Testing of the Guidance on Risk Assessment of Living Modified Organisms

#24

COMPLETE

Collector: BCH website (Website Survey)
Started: Sunday, March 30, 2014 11:39:55 AM
Last Modified: Sunday, March 30, 2014 12:20:30 PM
Time Spent: 00:40:35

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Q1: **Type of submission:**	Party

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Q2: **Name of the Party:**	New Zealand
Q3: **Person submitting this questionnaire:**	
Full Name:	Kirsty Allen
Email Address:	Kirsty.Allen@epa.govt.nz
Q4: **Institution(s) or organization(s) that participated in the testing:**	Government authority(ies)
Q5: **Context in which the testing was conducted**	Individual exercise(s)
Q6: **Actual case(s) of risk assessment used in the testing: Note: Please enter the hyperlinks of BCH Risk Assessment Records (e.g. http://bch.cbd.int/database/record.shtml?documentid=104904 and http://bch.cbd.int/database/record.shtml?documentid=104905) or other publicly accessible web pages containing the technical and scientific data of the actual cases of risk assessment used in the testing.**	
Risk Assessment 1:	http://www.epa.govt.nz/search-databases/Pages/applications-details.aspx?appID=GMR07001
Risk Assessment 2:	http://www.epa.govt.nz/search-databases/Pages/applications-details.aspx?appID=ERMA200479#
Q7: **In what language was the Guidance tested?**	English

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Q8: Name of the other Government:	*Respondent skipped this question*
Q9: Person submitting this questionnaire:	*Respondent skipped this question*
Q10: Institution(s) or organization(s) that participated in the testing:	*Respondent skipped this question*
Q11: Context in which the testing was conducted	*Respondent skipped this question*

Q12: Actual case(s) of risk assessment used in the testing: Note: Please enter the hyperlinks of BCH Risk Assessment Records (e.g. http://bch.cbd.int/database/record.shtml?documentid=104904 and http://bch.cbd.int/database/record.shtml?documentid=104905) or other publicly accessible web pages containing the technical and scientific data of the actual cases of risk assessment used in the testing.	*Respondent skipped this question*
Q13: In what language was the Guidance tested?	*Respondent skipped this question*

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Q14: Name of the organization:	*Respondent skipped this question*
Q15: Person submitting this questionnaire:	*Respondent skipped this question*
Q16: Institution(s) or organization(s) that participated in the testing:	*Respondent skipped this question*
Q17: Context in which the testing was conducted	*Respondent skipped this question*
Q18: Actual case(s) of risk assessment used in the testing: Note: Please enter the hyperlinks of BCH Risk Assessment Records (e.g. http://bch.cbd.int/database/record.shtml?documentid=104904 and http://bch.cbd.int/database/record.shtml?documentid=104905) or other publicly accessible web pages containing the technical and scientific data of the actual cases of risk assessment used in the testing.	*Respondent skipped this question*
Q19: In what language was the Guidance tested?	*Respondent skipped this question*

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Q20: **Would you like to submit an evaluation of the following section of the Guidance: Part I: The Roadmap for Risk Assessment**	Yes

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Q21: **This section of the Guidance is practical.1**

(no label)	Disagree

Q22: Would you like to suggest improvements to this section to increase its practicality? If so, please indicate the line numbers and explain which improvements could be made:

These are general comments.
The guidance is high level and very academic (i.e. it does not provide on-the-ground practical advice). It is very complex, uses lots of technical language and references to other Protocol sections and other documents etc.
• It is unclear who the intended audience for this guidance is (i.e. how much previous experience with LMOs/ risk assessment practices do you need to be able to understand this guidance?). This document will not provide adequate guidance for non-experts to carry out a "case-by-case" risk assessment "on the ground" especially for less "mainstream" GMOs or activities (e.g. vaccinations).
An option to improve this is to provide real life case studies for a range of LMOs (from GM animals, plants and microorganisms, viruses) and uses (from field trials, commercial cultivation, vaccines) to show how different regulators actually carried out the risk assessment. For example how did Regulator X when assessing LMO Y;
o Frame the risk assessment/define the scope (e.g. What was within the scope and what was out? What are the underlying assumptions/scenarios? What fell outside the Protocol mandate and how was this dealt with? i.e. if there were risks still to be addressed).
o Decide what comparator to use (if needed at all?).
o Decide the information was sufficient for the activity.
o Identify and deal with uncertainty.
o Decide what expertise was required for the risk assessment (e.g. toxicologists, ecologists, commercial growers etc.)
o Deal with different activities (e.g. field test versus commercial releases).
o Use pre-existing information drawn from previous risk assessments.
o Use scientific consensus positions to inform the risk assessment e.g. current opinion on HGT.
o Describe the likelihood, consequence and risk characterisation used (quantitatively or qualitatively, how are the terms defined).

