Convention on Biological Diversity

2010 International Year of Biodiversity

# Format for the Second National Report

# on the implementation of

# the Cartagena Protocol on Biosafety

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## GUIDELINES FOR USE OF THE REPORTING FORMAT

The following format for preparation of the second national report on implementation of the Cartagena Protocol on Biosafety called for under Article 33 of the Protocol is a series of questions based on those requirements of the Protocol as well as questions that relate to indicators of the Strategic Plan.

Responses to these questions will help Parties to review the extent to which they are successfully implementing the provisions of the Protocol and will assist the Conference of the Parties serving as the meeting of the Parties to the Protocol to assess the overall status of implementation of the Protocol.

Questions highlighted in grey may not strictly be based on provisions of the Cartagena Protocol on Biosafety or the decisions of the Parties to the Protocol. They are included in this reporting format only to help draw a baseline for the assessment and review of the Protocol in the context of Article 35 and to help measure progress in the implementation of the Strategic Plan of the Protocol.

The deadline for submission of the second national report is no less than 12 months prior to the sixth meeting of the Conference of the Parties serving as the meeting of the Parties to the Protocol. It is intended to cover activities undertaken between the presentation of the first national report (or the entry into force of the Protocol for reporting Parties that ratified or acceded to the Protocol after 11 September 2007) and the date of reporting for the second national report.

For subsequent national reports, the format is expected to evolve, as questions that are no longer relevant may be deleted, questions that are relevant to ongoing progress in implementation will be retained, and additional questions will be formulated pursuant to future decisions of the Conference of the Parties serving as the meeting of the Parties to the Protocol.

The wording of questions follows the wording of the relevant articles of the Protocol as closely as possible. The use of terms in the questions follows the meanings accorded to them under Article 3 of the Protocol.

The format tries to minimize the reporting burden on Parties, while eliciting the important information regarding implementation of the provisions of the Protocol. Most of the questions asked require only a tick in one or more boxes and for each article, a text field allows the provision of further details on its implementation. Although there is no set limit on the length of text, in order to assist with the review and synthesis of the information in the reports, respondents are asked to ensure that answers are as relevant and as succinct as possible.

The Executive Secretary welcomes any comments on the adequacy of the questions, and difficulties in completing the questions, and any further recommendations on how these reporting guidelines could be improved. Space is provided for such comments at the end of the report.

It is recommended that Parties involve all relevant stakeholders in the preparation of the report, in order to ensure a participatory and transparent approach to its development and the accuracy of the information requested.

The form is also available on the BCH for completion electronically at the following address: http://bch.cbd.int/managementcentre/edit/CPBnationalreport2.shtml

***IMPORTANT:*** ***To facilitate the analysis of the information contained in this report, it is recommended that Parties submit the report through the Biosafety Clearing-House or as an attachment to an e-mail in MS Word format, together with a scanned copy of the first signed page, to the Secretariat at: secretariat@cbd.int***

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**Second National Report**
**on the Implementation of the Cartagena Protocol on Biosafety**

## Origin of report

| | | |
|---|---|---|
| 1. | **Country:** | **[ Estonia ]** |
| *Contact officer for report* | | |
| 2. | Name of contact officer: | **[ Liina Eek ]** |
| 3. | Title of contact officer: | **[ Adviser ]** |
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| 9. | Organizations/stakeholders who were consulted or participated in the preparation of this report: | **[ Ministry of the Environment, Ministry of Agriculture, Agricultural Board ]** |
| *Submission* | | |
| 10. | Date of submission: | **[ 30 September 2011 ]** |
| 11. | Time period covered by this report: | **[ September 2007 - September 2011 ]** |

Signature of the reporting officer[1] _____

[1] This document is made available as a protected form in MS Word format for further processing of the information contained therein by the CBD Secretariat. Only text entries and checkboxes are changeable. Once the document is filled in, please save it and print this first page for signature. The form is also available on the BCH for completion electronically at: http://bch.cbd.int/managementcentre/edit/CPBnationalreport2.shtml

**IMPORTANT: To facilitate the analysis of the information contained in this reports, please send the report to the Secretariat via e-mail at secretariat@cbd.int as attachment in MS Word format, together with a scanned copy of the first signed page; please *do not* send this report via fax or postal mail or in electronic formats other than MS Word.**

| | | |
|---|---|---|
| 12. | Is your country a Party to the Cartagena Protocol on Biosafety (CPB)? | ☒ Yes<br>☐ No |
| 13. | If you answered *No* to question 12, is there any national process in place towards becoming a Party? | ☐ Yes<br>☐ No<br>☒ Not applicable |
| 14. | Here you may provide further details:<br>[ Entry into force on 22 June 2004 ] | |

**Article 2 – General provisions**

| | | |
|---|---|---|
| 15. | Has your country introduced the necessary legal, administrative and other measures for the implementation of the Protocol? | ☒ A domestic regulatory framework is fully in place<br>☐ A domestic regulatory framework is partially in place<br>☐ Only temporary measures have been introduced<br>☐ Only a draft framework exists<br>☐ No measures have yet been taken |
| 16. | Which specific instruments are in place for the implementation of your national biosafety framework? | ☒ One or more national biosafety laws<br>☒ One or more national biosafety regulations<br>☒ One or more sets of biosafety guidelines<br>☒ Other laws, regulations or guidelines that indirectly apply to biosafety<br>☐ No instruments are in place |
| 17. | Has your country established a mechanism for the budgetary allocations of funds for the operation of its national biosafety framework? | ☒ Yes<br>☐ No |

| | | |
|---|---|---|
| 18. | Does your country have permanent staff to administer functions directly related to the national biosafety framework? | ☒ Yes<br>☐ No |
| 19. | If you answered *Yes* to question 18, how many permanent staff members are in place whose functions are directly related to the national biosafety framework? | ☐ One<br>☒ Less than 5<br>☐ Less than 10<br>☐ More than 10<br>☐ Not applicable |
| 20. | Has your country's biosafety framework / laws / regulations / guidelines been submitted to the Biosafety Clearing-House (BCH)? | ☐ Yes<br>☒ Partially<br>☐ No |

21. Here you may provide further details on the implementation of Article 2 in your country:

[ As an EU Member State, Estonia complies with European Community law. For the description of the EU framework, please see the report of EC. .

