**FINLAND**

**Submission to the CBD notification (2015-139) of 2 December 2015:**

**Peer review of the outcomes of the process in response to decision XII/24 on synthetic biology**

In the above mentioned notification the CBD Secretariat invites Parties, other Governments, relevant organizations and indigenous peoples and local communities to peer review two reports on Synthetic Biology that are for consideration by SBSTTA 20 (Montreal, Canada, 25-29 April 2016). These two reports are a) the updated report and synthesis of views in response to paragraph 7(b) of decision XII/24, and b) the report of the meeting of the Ad Hoc Technical Expert Group (AHTEG) on Synthetic Biology (Montreal, Canada, 21-25 September 2015).

Finland welcomes the opportunity to provide its peer review on the two reports. The first report compiles both the information on Synthetic Biology submitted to the Executive Secretary by April 2015, and the results of the online discussions in the open-ended online forum between April and July 2015. Finland provided input to both actions.

Both reports provide an excellent basis for discussions at the SBSTTA 20 meeting. The updated report and synthesis of views describes well and thoroughly the different views on the different discussion topics. It provides good background information on technical issues of Synthetic Biology, on common and different views on Synthetic Biology and moreover, especially provides some clarification on reasons behind differences in views and opinions.

The report of the meeting of AHTEG on Synthetic Biology gives a thorough overview of the work and conclusions of the meeting.

Finland welcomes the operational definition of Synthetic Biology and the clear conclusion that living organisms developed through current and near future applications of Synthetic Biology are similar to LMOs as defined in the Cartagena Protocol. Moreover, the AHTEG clearly states that non-living components (e.g. a DNA-molecule) and products (e.g. a chemical substance) do not fall under the Cartagena Protocol.

The AHTEG noted that living organisms, components and products of synthetic biology fall within the scope of the Convention and its three objectives: conservation of biological diversity, sustainable use of biological diversity, and fair and equitable sharing of the benefits of biological diversity/utilization of genetic resources. Moreover, the AHTEG provided examples of potential benefits and potential adverse effects of Synthetic Biology grouped in accordance with these objectives. Finland notes, that the clear contextualisation of the subject and the well-structured handling of the different substantive issues in the meeting and its report provide a good basis for further work.

Finland agrees that RA&RM framework and practices under the Cartagena protocol provide a good basis for the RA&RM of living organisms developed through current and near future applications of Synthetic Biology. The framework may need updating or adjustments, e.g. when it comes to comparators in the assessment or data requirements for the assessment.

Finland welcomes the conclusions and ways forward included in the report of the AHTEG and would especially like to draw the attention of the SBSTTA to the following issues: (j) assessment of potential gaps in oversight under the Convention and its Protocols with regard to components and products of Synthetic Biology; (e) coordination and establishment of synergies with other United Nations and international organizations, especially WHO and OECD, taking into account the potential applications in different fields; (d) addressing synthetic biology in a coordinated manner; and (f, l) knowledge and information sharing, and discussion of potential benefits and potential adverse effects of Synthetic Biology, considering also possible connections to other international agreements, as appropriate.