Government of Jamaica

PUBLIC CONSULTATION

The Biosafety Policy for Jamaica (Green Paper)

Ministry of Housing, Urban Renewal, Environment and Climate Change

October 14, 2020 at 10:00 a.m.

FINAL REPORT

CONTENTS

ACRONYMS

AIA	Advanced Informed Agreement
BSJ	Bureau of Standards of Jamaica
CAC	Consumer Affairs Commission
CASE	College of Agriculture, Science and Education
COTED	Council on Trade and Economic Development
DNA	Deoxyribonucleic acid
GATT	General Agreement on Trade and Tariffs
GMOs	Genetically modified organisms
IOJ	Institute of Jamaica
JACRA	Jamaica Agricultural Commodities Research Authority
JCA	Jamaica Customs Agency
LLP	Low Level Presence
LMO	Living modified organisms
MHURECC	Ministry of Housing, Urban Renewal, Environment and Climate Change
MOAF	Ministry of Agriculture and Fisheries
MOHW	Ministry of Health and Wellness
MRE	Ministry with Responsibility for Environment
MRST	Ministry with Responsibility for Science and Technology
NBC	National Biosafety Committee
NBP	National Biosafety Policy
NCST	National Council on Science and Technology
NEPA	National Environment and Planning Agency
NRCA	Natural Resources and Conservation Authority
OIE	World Organization for Animal Health
R&D	Research and Development
SIRI	Sugar Industry Authority
SRC	Scientific Research Authority
SPS	Sanitary and Phytosanitary Measures
TBT	Technical Barriers to Trade
TRIPS	Trade-Related Aspects of Intellectual Property Rights
Utech	University of Technology
UWI	University of the West Indies

CONTEXT

The National Biosafety Policy (NBP) for Jamaica is the product of deliberations by a range of state and non-state agencies, many of which were represented on the National Biosafety Committee (NBC) formed in 1997 (now defunct), as well as, consultations with stakeholders. It sets out objectives, strategies, and implementation procedures for a range of state-led activities, which together create the framework for a national biosafety regime. It addresses the safe use, transportation, containment, storage, and handling of living modified organisms (LMOs) – including requirements for transboundary movement – and a policy framework for supporting research and public education on modern biotechnology.

Biotechnology is not new, but recent advances raise a host of environmental, social and health issues. While the importance of modern biotechnology in advancing Jamaica as a country is seen to be desirable, the inherent risks to the natural environment and health must be paramount in any considerations for its application. This Policy seeks to strike this balance by setting out the framework by which Jamaica will be able to meet its international obligations under the Cartagena Protocol on Biosafety to which Jamaica is a Party, while also meeting the peculiar needs and requirements of the country.

In the interest of ensuring that issues are effectively and comprehensively covered, the Green Paper has been shared with the stakeholders impacted as well as the wider public to seek their input. Consultations were held on October 14 and 15 in this regard with public sector partners and the private sector and members of the public, respectively.

EXECUTIVE SUMMARY

The consultation was chaired by Ms. Joni Jackson, Director, Natural Resources, Ministry of Housing, Urban Renewal, Environment and Climate Change (MHURECC).

The Honourable Pearnel Charles Jr, Minister of Housing, Urban Renewal, Environment and Climate Change, explained that the Biosafety Policy was aimed at highlighting the rules and procedures relating to the handling of biological and microbiological agents. The goal of the policy, he said, was to provide a safe and enabling environment for the safe transboundary movement, handling and use of LMOs while managing any potential risk to human health and biodiversity. The implementation of the policy would see the effective regulation of transboundary movement, import and export of LMOs in compliance with international standards and the Cartagena Protocol.

Ms. Jackson advised that the consultations being implemented would inform amendments to the current document which would then be submitted to Cabinet for approval as a white paper. She advised that the Green Paper had been widely shared, including the placement of copies in libraries island wide. A copy was also available on the website of the Ministry of Economic Growth and Job Creation for general consultation. Advertisements had been placed in the daily newspapers inviting written submissions.