Estonia has adopted the Act on the Release into the Environment of Genetically Modified Organisms, valid since 01.05.2004, which provides regulations in accordance with Directive 2001/18 of the European Council. The act was amended and provisions about co-existence of GMOs and conventional crops were added in 2011. Additional regulations under Ministry of Agruculture for co-existance measures will be adopted during 2011.

Additionally, there are several sctoral legal acts connected to biosafety, based on EU legal acts: The Act on Contained Use of Genetically Modified Microorganisms (01.08.2002); The Food Act, (last redaction cince 20.01.2011); The Act on Seeds and Plant Propagation Material (new version will be adopted in 2011 that has some new provisions about GMOs as well); The Feed Act (11.01.2007).

## Article 5 – Pharmaceuticals

| | | |
|---|---|---|
| 22. | Does your country regulate the transboundary movement, handling and use of living modified organisms (LMOs) which are pharmaceuticals? | ☒ Yes<br>☐ Yes, to some extent<br>☐ No |

| | | |
|---|---|---|
| 23. | If you answered *Yes* to question 22, has this information been submitted to the BCH? | ☐ Yes<br>☒ Partially<br>☐ No<br>☐ Not applicable |

24. Here you may provide further details on the implementation of Article 5 in your country:

[ The use of GM medicinal products are regulated by the Medicinal Products Act. The State Agency of Medicines is the National Drug Regulatory Authority for Human and Veterinary Products and Competent Authority for Medical Devices in Estonia. SAM has the following obligations: marketing authorization and quality control of medicinal products including biological products, evaluation and approval of applications for clinical trials, import and export authorization of medicinal products, control of licit use of psychotropic and narcotic substances, control over precursors, drug information, advertising and promotion control and pharmaceutical inspection.

See also the report of EC. ]

**Article 6 – Transit and Contained use**

| | | |
|---|---|---|
| 25. | Does your country regulate the transit of LMOs? | ☒ Yes<br>☐ No |
| 26. | Does your country regulate the contained use of LMOs? | ☒ Yes<br>☐ No |
| 27. | If you answered *Yes* to questions 25 or 26, has this information been submitted to the BCH? | ☒ Yes<br>☐ Partially<br>☐ No<br>☐ Not applicable |

28. Here you may provide further details on the implementation of Article 6 in your country:

[ In regard of q 25 please see the report of EC.

In regard of contained use: The Act on Contained Use of Genetically Modified Microorganisms (01.08.2002). The Labour Inspectorate under Ministry of Social Affairs is responsible for issuing licences for use of genetically modified micro-organisms in contained use. ]

**Articles 7 to 10: Advance Informed Agreement (AIA) and intentional introduction of LMOs into the environment**

| | | | |
|---|---|---|---|
| 29. | Has your country adopted law(s) / regulations / administrative measures for the operation of the AIA procedure of the Protocol? | ☒ | Yes |
| | | ☐ | No |
| 30. | Has your country adopted a domestic regulatory framework consistent with the Protocol regarding the transboundary movement of LMOs for intentional introduction into the environment? | ☒ | Yes |
| | | ☐ | No |
| 31. | Has your country established a mechanism for taking decisions regarding first intentional transboundary movements of LMOs for intentional introduction into the environment? | ☒ | Yes |
| | | ☐ | No |
| 32. | If you answered *Yes* to question 31, does the mechanism also apply to cases of intentional introduction of LMOs into the environment that were not subject to transboundary movement? | ☒ | Yes |
| | | ☐ | No |
| | | ☐ | Not applicable |
| 33. | Has your country established a mechanism for monitoring potential effects of LMOs that are released into the environment? | ☒ | Yes |
| | | ☐ | No |

| | | | |
|---|---|---|---|
| 34. | Does your country have the capacity to detect and identify LMOs? | ☒ | Yes |
| | | ☐ | Yes, to some extent |
| | | ☐ | No |
| 35. | Has your country established legal requirements for exporters under its jurisdiction to notify in writing the competent national authority of the Party of import prior to the intentional transboundary movement of an LMO that falls within the scope of the AIA procedure? | ☒ | Yes |
| | | ☐ | No |
| 36. | Has your country established legal requirements for the accuracy of information contained in the notification? | ☒ | Yes |
| | | ☐ | No |
| 37. | Has your country ever received an application / notification regarding intentional transboundary movements of LMOs for intentional introduction into the environment? | ☐ | Yes |
| | | ☒ | No |
| 38. | Has your country ever taken a decision on an application / notification regarding intentional transboundary movements of LMOs for intentional introduction into the environment? | ☐ | Yes |
| | | ☒ | No |
| | | ☐ | Not applicable |
| 39. | If you answered *Yes* to question 38, how many LMOs has your country approved to date for import for intentional introduction into the environment? | ☐ | None |
| | | ☐ | Less than 5 |
| | | ☐ | Less than 10 |
| | | ☐ | More than 10 |
| | | ☒ | Not applicable |
| 40. | If you answered *Yes* to question 38, how many LMOs, not imported, has your country approved to date for intentional introduction into the environment? | ☒ | None |
| | | ☐ | Less than 5 |
| | | ☐ | Less than 10 |
| | | ☐ | More than 10 |
| | | ☐ | Not applicable |

| | | |
|---|---|---|
| 41. In the current reporting period, how many applications/notifications has your country received regarding intentional transboundary movements of LMOs for intentional introduction into the environment? | ☒ | None |
| | ☐ | Less than 5 |
| | ☐ | Less than 10 |
| | ☐ | More than 10 |
| 42. In the current reporting period, how many decisions has your country taken regarding intentional transboundary movements of LMOs for intentional introduction into the environment? | ☒ | None |
| | ☐ | Less than 5 |
| | ☐ | Less than 10 |
| | ☐ | More than 10 |
| *If you replied <u>None</u> to question 42 please go to question 50* | | |
| 43. With reference to the decisions taken on intentional transboundary movements of LMOs for intentional introduction into the environment, has your country received a notification from the Party(ies) of export or from the exporter(s) prior to the transboundary movement? | ☐ | Yes, always |
| | ☐ | In some cases only |
| | ☐ | No |
| 44. Did the notifications contain complete information (at a minimum the information specified in Annex I of the Cartagena Protocol on Biosafety)? | ☐ | Yes, always |
| | ☐ | In some cases only |
| | ☐ | No |
| | ☐ | Not applicable |
| 45. Has your country acknowledged receipt of the notifications to the notifier within ninety days of receipt? | ☐ | Yes, always |
| | ☐ | In some cases only |
| | ☐ | No |
| | ☐ | Not applicable |

