**FINLAND**

**Finnish submission to CBD notification (2015-013) of 6 February 2015:**

**Submission of Information on Synthetic Biology**

Finland welcomes the opportunity to provide information on Synthetic Biology based on its national expertise and discussions/policy discussions on this challenging new field. We have, however, only quite recently started our national elaborations and will with keen interest follow the developments under the open-ended online forum and the AHTEG on Synthetic Biology.

Our first national discussions on Synthetic Biology have been conducted by and within our National Advisory Board on Biotechnology. A small information leaflet (in Finnish) was published as a result of these discussions giving some insight into the putative applications, benefits and risks of synthetic biology as well as regulatory and ethical issues.

According to our experience, almost all applications produced so far using synthetic biology technology, methods and principles are GMOs. The only exception for this would be the so-called protocells (not living organisms). In addition, organisms with altered DNA composition (xenobiology) would probably require changes in the present legislative definitions but from a scientific point of view they would also constitute a group of organisms with modified genomes.

This means, according to our present understanding, that the GMO/LMO regulation and Risk Assessment Framework is directly applicable to these organisms (products of synthetic biology). There is no difference between living modified organisms produced using modern biotechnology (definition of the Cartagena Protocol) and synthetic biology.

We hope that this provides some insight to questions (a) ii), iii), vi), vii) and (b) (in relation to paragraph 3 (a), (b) and (c) of the decision). We have so far not yet had any national discussions on issues referred in the other questions of the notification.

Considering the need for new elements to assess synthetic biology also the existing regulatory framework should be kept in mind as it may already cover many of the components and products of synthetic biology. In the EU such regulatory elements are already in place e.g. for chemicals, novel foods and feeds and medicinal products in addition to GMO/LMO regulation.