

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
0	0	The scope and intent of the implementation plan and the capacity building action plan for 2021-2030 is appropriate and not too restrictive. The key areas and capacity building are necessarily broad and take into consideration the multifarious environment.
0	0	It is important to provide linkages to SDG that biosafety contribute to, in particular: Goal 2 – Hunger: biosafety contributes to conservation and sustainable use of genetic diversity for food and agriculture; Goal 3 – Health: risk assessment under the Protocol enables research and development for human health applications; Goal 4 – Education: the Biosafety Clearing-House contributes to education by raising awareness of biosafety; and Goal 5 – Gender equality: can be addressed by socio-economic considerations in biosafety.
0	0	The Cartagena Protocol on Biosafety plays an important role in providing global risk assessment and risk management frameworks for emerging technologies. It is therefore recommended that specific elements on emerging technologies be incorporated in the implementation plan.
5	Objective A.1.2	Align language on A.1.2 to respond to point (b) under indicators and key area (2) under capacity building activities i.e. A.1.2 to read “Parties have mainstreamed biosafety in national sectoral and cross-sectoral strategies.....”
6	Objective A.1.4	This is adequately addressed under enabling environment therefore we propose to either delete or adopt the language under Par. 1 of Art 2 of the CPB and objective A.1.4 should read “Competent national authorities have the necessary administrative, resources and other measures to carry out their obligations under the CPB

6	Objective A.2.1	Proposing the use of the word mandatory such that the objective reads “Parties provide accurate and complete mandatory information...”
6	A.2 new proposed Indicators	d) Number of active users under the BCH
6	A.2 Capacity building activity	Provide technical training to the IT officials in particular programming language which is advanced to support the national information technology infrastructure .i.e. the current language used for hermes tools for BCH-3 project was not a feasible programming language option.
6	A.2 Outcome	On its current formulation the expected outcome reads like a definition and doesn’t outline what we are expected to archive. We therefore propose that we align outcome A.2 with language under Art.20; “Mandatory and other relevant information is available to facilitate the exchange of biosafety information, enabling Parties to take informed decisions.”
6	A.3 Goal and Outcomes	Goal A.3 Should read as follows: Parties submit their national reports within the prescribed time frame or deadline. Propose that we retain the outcome under the current strategic plan “Improved reporting by Parties including by submitting complete and timely national reports”
6	A.3 proposed key area	Assisting Parties to develop their national report
	A.3 proposed capacity building activity	Provide technical support towards the development of the national report
6	A.4 Outcome	Propose insertion of words for easy read; A.4.2 Outcome should read “The effectiveness of compliance mechanisms to facilitate the implementation of the Protocol.”
6	A.4. Key area (1)	Is there any relevancy in providing capacity building under this component noting that non-compliance may be addressed under measures to promote compliance and address cases of non-compliance as per the established procedures and mechanisms on compliance under the Cartagena Protocol on Biosafety? Also, it is unclear to whom this capacity building will be provided to?
6	A.4. Indicator (b)	Rearrange the wording for better reading i.e. “Percentage of non-compliance issues identified and resolved by the Compliance Committee.”
7	Goal A.5.	‘...as relevant.’ Should be added at the end of the goal. This will i.) indicate that these risk assessments are only necessary under the conditions of the Protocol and; ii.) that not all identified risks need to be managed or controlled.
7	A.5. Key area	Propose to add key area number (5); Key area (5) should read as “Integration of traditional knowledge of IPLCs into RA processes.”
7	A.5. CB activity (ii)	Propose rephrasing to align with other activities “Provide training on conducting and reviewing risk assessments, including use of guidance documents”
7	A.5. Capacity Building activities	Propose to add Capacity Building activity (vii) CB activity (vii) should read as “Provide training on how to consider traditional knowledge of IPLCs into RA processes”
8	A.6 Outcome	Propose to replace the word “respond’ with “address”

8	A.6. Key areas (1-4)	Take note of decision Par 9 a-c of COP MOP9/11 whereby the Executive Secretariat was requested to review and finalise the training manual on detection and identification of LMOs
8-9	Goal A.6, A.7 and A.8	There is a need to consider reworking Goals A.6, A.7, and A.8 in particular their objectives, indicators and expected outcomes as they appear to being used interchangeably i.e. expected outcomes of A.6 responds to Goal A.8 which addresses unintentional transboundary movement. We therefore propose that outcomes under A.6 should adopt the language under the previous Strategic Plan which states “ability to access and use available technical tools for the detection and identification of unauthorised LMOs”
8-9	Capacity building activities A.6, A.7 and A.8	Propose to add Capacity building activity (vii) to read as; “Provide support towards the establishment of infrastructure for detection and identification of LMOs”
9	Goal A.7.	This goal should be a sub-section of goal A.4
10	Goal A.9.	“or under its domestic measures implementing the Protocol” should be added after ‘...import of LMOs...’. This is in accordance with article 26
10	A.9. Key area (1)	Propose to replace the word “capacities” with “human capacities”
10	A.9 Indicator (c)	Proposed language (c) Percentage of Parties that cooperate on research and information exchange on any socio-economic impacts of LMOs in accordance with Article 26, especially with respect to IPLCs.
11	Goal A.10	‘All parties to the Cartagena Protocol’ should be ‘Parties that choose to become Parties to the Nagoya Kuala Lumpur ...’
13	Goal B.2.	Propose to extend text; Goal B.2. should read “Parties to mobilize resources to support implementation of the protocol <i>and its Supplementary Protocol</i> ”
13	Objective B.2.1.	Rephrase to “Parties with national resources allocated to biosafety through national budgets.”
13	B.2. Indicator (a)	Rephrase to “Percentage of Parties with national resources allocated to biosafety through national budgets”
15	Goal B.4.	‘...and coordination...’ should be included after ‘...enhance cooperation...’ This is in line with paragraph 10 of the plan.
15	Goal B.4.	This is the most important and first step of creating an enabling environment and it would make sense to make this goal B.1.

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