Ms. Gillian Guthrie Chief Technical Director (Acting) presented an overview of the Biosafety Policy for Jamaica. She explained that the Policy had been developed in compliance with the requirements of the Cartagena Protocol on Biosafety, a supplementary Protocol to the Convention on Biological Diversity, to which Jamaica is a Party. She presented the historical context of biotechnology in Jamaica, explaining that to date a number of different government ministries, agencies and departments had responsibility for various different areas of responsibility but there was no cohesive framework regulating and monitoring its implementation. This situation was non-compliant with the Cartagena Protocol.

Ms. Guthrie listed various policies and legislation, some of which were still at the draft stage, that were necessary for the efficient implementation of the policy.

The draft Biosafety Policy had been approved by Cabinet in the fourth quarter of the 2020/21FY as a Green Paper. It is anticipated that the draft Policy would be revised based on the comment received from the consultations prior to submission to Cabinet for approval as a paperwhite Paper in January 2021. She shared the purpose, vision, goals, and objectives of the policy as well as the proposed institutional framework.

PRESENTATION ON THE BIOSAFETY POLICY GREEN PAPER

Welcome – Ms. Joni Jackson, Director, Natural Resources, MHURECC

Ms. Jackson informed the meeting that the biosafety policy was intended to protect human life and the environment from possible adverse effects of modern biotechnology. She advised that Ms. Gillian Guthrie, Chief Technical Director (Acting) in MHURREC and Jamaica's national focal point for the Convention on Biological Diversity and the Cartagena Protocol on Biosafety, would present an overview of the policy document.

In addition, Ms. Jackson advised several resource personnel were participating in the meeting to assist in responding to queries, namely Ms. Yvette Strong, Senior Manager for the Conservation and Protection Division, National Environment and Planning Agency (NEPA) and who was also representing the Scientific Authority; Ms. La-Tanya Richards, Pest Risk Analysis Manager, Plant Quarantine and Produce Inspection Branch, Ministry of Agriculture and Fisheries (MOAF); and Dr. Wintorph Marsden, Senior Officer of the Veterinary Services Division, MOAF.

Message from Honourable Pearnel Charles Jr., MP, MHURECC

Minister Pearnel Charles Jr. noted that substantive work had already been carried out under the Ministry of Economic Growth and Job Creation on several environmental policies and congratulated the team at the Environmental Risk Management Branch on their efforts and for the preparation of the current policy and its presentation as a Green Paper. He explained that the Biosafety Policy was aimed at highlighting the rules and procedures relating to the handling of biological and microbiological agents.

He observed that any economic advances to be made by the country must be driven by science and technology as well as a healthy natural environment. He pointed to outcomes 11 and 13 – "A Technology Enabled Society" and "Sustainable Management and Use of Environmental and Natural Resources". Minister Charles noted that recent advances in biotechnology had raised several health and social issues and any inherent risk to environment health had to be foremost in its application. The Policy provided the framework by which Jamaica could honour its international obligations, as outlined in the Cartagena Protocol, while also meeting national requirements.

The goal of the Policy, he said, was to provide a safe and enabling environment, safe transboundary movement, handling and use of living modified organisms (LMOs) while managing any potential risk to human health and biodiversity. The minister highlighted the importance of the precautionary approach which meant that lack of scientific information should not prevent action to prevent environmental degradation or possible harm to human health.

The implementation of the Policy would see effective regulation of transboundary movement, import and export of LMOs in compliance with international standards and the Cartagena Protocol.

Promotion of modern biotechnology at the national level would involve standards for the safe handling, transport, labelling, documentation, packaging, and disposal. He underscored the increased capacity of the relevant institutions to safely monitor and implement the national framework. In order to ensure the integration of biosafety in all sectors continuous public education would be critical.

Protocols governing public consultations on the draft Policy

Ms. Jackson noted that the Green Paper had been tabled in the Houses of Parliament as a Green Paper in June 2020. The consultations being held, she said were being held in compliance with the Cabinet Office's guidelines for the policy development process. The feedback from the consultations would inform amendments to the document which would then be submitted to Cabinet as a White Paper. She advised that following the presentation of the Policy by Ms. Guthrie there would be the opportunity for discussion. Ms. Jackson reported that a report would be prepared on the consultation which would detail all questions and responses. The responses to any questions that were not answered during the day's session would be included in the report which would be made available to the public.

