

## **India's preliminary and initial views in response to CBD notification 2019-027 dated 28 February 2019 relating to post-2020 process for CPB**

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### **(1) The structure and content of the Implementation Plan for the Cartagena Protocol on Biosafety post 2020**

The Strategic Plan for the Cartagena Protocol on Biosafety (CPB) 2011-2020 has been a very useful tool for guiding Parties in meeting their obligations. However, significant challenges still remain as regards the implementation of the Protocol. The key requirement for implementation of CPB by Parties is to have a functional biosafety regulatory framework in place. It is a matter of concern that even after nearly two decades of adoption of the Cartagena Protocol, necessary legal, administrative and other measures are still not fully in place in many Parties. This was clearly evident from the mid-term evaluation of the Strategic Plan. Having a functional biosafety framework is even more important in view of the continuing advancement of modern biotechnology and introduction of new tools such as synthetic biology, gene drives etc. Parties can fulfill their commitments relating to evaluation of potential adverse effects of LMOs on biodiversity and further decision making only if the basic requirements of having a functional regulatory system are in place. Though, the focal area 1 of the Strategic Plan focused on “Facilitating the establishment and further development of effective biosafety systems for the implementation of the Protocol”, much more efforts are still required in this regard.

While the existing elements of the Strategic Plan for the Cartagena Protocol 2011-2020 are still relevant, there is a need to expand the scope to include “Mainstreaming” and “Regional cooperation”. Mainstreaming biosafety into cross sectoral policies and programmes is extremely important as it contributes to the synergetic and coordinated implementation of the Cartagena Protocol, the Nagoya-Kuala Lumpur Supplementary Protocol on Liability and Redress and the Convention on Biological Diversity. Inclusion

of biosafety in the national action plans would also contribute to the establishment and development of effective biosafety systems at the national level. This would also help in addressing key issues regarding resource allocation at the national level towards biosafety considerations, which has been highlighted as one of the concerns in the mid-term evaluation. India has included action points related to biosafety in several of the key policies and action plans, viz. National Environment Policy, 2006, National Biodiversity Action Plan, 2008 and its Addendum 2014, National Biotechnology Strategy, 2015-2020 etc.

Regional cooperation is another key area that needs to be further encouraged, particularly as the Cartagena Protocol focuses on transboundary movement of LMOs. Effective implementation of several key Articles can be facilitated through regional collaboration and harmonization of the guidance, protocols and procedures. Limited efforts have taken place in this area through the GEF supported projects, however, much more thrust needs to be given to this. Inclusion of regional cooperation in the post-2020 framework would also help in dedicated fund allocation for regional projects to strengthen the implementation of the Cartagena Protocol by sharing of experiences.

**(2) Possible elements of a specific action plan for capacity-building on biosafety, covering the Cartagena Protocol and its Supplementary Protocol**

The Framework and Action Plan for Capacity Building for the Effective Implementation of CPB (2012-2020) has served both as a reference or guidance document as well as a plan of action for the implementation of the Protocol. However, there are concerns relating to implementation of biosafety capacity building activities in an adhoc and piecemeal manner. Further, sustainability of capacity building activities in countries remains a major issue. It is felt that mainstreaming of biosafety into broader national development plans and sectoral policies/programmes would help to address the above

challenges, and therefore the action plan should also include guidance on the above for Parties.

**(3) Relevant elements of the biosafety component of the post-2020 global biodiversity framework.**

The post-2020 implementation plan for biosafety needs to be well integrated with the post-2020 global biodiversity framework; while maintaining specific and detailed programme settings so that significant attention is paid by the Parties to biosafety issues. While working out the global targets in the post-2020 process, it would be useful to include a specific target on biosafety. This is essential as new and emerging areas, viz. synthetic biology, gene drives etc. being considered under CBD also have biosafety implications. This also would help in enhancing visibility of biosafety issues, while at the same time highlighting the need for augmenting awareness.

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