

## **SUBMISSION FROM THE UNITED ARAB EMIRATES (PARTY)**

*(Translated from the original in Arabic)*

### **FORM FOR THE SCIENTIFIC REVIEW OF THE GUIDANCE ON RISK ASSESSMENT OF LIVING MODIFIED ORGANISMS**

The Guidance for Risk Assessment of Living Modified Organisms (the “Guidance”) was developed through collaborative efforts between the Open-ended Online Expert Forum and the Ad Hoc Technical Expert Group (AHTEG) on Risk Assessment and Risk Management.\*

The aim of the Guidance is to further elaborate the methodology for risk assessment of living modified organisms (LMOs) in accordance with the Cartagena Protocol on Biosafety, and in particular in accordance with Annex III of the Protocol.

The Guidance is intended to be a “living document” that will be improved with time as new experience becomes available and new developments occur in the field of applications of LMOs, as and when mandated by the Parties to the Cartagena Protocol on Biosafety.

At the fifth meeting of the Conference of the Parties serving as the meeting of the Parties to the Protocol (COP-MOP), the Parties to the Protocol welcomed the first version of the Guidance and noted that it requires further scientific review and testing to establish its overall utility and applicability to living modified organisms of different taxa introduced into various environments.

The Executive Secretary was therefore requested to coordinate a review process of this first version of the Guidance among Parties and other Governments, through their technical and scientific experts, and relevant organizations.

The following questions are aimed at seeking views to assist the Open-ended Online Expert Forum and the AHTEG in revising the Guidance.

The completed review forms are to be mailed to the Secretariat at: [riskassessment.forum@cbd.int](mailto:riskassessment.forum@cbd.int) . Reviews from Parties and other Governments are to be submitted by their National Focal Points. Reviews from organizations are to be submitted through their head offices.

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\* Additional information on the development of the “Guidance on Risk Assessment of Living Modified Organisms” may be found in document UNEP/CBD/BS/COP-MOP/5/12 (see “Official Documents” at <http://www.cbd.int/doc/?meeting=MOP-05>).

**i. Reviewer's information**

Please select **only one** of options below

**This scientific review of the Guidance on Risk Assessment of Living Modified Organisms is being submitted on behalf of a:**

- Party. Please specify: United Arab Emirates
- Other Government. Please specify: <Country's name>
- Organization: Please specify: <Organization's name>

**ii. Overall evaluation**

Please select **only one** answer for each section

<b>Q1. How do you evaluate the level of consistency of the following sections of the Guidance with the Cartagena Protocol on Biosafety, particularly with its Article 15 and Annex III?</b>	<b>Very poor</b>	<b>Poor</b>	<b>Neutral</b>	<b>Good</b>	<b>Very good</b>
• Roadmap for risk assessment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Risk assessment of living modified organisms with stacked genes or traits	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Risk assessment of living modified crops with tolerance to abiotic stress	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Risk assessment of living modified mosquitoes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Q2. How do you evaluate the usefulness of the following sections of the Guidance as tools for assisting countries in conducting and reviewing risk assessments of LMOs <u>in a scientifically sound and case-by-case manner?</u></b>	<b>Very poor</b>	<b>Poor</b>	<b>Neutral</b>	<b>Good</b>	<b>Very good</b>
• Roadmap for risk assessment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Risk assessment of living modified organisms with stacked genes or traits	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Risk assessment of living modified crops with tolerance to abiotic stress	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Risk assessment of living modified mosquitoes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<b>Q3. How do you evaluate the usefulness of the following sections of the Guidance as tools for assisting countries in conducting and reviewing risk assessments of LMOs introduced into various receiving environments?</b>					
	Very poor	Poor	Neutral	Good	Very good
• Roadmap for risk assessment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Risk assessment of living modified organisms with stacked genes or traits	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Risk assessment of living modified crops with tolerance to abiotic stress	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Risk assessment of living modified mosquitoes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Q4. How do you evaluate the usefulness of the “Roadmap” as a tool for assisting countries in conducting and reviewing risk assessments of LMOs of different taxa?</b>					
	Very poor	Poor	Neutral	Good	Very good
• Roadmap for risk assessment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**ADDITIONAL COMMENTS ON THE OVERALL EVALUATION**

Please add any additional comment you may have regarding the overall evaluation of the first version of the “Guidance on Risk Assessment of Living Modified Organisms” below.

Q5. We believe that we must add the term in English next to all points mentioned such as stacked cases, abiotic stress, evolutionary responses, injection areas, transgene stability, etc. in order to understand correctly without confusion the scientific term used.

**iii. Section-by-section review**

Please select **only one** of the boxes for each question

**PART I: THE ROADMAP FOR RISK ASSESSMENT**

**1. INTRODUCTION**

Q6. Are all the concepts in this section relevant and accurate from a scientific point of view?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No. Please comment: <Type here>
Q7. Does this section include all the necessary relevant concepts?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No. Please comment: <Type here>
Q8. Are all the concepts in this section expressed in a language that could be easily	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No. Please comment: Please simplify the terms and

understood by the target users?

provide a more detailed explanation of each term so that targeted users can understand it easily.

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## 2. THE RISK ASSESSMENT

**Step 1: “An identification of any novel genotypic and phenotypic characteristics associated with the living modified organism that may have adverse effects on biological diversity in the likely potential receiving environment, taking also into account risks to human health”**

Q9. Are all the concepts in this section relevant and accurate from a scientific point of view?

