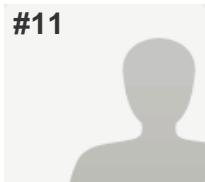


# Testing of the Guidance on Risk Assessment of Living Modified Organisms

#11



**COMPLETE**

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

**Started:** Saturday, February 08, 2014 2:46:41 AM

**Last Modified:** Saturday, February 08, 2014 3:37:49 AM

**Time Spent:** 00:51:08

## PAGE 1

**Q1: Type of submission:**

Party

## PAGE 2

**Q2: Name of the Party:**

Spain

**Q3: Person submitting this questionnaire:**

Full Name:

Ana Fresno

Email Address:

afresno@magrama.es

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

Government authority(ies)

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

Group event(s) (e.g., workshop, training course, meeting)

**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.**

Risk Assessment 1:

BCH records 104544, 104540, 104538, 104536, 104530, 104524

Risk Assessment 2:

[http://www.magrama.gob.es/es/calidad-y-evaluacionambiental/temas/biotecnologia/ERMA\\_B\\_ES\\_12\\_30\\_tcm7-217082.pdf](http://www.magrama.gob.es/es/calidad-y-evaluacionambiental/temas/biotecnologia/ERMA_B_ES_12_30_tcm7-217082.pdf)

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

Spanish

## PAGE 3

**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*

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

**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*

## PAGE 4

**Q14: Name of the organization:**

*Respondent skipped this question*

**Q15: Person submitting this questionnaire:**

*Respondent skipped this question*

**Q16: Institution(s) or organization(s) that participated in the testing:**

*Respondent skipped this question*

**Q17: Context in which the testing was conducted**

*Respondent skipped this question*

**Q18: 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*

**Q19: In what language was the Guidance tested?**

*Respondent skipped this question*

## PAGE 5

**Q20: Would you like to submit an evaluation of the following section of the Guidance: Part I: The Roadmap for Risk Assessment**

Yes

## PAGE 6

**Q21: This section of the Guidance is practical.1**

(no label)

Agree

**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:**

*Respondent skipped this question*

**Q23: This section of the Guidance is useful or has utility.2**

(no label)

Agree

**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:**

*Respondent skipped this question*

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

**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:**

*Respondent skipped this question*

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

(no label)

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:**

La Parte I "Hoja de Ruta" es la parte más desarrollada de la Guía. En ella se especifican todos los pasos necesarios para realizar una evaluación de riesgo, incluidas cuestiones globales como la calidad y pertinencia de la información. Permite por tanto realizar la evaluación desde las etapas de planificación de la misma, incidiendo en aspectos que no serán ya necesarios para evaluadores con más experiencia, pero que sí lo serán para aquellos que se planteen por primera vez realizar una evaluación.

En esta parte se enumeran con un elevado nivel de detalle los aspectos a considerar, pero dejando margen para que el grado de exigencia de la información requerida por el evaluador pueda adaptarse a las características de la liberación (escala, tiempo) lo que consideramos positivo. Sin embargo este margen puede significar que evaluadores con poca experiencia encuentren que algunos aspectos puedan requerir más definición. Por eso hemos asignado un valor de "acuerdo" a los criterios de practicidad y utilidad.

Hemos asignado "muy de acuerdo" al criterio de conformidad con el Protocolo de Cartagena porque esta parte de la Guía se adapta completamente a lo exigido en el Anexo III.

## PAGE 7

**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

## PAGE 8

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

(no label)

Neutral

**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)

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*

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

**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)

Neutral

**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:**

Este apartado se centra en la evaluación de plantas que expresan eventos apilados entendiendo como tales los que provengan de la acumulación de eventos individuales por fecundación de dos plantas vivas modificadas. Para esta evaluación es necesario que los eventos simples hayan sido evaluados previamente, y en este sentido hemos calificado la practicidad como neutra, ya que necesariamente se debe referir a la parte 1 "hoja de ruta".

En cuanto al criterio de experiencia, a nuestro parecer la Guía trata los eventos apilados como una generación de OMG por desarrollar, cuando de hecho en la actualidad son los eventos más ampliamente utilizados. Por eso hemos asignado una calificación de "neutral".

PAGE 9

**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

PAGE 10

**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*

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

**Q47:** This section of the Guidance takes into account past and present experiences with LMOs.<sup>4</sup>

*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

PAGE 12

**Q51:** This section of the Guidance is practical.<sup>1</sup>

*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.<sup>2</sup>

*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.<sup>3</sup>

*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.<sup>4</sup>

*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

Yes

**Q61: This section of the Guidance is practical.1**

(no label)

Agree

**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:**

*Respondent skipped this question*

**Q63: This section of the Guidance is useful or has utility.2**

(no label)

Agree

**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:**

*Respondent skipped this question*

**Q65: This section of the Guidance is consistent with the Cartagena Protocol on Biosafety.3**

(no label)

Strongly Agree

**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**

(no label)

Agree

**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:**

En este apartado, al igual que en la "hoja de ruta" se enumeran detalladamente los aspectos a considerar en la evaluación, por lo que hemos asignado valores elevados de conformidad con los criterios de practicidad y utilidad.

En cuanto al criterio experiencia, consideramos que se han tenido en cuenta los conocimientos adquiridos en la evaluación de árboles vivos hasta el momento, pero es importante destacar que estos conocimientos son más reducidos que en plantas herbáceas, de menor permanencia en el medio.

**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

**Q71: This section of the Guidance is practical.1**

(no label)

Neutral

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

**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)

Neutral

**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)

Neutral

**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:**

Este apartado es el que encontramos menos concreto a la hora de aplicarlo a una situación real. Al no referirse a situaciones concretas, ni presentarse ejemplos, su practicidad y utilidad es más limitada que los anteriores, en que se especificaban los requerimientos de distintos tipos de OMG. El objetivo y ámbito están en nuestra opinión correctamente descritos, pero el desarrollo de un plan de vigilancia establece unas pautas tan generales que no facilitan su aplicación.

En este sentido, el Protocolo es mucho menos específico de los requisitos de este tipo de programas de vigilancia, por lo que hemos asignado al criterio de conformidad un valor de "muy de acuerdo".

PAGE 17

**Q80: Would you like to submit an evaluation of the following section of the Guidance: Background Documents** No

PAGE 18

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

**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*