| | | |
|---|---|---|
| 46. | Has your country informed the notifier(s) and the BCH of its decision(s)? | ☐ Yes, always<br>☐ In some cases only<br>☐ In some cases only the notifier<br>☐ In some cases only the BCH<br>☐ No<br>☐ Not applicable |
| 47. | Has your country informed the notifier(s) and the BCH of its decision(s) in due time (within 270 days or the period specified in your communication to the notifier)? | ☐ Yes, always<br>☐ In some cases only<br>☐ No<br>☐ Not applicable |
| 48. | What percentage of your country's decisions fall into the following categories? | [ %] Approving the import without conditions<br>[ %] Approving the import with conditions<br>[ %] Prohibiting the import<br>[ %] Requesting additional information<br>[ %] Extending the period for the communication of the decision<br>☐ Not applicable |
| 49. | In cases where your country approved an import with conditions or prohibited an import, did it provide reasons on which its decisions were based to the notifier and the BCH? | ☐ Yes, always<br>☐ In some cases only<br>☐ In some cases only to the notifier<br>☐ In some cases only to the BCH<br>☐ No<br>☐ Not applicable |

50. Here you may provide further details on the implementation of Articles 7-10 in your country, including measures in case of lack of scientific certainty on potential adverse effects of LMOs for intentional introduction to the environment:

[ Please see the report of EC. As Estonia belongs to EU then Estonian authorities participate in the decision making process as descibed in the report of EC, but decisions are made on the level of European Commission. Estonia itself has issued no permits for environmental releases. ]

**Article 11 – Procedure for living modified organisms intended for direct use as food or feed, or for processing (LMOs-FFP)**

| | | | |
|---|---|---|---|
| 51. | Has your country adopted specific law(s) or regulation(s) for decision-making regarding domestic use, including placing on the market, of LMOs-FFP? | ☒ | Yes |
| | | ☐ | No |
| 52. | Has your country established legal requirements for the accuracy of information to be provided by the applicant? | ☒ | Yes |
| | | ☐ | No |
| 53. | Has your country established a mechanism to ensure that decisions regarding LMOs-FFP that may be subject to transboundary movement will be communicated to the Parties through the BCH? | ☒ | Yes |
| | | ☐ | No |
| 54. | Has your country established a mechanism for taking decisions on the import of LMOs-FFP? | ☒ | Yes |
| | | ☐ | No |
| 55. | Has your country declared through the BCH that in the absence of a regulatory framework its decisions prior to the first import of an LMO-FFP will be taken according to Article 11.6 of the Cartagena Protocol on Biosafety? | ☐ | Yes |
| | | ☒ | No |
| 56. | Has your country indicated its needs for financial and technical assistance and capacity-building in respect of LMOs-FFP? | ☐ | Yes |
| | | ☒ | No |
| 57. | Has your country ever taken a decision on LMOs-FFP (either on import or domestic use)? | ☐ | Yes |
| | | ☒ | No |

*If you replied <u>No</u> to question 57 please go to question 63*

| | | |
|---|---|---|
| 58. | How many LMOs-FFP has your country approved to date? | ☐ None<br>☐ Less than 5<br>☐ Less than 10<br>☐ More than 10<br>☐ Not applicable |
| 59. | In the current reporting period, how many decisions has your country taken regarding the import of LMOs-FFP? | ☐ None<br>☐ Less than 5<br>☐ Less than 10<br>☐ More than 10 |
| 60. | In the current reporting period, how many decisions has your country taken regarding domestic use, including placing on the market, of LMOs-FFP? | ☐ None<br>☐ Less than 5<br>☐ Less than 10<br>☐ More than 10 |

*If you replied <u>None</u> to both questions 59 and 60 please go to question 63*

| | | |
|---|---|---|
| 61. | Has your country informed the Parties through the BCH of its decision(s) regarding import, of LMOs-FFP? | ☐ Yes, always<br>☐ In some cases only<br>☒ No |
| 62. | Has your country informed the Parties through the BCH of its decision(s) regarding domestic use, including placing on the market, of LMOs-FFP within 15 days? | ☐ Yes, always<br>☐ In some cases only<br>☐ Yes, but with delays (i.e. longer than 15 days)<br>☒ No |

63. Here you may provide further details on the implementation of Article 11 in your country, including measures in case of lack of scientific certainty on potential adverse effects of LMOs-FFP:

[Please see the report of EC: As Estonia belongs to EU then toe decisions are made on the level of EC and no decisions are made in Estonia (q 57) . Also, the decisions are input in to the BCH by EC and not by individual member states (q 61 and 62).

**Article 12 – Review of decision**

| | | |
|---|---|---|
| 64. | Has your country established a mechanism for the review and change of a decision regarding an intentional transboundary movement of LMOs? | ☒ Yes<br>☐ No |
| 65. | Has your country ever received a request for a review of a decision? | ☐ Yes<br>☒ No |
| 66. | Has your country ever reviewed / changed a decision regarding an intentional transboundary movement of LMOs? | ☐ Yes, decision reviewed<br>☐ Yes, decision reviewed and changed<br>☒ No |
| 67. | In the current reporting period, how many decisions were reviewed and/or changed regarding an intentional transboundary movement of an LMO? | ☒ None<br>☐ Less than 5<br>☐ More than 5 |

*If you replied <u>None</u> to the question 67 please go to question 71*

| | | |
|---|---|---|
| 68. | Has your country informed the notifier and the BCH of the review and/or changes in the decision? | ☐ Yes, always<br>☐ In some cases only<br>☐ In some cases only the notifier<br>☐ In some cases only the BCH<br>☐ No |

| | | |
|---|---|---|
| 69. | Has your country informed the notifier and the BCH of the review and changes in the decision within thirty days? | ☐ Yes, always<br>☐ In some cases only<br>☐ Yes, but with delays (i.e. longer than 30 days)<br>☐ No |
| 70. | Has your country provided reasons to the notifier and the BCH for the review and/or changes in the decision? | ☐ Yes, always<br>☐ In some cases only<br>☐ In some cases only the notifier<br>☐ In some cases only the BCH<br>☐ No |
| 71. | Here you may provide further details on the implementation of Article 12 in your country:<br>[ Type your text here ] | |

