

Re: CBD Notification 2015-029 - Request for submissions of views and comments on “Elements of a Framework for Conceptual Clarity on Socio-Economic Considerations” contained in annex to report of the first meeting of the AHTEG on socio-economic considerations.

Mr. Bráulio Ferreira de Souza Dias  
Executive Secretary  
Convention on Biological Diversity

Dear Sir:

Reference is made to the Notification No. 2015-007 dated 15 January 2015.

Acknowledging the work of secretariat, the AHTEG and all those who have contributed towards the current text contained in the Annex to the report of the first meeting of the AHTEG on socio-economic considerations in the context of Art. 26 of the CPB, the Islamic Republic of Iran wishes to officially provide its views and comments on the “Elements of a framework for conceptual clarity on socio-economic consideration”.

#### *Objective*

- 1- The language and the text of the objective is somehow different from the text of Art. 26 in a way that may cause some confusion on the issue. Therefore, we would like to bring the text as consistent as possible to the text of protocol itself. In an attempt to this end we propose the following text as the objective:

To assist parties to achieve clarity in taking into account socio-economic considerations arising from the impact of living modified organisms on the conservation and sustainable use of biological diversity, especially with regard to the value of biological diversity to indigenous and local communities for reaching a decision on import under the Protocol or under its domestic measures, by identifying and evaluating their potential socio-economic impacts, in accordance with the objective and scope of the Protocol.

#### *General Principles*

- 2- The following sentence is proposed to be added to the end of the paragraph 1 under the general principle:  
  
, and therefore it should not be considered as an obligatory composition or step in decision making and/or risk assessment etc.
- 3- Under paragraph 4 we suggest that “religious believes and practices” be accommodated.
- 4- The human health related issues should not be included in the socio-economic considerations arising from the impact of living modified organisms on the conservation and sustainable use of biological diversity. All those concerns related to the human health should be taken care of under the risk assessment accordingly. It is therefore suggested that the entire paragraph 6 is removed or as the minimum the word “should” in the second line of the paragraph 6 is replaced with the word “may”.

- 5- Risk assessment and decision making are two entirely different practices. Risk assessment is a mandatory practice and should be conducted in accordance to the Annex 3 of the Protocol, but taking socio-economic considerations into account during decision making is not mandatory and it “may” be practiced. The paragraph 9 is therefore confusing since it may call for the complementation of the risk assessment with taking into account socio-economic considerations.
- 6- Public consultation “may” also be considered as part of the process of taking socio-economic considerations into account. Paragraph 10 however calls for the definite inclusion of public consultation as “part” of the process.

#### *Methodological considerations*

- 7- As mentioned earlier Human health related issues should not be included in the socio-economic consideration and should be out of the scope.
- 8- Since the article 26 of the CPB is about the “impact” of the LMOs on..., Ex-ante studies should not be considered during the decision making process.

#### *Points to consider*

As in the case of human health related issues, ecological issues and considerations including the “ecosystem functions” also are not part of the socio-economic considerations and should be included under the risk assessment procedure accordingly.

Islamic Republic of Iran takes this occasion to renew its highest regards and salute to the secretariat and wishes to assure you of its availability for further assistance in all subjects related to the implementation of the Cartagena Protocol on Biosafety including the face to face meeting of the AHTEC on socio economic considerations.

Finally, I would like to emphasize that, “impact” includes both negative and positive impacts. Therefore, for reaching a decision on import under the Protocol or under its domestic measures, by identifying and evaluating their potential socio-economic impacts, both potential negative and positive impacts should be taken into account. The Annex to the report of the first meeting of the AHTEG on socio-economic considerations lacks this clarification.

With my best personal wishes.

Sincerely:

**Behzad Ghareyazie** (PhD Genetics)

CPB National Focal Point & Director General,  
Agricultural Biotechnology Research Institute of Iran (ABRII),  
President, Biosafety Society of Iran.  
President, Agronomy and Plant Breeding Society of Iran,  
Executive Director, Iran Biotechnology Information Center (IRBIC)