

Comment submitted by Dr Anastasia Malygina

The paper I was asked to review proves that the BWC was and remains the cornerstone of the global biosecurity governance. The report suggests a set of extremely helpful insights regarding the nature, scope, and objectives of verification.

Although the paper does not pronounce it explicitly, it introduces three dimensions of verification as a process: *political, executive, and technical*. I guess, the SPs of the BWC as well as other stakeholders expect that verification as a process will be effective, sufficient, and resilient in all three dimensions.

Let's have a closer look at these three dimensions and corresponding features.

In terms of its political dimension, verification should not only fit the expectations of the SPs. It should also be based on collective agreement and ensured multilateral legitimacy in any applied mechanisms and procedures. Verification is expected to be non-discriminative and strengthen transparency, accountability, and assurance about compliance. The report highlights that verification also needs to be appropriate and adequate in terms of protection of national security and commercial proprietary information. It needs to be reliable and well-equipped in terms of balanced package of administrative mechanisms and various tools.

I would add a few more features here. The verification process needs to be resilient in terms of its continuity. And it needs to fit the principles of objectivity, independence and impartiality of those who undertake verification activities.

Regarding the executive dimension, verification needs to be smart in terms of human, administrative, financial, and other resource intensity. The UNIDIR paper suggests that the S&T tools need to be validated for use and accompanied by institutional support. And I would add one more aspect here. The verification process needs to be equipped with appropriate review procedures, organizational learning and knowledge management mechanisms to secure all three dimensions of its resilience (political, executive, technical).

As for the technical dimension, verification process needs to be scientifically robust and adaptive in terms of catching up with technology change. The launched process of the Working Group opens up a window of opportunity for the BWC SPs to advance work around compliance and verification in the Convention. However, as the UNIDIR paper fairly admits, the Working Group has a broad mandate and limited time.

That's why I guess it would be reasonable to think on how to stimulate "cross-fertilization" among various unilateral and multilateral initiatives and existing international structures. For instance, expert dialogue at such platforms as the WHO, OIE, FAO, IPPC and OPCW may be helpful to identify best practices as well as

review shortcomings which should not be replicated while designing verification regime for the BWC.

A reasonable question would be about whether it is possible to strengthen jointness and interoperability of databases and information exchange flows which exist in various international structures related to global biosecurity.

In terms of improving transparency and accountability on national activities related to global biosecurity, I guess the need for kind of “System integrator” is quite evident.

And in this context, I would like to refer to the idea of International Agency for Biological Safety. This initiative was presented to the UN General Assembly in 2020 by the president of Kazakhstan and was further developed as a working paper at the Meeting of experts on institutional strengthening of the BWC in September 2021.

Later, in April 2022 the Permanent Mission of Kazakhstan to the UN European Office and the Geneva Center for Security Policy hosted a very informative and productive discussion on this initiative in Geneva. The participants of this even addressed objectives and functions of the Agency. Significant part of that discussion focused on verification and related risks of leakage of confidential information and intellectual property. Which to my mind was especially valuable is the discussion of possible functional overlaps with other institutions of global governance.

One more thing, I guess, can be added here. Improved exchange of information and strengthened intergovernmental coordination of national biosecurity related activities among members of various regional associations and other integration formats may be valuable for maturing of the conceptual basis for verification within the BWC regime. In this regard the model of an intergovernmental coordinating council on biological security might be helpful. As I can see in some of the efforts aimed at making the work of such coordinating councils effective are already on their way.

One more element which may be helpful is a well-structured and routine interaction at the level of national bodies which perform various legislative functions.

And last but not least, building a verification regime that is fit for purpose cannot be achieved without nurturing a constructive relationship with industry. Identifying potential vis-à-vis for such interaction and ensuring inclusiveness of such cross-sectoral dialogue will be critical in terms of safeguarding all three dimensions of verification process. To do so, there is need to map current landscape of professional associations, national unions of enterprises in biotechnology sector as well as national commercial chambers which may be involved into a multi-stakeholder dialogue on verification in the BWC regime.