

## **CBD Notification 2015-007**

### **MALAYSIA – COMMENTS ON THE ELEMENTS OF A FRAMEWORK FOR CONCEPTUAL CLARITY ON SOCIO-ECONOMIC CONSIDERATIONS**

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#### **Specific Comments to the Elements of a Framework for a Conceptual Clarity**

##### *On General Principles*

- i) Point no. 4 – Perhaps to include traditional knowledge and farming practices in addition to cultural practices.
- ii) Point no. 6 – Further deliberation is needed as we are in the view that health related issues better be covered in the scientific/technical assessment.
- iii) Point no. 10 – In addition to public participation and consultation, access to information is equally important and should be included in this point.

##### *On Dimensions*

- i) For Economic dimension, in addition to income, other consideration can include productivity, trait introduced to the LMO as well as competitiveness and efficacy.
- ii) For Cultural/Traditional/Religious/Ethical dimension, we think that “Ethical” should be by its own bullet. Other considerations to be included for Ethical dimension are human gene transferred to crops or livestock, sacrificing animals in unethical manner in LMO trials, negative labelling of LMOs and source of gene.
- iii) For Cultural/Traditional/Religious dimension, other considerations that can be included are vegetarian practices, halal practices and source of gene.
- iv) For Human health-related dimension, similar to our view on General Principles above, this dimension should be dropped from SECs.
- v) A scoring/prioritization of these dimensions/elements is needed for decision making. This will help to determine what is acceptable and what is not by giving weightage to the various elements.

#### **General Comments**

Some countries have integrated socio-economic considerations into the LMOs biosafety assessment, while others may take into account socio-economic considerations separately. In Malaysia for example, the incorporation of socio-economic considerations as provided in the Biosafety Act 2007, intends to ensure production and use of LMOs in an ethically acceptable and socially justifiable way, in harmony with the principle of sustainable development and without detrimental effects on health and environment. Whatever the approach the Government chooses, it is important to consider national priorities related to food security, dependence on imported food and feed, preservation of genetic diversity and choice of technologies for local farmers and communities to improve agricultural productivity. The Government ultimately determine the functionality of LMOs biosafety laws and systems, either toward the safe use of LMOs or not, depending on national priorities and goals. These are major decisions and should be made based on facts and not on unsubstantiated allegations of risk. As a result, the inclusion of socio-economic considerations in decision making should be weighed against national priorities and

evaluated in the context of their utility for informing decision-making, the Government also should consider how delays in decision-making, based on efforts to consider socio-economic impacts that by their nature are challenging to apply, may impact achieving national priorities and goals.