Q23: This section of the Guidance is useful or has utility.2

(no label) — Disagree

Q24: Would you like to suggest improvements to this section to increase its usefulness/utility? If so, please indicate the line numbers and explain which improvements could be made:

See above comments

Q25: This section of the Guidance is consistent with the Cartagena Protocol on Biosafety.3

(no label) — Neutral

Q26: Would you like to suggest improvements to this section to increase its consistency with the Protocol? If so, please indicate the line numbers and explain which improvements could be made: — *Respondent skipped this question*

Q27: This section of the Guidance takes into account past and present experiences with LMOs.4

(no label) — Disagree

Q28: Would you like to suggest improvements to this section in order to better take into account past and present experiences with LMOs? If so, please indicate the line numbers and explain which improvements could be made:

See above comments

Q29: Here you may provide further details to explain your answers in evaluating this section of the Guidance:

See above comments

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Q30: Would you like to submit an evaluation of the following section of the Guidance: Part II: Specific types of LMOs or Traits - Risk assessment of LMOs with stacked genes or traits — No

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Q31: This section of the Guidance is practical.1	*Respondent skipped this question*
Q32: Would you like to suggest improvements to this section to increase its practicality? If so, please indicate the line numbers and explain which improvements could be made:	*Respondent skipped this question*
Q33: This section of the Guidance is useful or has utility.2	*Respondent skipped this question*
Q34: Would you like to suggest improvements to this section to increase its usefulness/utility? If so, please indicate the line numbers and explain which improvements could be made:	*Respondent skipped this question*
Q35: This section of the Guidance is consistent with the Cartagena Protocol on Biosafety.3	*Respondent skipped this question*
Q36: Would you like to suggest improvements to this section to increase its consistency with the Protocol? If so, please indicate the line numbers and explain which improvements could be made:	*Respondent skipped this question*
Q37: This section of the Guidance takes into account past and present experiences with LMOs.4	*Respondent skipped this question*
Q38: Would you like to suggest improvements to this section in order to better take into account past and present experiences with LMOs? If so, please indicate the line numbers and explain which improvements could be made:	*Respondent skipped this question*
Q39: Here you may provide further details to explain your answers in evaluating this section of the Guidance:	*Respondent skipped this question*

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Q40: **Would you like to submit an evaluation of the following section of the Guidance: Part II: Specific types of LMOs or Traits - Risk assessment of LM crops with tolerance to abiotic stress**	No

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Q41: This section of the Guidance is practical.1	*Respondent skipped this question*
Q42: Would you like to suggest improvements to this section to increase its practicality? If so, please indicate the line numbers and explain which improvements could be made:	*Respondent skipped this question*
Q43: This section of the Guidance is useful or has utility.2	*Respondent skipped this question*
Q44: Would you like to suggest improvements to this section to increase its usefulness/utility? If so, please indicate the line numbers and explain which improvements could be made:	*Respondent skipped this question*
Q45: This section of the Guidance is consistent with the Cartagena Protocol on Biosafety.3	*Respondent skipped this question*

Q46: Would you like to suggest improvements to this section to increase its consistency with the Protocol? If so, please indicate the line numbers and explain which improvements could be made:	*Respondent skipped this question*
Q47: This section of the Guidance takes into account past and present experiences with LMOs.4	*Respondent skipped this question*
Q48: Would you like to suggest improvements to this section in order to better take into account past and present experiences with LMOs? If so, please indicate the line numbers and explain which improvements could be made:	*Respondent skipped this question*
Q49: Here you may provide further details to explain your answers in evaluating this section of the Guidance:	*Respondent skipped this question*

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Q50: **Would you like to submit an evaluation of the following section of the Guidance: Part II: Specific types of LMOs or Traits - Risk assessment of LM mosquitoes**	No