Ms. Jackson said that advertisements, inviting written comments on the policy, had been placed in the daily newspapers. She also noted that there would be the opportunity for participants in the session to submit any additional comments by email.

The Biosafety Policy for Jamaica (Green Paper) – Gillian Guthrie, Chief Technical Director (Acting), MHURECC

Ms. Guthrie outlined the content of her presentation on the policy. It would include an introduction to the issues relating to biosafety, a background on biosafety, definition of key terms and a report on the

status quo in relation to the biosafety framework in Jamaica. She would then present the details of the Green Paper on The Biosafety Policy for Jamaica.

Ms. Guthrie began by mentioning the company Monsanto, producer of several pesticides and genetically modified crops, the safety of which had been questioned. The company had gained a bad reputation for perceived inappropriate practices and had become associated with GMOs and hazards related to GMOs. She noted that Monsanto had been bought out by Bayer.

Ms. Guthrie emphasized that biotechnology had had a positive impact through the advances that had been realised in the areas of medicine and agriculture, the environment, food security, industry and manufacturing. For example, biotechnology allowed increased productivity through genetically modified plants and facilitated food security in countries that did not have fertile or productive land. She acknowledged the risks associated with biotechnology in relation to human health and biodiversity. The negative impacts on human health were still largely unknown and there was the potential for the transfer of genetic material from LMOs in modified organisms to natural or unmodified organisms. There was the possibility that LMOs which escaped into the wild might upset the balance of the country's ecosystems negatively impacting our biodiversity.

The global response to the issues raised by biotechnology, Ms. Guthrie advised, was the introduction of the Cartagena Protocol on Biosafety, a supplementary Protocol to the Convention on Biological Diversity. The Protocol had been in effect since 2003 and was ratified by Jamaica in September 2012. Its aim was to safeguard human health and the environment by ensuring adequate levels of protection in the safe transfer of LMOs resulting from the use of modern biotechnology. The focus of the Cartagena Protocol, she emphasized, was the safe transboundary movement of LMOs that could have a negative impact on biodiversity and human health. She stressed that it did not apply to transboundary movements of LMOs which were: pharmaceuticals for humans that were addressed by other international agreements/organizations; in transit (Advanced Informed Agreement [AIA] procedure does not apply); or destined for contained use (subject to the AIA procedure does not apply).

Ms. Guthrie shared key provisions of Cartagena Protocol.

- Articles 7-10 addressed the AIA procedure which required export states to inform the import states about the movement of LMOs. The exporting state was required to notify the competent authority in the state of import regarding the planned movement of LMOs which were to be intentionally released into the environment. Within 90 days, the importing state had to acknowledge receipt of the notice in writing. Within 270 days, the importing state must advise the exporting state of its decision to approve or prohibit the import of the LMOs. If the importation was to be allowed, then any special conditions should be included. Timelines were rigorously enforced.
- Article 11 dealt with LMOs being exported to be used for food, feed or for processing and also observed a rigorous schedule. Within 15 days of receiving notification from the exporting state, the importing state had to advise the exporting state whether the import of the LMOs was being allowed. The decision to import was based on the importing state's domestic regulatory framework. If an importing country did not have a domestic regulatory framework the decision

had to be taken in accordance with the risk assessment done by the importing state. Risk assessment procedures were available on the Biosafety Clearing House to Parties.

- Article 13 of the protocol addressed a simplified procedure through which Parties could advise others that they had no restrictions on the transboundary movement of LMOs. This could be done through the Biosafety Clearing House.
- Articles 15 and 16 outlined risk management and risk assessment procedures.
- Article 17 spoke to the unintentional release of LMOs into the environment and the emergency measures to be taken to contain any potential adverse effects. The concerned state was required to advise the Convention through the Biosafety Clearing House and to execute the emergency measures.
- Article 18 was related to the handling, transportation packaging and identification of LMOs being transported.
- Article 19 addressed the need for Parties to designate national authorities which would have responsibility to review applications for the importation of LMOs intended for release into the environment and give the necessary approvals. This article also looked at the designation of a national focal point – MHURECC – which was responsible for communicating with the Convention on Biological Diversity Secretariat on the implementation of the protocol at the national level.
- Article 20 spoke to the Biosafety Clearing House which facilitated information sharing on legislation, research, policies, administrative measures, risk assessments, and so on.

