

## **Email Submission: Dutch Institute for Public Health and the Environment**

On behalf of the Dutch Institute for Public Health and the Environment (RIVM) I hereby like to submit information to your discussion paper 'Options for regulating new technologies', more specific to question 6 'contained research on GM gene drive organisms'.

The RIVM published early 2016 a policy paper on gene drives (see attached pdf and/or

[http://www.rivm.nl/en/Documents\\_and\\_publications/Scientific/Reports/2016/februari/Gene\\_drives\\_Policy\\_report/Download:nK3Lftb5SjyL\\_ChHO9VMSQ/Download\\_PDF](http://www.rivm.nl/en/Documents_and_publications/Scientific/Reports/2016/februari/Gene_drives_Policy_report/Download:nK3Lftb5SjyL_ChHO9VMSQ/Download_PDF)).

In this report we concluded that sexual reproducing organisms with a gene drive pose other risks than the currently regulated GMOs under contained use since the accidental release of a gene drive GMO can spread its genetic trait quickly and permanently through an entire population. The current risk assessment for contained use in The Netherlands is specifically addressing pathogenicity, allergenicity and toxicity of GMOs, and not the spread of a new trait into the environment. Therefore, the risk assessment for contained use is therefore not yet tailored to GM gene drive organisms.

RIVM recommended that authorisation should be obligatory for applications in laboratories of GM gene drive organisms. Notification is insufficient. This recommendation has lead in a change in the Dutch GMO Decree. The Dutch minister has adopted an additional rule that GM gene drive organisms are assigned to the highest containment level thereby enabling a case-by-case risk assessment to address correct containment measures.

Finally, RIVM recommends that an international debate should be sought since GM gene drive organisms may have potential effects on human health and the environment that could spread across national borders.

Experiments with GM gene drive organisms are not yet taking place in The Netherlands under contained use. This could change on short notice and will call for an immediate and adequate risk assessment and determination of proper containment measures. Therefor RIVM plans to organize a small expert meeting in order to discuss these topics with experts and collaborate on this on international level. This meeting will be held in Utrecht, The Netherlands, in January 2017. You are kindly invited to participate as well.

With kind regards,  
Cécile van der Vlugt