

# Testing of the Guidance on Risk Assessment of Living Modified Organisms

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**COMPLETE**

**Collector:** BCH website (Website Survey)

**Started:** Wednesday, February 12, 2014 8:10:52 AM

**Last Modified:** Wednesday, February 12, 2014 8:13:41 AM

**Time Spent:** 00:02:49

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**Q1: Type of submission:**

Organization

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**Q2: Name of the Party:**

*Respondent skipped this question*

**Q3: Person submitting this questionnaire:**

*Respondent skipped this question*

**Q4: Institution(s) or organization(s) that participated in the testing:**

*Respondent skipped this question*

**Q5: Context in which the testing was conducted**

*Respondent skipped this question*

**Q6: Actual case(s) of risk assessment used in the testing:**  
**Note:** Please enter the hyperlinks of BCH Risk Assessment Records (e.g. <http://bch.cbd.int/database/record.shtml?documentid=104904> and <http://bch.cbd.int/database/record.shtml?documentid=104905>) or other publicly accessible web pages containing the technical and scientific data of the actual cases of risk assessment used in the testing.

*Respondent skipped this question*

**Q7: In what language was the Guidance tested?**

*Respondent skipped this question*

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**Q8: Name of the other Government:**

*Respondent skipped this question*

**Q9: Person submitting this questionnaire:**

*Respondent skipped this question*

**Q10: Institution(s) or organization(s) that participated in the testing:**

*Respondent skipped this question*

**Q11: Context in which the testing was conducted**

*Respondent skipped this question*

**Q12: Actual case(s) of risk assessment used in the testing:**  
**Note:** Please enter the hyperlinks of BCH Risk Assessment Records (e.g. <http://bch.cbd.int/database/record.shtml?documentid=104904> and <http://bch.cbd.int/database/record.shtml?documentid=104905>) or other publicly accessible web pages containing the technical and scientific data of the actual cases of risk assessment used in the testing.

*Respondent skipped this question*

**Q13: In what language was the Guidance tested?**

*Respondent skipped this question*

<b>Q14: Name of the organization:</b>	ENCA EPA interest group On Risk Assessment and Monitoring of Genetically Modified Organisms (GMOs)
<b>Q15: Person submitting this questionnaire:</b>	
Full Name:	Sara Restrepo-Vassalli
Email Address:	sara.restrepo-vassalli@bafu.admin.ch
<b>Q16: Institution(s) or organization(s) that participated in the testing:</b>	Government authority(ies)
<b>Q17: Context in which the testing was conducted</b>	Group event(s) (e.g., workshop, training course, meeting)
<b>Q18: Actual case(s) of risk assessment used in the testing: Note: Please enter the hyperlinks of BCH Risk Assessment Records (e.g. <a href="http://bch.cbd.int/database/record.shtml?documentid=104904">http://bch.cbd.int/database/record.shtml?documentid=104904</a> and <a href="http://bch.cbd.int/database/record.shtml?documentid=104905">http://bch.cbd.int/database/record.shtml?documentid=104905</a>) or other publicly accessible web pages containing the technical and scientific data of the actual cases of risk assessment used in the testing.</b>	
Risk Assessment 1:	<a href="http://bch.cbd.int/database/results?searchid=592672">http://bch.cbd.int/database/results?searchid=592672</a>
<b>Q19: In what language was the Guidance tested?</b>	English

<b>Q20: Would you like to submit an evaluation of the following section of the Guidance: Part I: The Roadmap for Risk Assessment</b>	Yes
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<b>Q21: This section of the Guidance is practical.1</b>	
(no label)	Agree
<b>Q22: Would you like to suggest improvements to this section to increase its practicality? If so, please indicate the line numbers and explain which improvements could be made:</b>	
<p>The paras starting line 398 – to line 417 describe a quite narrow approach for step I. From our perspective there should be no restrictions to RA in advance.</p> <p>We propose to delete in line 407 “scientifically plausible scenarios”. The sentence could possibly read: “In this step, risk assessors develop meaningful risk hypotheses....”</p> <p>Additionally in line 415 it is proposed to introduce the following changes: “It is important to define a link or pathway between the LMO and a possible adverse effect, .... (this proposal is meant to also cover indirect effects and long-term effects which are missing in the proposed approach)</p>	
<b>Q23: This section of the Guidance is useful or has utility.2</b>	
(no label)	Strongly Agree

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**Q24: Would you like to suggest improvements to this section to increase its usefulness/utility? If so, please indicate the line numbers and explain which improvements could be made:**

Line 229: term “accepted practice”. This term is not clear and should be better explained.

Line 235 : add: “Reporting of data, source of data and methods....”The whole bullet point starting 235 ff is felt to be very important.

Line 260 ff. “Additional considerations”. These bullet points are difficult to understand and would need further explanations.

