Republic of Bulgaria
MINISTRY OF ENVIRONMENT AND WATER

25 February 2015

Dr Braulio Ferreira de Souza Dias
Executive Secretary
Secretariat of the Convention on Biological Diversity
United Nations Environment Programme
413 Saint-Jacques Street, Suite 800
Montreal, QC, H2Y 1N9 Canada

Subject: Reply of Bulgarian Ministry of Environment and Water to **Notification 2015-007**

Ref.: SCBD/BS/CG/ps/84239

Dear Dr Ferreira de Souza Dias,

Bulgarian Ministry of Environment and Water examined the "Elements of a Framework for Conceptual Clarity on Socio-Economic Considerations" contained in annex to Notification 2015-007. We approve the document developed by the *Ad Hoc* Technical Expert Group on Socioeconomic considerations. It provides a good basis for the future work in that area in the context of Cartagena protocol on Biosafety.

We would like to propose the following technical changes in the document:

1. Living modified organisms on can have direct or indirect, beneficial or detrimental effects on plant and animal health with significant economic and social consequences. Such effects may not necessarily be addressed in risk assessment that focuses on human health and effects on the environment. Animal and plant health-related issues should be included at following three places in the document:
a) General principles, point 6;
b) Methodological considerations, point 1 Scope, last dot;
c) Points to consider, point 5, first paragraph.

2. Public opinion surveys as a cost effective and informative approach to investigate socioeconomic considerations. As such it should be included in Methodological considerations, point 2 Methodological approaches, fifth dot.

For any inquiries please refer to Mr Nikolay Tzvetkov, principal expert on Genetically Modified Organisms, Biodiversity Unit, NNPS Directorate, Ministry of Environment and Water, tel. ++359-29406123 fax ++359-29406127 ntsvetkov@moew.government.bg

Yours sincerely,

BOYKO MALINOV
DEPUTY MINISTER OF ENVIRONMENT AND WATER