**Article 13 – Simplified procedure**

| | | |
|---|---|---|
| 72. | Has your country established a system for the application of the simplified procedure regarding an intentional transboundary movement of LMOs? | ☐ Yes<br>☒ No |
| 73. | Has your country ever applied the simplified procedure? | ☐ Yes<br>☒ No |
| 74. | If you answered *Yes* to question 73, has your country informed the Parties through the BCH of the cases where the simplified procedure applies? | ☐ Yes, always<br>☐ In some cases only<br>☐ No<br>☒ Not applicable |
| 75. | In the current reporting period, how many LMOs has your country applied the simplified procedure to? | ☒ None<br>☐ Less than 5<br>☐ More than 5 |

76. Here you may provide further details on the implementation of Article 13 in your country:

[ Type your text here ]

**Article 14 – Bilateral, regional and multilateral agreements and arrangements**

| | | | |
|---|---|---|---|
| 77. | Has your country entered into any bilateral, regional or multilateral agreements or arrangements? | ☐ | Yes |
| | | ☒ | No |
| 78. | If you answered *Yes* to question 77, has your country informed the Parties through the BCH of the agreements or arrangements? | ☐ | Yes, always |
| | | ☐ | In some cases only |
| | | ☐ | No |
| | | ☒ | Not applicable |

79. If you answered Yes to question 77, please provide a brief description of the scope and objective of the agreements or arrangements entered into:

[ Type your text here ]

80. Here you may provide further details on the implementation of Article 14 in your country:

[ Type your text here ]

**Articles 15 – Risk assessment**

| | | | |
|---|---|---|---|
| 81. | Has your country established a mechanism for conducting risk assessments prior to taking decisions regarding LMOs? | ☒ | Yes |
| | | ☐ | No |
| 82. | If you answered *Yes* to question 81, does this mechanism include procedures for identifying experts to conduct the risk assessments? | ☒ | Yes |
| | | ☐ | No |
| 83. | Has your country established guidelines for how to conduct risk assessments prior to taking decisions regarding LMOs? | ☒ | Yes |
| | | ☐ | No |
| 84. | Has your country acquired the necessary domestic capacity to conduct risk assessment? | ☒ | Yes |
| | | ☐ | No |

| | | | |
|---|---|---|---|
| 85. | Has your country established a mechanism for training national experts to conduct risk assessments? | ☐<br>☒ | Yes<br>No |
| 86. | Has your country ever conducted a risk assessment of an LMO for intentional introduction into the environment? | ☒<br>☐ | Yes<br>No |
| 87. | Has your country ever conducted a risk assessment of an LMO intended for direct use as food or feed, or for processing? | ☒<br>☐ | Yes<br>No |
| 88. | If your country has taken decision(s) on LMOs for intentional introduction into the environment or on domestic use of LMOs-FFP, were risk assessments conducted for all decisions taken? | ☐<br>☐<br>☐<br>☒ | Yes, always<br>In some cases only<br>No<br>Not applicable |
| 89. | Has your country submitted summary reports of the risk assessments to the BCH? | ☐<br>☐<br>☐<br>☒ | Yes, always<br>In some cases only<br>No<br>Not applicable |
| 90. | In the current reporting period, if your country has taken decisions regarding LMOs, how many risk assessments were conducted in the context of these decisions? | ☐<br>☐<br>☐<br>☒ | None<br>5 or less<br>10 or less<br>More than 10 |
| 91. | Has your country ever required the exporter to conduct the risk assessment(s)? | ☐<br>☐<br>☐<br>☒ | Yes, always<br>In some cases only<br>No<br>Not applicable |

| | | |
|---|---|---|
| 92. Has your country ever required the notifier to bear the cost of the risk assessment(s) of LMOs? | ☐ | Yes, always |
| | ☐ | In some cases only |
| | ☐ | No |
| | ☒ | Not applicable |

93. Here you may provide further details on the implementation of Article 15 in your country:

[ See the report of EC.

Estonia has not carried out any initial risk assessment before the risk assessment of EFSA. Estonian scientists are not activly participating in EFSA risk assessment procedure, however, the expertise is available if the need would rise.

Estonain scientsts are participating in evaluation of risk assesment documents (dossiers) of GMO applications. (see q 86 and 87).

Special courses have not been organized for past couple of years. The courses were organized in the frameworks of UNEP/GEF biosafety projet and training materials are available electronically.

Estonia has not taken any decisions on GMOs, but it has particiapted in risk assessment evaluation process while processing GMO application for EU (q 90). ]

## Article 16 – Risk management

94. Has your country established and maintained appropriate and operational mechanisms, measures and strategies to regulate, manage and control risks identified in risk assessments for:

| | | |
|---|---|---|
| (i) LMOs for intentional introduction into the environment? | ☒ | Yes |
| | ☐ | Yes, to some extent |
| | ☐ | No |

| | | |
|---|---|---|
| | (ii) LMOs intended for direct use as food or feed, or for processing? | ☒ Yes<br>☐ Yes, to some extent<br>☐ No |
| 95. | Has your country established and maintained appropriate measures to prevent unintentional transboundary movements of LMOs? | ☐ Yes<br>☒ Yes, to some extent<br>☐ No |
| 96. | Has your country taken measures to ensure that any LMO, whether imported or locally developed, undergoes an appropriate period of observation that is commensurate with its life-cycle or generation time before it is put to its intended use? | ☒ Yes<br>☐ No |
| 97. | Has your country cooperated with other Parties with a view to identifying LMOs or specific traits that may have adverse effects on the conservation and sustainable use of biological diversity? | ☐ Yes<br>☒ No |
| 98. | Has your country cooperated with other Parties with a view to taking measures regarding the treatment of LMOs or specific traits that may have adverse effects on the conservation and sustainable use of biological diversity? | ☐ Yes<br>☒ No |

99. Here you may provide further details on the implementation of Article 16 in your country, including any details regarding risk management strategies, also in case of lack of scientific certainty on potential adverse effects of LMOs:

[ Estonia folows the EU risk management prodecure, see the report of EC for more details.

As Estonia does not grow GMOs then the risk management system is in place, but "dormant". System is in place for LMO/FFPs.

