

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		
Page #	Line in text or Element in Appendix	Comment
1	3-31	Section one (Background and introduction) is unnecessary detail and is complicated and difficult to follow for people unfamiliar with the language of the CBD. It should be deleted to make the document easier to understand.
1-2	32-65	Once section one has been deleted, sections two and three should be swapped, so that the document starts with the section on the “Purpose of the Implementation Plan and the Capacity-Building Action Plan”. Readers should be clear on the purpose of the document and this should be the first thing they see when starting to read the document.
2	63	Non-parties can also support the implementation plan. “non-Parties,” should be added ahead of the word “stakeholders” at the start of line 63
6	A.2. CB activity (i)	Under Capacity-building activities, it is unclear what is meant in (i), specifically what constitutes a “target group” and how their training would need to differ. This term requires clarification.
6	A.2. CB activity (iv)	It is unclear with/amongst whom collaboration is meant to be strengthened, and thus who requires training, if any, as well as what form such training might take. Further clarification is required.
7	A.5.2	There is no need for Parties to develop further guidance material on risk assessment and risk management. Adequate guidance exists already. The word “develop,” should be deleted.
7	A.5. CB activity (i)	There is no need for the development of further guidance material on risk assessment and risk management. Adequate guidance exists already. The word “develop,” should be deleted.
8	A.6. Key area (2)	This work has already been completed and this key area is unnecessary. It should be deleted. See below for further detail.
8	A.6 CB activity (ii)	Each Party needs to determine the best way to verify documentation accompanying LMO shipments. Checklists need to be tailored to each pathway, the feasibility of identification, the resources available, and the specific relevant domestic legislation/regulation/policy of the Party. A ‘one size fits all’ approach will not work, and, as such, generic checklists

		will not add any value. This activity should be deleted.
8	A.6 CB activity (iii)	<p>The online group of laboratories for the detection and identification of living modified organisms have already worked on a number of guidance which includes:</p> <ol style="list-style-type: none"> 1. Overview of available detection methods, including validated methods; 2. Overview of available databases for methods and sequence information, and available screening matrices; 3. Minimum performance criteria for sample handling, extraction, detection and identification methodology; 4. Experience and case studies on detection and identification with the view to assist Parties that are currently building their capacities in this area. <p>Given the significant amount of information available, further work in this area is not warranted and would be duplicative and unnecessary. This activity should be deleted.</p>
8	A.5. CB activity (vi)	<p>This activity appears to imply that post-release monitoring is required in all cases. However, there is no requirement for monitoring of LMOs in the Cartagena Protocol. Indeed, Annex III 8.(f) states:</p> <p>“Where there is uncertainty regarding the level of risk, it may be addressed by requesting further information on the specific issues of concern or by implementing appropriate risk management strategies and/or monitoring the living modified organism in the receiving environment.”</p> <p>The need for any “LMO monitoring framework” is outside the bounds of the Protocol. Any aspect of LMO detection, including illegal/unintentional transboundary movements, are more than adequately covered under goals A.6., A.7., and A.8.</p> <p>Therefore, this activity should be deleted.</p>
12	B.1.1 and indicator (a)	<p>Given restrained resources for, and ability to absorb, capacity building, it is important that Parties prioritise the capacity building they most need. The following words in bold should be added to B.1.1. and indicator (a): “...have identified and prioritised their capacity building needs.”</p>

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