**Template for comments on the Study on Financial Security Mechanisms under the Nagoya-Kuala Lumpur Supplementary Protocol**

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| **Comments on the text and Appendix** |
| **Page #** | **Line in text** | **Comment** |
| 8 | 13 | We understand that the scarcity of examples in the literature, makes difficult to base the study on examples that stick to the scope of the Protocol. However, Spain is of the opinion that the *'traditional damage that would be suffered by non-GM farmers who are confronted with GM comingling'* SHOULD NOT be put as an example in this context. To start with, the damage that these farmers would suffer from possible contamination with LMOs should be directly related to the conservation and sustainable use of biological diversity, as stated in the Supplementary Protocol.In any case, and if it is considered that giving such an example is absolutely necessary, it would be also important to specify that, taking into account the scope of the Supplementary Protocol, it would only apply to cases in which such damage could be associated with LMOs whose origin was a transboundary movement. Therefore, we understand that this issue does not apply, for example, to contamination damage from LMOs grown in one plot in one State Party to another plot in that very same State Party. |
| 8 | 15 | Please **replace** ‘may be less relevant’ with ‘are of little relevance’ so that it reads as follows:Even though these examples ~~may be less relevant~~ are of little relevance for the biodiversity damage covered…  |
|  8 | 21 | Please **delete** ‘main’ so that it reads:‘and that the ~~main~~ focus’ |
| 8 | 22 | Please **add** ‘associated to transboundary movements’ so that it reads:‘of the NKLSP is on damage to biodiversity associated to transboundary movements rather than’ |
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Please submit your comments to secretariat@cbd.int by **25 June 2020.**