Comments to the document

MONITORING OF LMOs RELEASED INTO THE ENVIRONMENT

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OBJECTIVE AND SCOPE

Line 17-18: Alternative text:

It is intended to be a precaution-base guideline, using the best scientific information available…

PURPUSES OF MONITORING

Line 46-47:

You can never avoid risk management based on monitoring done on a small scale or from field trials, because large-scale conditions are always different. If we think that GMOs cover millions of hectares of monoculture, which cut across different geographical settings, it is not adequate to use monitoring to prevent risk management.

After line 66 add:

Monitoring of LMOs can also be used for liability and redress purposes in application of the Complementary Protocol of Nagoya –KL.

Another purpose of monitoring is to identify changes caused by global warming.

DESIGNING A MONITORING PLAN

1. Identification and prioritization of protection goals, potential adverse effects and the choice of indicators and parameters for monitoring (“what to monitor?”)

Line 153 Add: Human health, socio-economical considerations.

Line 160. Add: Human health, traditional agroecosytems.

Line 172. Add: Human health, socio-economical considerations.

1. Identification and description of appropriate monitoring methods and establishment of baselines (“how to monitor?”) .

Line 192. Add: medical histories, epidemiological studies of populations living in areas affected by GM crops.

Line 196: Add Questionnaires from populations living in areas affected by GM crops.

Line 205 Add: and the areas were there is GM crops affect human communities.

A baseline on human health will also be necessary.

Line 210. Add: accumulative and combinatorial effects.

1. Duration and scale of the monitoring activities (“how long to monitor?”

Line 229. Add: accumulative and combinatorial effects.

1. Monitoring sites and regions (“where to monitor?”)

Line 266: indigenous / peasant territories, areas with high concentration of agro-ecological / organic farms.

1. Use of existing monitoring networks

Here, it should include language to ensure the participation of civil society, especially those potentially affected by GE crops in monitoring.

1. .Reporting of results from monitoring

It is important to incorporate a text stating that the potentially affected population must also know the results of monitoring.

It is also important to include throughout the text the importance of monitoring the entire technological package used in GE crops