be done in a manner that the involved organisms are carefully protected from outside influences and contaminations.

PRRI believes that the existing documentation systems in combination with the additional guidance provided by the MOP at its first meeting are sufficient and that there is at this stage no need to develop further documentation requirements.

Yours truly,

Em. Professor Marc van Montagu
Chairman of the Steering Committee of the Public Research and Regulation Initiative