Identification of Key Terms

Key Terms	
Biotechnology	Technological applications that use biological systems, living organisms, or derivatives thereof to make or modify products or processes for a specific use.
Modern biotechnology	The application of: ▪ In vitro nucleic acid techniques, including recombinant deoxyribonucleic acid (DNA) and direct injection of nucleic acid into cells; or ▪ Fusion of cells beyond its taxonomic family that overcome natural physiological reproductive or recombination barriers and that are not techniques used in traditional breeding and selection (Article 3).
Biosafety	Represents efforts to reduce and eliminate the potential risks resulting from modern biotechnology and its products.
Living modified organism (LMO)	Any living organism that possesses a novel combination of genetic material obtained through modern biotechnology.

Context – Locally, Regionally and Internationally

Ms. Guthrie provided the background to biosafety in Jamaica. A National Biosafety Committee (NBC) was established under the Plants Quarantine Act in 1997, in response to a request the from the Biotechnology Centre, UWI, Mona. The request was for permission to import genetically modified Solo variety papaya *(Carica papaya)* for research purposes. There was no mechanism in place to address applications of this

nature and thus the committee was formed. She explained that this committee was no longer operational. However, imported LMOs were widely used locally. For example, soy products, corn and canola related products were primarily derived from LMOs. The LMO seeds available on the domestic market were developed and owned by overseas agencies.

Under the new policy framework, the NBC would be reintroduced to move the country's biotechnology agenda forward.

In terms of CARICOM, a Working Group on Biosafety and Biotechnology, established by the Council on Trade and Economic Development (COTED) of CARICOM, was mandated to develop a regional Biotechnology/Biosafety Policy. The regional Biotechnology/Biosafety Policy was approved by COTED at its 71st meeting in 2017.

The development of regional and local biosafety frameworks was guided by several international agreements relating to biosafety to which Jamaica is a Party. These included the:

- Cartagena Protocol on Biosafety to the Convention on Biological Diversity
- International Plant Protection Convention
- International Treaty on Plant Genetic Resources for Food and Agriculture
- World Trade Organization Agreements (GATT, SPS, TBT, TRIPS)
- Codex Alimentarius
- World Organization for Animal Health (OIE).

Local policy documents which addressed biotechnology included:

- Biotechnology Policy for Economic and Social Development (draft)
- Science and Technology for Socio-economic Development: A Policy for Jamaica (revised draft)
- National Foreign Trade Policy: Positioning Jamaica to increase Foreign Trade, 2018
- Policies in the agricultural sector

Relevant legislation included the:

- Plants (Quarantine) Act, 1993
    - Plants (Importation) Control Regulations
- Animals (Diseases and Importation) Act, 1948
- Natural Resources and Conservation Act, 1991
- Protection of Plant Genetic Resources for Food and Agriculture Act, 2013 (amended 2019)
- Food and Drugs Act, 1975
- Pesticides Act, 1975
- National Commission on Science and Technology Act, 2007
- The Scientific Research Council Act, 1988.

Ms. Guthrie pointed out that, currently, Jamaica did not have a cohesive biosafety framework. Various entities carried out different responsibilities and many were not compliant with the protocol. The entire situation represented a lack of compliance with the Cartagena Protocol. In addition, there was insufficient knowledge among the public about biosafety and LMOs.