Unintentional movements - customs checks documentation of shopments from third countries on board. Customs has a right to take samples from shipment if there is a threat of illegal (not labelled) GM shipment. Estonia has ability to identify GMOs from shipments, serticied laboratories and trained laboratory staff.
]

**Article 17 – Unintentional transboundary movements and emergency measures**

| | | |
|---|---|---|
| 100. Has your country made available to the BCH the relevant details setting out its point of contact for the purposes of receiving notifications under Article 17? | ☒ | Yes |
| | ☐ | No |
| 101. Has your country established a mechanism for addressing emergency measures in case of unintentional transboundary movements of LMOs that are likely to have significant adverse effect on biological diversity? | ☒ | Yes |
| | ☐ | No |
| 102. Has your country implemented emergency measures in response to information about releases that led, or may have led, to unintentional transboundary movements of LMOs? | ☐ | Yes |
| | ☒ | No |
| 103. In the current reporting period, how many times has your country received information concerning occurrences that led, or may have led, to unintentional transboundary movement(s) of one or more LMOs to or from territories under its jurisdiction? | ☒ | Never |
| | ☐ | Less than 5 |
| | ☐ | Less than 10 |
| | ☐ | More than 10 |
| *If you replied <u>Never</u> to question 103 please go to question 107* | | |
| 104. Has your country notified affected or potentially affected States, the BCH and, where appropriate, relevant international organizations, of the above release? | ☐ | Yes, for every occurrence |
| | ☐ | Yes, for some occurrences |
| | ☐ | No |
| 105. If you answered *Yes* to question 104, who did your country notify? | ☐ | The affected or potentially affected State |
| | ☐ | The BCH |
| | ☐ | Relevant international organizations |
| | ☐ | Not applicable |

| | | |
|---|---|---|
| 106. Has your country immediately consulted the affected or potentially affected States to enable them to determine appropriate responses and initiate necessary action, including emergency measures? | ☐ | Yes, always |
| | ☐ | Yes, in some cases |
| | ☐ | No, consultation was made but not immediately |
| | ☐ | No, consultation was never made |

107. Here you may provide further details on the implementation of Article 17 in your country:

[ ]

**Article 18 – Handling, transport, packaging and identification**

| | | |
|---|---|---|
| 108. Has your country taken measures to require that LMOs that are subject to transboundary movement are handled, packaged and transported under conditions of safety, taking into account relevant international rules and standards? | ☒ | Yes |
| | ☐ | Yes, to some extent |
| | ☐ | No |
| 109. Has your country taken measures to require that documentation accompanying LMOs-FFP clearly identifies that, in cases where the identity of the LMOs is *not known* through means such as identity preservation systems, they *may contain* living modified organisms and are not intended for intentional introduction into the environment, as well as a contact point for further information? | ☒ | Yes |
| | ☐ | Yes, to some extent |
| | ☐ | No |
| 110. Has your country taken measures to require that documentation accompanying LMOs-FFP clearly identifies that, in cases where the identity of the LMOs *is known* through means such as identity preservation systems, they *contain* living modified organisms and are not intended for intentional introduction into the environment, as well as a contact point for further information? | ☒ | Yes |
| | ☐ | Yes, to some extent |
| | ☐ | No |

| | |
|---|---|
| 111. Has your country taken measures to require that documentation accompanying LMOs that are destined for *contained use* clearly identifies them as *living modified organisms* and specifies any requirements for the safe handling, storage, transport and use, the contact point for further information, including the name and address of the individual and institution to whom the LMO are consigned? | ☒ Yes<br>☐ Yes, to some extent<br>☐ No |
| 112. Has your country taken measures to require that documentation accompanying LMOs that are *intended for intentional introduction into the environment* of the Party of import, clearly identifies them as *living modified organisms*; specifies the identity and relevant traits and/or characteristics, any requirements for the safe handling, storage, transport and use, the contact point for further information and, as appropriate, the name and address of the importer and exporter; and contains a declaration that the movement is in conformity with the requirements of this Protocol applicable to the exporter? | ☒ Yes<br>☐ Yes, to some extent<br>☐ No |
| 113. Does your country have the capacity to enforce the requirements of identification and documentation of LMOs? | ☒ Yes<br>☐ Yes, to some extent<br>☐ No |
| 114. Has your country established procedures for the sampling and detection of LMOs? | ☐ Yes<br>☒ Yes, to some extent<br>☐ No |

115. Here you may provide further details on the implementation of Article 18 in your country:

[ Handling, packaging and transport of GMOs is regulated by EU legislation, please see the report of EC.

Estonia has laboratories that are able to detect and analyse GMOs.

Agricultural Board and Veterinary and Food Board are responsible for sampling of GMOs.

**Article 19 – Competent National Authorities and National Focal Points**

| | | |
|---|---|---|
| 116. Has your country designated one *national focal point for the Cartagena Protocol* to be responsible for liaison with the Secretariat? | ☒ | Yes |
| | ☐ | No |
| 117. Has your country designated one *national focal point for the Biosafety Clearing-House* to liaise with the Secretariat regarding issues of relevance to the development and implementation of the BCH? | ☒ | Yes |
| | ☐ | No |
| 118. Has your country designated one or more *competent national authorities*, which are responsible for performing the administrative functions required by the Cartagena Protocol on Biosafety and are authorized to act on your country's behalf with respect to those functions? | ☐ | Yes, one |
| | ☒ | Yes, more than one |
| | ☐ | No |
| 119. In case your country designated more than one *competent national authority*, has your country conveyed to the Secretariat the respective responsibilities of those authorities? | ☒ | Yes |
| | ☐ | No |
| | ☐ | Not applicable |
| 120. Has your country made available the required information referred in questions 116-119 to the BCH? | ☒ | Yes, all information |
| | ☐ | Yes, some information |
| | ☐ | No |
| 121. In case your country has designated more than one *competent national authority*, has your country established a mechanism for the coordination of their actions prior to taking decisions regarding LMOs? | ☒ | Yes |
| | ☐ | No |
| | ☐ | Not applicable |
| 122. Has your country established adequate institutional capacity to enable the *competent national authority(ies)* to perform the administrative functions required by the Cartagena Protocol on Biosafety? | ☒ | Yes |
| | ☐ | Yes, to some extent |
| | ☐ | No |

123. Here you may provide further details on the implementation of Article 19 in your country:

[ ]

**Article 20 – Information Sharing and the Biosafety Clearing-House (BCH)**

124. Please provide an overview of the status of the information provided by your country to the BCH by specifying for each category of information whether it is available and whether it has been submitted to the BCH.