Yes  
 No. Please comment: <Type here>

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Q10. Does this section include all the necessary relevant concepts?

Yes  
 No. Please comment: <Type here>

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Q11. Are all the concepts in this section expressed in a language that could be easily understood by the target users?

Yes  
 No. Please comment: Please further simplify the detailed explanation of the term for targeted users.

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**Step 2: “An evaluation of the likelihood of adverse effects being realized, taking into account the level and kind of exposure of the likely potential receiving environment to the living modified organism”**

Q12. Are all the concepts in this section relevant and accurate from a scientific point of view?

Yes  
 No. Please comment: <Type here>

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Q13. Does this section include all the necessary relevant concepts?

Yes  
 No. Please comment: <Type here>

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Q14. Are all the concepts in this section expressed in a language that could be easily understood by the target users?

Yes  
 No. Please comment: <Type here>

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**Step 3: “An evaluation of the consequences should these adverse effects be realized”**

Q15. Are all the concepts in this section relevant and accurate from a scientific point of view?

Yes  
 No. Please comment: <Type here>

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Q16. Does this section include all the necessary relevant concepts?

Yes  
 No. Please comment: <Type here>

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Q17. Are all the concepts in this section expressed in a language that could be easily understood by the target users?

Yes  
 No. Please comment: More detailed explanation of the terms mentioned so that they are easier to understand by targeted users since targeted users may not necessarily have the same level of scientific or technical knowledge necessary to understand the terms used as the specialists.

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**Step 4: “An estimation of the overall risk posed by the living modified organism based on the evaluation of the likelihood and consequences of the identified adverse effects being realized”**

Q18. Are all the concepts in this section relevant and accurate from a scientific point of view?

Yes  
 No. Please comment: Please adjust the following paragraph in the rationale (also taking into account human health) to also considering human and animal health and environmental safety among the necessary priorities.

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Q19. Does this section include all the necessary relevant concepts?

Yes  
 No. Please comment: We believe in the need 1- to find an universally acceptable way to estimate risks and 2- provide a more accurate description of the risk characteristics' terms

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Q20. Are all the concepts in this section expressed in a language that could be easily understood by the target users?

Yes  
 No. Please comment: Further clarification of the scientific terms.

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**Step 5: “A recommendation as to whether or not the risks are acceptable or manageable, including, where necessary, identification of strategies to manage these risks”**

Q21. Are all the concepts in this section relevant and accurate from a scientific point of view?

Yes  
 No. Please comment: <Type here>

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Q22. Does this section include all the necessary relevant concepts?

Yes  
 No. Please comment: <Type here>

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Q23. Are all the concepts in this section expressed in a language that could be easily understood by the target users?

Yes  
 No. Please comment: <Type here>

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**3. RELATED ISSUES**

Q24. Does the “Related Issues” section include all relevant issues related to risk assessment and decision-making process but that are outside the scope of the Roadmap?

Yes  
 No. Please comment: <Type here>

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**4. FLOWCHART**

Q25. Does the flowchart provide an accurate graphic representation of the risk assessment process as described in the Roadmap?

Yes  
 No. Please comment: <Type here>

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## PART II: SPECIFIC TYPES OF LMOs AND TRAITS

### A. RISK ASSESSMENT OF LIVING MODIFIED ORGANISMS WITH STACKED GENES OR TRAITS

Q26. Are all the concepts in this section relevant and accurate from a scientific point of view?  Yes  
 No. Please comment: <Type here>

Q27. Does this section include all the necessary relevant concepts?  Yes  
 No. Please comment: <Type here>

Q28. Are all the concepts in this section expressed in a language that could be easily understood by the target users?  Yes  
 No. Please comment: <Type here>

### B. RISK ASSESSMENT OF LIVING MODIFIED CROPS WITH TOLERANCE TO ABIOTIC STRESS

Q29. Are all the concepts in this section relevant and accurate from a scientific point of view?  Yes  
 No. Please comment: <Type here>

Q30. Does this section include all the necessary relevant concepts?  Yes  
 No. Please comment: <Type here>

Q31. Are all the concepts in this section expressed in a language that could be easily understood by the target users?  Yes  
 No. Please comment: <Type here>

### C. RISK ASSESSMENT OF LIVING MODIFIED MOSQUITOES

Q32. Are all the concepts in this section relevant and accurate from a scientific point of view?  Yes  
 No. Please comment: Please delete the following "human health arising" (page 17, line 20) and replace it with "human and animal health and environmental safety arising..."

Q33. Does this section include all the necessary relevant concepts?  Yes  
 No. Please comment: Effects on biological diversity (page 18) 1- We believe we should add the following 1- the possibility that genetic developments in mosquitoes may lead to unknown behaviour and 2- the effects of other organisms on the food chain have adverse effects on the food chain

Q34. Are all the concepts in this section expressed in a language that could be easily understood by the target users?  Yes  
 No. Please comment: Simplification of terms

## ADDITIONAL COMMENTS ON THE SECTION-BY-SECTION REVIEW

*Please add any additional comment you may have regarding particular sections of the first version of the "Guidance on Risk Assessment of Living Modified Organisms" below.*

Q35. *Please insert the term in English next to titles to simplify the correct understanding of the translated term*

*without confusion. Add "and animal health and environmental safety" after "human health" in all paragraphs, particularly paragraph c.*

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