



ASIS International European Bureau
287 Avenue Louise, 2nd Floor
B-1050 Brussels
Belgium
Tel: +32 2 645 26 74, Fax: +32 2 645 26 71

ASIS International's Response to the European Commission's Green Paper on Bio-Preparedness {COM(2007)399}

Brussels, September/October 2007

Introduction

ASIS International welcomes this opportunity to reply to the European Commission's Green Paper on bio-preparedness published in July 2007. However, ASIS International wishes to express concern that the paper has failed to recognise the professional security community as a stakeholder.

ASIS International is a not-for-profit association of security management professionals. The association was established in 1955. Its membership of more than 35,000 members worldwide consists of security professionals who work in a wide variety of professions. ASIS International is dedicated to increasing the effectiveness and productivity of security professionals by developing educational programmes and materials. ASIS also advocates the role and value of the security management profession to business, the media, government entities and the public.

Answers

Question 1: Is a competitive approach to European biological risk reduction and preparedness required?

Reply:

Yes. A competitive approach is necessary in order to prevent future incidents or misuse of dual use technology.

Question 2: How could the EU bridge the perceived gap between non proliferation and international cooperation in a dual-use field such as biology?

Reply:

In order to bridge this gap, ASIS International suggests that networking possibilities on the expert-level and sharing on classified level be developed. Another possibility could be to use strategies similar to the ones already in use in Germany where dual use products are on a watch list. Exporters must get special permission from the German authorities before a sale.



ASIS International European Bureau
287 Avenue Louise, 2nd Floor
B-1050 Brussels
Belgium
Tel: +32 2 645 26 74, Fax: +32 2 645 26 71

Question 3: Can the current defence mechanisms for facing natural and non-intentional crisis situations become more sufficient to cope with deliberately provoked mass-scale and simultaneous crisis situations?

Reply:

Yes. This can be done through raising awareness of security as well as by providing sufficient resources for the civil defence community.

Question 4: How could the European Center for Disease Prevention and Control, as well as the European Food Safety Agency contribute to this endeavour?

Reply:

These bodies can contribute to this endeavour by providing the research capabilities and knowledge about bio-agents.

Question 5: Would peer evaluation methods be useful in addressing existing shortcomings across Europe?

Reply:

Yes. But, these evaluation methods could be supplemented as special interests could influence the results.

Question 6: What role should be played by the private sector in public-private partnership?

Reply:

ASIS International fully supports the involvement of the private sector in public-private partnerships. The private sector could be involved through a non-directive role or contribute to the exchange of knowledge and best practices.

Question 7: Should an EBN (European bio-Network) be created in order to support the implementation of the results of this consultation?

Reply:

Yes. But, the role of this structure should be clarified before another body is created.

Question 8: How could cooperation among relevant authorities and agencies at EU level be improved?

Reply:

Cooperation can be enhanced through the creation of round tables and workshops.



ASIS International European Bureau
287 Avenue Louise, 2nd Floor
B-1050 Brussels
Belgium
Tel: +32 2 645 26 74, Fax: +32 2 645 26 71

Question 9: Should awareness among stakeholders be increased about possible risks related to biological research and commercial activities and about the rules they have to comply with, If so, how?

Reply:

Yes. Awareness among stakeholders regarding these issues can be improved through existing channels, by articles in newspapers and magazines. In addition, briefings targeting security professionals in relevant organisations could be organised..

Question 10: Do you experience difficulties in following new adjustments of rules and restrictions? If so, which ones?

Reply:

N/A

Question 11: Should common minimum bio-standards and the exchange of best practices be developed at the EU level?

Reply:

Yes. Common minimum bio-standards and the exchange of best practices will be beneficial to security. In the field of standard setting, ASIS suggests that a role be allocated to CEN. ASIS International notes that any future legislation in this area should in its opinion be in line with the goals set in the Lisbon Strategy and avoid an unnecessary increase in the administrative and financial burden for the private sector, especially SMEs.

ASIS International supports the exchange of best practices, especially between the public and the private sector.

Question 12: Would you be interested in developing rules for national certification and registering of facilities and researchers which could facilitate European and international exchange of samples and expertise?

Reply:

Yes. This mechanism should enhance the security of samples' exchanges and will facilitate the exchange of expertise among researchers. However, rules for certification and registering should be set up at European level. ASIS International is willing and able to provide expert input through its membership.

Question 13: What should be included in national registers –agents, facilities, activities- ensuring that there are no loopholes and that the security and oversight requirements avoid damaging health, safety, research or industrial activities?



ASIS International European Bureau
287 Avenue Louise, 2nd Floor
B-1050 Brussels
Belgium
Tel: +32 2 645 26 74, Fax: +32 2 645 26 71

Reply:

National registers should include provisions that security agents are hired after background checks. Moreover, these registers should mention that security agents have followed relevant trainings.

Question 14: Should a limited number of bio-researchers possess security clearance? If so, on what basis would you identify them?

Reply:

Yes. All researchers involved in research on pathogens agents which can be used for terrorist attacks should possess identity clearance. They could be identified through standard or enhanced vetting procedures.

Question 15: Should a specific and limited number of laboratories, health institutions, production establishments, pharmaceutical and food processing plants be accredited on the basis of compliance with minimum security standards?

Reply:

Yes. These institutions should comply with minimum security standards.

