West Africa Animal Ag Workshop

Perspectives on the Regulation of Novel GM Insects

John McLean July 2018



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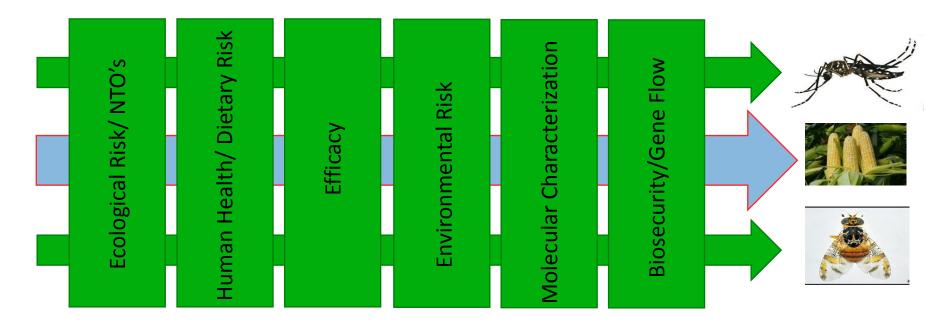


Regulatory Overview: Technology and Risk Assessment Elements

	Mosquito	Ag Pest	Plant Biotech
Technology			
GMO	*	*	*
Biopesticide	*	*	*
Biocontrol Agent	*	*	
Disease Vector/ Human Health	*		
Plant Pest		*	*
Risk Assessment			
Human Risk	*	*	*
Environmental Risk	*	\star	*
NTO Risk	*	*	*
Biocontainment/ Gene Flow	*	*	*
GMO Risk	*	*	*



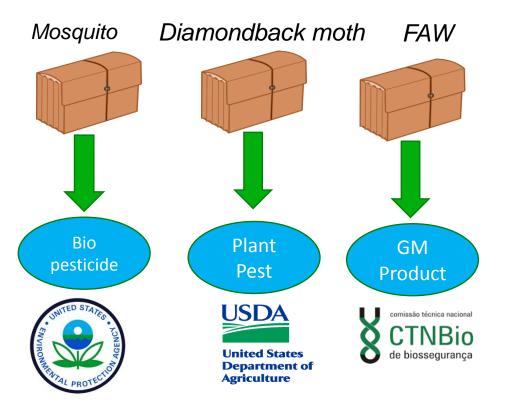
Regulatory/ Risk Assessment Paradigm An Overview



• Regulatory jurisdiction and oversight may differ, but problem formulation and core scientific risk assessments related to human health and environmental safety are very similar.

Example: Regulatory Oversight in US and Brazil

 Depending on countries and biosafety legislation, regulatory oversight and jurisdiction may either be based on technology (GM vs conventional) or nature of product (biopesticide, vector control, public health application)





Overview: Regulation of GM Insects

- Conceptually analogous to framework for GM plants
 - · Focus on safety of constituent proteins
 - Adapt to differences in behavior and characteristics of regulated organism
- Focus on key data to characterize:
 - Human safety
 - Ecological safety
 - Environmental safety
 - Efficacy



Regulatory Data Summary for GM Insects

- Human safety
 - Protein tox
 - Bioinformatic assessment
 - Molecular characterization
 - Allergenicity/ Digestibility of proteins
 - Residues of constituent proteins in grain
- Ecological/ Environmental safety
 - Protein persistence and degradation
 - Insect persistence
 - Biocontainment
 - NTO assessment ie avian, predator feeding studies
- Socio-economic considerations
 - Global import approvals not required (GM pest control product vs GM article in commerce)



SLI Regulatory Assessment Summary

>14 Years of Studies – Biosafety Profile for SLI Technology

Characteristics	SLI
Free of toxic or allergenic components	\checkmark
Safe for predators (Two oral exposure studies available)	✓
Fully susceptible to insecticides	✓
Species-specific insect control	✓
Ability to monitor and assess efficacy	✓
Ability to confine & contain/management of off-target impacts	✓
De minimis protein exposures to humans/NTOs	✓
Genetically and phenotypically stable	✓
Efficacious control of target pests demonstrated	✓



8

Global Regulatory Progress for SLI Insects

Import & contained trials approved

• Vietnam

Morocco

India

• USA

- Austria
- France
- Greece
- Guatemala Australia
- Israel
- Singapore
- Thailand



Environmental release approved

- Brazil
- Cayman
- Malaysia
- USA
- Panama





Current outdoor release

Multiple ongoing

- USDA DBM
- Dutch EU standard



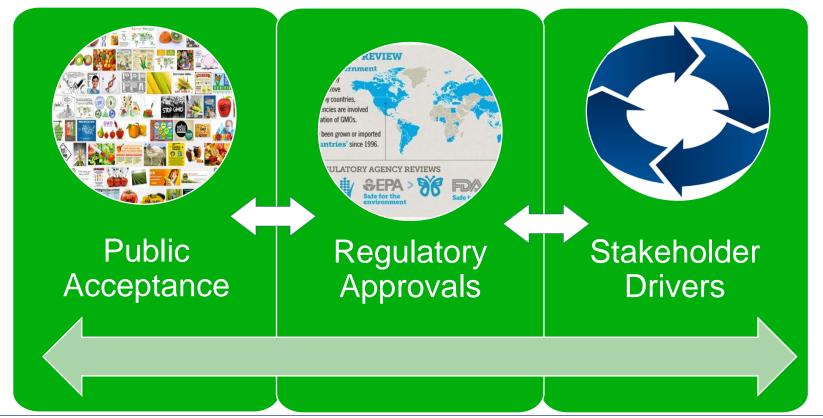


National Institute for Public Health and the Environment Ministry of Health, Welfare and Sport



9

Regulatory Drivers





Stakeholder Engagement: Acceptance

Demand Drivers

- Race to increase trait durability
- Preservation and sustainability of widely adopted traits
- Opportunity to mitigate or maintain current IRM requirements without addition of onerous, untenable measures

'Greener' Solutions

- Significantly reduced environmental footprint
- Reduce off target NTO impacts
- Opportunity to curb increasing use of chemistries to manage hard to control and resistant insects

Stakeholder Acceptance

- Market access: will not be subject to import approvals or other GMO barriers to trade
- *De minimis* exposures and risks to consumers
- Supplement current crop production input methods

Stakeholder Engagement across the Value Chain





Public Engagement—Example: Mosquitoes

- Fundamental component of release program:
- Robust public engagement plan
- Stakeholder mapping
- Adopt culturally appropriate methods
- Train staff
- Train partnering public heath/vector control agents
- 6-8 week intensive campaign before release
- Ongoing engagement throughout project
- Channels for 2 way communication listen and respond





In Closing...Summary and Learnings

- Global regulatory systems evolving for the evaluation of novel GM animal products
- Most countries have shown a keen ability to adapt to a novel technology utilizing existing authorities and guidelines
- Common risk assessment principles apply across GM organisms released into the environment, including insects
- Harmonization of regulatory requirements and transportability of data will be necessary to ensure timely regulatory approvals
- Proactive engagement and communication with regulators, the public and value chain stakeholders critical to regulatory process and subsequent introduction
- Risk-benefit aspects (public health, resistance development) need to be consistently considered in regulatory decision-making and timing



