



SBSTTA 24 online session - Feb., 2021
Agenda Item 5 - Risk Assessment and risk management

Thank you, Chair. I am making this statement on behalf of the CBD Alliance, which gathers a diverse range of views and proposals from civil society.

There are fundamental risk assessment challenges for living modified fish, as listed in the AHTEG report. The modification of wild organisms such as fish introduces the potential for next-generation effects as the organisms persist over time and space. Such increases in spatial and temporal complexities, along with fundamental knowledge gaps, as acknowledged by the AHTEG, increases uncertainty.

We therefore agree with the AHTEG members who saw a clear need and rationale for guidance on risk assessment to be developed on living modified fish. We support the intervention of Mexico in this regard.

The AHTEG also acknowledged that LMOs containing engineered gene drives pose specific challenges to risk assessment due to their invasive design to spread and persist in wild populations. This presents a potentially irreversible threat to biodiversity, which is compounded by the inability to control or recall a gene drive after release.

Gene drives have potential next-generation effects. The inclusion of genetic engineering machinery that will continue to perform genetic engineering at every generation, in genetically diverse wild populations raises specific challenges due to the potential for unintended effects to occur over time, as acknowledged by the AHTEG. Evolutionary processes make it possible to turn events with a low probability of ever happening into events that are likely to happen. Inherent non-knowledge can, thereby, increase to such an extent that the conclusiveness of risk assessment is severely affected.

We support the conclusion of the AHTEG that current risk assessment frameworks are insufficient for LMOs containing engineered gene drives. Given their invasive nature and inability to control, recall or reverse them, we call for an immediate global moratorium on the release, including experimental release, into the environment of such organisms.

Any guidance on risk assessment has to fully operationalize the precautionary principle to protect against the potential irreversible damage to biodiversity and acknowledge the serious challenges to risk assessment for LMOs containing engineered gene drives. If it is likely that such organisms can escape spatio-temporal controllability, the risk assessment cannot be sufficiently reliable because it is not

conclusive. Under such circumstances, the environmental release of such organisms is not compatible with the precautionary principle.

The work of the AHTEG developing guidance on risk assessment for LMOs containing engineered gene drives must build on and complement existing CBD decisions on organisms containing engineered gene drives, inter alia, applying a precautionary approach, obtaining the free, prior and informed consent of potentially affected indigenous peoples and local communities, and assessing the socioeconomic, cultural and ethical impacts.

Furthermore, we remind all of the procedure for avoiding or managing conflicts of interest, adopted by Parties and as contained in COP Decision 14/33 and COPMOP Decision 9/10 and the necessity of applying these procedures to the AHTEG developing guidance. It is also essential that there is full, meaningful and effective participation of IPLCs in the AHTEG.

Finally, given the rapid technology developments, including of LMOs produced through genome editing, it is urgent that additional guidance materials on risk assessment continue to be developed, taking into account priorities identified by Parties.

Thank you