Question 16: Do you agree that an enhanced EU-level capacity for analysis of biological risks is necessary or is the present situation satisfactory?

Reply:

The present situation is not satisfactory. An improved EU-level capacity to assess biological risks is therefore necessary.

Question 17: Should there be EU funding for joint training and awareness raising?

Reply:

Yes. Training programmes at trans-national level already exist and could be funded by the European Union.

Question 18: Should EU-level lists of biological agents of special security concern be developed jointly by the Member States and the Commission?



ASIS International European Bureau
287 Avenue Louise, 2nd Floor
B-1050 Brussels
Belgium
Tel: +32 2 645 26 74, Fax: +32 2 645 26 71

Reply:

Yes. Some of our members would like to support this proposition. However, some of them cannot participate to the development of such a list as it is prohibited under their national law.

Question 19: If you believe that each Member State should have its own pathogen lists, do you agree that interaction with other Member States on this topic could be beneficial for your organisation?

Reply:

A majority of our members expressed that this will be beneficial for their organisation.

Question 20: Is the current level of research activities on bio-preparedness sufficient in the EU? Which research activities should be prioritised?

Reply:

No. The current level of research on bio-preparedness is not sufficient. Researches on pathogen agents dangerous for human health and life which can be used for terrorist attacks should be prioritised. Furthermore, research conducted with a view to developing recommendations to officials and the public concerning health prevention and epidemics should be a priority.

Question 21: Should public and private funding for research on bio-substances be made conditional on the compliance of bio-standards?

Reply:

Yes.

Question 22: Do you agree that a publication procedure should be applied where sensitive biological dual-use research should be published in two versions:

- a public version with no publishing restrictions (without sensitive content) and
- a restricted version containing the sensitive parts of the research with access only for relevant bio-stakeholders?

Reply:

Yes. This two-fold approach has proven successful in the United States, as it allows for more specific feedback from experts who are given a complete set of facts whilst engaging the opinions of the general public without jeopardizing the sensitivity of certain information



ASIS International European Bureau
287 Avenue Louise, 2nd Floor
B-1050 Brussels
Belgium
Tel: +32 2 645 26 74, Fax: +32 2 645 26 71

Question 23: Could the EBN assist in the development of bio-security and bio-safety guidelines for publicly funded research?

Reply:

Yes. But the private sector as well as security professionals should also be involved in the development of guidelines.

Question 24: Should mandatory academic courses on bio-standards and best practices become part of the university curriculum in the field relevant to life sciences?

Reply:

Yes. Courses on bio-standards and best practices are already part of some university curricula.

Question 25: Should researchers in life sciences be obliged to adopt a professional code of conduct?

Reply:

Yes. ASIS International fully agrees that researchers should adopt a professional code of conduct.

Question 26: Should the above-mentioned professional code of conduct be developed at EU level? If so, by whom?

ASIS' reply:

Yes. A professional code of conduct should be developed at the EU level, in close collaboration with stakeholders (professional societies).

Question 27: Each Member State depends on the bio-preparedness of others. In view of this, should the current early warning mechanisms within the European Union and Member States be further adapted? If so, in what respect?

Reply:

Yes. Early warning mechanisms should be developed further. This should be done primarily with regard to potential pandemics.

Question 28: How could the EU coordinate the different initiatives, at national, NATO, G7 and WHO level in order to increase the overall consistency and effectiveness of an EU capability?



ASIS International European Bureau
287 Avenue Louise, 2nd Floor
B-1050 Brussels
Belgium
Tel: +32 2 645 26 74, Fax: +32 2 645 26 71

Reply:

Coordination could be set up through the creation of expert task forces with the power to take decisions. Naturally, this process should be transparent and its participants accountable.

Question 29: Do you consider that coordination of existing warning and detection capabilities, as well as the exchange of best practices in bio-preparedness, should be enhanced at EU level?

Reply:

Yes. The coordination of existing capabilities and systems should be enhanced to ensure that the response to an incident is relevant and proportional to the given situation.

Question 30: Should the EU look into the possibility of developing a capacity for test detection tools on live and dangerous substances?

Reply:

Yes. The EU should develop such a capacity.

Question 31: Should co-operation among relevant authorities and agencies at Member States and EU level be improved? If so, how?

Reply:

Yes.

Question 32: Are regular exercises and training courses a good approach to enhance bio-preparedness or should other additional actions be pursued?

Reply:

Yes. Regular exercises and training could be enough for lower and middle management.

Question 33: Do you agree with the need to build up a European capacity for developing medical countermeasures including vaccines and prophylactics?

Reply:

No. This can be done by the individual member states.



ASIS International European Bureau

287 Avenue Louise, 2nd Floor

B-1050 Brussels

Belgium

Tel: +32 2 645 26 74, Fax: +32 2 645 26 71

Question 34: Do you agree that the creation of limited EU solidarity stocks, as already exist for animal health, supported by Community funding, would be a way forward?

Reply:

Yes. European solidarity stocks could be created but the conditions under which this stock is created should be clarified.

Question 35: Are the provisions already in place, such as antigen and vaccine banks, or reagent banks, sufficient?

ASIS' reply:

No. ASIS International's members do not consider that provisions in place in this area are sufficient.

For more information, please contact Michiel Gen at contact@asisonline.eu or +32 (0)2 6452674