

Physical address:

19 Frikkie De Beer, Atterbury
Estate, Block 3, Ground Floor,
Menlyn Pretoria, South Africa

Tel: +27123480892

Mobile: +27605186261

**Postal address:**

RAEIN-Africa
Box 657, Menlyn Retail Park,
Postal code: 0063, Pretoria, South
Africa

E-mail: admin@raeinfrica.org.za

Web site: www.raein-africa.org

NPC Reg No: 2013/008383/08

REGIONAL AGRICULTURAL AND ENVIRONMENTAL INNOVATION NETWORK - AFRICA

Secretariat of the Convention on Biological Diversity
World Trade Center
413 St. Jacques Str. Office 800
Montreal, QC H2Y 1N9
Canada

Dear Sir/Madam,

Ref: SCBD/CPU/DC/KG/PD/PS/87928

In response to Notification 2019-027 we hereby submit the following towards the post 2020 process for the Cartagena Protocol on Biosafety:

1. The structure and content of the implementation plan for the cartagena protocol on biosafety post-2020*Implementation of National Biosafety Frameworks*

In many African countries, the Cartagena Protocol on Biosafety has not been fully implemented at national level. Countries' level of development of national biosafety frameworks vary. There is need for inadequate attention to administrative capacity for national implementation arrangements. Thus, implementation plan for the CPB Post 2020 requires a stock taking exercise to document progress made on the 2011- 2020 implementation plan. The new implementation plan will therefore need to consider the inclusion of a mechanism for developing national biosafety targets and integrating them into national plans and priorities as appropriate. In addition, we recommend prioritization of biosafety through setting aside resources to achieve the above as well as other funding mechanisms to promote biosafety implementation at regional and national level.

Public awareness, education and participation

BOARD MEMBERS ■

B. Maloa, Prof. I. Mariga, H, Ngwenya, D Mnyulwa (Executive Director)

Public awareness, education and participation are important priorities for the implementation plan. These elements need to be complimented with mainstreaming biosafety tools and education support interventions.

Scientific and technical cooperation

Biosafety implementation strategies should build on enhancing regional capacity for the implementation of the Cartagena Protocol on Biosafety. Issues on scientific and technical cooperation are particularly relevant for the implementation of biosafety. Thus, the role of strategic partners in the implementation plan needs to be articulated and incorporated into the strategic plan.

2. Possible elements of a specific action plan for capacity-building on biosafety, covering the Cartagena Protocol and its supplementary protocol

Capacity building

- The initial focus of capacity building was on the development of national biosafety frameworks. The attention was therefore on legislative and policy tools for establishing national regulatory frameworks. Post2020, emphasis needs to focus on the implementation of these frameworks to ensure conservation and sustainable use of biodiversity.
- Capacity building on biosafety comprises a number of components relating to infrastructure, technology and scientific cooperation, and human capital development. Capacity building is still vital in the Post 2020 strategy. Based on the identified gaps in many countries in the 2011-2020 implementation plan, we propose that a regional approach to capacity building be adopted for effective implementation of biosafety frameworks. Such an approach will surpass piece-meal strategies and enable
 - addressing region-specific contexts,
 - regional cooperation and harmonisation of tools and guidelines to produce better coherence in the implementation of common goals,
 - sharing of resources and expertise,
 - lesson learning, especially in facilitating the revision of legal frameworks to include new developments, administrative challenges in the implementation of

biosafety frameworks and in establishing capacity to identify/ detect LMOs or other specific traits.

3. Relevant elements of the biosafety component of the post-2020 global biodiversity framework

- The Post 2020 global biodiversity framework should reflect a balanced approach to the three objectives of the convention namely; the conservation of biological diversity, the sustainable use of its components and the fair and equitable sharing of the benefits arising out of the utilization of genetic resources. The Cartagena Protocol on Biosafety responds to the sustainable utilization of biodiversity. It is therefore important to ensure that aspects of the Protocol are incorporated into the Post 2020 global biodiversity framework.
- Regarding the cross-talk between the Convention its Protocols we note that biosafety lags in priority. In particular, *Article 8(g)* of the Convention on Biological Diversity requires parties to “Establish or maintain means to regulate, manage or control the risks associated with the use and release of living modified organisms resulting from biotechnology which are likely to have adverse environmental impacts that could affect the conservation and sustainable use of biological diversity, taking also into account the risks to human health. If some biosafety aspects are overlooked, the long term contribution of biosafety to biodiversity conservation may be missed.
- The Cartagena Protocol on Biosafety plays an important role in providing global risk assessment and risk management frameworks for emerging technologies. Modern biotechnology has greatly progressed since the entry into force of the CPB. Thus, the Convention and its Protocols should incorporate elements that specifically respond to new and emerging technologies. A specific review of the current legal instrument will establish its adequacy in responding to technological developments. In addition, many national biosafety legal frameworks were developed with little or no understanding of the current technological developments. Thus, some of the frameworks are too prescriptive and lack sufficient flexibility to accommodate the challenges of new and emerging

technologies. A review of national legal frameworks would also promote effective national biosafety implementation.

Sincerely,

A handwritten signature in black ink, appearing to read 'D Mnyulwa'.

Doreen Mnyulwa
RAEIN-Africa Executive Director