

FA-Net Japan
Japan Citizens' Network for Sustainable Food and Agriculture

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Comments on CBD/SBSTTA/26/4

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We welcome this opportunity to comment on the CBD multidisciplinary Ad Hoc Technical Expert Group on Synthetic Biology (mAHTEG). Evolution in synthetic biology is rapid and has strong effects on biodiversity and health. The horizon scanning process should continue and become regular. In particular, we believe the multidisciplinary aspect was crucial to reach the important conclusions that are in the document.

Gene drives

We are concerned that the technology seems to be extremely dangerous, with wide-ranging effects not only on target species but on all related species. The socioeconomic and ethical aspect is missing in current risk assessment and must be commissioned by CBD as recommended by the mAHTEG. Also, the socioeconomic and ethical assessment should be carried out by civil society experts without conflict of interest. There are currently no measures for redress and no regulatory framework that can account for transboundary movements. Consequently, we cannot accept environmental release to be allowed. Embracing the precautionary principle, addressing the technology assessment imbalance between developing and developed nations, and recognizing the complexity of synthetic biology highlight the need for ongoing CBD processes (Sections 2b, 2a).

Efforts to address ethical concerns and promote equitable participation should include technology assessment alongside technology transfer (Section 15). Overemphasis on benefits without acknowledging potential harms must be rectified, as highlighted in Sections 16 and 18. Also, governance considerations, including monitoring intellectual property patents and enhancing participation through established mechanisms like the CBD mAHTEG, are crucial for equitable involvement (Sections 19h, 20f). References to agriculture and pesticides are helpful for parties to understand the implications of gene drives (Sections 23, 24, 27). Finally, we are very critical of the practice of referring to so-called “trade secrets” that limit access to research data and information, without any benefit to society.

Genome-edited plants and animals (VII 3, 4)

As genome-edited plants and animals have recently come on the market in Japan, we think they should be at the top of the agenda of the CBD mAHTEG. Further liability and redress mechanisms are necessary, which requires continued work under the Cartagena protocol and a regular horizon scanning mechanism. We note that the corporations that have

released these products (GABA tomato, fast-growing fish) are not transparent and hide data behind the above-mentioned practice of “trade secrets” which is not in the interest of consumers or farmers, with potential implications for biodiversity and health.

Specifically, transboundary movements and relation to detection and identification of synthetic biology organisms, parts and products should be a focus when it comes to genome-edited plants and animals. We are especially concerned by the use of CRISPR-Cas to manipulate plants and animals intended for food and feed, as this technology is new and without any history of long-term safety.

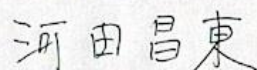
Synthetic biology-enabled production of cosmetics and fragrances (VII 21)

This is an area where many people already suffer from severe health effects, allergies and respiratory problems. We are concerned that the release of novel substances without risk assessment will lead to further suffering and adverse health effects. Mandatory labelling and standards are lacking both at the national and international level.

Synthetic biology-enabled production of food, food ingredients and flavours (VII 22)

This is an area where many people already suffer from severe health effects, allergies and health problems. We are concerned that the release of substances without risk assessment will lead to further suffering and adverse health effects. Mandatory labelling is lacking and standards are extremely slow to develop by FAO/WHO Codex Alimentarius, making it difficult or impossible for consumers to avoid such food, food ingredients and flavours.

Yours sincerely,



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