

African Centre for Biodiversity (ACB) comments on the draft Implementation Plan for the Cartagena Protocol and Capacity-Building Action Plan (2021-2030)

Contact information		
Surname:		Mayet
Given Name:		Mariam
Government (if applicable):		
Organization/IPLC:		African Centre for Biodiversity (ACB)
E-mail:		Mariam@acbio.org.za
Comments on the text and Appendix		
Page #	Line in text or Element in Appendix	Comment
5	Goal A.1.	Should preferably read “Parties have in place functional national biosafety frameworks <i>that strongly incorporate the precautionary approach and precautionary principle</i>
5	Goal A.1 and associated objectives, indicators etc.	Such functional national biosafety frameworks, and associated capacity building, should be sure to include <i>strict</i> application of contained use guidelines and regulations.
6	Objective A.1.4.	Should incorporate the need to constantly update regulatory capacities and instruments in relation to new technologies, such as gene drives, synthetic biology, ensuring contained use etc.
7	Objectives linked with A5	In line with Goal A5, an objective on contained use, and associated indicators, outcomes and areas for capacity building should be added i.e. it should be made clearer that risk assessments should also be conducted for contained use, as the Protocol provides for.
9	A.7.1.	Should include contained use
10	Goal A.9.	Should rather read, “Parties <i>are encouraged</i> to take into account socio-economic considerations when making decisions...” Given that it is mostly developing countries that require capacity support in developing effective biosafety regulatory frameworks and implementation, and that their agricultural systems are seen as important sites for the spread of modern biotechnology by interested corporations, the socio-economic impacts of modern biotechnology are important to consider – on farmers and consumers. Countries especially developing countries should thus be strongly encouraged to undertake comprehensive socio-economic impact assessments.
12	B.1. Objectives	Should be made clearer that such capacity building should include capacity building on understanding, regulating and applying the precautionary principle to new technologies like gene drives, genome editing, cisgenesis and other synthetic biology techniques.
12	Capacity-building	Delete this item, as it gives the operator the ability to attempt to have

	activity (vii) under Goal A.10.	decisions changed whenever they are instructed to undertake response measures.
14	Goal B.3	Replace “consult the public in decision-making” with “ensure public participation in decision-making”. The word participation is used through Objectives, Indicators and Outcomes, and so given that consultation and participation are not the same thing, participation should be used in Goals and Objectives for clarity and consistency.
14	Goal B.3.	Insert ‘ <i>all according to the highest ethical standards of research and public participation</i> ’ at end of existing sentence. This is especially important in light of the new technologies like gene drives, which in places like Burkina Faso are being tested through the use of human subjects in the case of Target Malaria, raising severe ethical problems.
14	Objectives B.3.3	Replace ‘consult’ with ‘participation’ for consistency with other Objectives and the Indicators.

Please submit your comments to secretariat@cbd.int by **17 January 2020**.