

ENSSER Statement on the Roadmap for Risk Assessment of LMOs,

I speak on behalf of the European Network of Scientists for Social and Environmental Responsibility (ENSSER). ENSSER is an association that brings together scientific expertise to develop public-good knowledge for the in-depth assessment of existing and emerging technologies independent from the interests of those developing and owning the technology.

ENSSER is committed to:

- Transparent and high quality scientific information that focuses on the ecological, health, and socioeconomic aspects of technology use.
- The assessment of alternative options within technology policy, strengthening innovation and long-term sustainability, meanwhile prioritising public and environmental safety.

ENSSER welcomes the work and outcomes of the AHTEG on the "ROADMAP FOR RISK ASSESSMENT OF LIVING MODIFIED ORGANISMS". We believe that the approach of the AHTEG to suggest an integrated risk assessment process with the three sub-sections:

"Overarching Issues in the Risk Assessment Process";

"Planning Phase of the Risk Assessment"; and

"Conducting the Risk Assessment"

is well suited to support the Parties of the CPB in their efforts to implement the CPB and to reach transparent and sound decisions with regard to the introduction of LMOs.

ENSSER regards this structure as necessary and as reflecting the scientific and public discussions ongoing since the adoption of the Cartagena Protocol on Biosafety in 2000, which is indeed more than a decade ago. We specifically welcome the Roadmap as it stands now because it reflects the widely recognised approach that scientific findings and their interpretation in the context of national decision-making must be based on normative decisions in an open and transparent way. This is what the document COP-MOP/6/13/Add.1 means in saying: "What is considered an adverse effect as well as an "acceptable risk" depends on protection goals and their assessment endpoints."

ENSSER regards the result of the AHTEG as a living document as already noted by previous speakers, which need to be continuously updated. We support the 4 recommendations brought by the AHTEG to the COP-MOP recommendations including:

- (i) endorsement of the Guidance by the Parties; and
- (ii) using and testing the Guidance.

Experience shows that if documents developed by work within the CPB as the Roadmap are not endorsed by COP-MOP they will not be used widely - and hence not tested. The best way to achieve further testing is indeed through endorsement for example when searching for external financial support for testing activities. ENSSER fears that the reluctance of many Parties to not endorse the Roadmap could - also with regard to the current financial constraints - lead to a situation to effectively stall the work on developing up-to-date guidance to risk assessment and management of the CPB that is necessary to take into account the recent developments in risk research in accordance with the spirit and wording of the CPB and LMO decision making.