**\*\*Altogether the chapter on Overarching issues is very useful and important and is strongly endorsed.\*\***

Last para of the chapter on comparators:

Line 369: we propose to quote more precisely: “...please refer to Part II, Section B, of this Guidance.”

**Q25: This section of the Guidance is consistent with the Cartagena Protocol on Biosafety.3**

(no label)

Strongly Agree

**Q26: Would you like to suggest improvements to this section to increase its consistency with the Protocol? If so, please indicate the line numbers and explain which improvements could be made:**

There is only weak reference to the precautionary approach. In order to ensure better consistency with the Protocol, we would like to propose additional wording for line 293 complementing the last sentence of the para:

“...in order to help applying the precautionary approach in an adequate manner”

The whole para would then read:

“The various forms of uncertainty are considered and described in each step of the risk assessment. In addition, when communicating the results of a risk assessment, it is important to describe, quantitatively or qualitatively, what impact uncertainty may have on the estimated level of risk and on the conclusions and recommendations of the risk assessment in order to help applying the precautionary approach in an adequate manner”

**Q27: This section of the Guidance takes into account past and present experiences with LMOs.4**

(no label)

Strongly Agree

**Q28: Would you like to suggest improvements to this section in order to better take into account past and present experiences with LMOs? If so, please indicate the line numbers and explain which improvements could be made:**

*Respondent skipped this question*

**Q29: Here you may provide further details to explain your answers in evaluating this section of the Guidance:**

*Respondent skipped this question*

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**Q30: Would you like to submit an evaluation of the following section of the Guidance: Part II: Specific types of LMOs or Traits - Risk assessment of LMOs with stacked genes or traits**

No

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**Q31: This section of the Guidance is practical.1**

*Respondent skipped this question*

**Q32: Would you like to suggest improvements to this section to increase its practicality? If so, please indicate the line numbers and explain which improvements could be made:**

*Respondent skipped this question*

**Q33: This section of the Guidance is useful or has utility.2**

*Respondent skipped this question*

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**Q34: Would you like to suggest improvements to this section to increase its usefulness/utility? If so, please indicate the line numbers and explain which improvements could be made:** *Respondent skipped this question*

**Q35: This section of the Guidance is consistent with the Cartagena Protocol on Biosafety.3** *Respondent skipped this question*

**Q36: Would you like to suggest improvements to this section to increase its consistency with the Protocol? If so, please indicate the line numbers and explain which improvements could be made:** *Respondent skipped this question*

**Q37: This section of the Guidance takes into account past and present experiences with LMOs.4** *Respondent skipped this question*

**Q38: Would you like to suggest improvements to this section in order to better take into account past and present experiences with LMOs? If so, please indicate the line numbers and explain which improvements could be made:** *Respondent skipped this question*

**Q39: Here you may provide further details to explain your answers in evaluating this section of the Guidance:** *Respondent skipped this question*

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**Q40: Would you like to submit an evaluation of the following section of the Guidance: Part II: Specific types of LMOs or Traits - Risk assessment of LM crops with tolerance to abiotic stress** No

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**Q41: This section of the Guidance is practical.1** *Respondent skipped this question*

**Q42: Would you like to suggest improvements to this section to increase its practicality? If so, please indicate the line numbers and explain which improvements could be made:** *Respondent skipped this question*

**Q43: This section of the Guidance is useful or has utility.2** *Respondent skipped this question*

**Q44: Would you like to suggest improvements to this section to increase its usefulness/utility? If so, please indicate the line numbers and explain which improvements could be made:** *Respondent skipped this question*

**Q45: This section of the Guidance is consistent with the Cartagena Protocol on Biosafety.3** *Respondent skipped this question*

**Q46: Would you like to suggest improvements to this section to increase its consistency with the Protocol? If so, please indicate the line numbers and explain which improvements could be made:** *Respondent skipped this question*

**Q47: This section of the Guidance takes into account past and present experiences with LMOs.4** *Respondent skipped this question*

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**Q48: Would you like to suggest improvements to this section in order to better take into account past and present experiences with LMOs? If so, please indicate the line numbers and explain which improvements could be made:** *Respondent skipped this question*

**Q49: Here you may provide further details to explain your answers in evaluating this section of the Guidance:** *Respondent skipped this question*

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**Q50: Would you like to submit an evaluation of the following section of the Guidance: Part II: Specific types of LMOs or Traits - Risk assessment of LM mosquitoes** No

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**Q51: This section of the Guidance is practical.1** *Respondent skipped this question*

**Q52: Would you like to suggest improvements to this section to increase its practicality? If so, please indicate the line numbers and explain which improvements could be made:** *Respondent skipped this question*

