

Template for comments on the draft Implementation Plan for the Cartagena Protocol and Capacity-Building Action Plan (2021-2030)

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Comments on the text and Appendix		
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5	Goal A.1	Biosafety frameworks should be science-based and consistent with international trade obligations including the WTO Agreement on the Application of Sanitary and Phytosanitary Measures, the WTO Agreement on Technical Barriers to Trade and the General Agreement on Tariffs and Trade (GATT). We suggest the following underlined changes: “Parties have in place functional, <u>scientific-based</u> national biosafety frameworks <u>that are consistent with the mandates of other international fora and agreements, in particular those relating to trade</u> ”.
5	A.1 Outcome	We suggest the following underlined changes to align with our suggested changes to Goal A.1: “Functional, <u>science-based</u> national biosafety frameworks enable competent authorities and national focal points of all Parties to effectively and efficiently fulfil their obligations under the Protocol <u>and other international agreements</u> ”.
7	Objective A.5.1	The word “appropriate” should be replaced with “scientifically sound” to align with Goal A.5 which states “Parties carry out scientifically sound risk assessments of LMOs, and ...”. The word “appropriate” implies techniques other than scientific assessments can be used.
8	A.6. Key area (2)	Development of guidance for sampling, detection and identification of LMOs must be consistent with international trade rules and standards. We suggest the following underlined changes: “Development and access to guidance materials, procedures and information, <u>that is consistent with international trade rules and standards,</u> for sampling, detection and identification of LMOs”.
9	Objective A.7.1	Any measures adopted must be consistent with international trade obligations. We suggest the following underlined changes:

		“Parties have adopted appropriate measures <u>that are consistent with international trade obligations</u> to prevent illegal and unintentional transboundary movements of LMOs”.
10	A.9 Key area (2)	Under the WTO, members are bound by certain obligations that limit their right to restrict imports. Therefore any development of resource materials on socio-economic considerations need to reflect this. We suggest the following underlined changes: “(2) Development and access to resource materials on socio-economic considerations <u>that are consistent with international trade obligations</u> ”.
10	A.9.1 CB activity (ii)	Under the WTO, members are bound by certain obligations that limit their right to restrict imports. Therefore any development of training materials on socio-economic considerations need to reflect this. We suggest the following underlined changes: “(ii) Develop, update and disseminate training materials on socio-economic considerations <u>that are consistent with international trade obligations</u> ”.

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