Prevailing Institutional Arrangements

Institution	Responsibility
Ministry of Agriculture and Fisheries (MOAF)	Carries out research in disease and drug resistant crops, transboundary movement of LMOs and risk assessment
Sugar Industry Research Institute (SIRI); Scientific Research Council (SRC), Jamaica Agricultural Commodities Research Authority (JACRA), Banana Board, Coconut industry Board, University of the West Indies (UWI), University of Technology (Utech), College of Agriculture, Science and Education (CASE)	Additional research institutions
Natural Conservation Resources Authority (NCRA)/ National Environment Planning Agency (NEPA)	Issues research permits and permits for the introduction of flora and fauna
Bureau of Standards (BSJ)	Regulates and monitors the application of standards to trade
MRE	CBD and Cartagena Protocol focal point
National Council on Science and Technology (NCST)	Advancing national strategy and policy for science and technology
Institute of Jamaica (IOJ)	Biosafety Clearing House Focal point (BCH) (https://jamaicachm.org.jm/CHM/biosafety/)
Ministry of Health and Wellness (MOHW)	Pharmaceuticals, medical research
Jamaica Customs Agency (JCA)	Transboundary movement of LMOs
Consumer Affairs Commission (CAC)	Consumer awareness and protection
National Biosafety Committee (NBC)	Development of procedural guidelines for the importation of plant LMOs for experimentation.

Ms. Guthrie made the point that biotechnology was recognised as a billion-dollar industry and that Jamaica was poised for growth in this area. However, there were several issues to be addressed if the country were to successfully develop the potential it promised. She highlighted the threat to the island's rich biodiversity by factors such as: (i) unsustainable development and consumption, (ii) climate change; (iii) the introduction of alien species; (iv) absence of a national regulatory system for biosafety; (v) non-compliance with the Cartagena Protocol; (vi) a defunct National Biosafety Committee; (vii) the need for capacity building; and (viii) an uninformed public. She observed that the monitoring of LMOs was critical.

The Biosafety Policy Green Paper

The draft policy was approved by Cabinet as a green paper in fourth quarter of 2019 financial year and was tabled in Parliament in June of 2020. She shared that this was the first of two public consultations to be held in October. Feedback received would be used to improve the draft and the resulting white paper should be submitted to Parliament by January 2021. She shared the purpose, vision, goals, principles, and objectives of the Policy.

Purpose - To meet the country's legally-binding obligations under the Cartagena Protocol on Biosafety as well as to meet its needs as it seeks to benefit from the advantages of modern biotechnology, while reducing potential risks to biodiversity, health and the environment.

Vision - "Jamaica has an enabling environment for the safe development and utilization of modern biotechnology, resulting in minimal risks to human health and biodiversity while providing benefits to health, agriculture and industry."

Goals

1. To manage the risks to human health, agriculture and biodiversity from the development, transboundary movement, handling and use of living modified organisms.
2. To facilitate the development of a national modern biotechnology sector in a safe and regulatory environment.

Principles

1. The Precautionary Approach (*Principle 15 of the Rio Declaration on Environment and Development)*
2. Primacy of public health and environment
3. An enabling environment for resource development
4. Shared and accessible benefits
5. Public awareness and participation
6. Effective access to judicial and administrative proceedings, including redress and remedy.

The Jamaican Biosafety Policy was focused, she said, on principle 1 – the precautionary approach – the main principle on which the Cartagena Protocol was based. This meant that lack of scientific certainty should not be used as an excuse for lack of action in pursuing biotechnology, but every measure should be implemented to protect human life and the environment.

Objectives

1. Ensure the effective regulation of the transboundary movement (import and export) of LMOs is in keeping with the relevant international rules and standards as well as the tents of the Cartagena Protocol on Biosafety
2. Ensure that the possible adverse effects of LMOs on human health and biodiversity are effectively mitigated and managed
3. Promote the development and utilization of the modern biotechnology at the national level that may provide financial benefits to the relevant sectors considering issues of biosafety
4. Establish standards for the safe handling, storage, transport and use of LMOs including packaging, labelling, documentation, disposal, and contingency procedures, in keeping with international labelling standards

5. Increase public education and awareness and information sharing on biosafety to facilitate effective implementation of the national biosafety regime
6. Increase the capacity of national institutions to implement and monitor a national framework for biosafety

Ms. Guthrie presented the proposed institutional framework which saw the ministry with responsibility for the environment (MRE), now (MHURECC), as the lead ministry in the implementation of the Biosafety Policy. It would articulate policies in collaboration with the NBC; as well as to promulgate legislation relevant to the Policy.