| | | |
|---|---|---|
| a. | Existing national legislation, regulations and guidelines for implementing the Protocol, as well as information required by Parties for the advance informed agreement procedure (Article 20, paragraph 3 (a)) | ☒ Information available and in the BCH<br>☐ Information available but not in the BCH<br>☐ Information available but only partially available in the BCH<br>☐ Information not available |
| b. | National laws, regulations and guidelines applicable to the import of LMOs intended for direct use as food or feed, or for processing (Article 11, paragraph 5) | ☒ Information available and in the BCH<br>☐ Information available but not in the BCH<br>☐ Information available but only partially available in the BCH<br>☐ Information not available |
| c. | Bilateral, multilateral and regional agreements and arrangements (Articles 14, paragraph 2 and 20, paragraph 3 (b)) | ☐ Information available and in the BCH<br>☐ Information available but not in the BCH<br>☐ Information available but only partially available in the BCH<br>☒ Information not available |
| d. | Contact details for competent national authorities (Article 19, paragraphs 2 and 3), national focal points (Article 19, paragraphs 1 and 3), and emergency contacts (Article 17, paragraph 3 (e)) | ☒ Information available and in the BCH<br>☐ Information available but not in the BCH<br>☐ Information available but only partially available in the BCH<br>☐ Information not available |

| | | |
|---|---|---|
| e. | Reports submitted by the Parties on the operation of the Protocol (Article 20, paragraph 3 (e)) | ☒ Information available and in the BCH<br>☐ Information available but not in the BCH<br>☐ Information available but only partially available in the BCH<br>☐ Information not available |
| f. | Decisions by a Party on regulating the transit of specific living modified organisms (LMOs) (Article 6, paragraph 1) | ☐ Information available and in the BCH<br>☐ Information available but not in the BCH<br>☐ Information available but only partially available in the BCH<br>☒ Information not available |
| g. | Occurrence of unintentional transboundary movements that are likely to have significant adverse effects on biological diversity (Article 17, paragraph 1) | ☐ Information available and in the BCH<br>☐ Information available but not in the BCH<br>☐ Information available but only partially available in the BCH<br>☒ Information not available |
| h. | Illegal transboundary movements of LMOs (Article 25, paragraph 3) | ☐ Information available and in the BCH<br>☐ Information available but not in the BCH<br>☐ Information available but only partially available in the BCH<br>☒ Information not available |

| | | |
|---|---|---|
| i. | Final decisions regarding the importation or release of LMOs (i.e. approval or prohibition, any conditions, requests for further information, extensions granted, reasons for decision) (Articles 10, paragraph 3 and 20, paragraph 3(d)) | ☐ Information available and in the BCH<br>☐ Information available but not in the BCH<br>☐ Information available but only partially available in the BCH<br>☒ Information not available |
| j. | Information on the application of domestic regulations to specific imports of LMOs (Article 14, paragraph 4) | ☐ Information available and in the BCH<br>☐ Information available but not in the BCH<br>☐ Information available but only partially available in the BCH<br>☒ Information not available |
| k. | Final decisions regarding the domestic use of LMOs that may be subject to transboundary movement for direct use as food or feed, or for processing (Article 11, paragraph 1) | ☐ Information available and in the BCH<br>☐ Information available but not in the BCH<br>☐ Information available but only partially available in the BCH<br>☒ Information not available |
| l. | Final decisions regarding the import of LMOs intended for direct use as food or feed, or for processing that are taken under domestic regulatory frameworks (Article 11, paragraph 4) or in accordance with annex III (Article 11, paragraph 6) (requirement of Article 20, paragraph 3(d)) | ☐ Information available and in the BCH<br>☐ Information available but not in the BCH<br>☐ Information available but only partially available in the BCH<br>☒ Information not available |

| | | |
|---|---|---|
| m. | Declarations regarding the framework to be used for LMOs intended for direct use as food or feed, or for processing (Article 11, paragraph 6) | ☒ Information available and in the BCH<br>☐ Information available but not in the BCH<br>☐ Information available but only partially available in the BCH<br>☐ Information not available |
| n. | Review and change of decisions regarding intentional transboundary movements of LMOs (Article 12, paragraph 1) | ☐ Information available and in the BCH<br>☐ Information available but not in the BCH<br>☐ Information available but only partially available in the BCH<br>☒ Information not available |
| o. | LMOs granted exemption status by each Party (Article 13, paragraph 1) | ☐ Information available and in the BCH<br>☐ Information available but not in the BCH<br>☐ Information available but only partially available in the BCH<br>☒ Information not available |
| p. | Cases where intentional transboundary movement may take place at the same time as the movement is notified to the Party of import (Article 13, paragraph 1) | ☐ Information available and in the BCH<br>☐ Information available but not in the BCH<br>☐ Information available but only partially available in the BCH<br>☒ Information not available |

| | | |
|---|---|---|
| q. Summaries of risk assessments or environmental reviews of LMOs generated by regulatory processes and relevant information regarding products thereof (Article 20, paragraph 3 (c)) | ☐ | Information available and in the BCH |
| | ☐ | Information available but not in the BCH |
| | ☐ | Information available but only partially available in the BCH |
| | ☒ | Information not available |
| 125. Has your country established a mechanism for strengthening the capacity of the BCH National Focal Point to perform its administrative functions? | ☐ | Yes |
| | ☒ | No |
| 126. Has your country established a mechanism for the coordination among the BCH National Focal Point, the Cartagena Protocol focal point, and the competent national authority(ies) for making information available to the BCH? | ☒ | Yes |
| | ☐ | No |
| 127. Does your country use the information available in the BCH in its decision making processes on LMOs? | ☐ | Yes, always |
| | ☒ | Yes, in some cases |
| | ☐ | No |
| 128. Has your country experienced difficulties accessing or using the BCH? | ☒ | Yes |
| | ☐ | No |
| 129. If you answered *Yes* to question 128, has your country reported these problems to the BCH or the Secretariat? | ☒ | Yes |
| | ☐ | No |
| | ☐ | Not applicable |
| 130. Is the information submitted by your country to the BCH complete and up-to date? | ☐ | Yes |
| | ☒ | No |

131. Here you may provide further details on the implementation of Article 20 in your country:

[ Most of decisions are made on the level of EU, information is input into the BCH on the level of EC, please refer to the report of EC

In regard of q 128 - failed to find information about NCAs, but this was quickly solved by Secretariat and the link was restored]

**Article 21 – Confidential information**

| | | |
|---|---|---|
| 132. Has your country established procedures to protect confidential information received under the Protocol? | ☒ | Yes |
| | ☐ | No |
| 133. Does your country allow the notifier to identify information that is to be treated as confidential? | ☒ | Yes, always |
| | ☐ | In some cases only |
| | ☐ | No |