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Q51: This section of the Guidance is practical.1	*Respondent skipped this question*
Q52: Would you like to suggest improvements to this section to increase its practicality? If so, please indicate the line numbers and explain which improvements could be made:	*Respondent skipped this question*
Q53: This section of the Guidance is useful or has utility.2	*Respondent skipped this question*
Q54: Would you like to suggest improvements to this section to increase its usefulness/utility? If so, please indicate the line numbers and explain which improvements could be made:	*Respondent skipped this question*
Q55: This section of the Guidance is consistent with the Cartagena Protocol on Biosafety.3	*Respondent skipped this question*
Q56: Would you like to suggest improvements to this section to increase its consistency with the Protocol? If so, please indicate the line numbers and explain which improvements could be made:	*Respondent skipped this question*
Q57: This section of the Guidance takes into account past and present experiences with LMOs.4	*Respondent skipped this question*
Q58: Would you like to suggest improvements to this section in order to better take into account past and present experiences with LMOs? If so, please indicate the line numbers and explain which improvements could be made:	*Respondent skipped this question*
Q59: Here you may provide further details to explain your answers in evaluating this section of the Guidance:	*Respondent skipped this question*

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Q60: Would you like to submit an evaluation of the following section of the Guidance: Part II: Specific types of LMOs or Traits - Risk assessment of LM trees

Yes

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Q61: This section of the Guidance is practical.1

(no label) Disagree

Q62: Would you like to suggest improvements to this section to increase its practicality? If so, please indicate the line numbers and explain which improvements could be made:

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o Use scientific consensus positions to inform the risk assessment e.g. current opinion on HGT.
o Describe the likelihood, consequence and risk characterisation used (quantitatively or qualitatively, how are the terms defined).

Q63: This section of the Guidance is useful or has utility.2

(no label) Disagree

Q64: Would you like to suggest improvements to this section to increase its usefulness/utility? If so, please indicate the line numbers and explain which improvements could be made:

Respondent skipped this question

Q65: This section of the Guidance is consistent with the Cartagena Protocol on Biosafety.3

(no label) Neutral

Q66: Would you like to suggest improvements to this section to increase its consistency with the Protocol? If so, please indicate the line numbers and explain which improvements could be made:

Respondent skipped this question

Q67: This section of the Guidance takes into account past and present experiences with LMOs.4

(no label) Disagree

Q68: Would you like to suggest improvements to this section in order to better take into account past and present experiences with LMOs? If so, please indicate the line numbers and explain which improvements could be made:

See above comments

Q69: Here you may provide further details to explain your answers in evaluating this section of the Guidance:

See above comments

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Q70: **Would you like to submit an evaluation of the following section of the Guidance: Part III: Monitoring of LMOs Released into the Environment**	No

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Q71: This section of the Guidance is practical.1	*Respondent skipped this question*
Q72: Would you like to suggest improvements to this section to increase its practicality? If so, please indicate the line numbers and explain which improvements could be made:	*Respondent skipped this question*
Q73: This section of the Guidance is useful or has utility.2	*Respondent skipped this question*
Q74: Would you like to suggest improvements to this section to increase its usefulness/utility? If so, please indicate the line numbers and explain which improvements could be made:	*Respondent skipped this question*
Q75: This section of the Guidance is consistent with the Cartagena Protocol on Biosafety.3	*Respondent skipped this question*
Q76: Would you like to suggest improvements to this section to increase its consistency with the Protocol? If so, please indicate the line numbers and explain which improvements could be made:	*Respondent skipped this question*
Q77: This section of the Guidance takes into account past and present experiences with LMOs.4	*Respondent skipped this question*
Q78: Would you like to suggest improvements to this section in order to better take into account past and present experiences with LMOs? If so, please indicate the line numbers and explain which improvements could be made:	*Respondent skipped this question*
Q79: Here you may provide further details to explain your answers in evaluating this section of the Guidance:	*Respondent skipped this question*

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Q80: **Would you like to submit an evaluation of the following section of the Guidance: Background Documents**	No

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Q81: This section of the Guidance is practical.1	*Respondent skipped this question*
Q82: This section of the Guidance is useful or has utility.2	*Respondent skipped this question*
Q83: This section of the Guidance is consistent with the Cartagena Protocol on Biosafety.3	*Respondent skipped this question*

Q84: This section of the Guidance takes into account past and present experiences with LMOs.4	*Respondent skipped this question*

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Q85: Please use the space below if you wish to provide additional feedback regarding the testing of the Guidance on Risk Assessment of Living Modified Organisms:	*Respondent skipped this question*