

Submission in response to the Consultation letter regarding the proposal for the Government of Greenland's Executive Order on New Permit Requirements to Utilize Genetic Resources and Payment of Costs for administrative Processing in Connection Therewith

We appreciate and commend the Government of Greenland for launching this public consultation and inviting stakeholder perspectives on the proposed Executive Order. This joint submission was elaborated by the Alfred-Wegener Institute, Helmholtz Centre for Polar and Marine Research, the University of Bremen, and Kiel University, in collaboration with the [German Nagoya Protocol HuB \(GNP-HuB\) project](#), and co-signed by the institutions listed below. The undersigned research institutions have long-standing experience in collaborative scientific work on genetic resources from Greenland and an established record of cooperation with Greenlandic partners. The GNP-HuB, meanwhile, has several years practical experience in supporting researchers in understanding and complying with legal obligations arising from the implementation of the Nagoya Protocol and in promoting solutions to existing ABS challenges.

We fully acknowledge Greenland's right to regulate access to its genetic resources and to recover administrative costs. However, **a uniform fee of DKK 8,000 (around 1,070 euros) risks disincentivizing basic, non-commercial biodiversity research and undermining long-standing cooperative scientific partnerships.**

We therefore respectfully urge the Government of Greenland to consider:

- 1. Exemptions or significantly reduced fees for basic, non-commercial research,**
- 2. Greater flexibility regarding the application deadline, and**
- 3. Clarification of procedural terms to improve transparency.**

A balanced approach in developing and applying the proposed Executive Order, especially concerning fees and procedural requirements, will ensure continued cooperation between Greenlandic and international research communities, support Greenland's goals for environmental stewardship, and uphold the Nagoya Protocol's principles on access and benefit-sharing.

Long-standing scientific partnerships with Greenlandic research institutions.

The co-signatory institutions have a long history of working with Greenlandic marine and terrestrial biodiversity. This collaboration has resulted in numerous joint, peer-reviewed publications and enduring research partnerships between Greenlandic and international institutions. The associated research has been instrumental in advancing biodiversity conservation, sustainable resource management, and climate change mitigation in the Arctic region. Such achievements have only been possible through open and collaborative scientific partnerships between our researchers and Greenlandic research institutions. For instance, long-term monitoring programs such as the Greenland Groundfish Survey (ongoing since 1981) and the Long-Term Ecological Research Observatory HAUSGARTEN in the Fram Strait (since 1999) exemplify this joint effort. The resulting datasets are widely used by colleagues at the Greenland Institute of Natural Resources. Similarly, the Geological Survey of Denmark

and Greenland frequently participates in joint expeditions with research vessels from partner countries. The resulting datasets have produced substantial non-commercial scientific benefits, enriching both Greenlandic and global ecological knowledge and providing essential information for management decisions.

The proposed fee is significantly higher than in other jurisdictions.

The vast majority of countries that regulate access to their genetic resources do not charge a fee for administering ABS permit applications for non-commercial biodiversity research. Those states that do, apply in general substantially lower rates for non-commercial applications than those proposed by Greenland. For example:

Country	Fee for non-commercial applications	
Republic of Korea	USD 7	DKK 44
Malaysia	USD 10	DKK 63
Panama	USD 15	DKK 95
Nigeria	USD 75	DKK 475
India	USD 110	DKK 697
Namibia	USD 125	DKK 792
Tanzania	USD 150	DKK 950
Cameroon	USD 360	DKK 2,282
Bhutan	USD 500	DKK 3,170

The proposed Greenland fee of DKK 8,000 exceeds these amounts severalfold. Given the small size of many research budgets, this would disproportionately affect non-commercial academic collaborations, particularly those involving institutions from countries with fewer financial resources, including partners from low- and middle-income countries.

The proposed application fee of DKK 8,000 may create barriers to basic, non-commercial research in Greenland.

Even for well-established European research institutions, such as those in Germany, this amount represents a considerable administrative burden within highly competitive funding environments. Moreover, most research projects operate under fixed budgets and externally defined funding conditions that do not allow the reallocation of funds or inclusion of new expenses once grants are approved. Researchers cannot retroactively cover additional administrative costs such as those which might be imposed by the Executive Order. Moreover, third-party funding agencies and institutional budget committees are likely to reject future funding proposals if such fees must be covered, leading researchers to conduct their work elsewhere, in jurisdictions where no comparable financial burden applies.

This could unintentionally discourage or even halt ongoing biodiversity, ecological, and environmental monitoring projects in Greenland—directly contradicting Greenland's interest in fostering strong research cooperation and strengthening scientific understanding of its unique ecosystems.

Recommendations for the Executive Order under consultation:

1. Exempt or significantly reduce fees for basic, non-commercial research.

It is unclear whether the proposed application fee applies to both commercial and non-commercial utilization of genetic resources. If non-commercial, basic research is included, this would significantly impede biodiversity and conservation-related research.

We therefore recommend:

- Including clarity on whether non-commercial users are required to pay the new fees to apply for ABS permits in Greenland.
- Exempting basic, non-commercial research from the payment obligation.

Or, if an exemption is not possible:

- Introducing a differentiated fee structure that substantially reduces fees for basic, non-commercial research activities.
- Considering reduced or waived fees for Greenlandic partner institutions or joint projects, or long-term, recurring expeditions.
- Establishing a one-time fee, thereby avoiding repeated payments for material transfer applications or amendments to existing permits (e.g., new expedition members or changes in sampling locations, which are common in dynamic research planning).

The adoption of these recommendations would help ensure that Greenland's policy remains aligned with international practice and supportive of collaborative science.

2. Introduce flexibility on the application deadline.

Section 2(2) of the current draft states that “*Naalakkersuisut* may refuse to process applications submitted less than six weeks before the requested start of the permit period”. While we appreciate this discretionary element, the fixed six-week timeframe may still be overly restrictive, especially for expeditions planned on short notice due to seasonal or weather conditions. We therefore recommend that *Naalakkersuisut* explicitly retain and exercise flexibility to accept late submissions in justified cases.

3. Clarify procedural terms to improve transparency and legal certainty.

Section 5, on when the order will enter into force, states that “applications registered as complete prior the enter into force of the Executive Order shall be processed in accordance with the rules in force at that time.” We suggest explicitly clarifying the term “applications registered as complete” to avoid ambiguity.

Such clarification would help ensure that all applicants have a clear understanding of what constitutes a complete submission, including which documents or declarations must be provided before an application is formally registered. This would also support consistent administrative practice and prevent misunderstandings about when an application falls under the previous or new regulation.

Concluding remarks.

We thank you again for the opportunity to submit our concerns and recommendations regarding this proposed Executive Order. This process provides an important opportunity to ensure that the forthcoming ABS framework continues to promote transparency, collaboration, and benefit-sharing, while enabling ongoing biodiversity research and conservation efforts. We are committed to continue fostering international scientific partnerships with Greenland and supporting benefit-sharing from the utilization of Greenlandic genetic resources. We also stand ready to contribute with further information and clarifications if needed.

Best regards,

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