134. Here you may provide further details on the implementation of Article 21 in your country:

[ See the report of EC. Estonia applies the rules of EU. Directive 2001/18/EC has taken over with GMO deliberate realease act and it contains provisions about confidential information that are in line with CPB. ]

**Article 22 – Capacity-building**

| | | |
|---|---|---|
| 135. Has your country received external support or benefited from collaborative activities with other Parties in the development and/or strengthening of human resources and institutional capacities in biosafety? | ☐ | Yes |
| | ☒ | No |
| 136. If you answered *Yes* to question 135, how were these resources made available? | ☐ | Bilateral channels |
| | ☐ | Regional channels |
| | ☐ | Multilateral channels |
| | ☒ | Not applicable |
| 137. Has your country provided support to other Parties in the development and/or strengthening of human resources and institutional capacities in biosafety? | ☐ | Yes |
| | ☒ | No |

| | | |
|---|---|---|
| 138. If you answered *Yes* to question 137, how were these resources made available? | ☐ | Bilateral channels |
| | ☐ | Regional channels |
| | ☐ | Multilateral channels |
| | ☒ | Not applicable |
| 139. Is your country eligible to receive funding from the Global Environment Facility (GEF)? | ☐ | Yes |
| | ☒ | No |
| *If you replied <u>No</u> to question 139 please go to question 143* | | |
| 140. Has your country ever initiated a process to access GEF funds for building capacity in biosafety? | ☐ | Yes |
| | ☐ | No |
| 141. If you answered *Yes* to question 140, how would you characterize the process?<br><br>*Please add further details about your experience in accessing GEF funds under question 150.* | ☐ | Very easy |
| | ☐ | Easy |
| | ☐ | Average |
| | ☐ | Difficult |
| | ☐ | Very difficult |
| 142. Has your country ever received funding from the GEF for building capacity in biosafety? | ☐ | Pilot Biosafety Enabling Activity |
| | ☒ | Development of National Biosafety Frameworks |
| | ☒ | Implementation of National Biosafety Frameworks |
| | ☒ | Building Capacity for Effective Participation in the BCH (Phase I) |
| | ☐ | Building Capacity for Effective Participation in the BCH (Phase II) |
| | ☐ | None of the above |

| | | |
|---|---|---|
| 143. During the current reporting period, has your country undertaken activities for the development and/or strengthening of human resources and institutional capacities in biosafety? | ☐ | Yes |
| | ☒ | No |

144. If you answered *Yes* to question 143, in which of the following areas were these activities undertaken?

- ☐ Institutional capacity
- ☐ Human resources capacity development and training
- ☐ Risk assessment and other scientific and technical expertise
- ☐ Risk management
- ☐ Public awareness, participation and education in biosafety
- ☐ Information exchange and data management including participation in the Biosafety Clearing-House
- ☐ Scientific, technical and institutional collaboration at subregional, regional and international levels
- ☐ Technology transfer
- ☐ Identification of LMOs, including their detection
- ☐ Socio-economic considerations
- ☐ Implementation of the documentation requirements under Article 18.2 of the Protocol
- ☐ Handling of confidential information
- ☐ Measures to address unintentional and/or illegal transboundary movements of LMOs
- ☐ Scientific biosafety research relating to LMOs
- ☐ Taking into account risks to human health
- ☐ Other: <Text entry>
- ☒ Not applicable

| | | |
|---|---|---|
| 145. During the current reporting period, has your country carried out a capacity-building needs assessment? | ☐ | Yes |
| | ☒ | No |
| 146. Does your country still have capacity-building needs? | ☐ | Yes |
| | ☒ | Yes, a few |
| | ☐ | No |

147. If you answered *Yes* to question 146, indicate which of the following areas still need capacity-building.

- ☐ Institutional capacity
- ☐ Human resources capacity development and training
- ☒ Risk assessment and other scientific and technical expertise
- ☒ Risk management
- ☐ Public awareness, participation and education in biosafety
- ☐ Information exchange and data management including participation in the Biosafety Clearing-House
- ☒ Scientific, technical and institutional collaboration at subregional, regional and international levels
- ☐ Technology transfer
- ☐ Identification of LMOs, including their detection
- ☐ Socio-economic considerations
- ☐ Implementation of the documentation requirements under Article 18.2 of the Protocol
- ☐ Handling of confidential information
- ☐ Measures to address unintentional and/or illegal transboundary movements of LMOs
- ☐ Scientific biosafety research relating to LMOs
- ☐ Taking into account risks to human health
- ☐ Other: <Text entry>
- ☐ Not applicable

| | | |
|---|---|---|
| 148. Has your country developed a capacity-building strategy or action plan? | ☐ | Yes |
| | ☒ | No |
| 149. Has your country submitted the details of national biosafety experts to the Roster of Experts in the BCH? | ☐ | Yes |
| | ☒ | No |

150. Here you may provide further details on the implementation of Article 22 in your country, including further details about your experience in accessing GEF funds:

[ Type your text here ]

**Article 23 – Public awareness and participation**

| | | |
|---|---|---|
| 151. Has your country established a strategy or put in place legislation for promoting and facilitating public awareness, education and participation concerning the safe transfer, handling and use of LMOs? | ☐ | Yes |
| | ☒ | Yes, to some extent |
| | ☐ | No |
| 152. Has your country established a biosafety website? | ☒ | Yes |
| | ☐ | No |
| 153. Has your country established a mechanism to ensure public access to information on living modified organisms that may be imported? | ☐ | Yes |
| | ☒ | Yes, to a limited extent |
| | ☐ | No |
| 154. Has your country established a mechanism to consult the public in the decision-making process regarding LMOs? | ☒ | Yes |
| | ☐ | Yes, to a limited extent |
| | ☐ | No |
| 155. Has your country established a mechanism to make available to the public the results of decisions taken on LMOs? | ☐ | Yes |
| | ☒ | Yes, to a limited extent |
| | ☐ | No |
| 156. Has your country taken any initiative to inform its public about the means of public access to the Biosafety Clearing-House? | ☒ | Yes |
| | ☐ | No |

| | | |
|---|---|---|
| 157. In the current reporting period, has your country promoted and facilitated public awareness, education and participation concerning the safe transfer, handling and use of LMOs? | ☒ | Yes |
| | ☐ | Yes, to a limited extent |
| | ☐ | No |
| 158. If you answered *Yes* to question 157, has your country cooperated with other States and international bodies? | ☒ | Yes |
| | ☐ | No |
| | ☐ | Not applicable |
| 159. In the current reporting period, how many times has your country consulted the public in the decision-making process regarding LMOs and made the results of such decisions available to the public? | ☐ | Never |
| | ☒ | Less than 5 |
| | ☐ | More than 5 |

