

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

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**COMPLETE**

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

**Started:** Monday, March 31, 2014 3:23:59 AM

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**Time Spent:** 00:07:45

## PAGE 1

**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>	GenOk - Centre for Biosafety
<b>Q15: Person submitting this questionnaire:</b>	
Full Name:	Odd-Gunnar Wikmark
Email Address:	odd-gunnar.wikmark@genok.org
<b>Q16: Institution(s) or organization(s) that participated in the testing:</b>	Academic institution(s), Other (please specify) National competence centre for Biosafety Norway.
<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/record.shtml?documentid=104904">http://bch.cbd.int/database/record.shtml?documentid=104904</a>
<b>Q19: In what language was the Guidance tested?</b>	Other (please specify): English with Russian interpretation. Documents in both languages used.

<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)	Strongly 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>	
The treatment of dealing with uncertainty in the risk assessment would be better served by outlining a framework that elaborates on the three main components for describing of uncertainty, namely its nature, source and level for each identified uncertainty. The guidance could be improved by adopting some common, simplified approaches currently under use.	
<b>Q23: This section of the Guidance is useful or has utility.2</b>	
(no label)	Strongly Agree
<b>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:</b>	
The issue of defining the problems and issues to address up front is an essential component of the risk assessment process, as discussed in the "context and scoping" and "step 1" in the "conduction the risk assessment" sections. Therefore, term "problem formulation process" on line 403 is perhaps in need of defining	
<b>Q25: This section of the Guidance is consistent with the Cartagena Protocol on Biosafety.3</b>	
(no label)	Strongly Agree

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**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:**

Protection of human health is mentioned in as a core protection goal under the Protocol, yet the consistency between this important goal and its consideration in the Guidance is disproportional. Greater weight and consideration should be given to appropriate and robust strategies for appraising the risks to human health in the document.

**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:**

The guidance makes does not reflect existing experience with environmental risk assessments which strongly considers what is categorized as "related issues" in the guidance, such as how it is done in practice in Norway. Line 715 should be changed to reflect this experience, to say "Other issues that may be part of the risk assessment or decision-making process, as appropriate, and that are mentioned in other articles of the Protocol, include

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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**

Yes

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

(no label)

Strongly Agree

**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**

(no label)

Strongly Agree

**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**

(no label)

Strongly Agree

**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**

(no label)

Strongly Agree

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**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:**

Text line 1041 discusses the use of "-omics" approaches in risk assessment. As these techniques are currently being applied, particularly in relation to iRNA LMOs, its characterization as "as it becomes available" is no longer applicable. The phrasing "as it becomes available" should be removed to reflect current experience

**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*

**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

Q51: This section of the Guidance is practical.1	<i>Respondent skipped this question</i>
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:	<i>Respondent skipped this question</i>
Q53: This section of the Guidance is useful or has utility.2	<i>Respondent skipped this question</i>
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:	<i>Respondent skipped this question</i>
Q55: This section of the Guidance is consistent with the Cartagena Protocol on Biosafety.3	<i>Respondent skipped this question</i>
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:	<i>Respondent skipped this question</i>
Q57: This section of the Guidance takes into account past and present experiences with LMOs.4	<i>Respondent skipped this question</i>
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:	<i>Respondent skipped this question</i>
Q59: Here you may provide further details to explain your answers in evaluating this section of the Guidance:	<i>Respondent skipped this question</i>

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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Q61: This section of the Guidance is practical.1	<i>Respondent skipped this question</i>
Q62: 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>
Q63: This section of the Guidance is useful or has utility.2	<i>Respondent skipped this question</i>
Q64: 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>
Q65: This section of the Guidance is consistent with the Cartagena Protocol on Biosafety.3	<i>Respondent skipped this question</i>

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**Q66: 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*

**Q67: This section of the Guidance takes into account past and present experiences with LMOs.4** *Respondent skipped this question*

**Q68: 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*

**Q69: 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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**Q70: Would you like to submit an evaluation of the following section of the Guidance: Part III: Monitoring of LMOs Released into the Environment** Yes

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**Q71: This section of the Guidance is practical.1**  
(no label) Strongly Agree

**Q72: 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*

**Q73: This section of the Guidance is useful or has utility.2**  
(no label) Strongly Agree

**Q74: 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*

**Q75: This section of the Guidance is consistent with the Cartagena Protocol on Biosafety.3**  
(no label) Strongly Agree

**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**  
(no label) Strongly Agree

**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*