

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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3	112	<p>In general, considering the current state of world biodiversity and the global climate crisis, the Implementation Plan should be completely harmonized with the Convention for Biological Diversity and the policies and actions from countries aimed to mitigate climate change effects.</p> <p>I consider that the goals are fine. However, its fundamental the availability of resources to provide an information base for the preparation of a long-term strategic framework for capacity-building beyond 2020 and from my point of view I think that it is necessary to consider other aspects such as organisms derived from new technologies especially crops created with new technologies and their products. In addition, we need to include aspects such as the Conservation of native biodiversity for preservation of genetic variability that is a fundamental tool to respond to environmental changes. On the other hand, is necessary consider socioeconomic aspects that is a fundament in the Conservation topic even indigenous people y local communities.</p> <p>The structure and content of the implementation Plan for the Cartagena Protocol on Biosafety is very important to update according with the needs of the population and in the construction of the take decisions to keep the biodiversity that has an impact on food and health, particularly on indigenous peoples, because this sector of the population is the one that has been dedicated for a long time to the maintenance of elements of biodiversity and from which products of high added value are obtained to which the new technologies are applied. I consider that the objectives should be updated with the creation of new technologies that are modified over time.</p> <p>In fact, is important the implementation of local protocols, methodologies and principally with monitoring protocols, according to the methodologies</p>

		<p>available in each area.</p> <p>In regards with the goals, it is appropriate to consider aspects like the risk assessment and procedures in the transport of LMOs such as: production processes, transport of LMOs and implementation plans with monitoring and methodologies and sanctions for damages caused by unintentional release.</p> <p>I consider necessary the planning instruments consider including the Nagoya Supplementary Protocol, particularly in the development of training schemes and dialogue spaces to reach conceptual agreements such as the definition of "damage". , and is important to consider that some living modified organisms were released into the environment for more than two decades, it would be pertinent for the Protocol of Cartagena to carry out a retrospective analysis of the effects that different living modified organisms have had on the environment, which could have effects on conservation and sustainable use of biological diversity, as well as the effects on human health.</p> <p>In addition, it should be included aspects such as unintentional transboundary movements and emergency measures, and I consider that the identification and correct label in all of modified products necessary, even monitoring in organic products. Actually, considering the crops and also their derivatives, as well as adverse effects to the environment and native varieties.</p> <p>In this aspect, in the Protocol is important to consider aspects such as emerging risks, creation of new technologies and the possible adverse effects in the environment and health. Actually, it is important to consider the responsibility and compensation for damages caused by the transboundary movements of genetically modified organisms, it must also be taken into consideration formulating regulations or flexible procedures between countries and it should be updated according to the time. In addition to take into account other aspects such as proper labelling, including risks to the environment and biodiversity, particularly in developing countries, which in many cases are also centers of biological origin and diversity and have great cultural wealth that could be the key to the conservation of native varieties.</p> <p>According to indicators, I think that it is necessary that the parties have access to appropriate guidance materials and universal protocols to identify GMO taking into account socio-economic considerations in accordance with Article 26 of the Protocol. I consider important to include a request a monitoring report before and after release I consider that the objectives should be updated with the creation of new technologies that are modified over time.</p>
6	Goal A.2.	I think that is important the exchange of relevant information through the BCH related new technologies or exchange of new methodologies to identify GMO effectively.
13	Goal B.2.	Respect to mobilize resources to support implementation of the Protocol. I

		consider that is necessary in some cases because for example in many countries there are biodiversity but not resources or tools to protect this richness or count with methodologies to identify GMO in native crops that is important tool in the conservation.
7	Objective A.5.2	In this regard, the detection of GMOs is mainly carried out through the qPCR technique, which has proven to be a reliable, reproducible and precise technique. Although there are now methods such as new generation sequencing and that is usually more accurate but more expensive than the use of this technique is more expensive and increases significantly due to the number of samples. Then, I think that qPCR technique is the best option for the identification of GMOs in both food or crops principally, through the identification of P35S and T-NOs and specific events. However, I believe that more laboratories are lacking that have this technique for the identification of GMOs in different crops, because the crops (GMOs) is increasingly common, which makes it increasingly necessary the identification. On the other hand, the need to join efforts to identify these types of crops and their effects in the environmental.
8	A.6. Indicator (c)	Percentage to Parties that have access to and use certified reference materials necessary to detect and identify LMOs In this regard, I think that in many countries is necessary implement materials and protocols to detect and identify LMOs and of course identify the localities with certified laboratories that could support in the identification in another countries.
8	A.6 Outcome	by detecting and identifying LMOs, parties are able to respond to unintentional and illegal transboundary movements and to follow the handling, transport, packaging and identification requirements in accordance with the Protocol. According with the implementation plan for the Cartagena Protocol on Biosafety, I think that is very important maintain carefully some aspects like the transport, packaging and identification requirements in accordance with the Protocol and is necessary implement this practice in all the countries and try to keep the Biosafety actions between the countries.
8	A.6. Key area (2)	by detecting and identifying LMOs, parties are able to respond to unintentional and illegal transboundary movements and to follow the handling, transport, packaging and identification requirements in accordance with the Protocol. at respect with unintentional or illegal transboundary movements, I think that in only some countries follow the transport, packaging and identification requirements in accordance with the Protocol and is necessary implement this practice in all the countries.
8	A.6./A.7. CB activity (iv)	I consider that is necessary implement training with local scientists and laboratory technicians in LMO detection and analysis and implement some courses online or meetings where can we argue about new techniques to the identification of LMOs and update references and researches done in our countries and share it through the BHC, maintaining communication between all parties supporting the implementation plan for the Cartagena Protocol on Biosafety.
13	B.2.	Is a fundamental point raise awareness strengthen cooperation between

	CB activity (iii)	parties and support other countries to ensure the full implementation of the Protocol, this is possible if we raise awareness support the native crops conservation and try to ensure the full implementation of the Protocol in all countries.
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Please submit your comments to secretariat@cbd.int by **17 January 2020**.