

## PRRI MOP4 Statement on Notifications - 13 May 2008

Thank you Madam Co-chair.

I speak on behalf of the Public Research and Regulation Initiative, or PRRI.

PRRI commends the Secretariat for the analysis of information regarding the status and experience of implementing requirements under Article 8 of the Protocol on notification, as provided through the first regular national reports.

Madam Co-chair, with regard to the issue of notifications, our main interest concerns the information requirements for small-scale confined field-testing for research and risk assessment purposes. 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 small-scale field trials.

Small-scale field trials are an important component of the work being done by public researchers. It is recognized that the risk associated with these small-scale activities is generally low because of the way confined field trials are conducted.

Our concern is that the AIA procedure does not differentiate between small-scale field trials for research and developments and large scale commercial releases, which generally require more detailed information and longer time for assessment.

Madam Co-chair, procedural requirements should be commensurate with the level of risk involved.

We propose that the MOP explicitly acknowledges that the level of detail required for a notification under Article 8 should be commensurate with the lower level of risk associated with small-scale confined field trials, similar to the approach in Annex III. As you will appreciate, unnecessary information requirements will unduly burden public research.

PRRI will support the elements of the draft decision that will provide guidance that helps countries to make a differentiation between small scale R&D field releases and commercial releases.

We would be happy to assist delegates in their deliberations about this.

Thank you very much for your attention Madam Co-Chair.