Proposed Biosafety Institutional Framework

National Biosafety Committee

- Handling issues related to LMOs
- Facilitating collaboration and communication among GOJ entities
- Reviewing and making recommendations on policy statements on biosafety and on biosafety legislation
- Approving certified list of risk assessors
- Collaborating with NEPA on public awareness and decision making on in the Biosafety Policy

Scientific Panel

- Advisory to the NBC
- Reviews and Approves risk assessment
- Recommends risk management measures
- Advises on biosafety measures

(Plant Quarantine Branch – Pest Risk Analysis Unit; Veterinary Services Division; Scientific Authority, NCST, SRC, representative from private sector, academia and NGO community)

Implementing Ministries and Agencies (MRE, MRST, IOJ, Jamaica Customs Agency, BSJ

- Participate in the National Biosafety Committee (NBC)
- Conduct designated functions under the Biosafety Policy (and legislation)
- Report to NBC on progress and challenges
- Share information through the Biosafety Clearing House
- Integrate public education on biosafety in communications activities
- Train staff in relevant departments/divisions on the Biosafety Policy and related issues
- Build internal capacity to implement designated functions under the Biosafety Policy (and legislation

Ministry with Responsibility for Environment (MRE)	**National Environment and Planning Agency/NRCA**
Lead Ministry for the Biosafety Policy ▪ Articulates policy statements on biosafety in collaboration with the NBC ▪ Promulgates regulations under the primary environmental legislation **Focal Point – Cartagena Protocol on Biosafety** ▪ Liaison with Secretariat of Cartagena Protocol ▪ Submits national reports- Cartagena	▪ Biosafety registrar as required under the protocol ▪ Secretariat to the NBC Competent National Authority – Cartagena Protocol NRCA, NEPA, MRE, MOH

DISCUSSION

Alison Richards, National Compliance and Regulatory Authority (NCRA) member of the CODEX Secretariat and the FAO GM Foods Platform focal point for Jamaica, observed that the Policy did not

include a low level presence (LLP) limit and it was customary for countries with a Biosafety Policy to establish a percentage limit regarding GMOs entering the country. She commended the team for the great effort that had been put into the preparation of the Policy. She observed that it was a milestone for a small country to have achieved such a major step.

Gillian Guthrie advised that the policy did not include an LLP limit as these were general guidelines. Establishment of parameters and the setting of limits would be the responsibility of the Scientific Panel of the National Biosafety Committee. She said that when the National Biosafety Policy was finalised, Jamaica would, indeed, be one of few Caribbean countries, if any, to have such a policy. A regional document existed but no other Caribbean country, as far as she was aware, had produced a policy. Jamaica's Policy would serve as a point of reference for other countries in the region.

Susan Davis, IOJ National Clearing House, in her capacity as National Focal Point for the Biosafety Clearing-House(BCH)w at the Institute of Jamaica, said that two regional BCH training workshops had been hosted in 2017 and 2019, respectively, by United Nations oriented Caribbean BCHs to facilitate cross-country information flow according to specific roles, and to assist with within-island information exchange.

Dionne Price, Bureau of Standards (BSJ) said that due to the advance stages of separation of the BSJ and NCRA, the regulatory/monitoring functions outlined in the policy would most likely fall under the purview of NCRA, whilst the standard promulgation would remain with the BSJ.

Joni Jackson – noted that the draft would be amended to reflect that division of responsibilities.

Michelle Sherwood, Research and Development Division, Ministry of Agriculture and Fisheries, noted that while the Policy detailed the Acts that governed it, it did not clearly highlight the Bees Control Act. The R&D Division housed the unit which managed the importation of bees and bee products. The Act prevented the importation of bee and bee products into the island. She said that the OIE which represented the animal side of things was the organization through which the information was reported internationally. She also highlighted the work being done by the Post Entry Quarantine Unit which housed the germplasm for plants in Jamaica. All plant material coming into the island had to pass through that unit for testing before being released to the agricultural sector.