160. Here you may provide further details on the implementation of Article 23 in your country:

[ Estonia complies with EU legislation, please refer to the report of EC. Consultation about GMO applications are carried out on EU level, Estonia does not take any additional initiative to involve local people to this process as information is available from sites referred to in report of EU and also the links are availbe from website of Ministry of the Ensironment in Estonia. ]

**Article 24 – Non-Parties**

| | | |
|---|---|---|
| 161. Has your country entered into any bilateral, regional, or multilateral agreement with non-Parties regarding transboundary movements of LMOs? | ☐ | Yes |
| | ☒ | No |
| 162. Has your country ever imported LMOs from a non-Party? | ☒ | Yes |
| | ☐ | No |
| 163. Has your country ever exported LMOs to a non-Party? | ☐ | Yes |
| | ☒ | No |
| 164. If you answered *Yes* to questions 162 or 163, were the transboundary movements of LMOs consistent with the objective of the Cartagena Protocol on Biosafety? | ☒ | Yes, always |
| | ☐ | In some cases only |
| | ☐ | No |
| | ☐ | Not applicable |

| | | |
|---|---|---|
| 165. If you answered *Yes* to questions 162 or 163, was information about these transboundary movements submitted to the BCH? | ☐ | Yes, always |
| | ☐ | In some cases only |
| | ☐ | No |
| | ☒ | Not applicable |
| 166. If your country is not a Party to the Cartagena Protocol, has it contributed information to the BCH on LMOs released in, or moved into, or out of, areas within its national jurisdiction? | ☐ | Yes, always |
| | ☐ | In some cases only |
| | ☐ | No |
| | ☒ | Not applicable |

167. Here you may provide further details on the implementation of Article 24 in your country:

[ Please read the report of EC. Estonia does not have any particular rules for non-parties except of those listed in the report or EC. ]

**Article 25 – Illegal transboundary movements**

| | | |
|---|---|---|
| 168. Has your country adopted domestic measures aimed at preventing and/or penalizing transboundary movements of LMOs carried out in contravention of its domestic measures to implement this Protocol? | ☒ | Yes |
| | ☐ | No |
| 169. Has your country established a strategy for detecting illegal transboundary movements of LMOs? | ☒ | Yes |
| | ☐ | No |
| 170. In the current reporting period, how many times has your country received information concerning cases of illegal transboundary movements of an LMO to or from territories under its jurisdiction? | ☒ | Never |
| | ☐ | Less than 5 |
| | ☐ | Less than 10 |
| | ☐ | More than 10 |

*If you replied <u>Never</u> to question 170 please go to question 175*

| | | |
|---|---|---|
| 171. Has your country informed the BCH and the other Party(ies) involved? | ☐ | Yes |
| | ☐ | Only in some cases |
| | ☐ | Only the other Party(ies) involved |
| | ☐ | Only the BCH |
| | ☐ | No |
| | ☐ | Not applicable |
| 172. Has your country established the origin of the LMO(s)? | ☐ | Yes |
| | ☐ | Yes, some cases |
| | ☐ | No |
| 173. Has your country established the nature of the LMO(s)? | ☐ | Yes |
| | ☐ | Yes, some cases |
| | ☐ | No |
| 174. Has your country established the circumstances of the illegal transboundary movement(s)? | ☐ | Yes |
| | ☐ | Yes, some cases |
| | ☐ | No |

175. Here you may provide further details on the implementation of Article 25 in your country:

[ See the report of EC. ]

**Article 26 – Socio-economic considerations**

| | | |
|---|---|---|
| 176. If your country has taken a decision on import, has it ever taken into account socio-economic considerations arising from the impact of the LMO on the conservation and sustainable use of biological diversity? | ☐ | Yes |
| | ☒ | Only in some cases |
| | ☐ | No |
| | ☐ | Not applicable |

| | | |
|---|---|---|
| 177. Has your country cooperated with other Parties on research and information exchange on any socio-economic impacts of LMOs? | ☐ | Yes |
| | ☒ | Yes, to a limited extent |
| | ☐ | No |

178. Here you may provide further details on the implementation of Article 26 in your country:

[ Please see the report of EC.

Estonia has worked out the co-existence measures, they will come into force in 2011. ]

**Article 27 – Liability and Redress**

| | | |
|---|---|---|
| 179. Has your country signed the Nagoya-Kuala Lumpur Supplementary Protocol on Liability and Redress? | ☐ | Yes |
| | ☒ | No |
| 180. Has your country initiated steps towards ratification, acceptance or approval of the Nagoya-Kuala Lumpur Supplementary Protocol? | ☒ | Yes |
| | ☐ | No |

181. Here you may provide further details on any activities undertaken in your country towards the implementation of the Nagoya-Kuala Lumpur Supplementary Protocol on Liability and Redress:

[ Process for signing the Protocol has been initiated. Protocol has been translated into Estonian, the analysis about the impact of ratification has been performed and is waiting for approval from other ministries (Ministries of Justice and Foreign Affairs). ]

**Article 33 – Monitoring and reporting**

| | | |
|---|---|---|
| 182. Has your country submitted the previous national reports (Interim and First National Reports)? | ☒ | Yes |
| | ☐ | Yes, Interim report only |
| | ☐ | Yes, First report only |
| | ☐ | No |
| | ☐ | Not applicable |

183. If your country did not submit previous reports, indicate the main challenges that hindered the submission

- ☐ Lack of financial resources to gather the necessary information
- ☐ Lack of relevant information at the national level
- ☐ Difficulty in compiling the information from various sectors
- ☐ No obligation to submit (e.g. country was not a Party at the time)
- ☐ Other, please specify
  [Type your text here]
- ☒ Not applicable

**Other information**

184. Please use this field to provide any other information on issues related to national implementation of the Protocol, including any obstacles or impediments encountered.

[ Type your text here ]

**Comments on reporting format**

185. Please use this field to provide any other information on difficulties that you have encountered in filling in this report.

[ The format is not fully compatible with open office and might cause problems in filling in to the governments that use open office instead of MS Word. ]