

**Comments on draft Implementation Plan for the Cartagena Protocol and Capacity-Building Action Plan
(2021-2030)**

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Comments on the text and Appendix		
Page #	Line in text or Element in Appendix	Comment
5	Goal A.1 Capacity Building activity (i) and (ii)	When providing training, it should be taken into account that countries have different experiences in the implementation of the Protocol.
6	A.2 Capacity Building activity (iii)	To agree that some countries, such as Costa Rica, have already developed their national biosafety websites, however, these sites are not used or remain outdated. Capacity must be created to bring them online, and disseminate or disclose its existence.
7	Goal A.5	We propose to use the wording of the Protocol “that may have adverse effects on the conservation and sustainable use of biological diversity, taking also into account risks to human health.”
7	Objective A.5.2 and Indicator (c)	We propose to delete these items; it should be remembered that the use of guidance is not mandatory.
7	Goal A.5 Indicator (d)	We propose using the wording of the Protocol and avoid the inclusion of non-mandatory considerations. In this case, it would be “ <i>scientifically sound risk assessments in accordance with Annex III and Article 15.</i> ”
7	Goal A.5 Capacity Building (i)	There are many guidance documents; however, experience sharing could be an important point. We propose that it be added: “Update, if necessary, based on experience sharing”.
7	Goal A.5 Capacity Building (ii)	We propose to add the use real risk assessments made by experienced countries. “...and real examples of risk assessments made by experienced countries.”.

7	Goal A.5 Capacity Building Activity (iv)	We propose to adjust the wording since it may not be biosafety research but a comparison of data. "Compare, compile, review, relevant data to perform risk assessment and risk management to address specific protection goals".
8	Goal A.5 Capacity Building Activity (vi)	Each country has its own regulations and they have developed their monitoring frameworks, monitoring is not mandatory.
8	Goal A.6	LMO can be detected but sometimes not specifically identified, we propose to edit "...detect <i>and/or</i> identify...".
8	Outcome A.6	Since the LMO can be detected but sometimes not specifically identified, we propose to edit "...detecting <i>and/or</i> identifying...".
9	Objective A.7.1	We propose to use the wording of the Protocol "that may have adverse effects on the conservation and sustainable use of biological diversity, taking also into account risks to human health."
10	Objective A.9.2	It should be remembered that the use of guidance is not mandatory.
11	Goal A.10 Capacity Building Activities (iv), (v), (vi) and (vii)	These items should not be included since it is not mandatory, nor an implementation objective.

Please submit your comments to secretariat@cbd.int by **17 January 2020**.