The management of the plant genetic resources was the responsibility of the Principal Director of Research and Development at R&D.

Gillian Guthrie raised the following questions regarding the composition of the institutional arrangements recommended in the Policy.

1. The Policy recommended that the ministry responsible for environment would establish the National Biosafety Committee which would have responsibility for reviewing applications for the importation of LMOs; safe handling, containment and disposal of LMOs; reviewing field research involving LMOs; assisting in the development of and review of guidelines for standards for material to be used in developing public education programmes.
2. The Policy recommended the entities that would form the membership of the NBC.
3. The Policy had designated three entities as competent authorities under the National Biosafety Framework – (i) NRCA/NEPA which would receive applications under the current licensing system under the NRCA Act and reviewing and approving applications in association with the NBC (focus

on LMOs intended for release into the environment); (ii) MOHW which would regulate LMOs for use in the health sector; (iii) MOAF which would be responsible for the regulation of LMOs in the agriculture and aquaculture sectors.

Ms. Guthrie asked whether the entities recommended as competent authorities were considered appropriate or were there any other entities that the group might recommend?

Dr. Wintorph Marsden, Veterinary Services, noted that there were other entities that might be considered as the area being addressed affected humans, animals and the environment in different ways. For example, three agencies were involved in the approval process for the importation of fish. The application first had to be sent to three agencies: (i) Fisheries to be approved; (ii) NEPA if it was an invasive species; (iii) the Veterinary Services Division if disease bound. The importer was often frustrated by the length of time expended in the approval process. It was, he said, necessary to identify a shorter and more efficient process.

Gillian Guthrie pointed out that based on the designated timelines it was not business as usual under the requirements of the Cartagena Protocol. Going forward, the biosafety framework would have to integrate the required timelines within the new system.

Howard Lynch, MOHW, said he agreed with the designation of the MOHW as a competent authority. He noted that different departments/agencies within the MOHW had responsibility under the different legislations. The MOHW would, therefore, need to institute, internally, a coordinated system to deal with this. He observed that it should not be a challenge as the MOHW already did this for other interventions such as trade facilitation.

Gillian Guthrie agreed that it was important for the MOHW to be involved as it was responsible for public health. Other authorities could lean on the expertise that resided in the MOHW to assist with implementation of the biosafety framework. She said that she hoped that Mr. Lynch would touch base with experts in the Ministry who could lend their support to this issue. She asked that as he reviewed the draft policy, he should indicate what, specifically, should be stated under the purview of the MOHW as it related to its role as a competent national authority and the regulation of the use of LMOs in the health ministry.

Gillian Guthrie added that the CAC was an important partner, particularly in the dissemination of public information and the MHURECC would be reaching out to the CAC to see how best to collaborate with the entity to ensure that the man in the street would be able absorb the information.

Dorothy Campbell, CAC, underscored the need for the CAC to be a part of process at the level of the subcommittees. The CAC needed to be educated to be able to educate the public, she said.

Dionne Pryce asked if there was a system in place to prevent duplication by the different agencies.

Gillian Guthrie advised that the NBC would be responsible for reviewing applications for the importation of LMOs, reviewing field research reports, developing and reviewing guidelines and standards. The agencies should be working collaboratively with the NBC. The NBC should be a one-stop shop and thus prevent duplication.

Mrs Sherwood asked if all the Acts supporting the policy were current and had been updated to strengthen the efforts under the policy.

Gillian Guthrie noted that existing legislation had to be reviewed and the necessary amendments made. Laws do not reflect what is required by a party to the Cartagena Protocol. The team had looked at the Biosafety Legislation. Once the policy was finalised the team would either look at amending existing laws or drafting new legislation.

CLOSING REMARKS

Ms. Joni Jackson announced that the opportunity to provide feedback would be extended to October 30. The email address to which comments should be sent was policycomments@mgejc.gov.jm. She thanked all participants for their attention and illuminating questions and comments. She encouraged the submission of comments and response to the survey that would be shared. Ms. Jackson thanked all involved in the organisation of the meeting, the technical team, and the rapporteur.