

## COMMENTS FROM THE FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS (FAO)

FAO welcomes the opportunity to provide comments to the implementation plan of the Cartagena Protocol on Biosafety.

FAO and in particular the Food Safety and Quality Unit is already collaborating with CBD, UN-Environment and OECD with regards to the capacity development activities on risk assessment on biosafety. In the current implementation, various Biosafety Clearing-House (BCH) -related capacity development projects at the national/regional level include the overall concept of “risk assessment” comprising all environmental risk assessment, food/feed safety assessment and socio-economic assessment.

FAO often receives request from national food safety agencies to provide technical assistance on implementation of GM food/feed safety assessment, as in the view of the national authorities, the Codex-aligned GM food/feed safety assessment is not sufficiently incorporated in the BCH-related capacity development, and thus additional technical assistance is essential. It is possible that the nature of the BCH projects, which target mainly national environment-related agencies, is contributing to this perceived lack of food safety focus. It may be advisable in any future implementation plan of the Cartagena Protocol on Biosafety to strengthen the emphasis on improved collaboration on capacity development and to give the same attention to the need for Codex-aligned GM food/feed safety assessment as it is already put on environmental risk assessment and other socio-economic assessments. FAO is available and willing to work closely with CBD secretariat on this.

The secretariat members of BCH, OECD BioTrack Product Database and FAO GM Foods Platform have been leveraging their excellent collaboration to ensure synergies and coordination among three databases which serve different, yet complimentary purposes and target audiences. The FAO GM Foods Platform covers all Codex Members (182 countries and EU) and the database management is anchored in relevant Codex texts, most notably: “Codex Guideline for the conduct of food safety assessment of foods derived from recombinant-DNA plants” (CAC/GL 45-2003). Annex III of this document, which was adopted in 2008, states that Codex Members are to share the results of those GM food/feed safety assessment that are in line with the mentioned Codex Guidelines, on FAO’s GM Foods Platform. The Cartagena Protocol requires countries to share the results of risk assessment on BCH, but it does not stipulate that the food/feed safety assessment needs to be in line with the Codex Guidelines. To give suitable guidance to member states, Codex had asked FAO to host a separate database for the food safety assessments. We would suggest considering strengthening the requirements for data exchange of suitable food safety assessments by CBD in the future implementation plan. With the focal points for the FAO GM Foods Platform being located mainly in food safety agencies and CBD’s mostly in environment agencies, synergies for cross-sectorial coordination could be easily leveraged to improve the implementation capabilities in emerging economies. FAO would like to suggest strengthening such cross-sectorial coordination by involving both sectors (environment and food/feed) at the national level through inclusion of appropriate agencies at the national/regional levels.

Furthermore, specifically on **Item 2: possible elements of a specific action plan for capacity-building on biosafety, covering the Cartagena Protocol and its Supplementary Protocol**, FAO’s standard training programme in biosafety, as contained in its [Biosafety Resource Book](#), consists of the following modules:

- **Molecular biology and genetic engineering**, which reviews the very basic scientific concepts and principles employed in producing GMOs, and provides a brief description of current and emerging uses of biotechnology in crops, livestock and fisheries.
- **Ecological aspects**, which provides the necessary background information on ecology and evolution needed to analyse and understand the consequences of introducing GMOs into the environment.
- **Risk analysis**, which provides basic information on biological risks, concepts, principles, and methodologies of risk assessment, risk management and risk communication. It focuses on crop biotechnology and environmental risk assessment of GM crops since these are of immediate interest to most countries.
- **Test and post-release monitoring of GMOs**, which addresses the use and monitoring of GMOs under containment, confinement and limited field trials, as well as the monitoring of commercially released GMOs. It also covers surveillance and emergency planning.
- **Legal aspects**, which provides an overview of the existing legal tools and frameworks on biotechnology and biosafety, and offers a thorough description of the international instruments that regulate biosafety and their interactions.

Training activities, using revised versions of these modules which reflect the advances in science and technology and the developments in the enabling policy environments since the publication of the Resource Book, should be elements of the action plan. This will facilitate the safe use of GMOs in productive and sustainable agricultural, forestry and fishery production systems.