

In the name of God



**Islamic Republic of Iran CPB NFP**

Executive Secretary,  
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Dear Sir/Madam

April 15, 2019

Reference to Notification No. 2019-027 dated February 28, 2019; I would like to inform you that in Islamic Republic of Iran's views on that 3 items are as following.

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

One important issue is that the structure and content of the "Implementation Plan for the CPB post-2020" should not be extended further beyond the CPB.

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

Without accurate understanding of modern biotechnology and genetic engineering, implementation of CPB is not possible. Therefore, an important element of a "specific action plan for capacity-building on biosafety covering the CPB" should be capacity building for genetic engineering and conduction of training courses and workshops such as production of LMOs.

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

- Balance of "Benefits" and "Potential Negative Impacts" of modern biotechnology should be considered in the "Post-2020 Global Biodiversity Framework".

- According to Article 1 of Cartagena Protocol on Biosafety, the objective of CPB is "to contribute to ensuring an adequate level of protection in the field of ... that may have adverse effects on conservation and sustainable use of biological diversity". It shows that there are some LMOs that may have adverse effects and some LMOs may not. In the other hand, paragraph 4 of Article 7 of CPB speaks about LMOs that being not likely to have

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adverse effects on the conservation and sustainable use of biodiversity that are defined by COP MOP. According to the above mentioned Articles, it is the time for definition of LMOs that are not likely to have adverse effects on biodiversity. It is suggested to consider this issue in “Post-2020 Global Biodiversity Framework”.

With my best personal wishes.  
Sincerely yours;

A handwritten signature in cursive script, appearing to read 'B. Ghareyazie'.

Behzad Ghareyazie  
CPB National Focal Point,  
Islamic Republic of Iran