**Q53: This section of the Guidance is useful or has utility.2** *Respondent skipped this question*

**Q54: Would you like to suggest improvements to this section to increase its usefulness/utility? If so, please indicate the line numbers and explain which improvements could be made:** *Respondent skipped this question*

**Q55: This section of the Guidance is consistent with the Cartagena Protocol on Biosafety.3** *Respondent skipped this question*

**Q56: Would you like to suggest improvements to this section to increase its consistency with the Protocol? If so, please indicate the line numbers and explain which improvements could be made:** *Respondent skipped this question*

**Q57: This section of the Guidance takes into account past and present experiences with LMOs.4** *Respondent skipped this question*

**Q58: Would you like to suggest improvements to this section in order to better take into account past and present experiences with LMOs? If so, please indicate the line numbers and explain which improvements could be made:** *Respondent skipped this question*

**Q59: Here you may provide further details to explain your answers in evaluating this section of the Guidance:** *Respondent skipped this question*

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**Q60: Would you like to submit an evaluation of the following section of the Guidance: Part II: Specific types of LMOs or Traits - Risk assessment of LM trees** No

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<b>Q61:</b> This section of the Guidance is practical. <sup>1</sup>	<i>Respondent skipped this question</i>
<b>Q62:</b> Would you like to suggest improvements to this section to increase its practicality? If so, please indicate the line numbers and explain which improvements could be made:	<i>Respondent skipped this question</i>
<b>Q63:</b> This section of the Guidance is useful or has utility. <sup>2</sup>	<i>Respondent skipped this question</i>
<b>Q64:</b> Would you like to suggest improvements to this section to increase its usefulness/utility? If so, please indicate the line numbers and explain which improvements could be made:	<i>Respondent skipped this question</i>
<b>Q65:</b> This section of the Guidance is consistent with the Cartagena Protocol on Biosafety. <sup>3</sup>	<i>Respondent skipped this question</i>
<b>Q66:</b> Would you like to suggest improvements to this section to increase its consistency with the Protocol? If so, please indicate the line numbers and explain which improvements could be made:	<i>Respondent skipped this question</i>
<b>Q67:</b> This section of the Guidance takes into account past and present experiences with LMOs. <sup>4</sup>	<i>Respondent skipped this question</i>
<b>Q68:</b> Would you like to suggest improvements to this section in order to better take into account past and present experiences with LMOs? If so, please indicate the line numbers and explain which improvements could be made:	<i>Respondent skipped this question</i>
<b>Q69:</b> Here you may provide further details to explain your answers in evaluating this section of the Guidance:	<i>Respondent skipped this question</i>

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<b>Q70:</b> Would you like to submit an evaluation of the following section of the Guidance: Part III: Monitoring of LMOs Released into the Environment	No
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<b>Q71:</b> This section of the Guidance is practical. <sup>1</sup>	<i>Respondent skipped this question</i>
<b>Q72:</b> Would you like to suggest improvements to this section to increase its practicality? If so, please indicate the line numbers and explain which improvements could be made:	<i>Respondent skipped this question</i>
<b>Q73:</b> This section of the Guidance is useful or has utility. <sup>2</sup>	<i>Respondent skipped this question</i>
<b>Q74:</b> Would you like to suggest improvements to this section to increase its usefulness/utility? If so, please indicate the line numbers and explain which improvements could be made:	<i>Respondent skipped this question</i>
<b>Q75:</b> This section of the Guidance is consistent with the Cartagena Protocol on Biosafety. <sup>3</sup>	<i>Respondent skipped this question</i>

# Testing of the Guidance on Risk Assessment of Living Modified Organisms

**Q76: Would you like to suggest improvements to this section to increase its consistency with the Protocol? If so, please indicate the line numbers and explain which improvements could be made:**

*Respondent skipped this question*

**Q77: This section of the Guidance takes into account past and present experiences with LMOs.4**

*Respondent skipped this question*

**Q78: Would you like to suggest improvements to this section in order to better take into account past and present experiences with LMOs? If so, please indicate the line numbers and explain which improvements could be made:**

*Respondent skipped this question*

**Q79: Here you may provide further details to explain your answers in evaluating this section of the Guidance:**

*Respondent skipped this question*

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**Q80: Would you like to submit an evaluation of the following section of the Guidance: Background Documents**

No

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**Q81: This section of the Guidance is practical.1**

*Respondent skipped this question*

**Q82: This section of the Guidance is useful or has utility.2**

*Respondent skipped this question*

**Q83: This section of the Guidance is consistent with the Cartagena Protocol on Biosafety.3**

*Respondent skipped this question*

**Q84: This section of the Guidance takes into account past and present experiences with LMOs.4**

*Respondent skipped this question*

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**Q85: Please use the space below if you wish to provide additional feedback regarding the testing of the Guidance on Risk Assessment of Living Modified Organisms:**

*Respondent skipped this question*