

**TEMPLATE FOR COMMENTS ON THE DRAFT REPORT OF DISCUSSIONS OF  
THE ONLINE FORUM ON RISK ASSESSMENT AND RISK MANAGEMENT  
(29 JANUARY-12 FEBRUARY 2018)**

Please find below comments on the draft report submitted by David Heron ([david.s.heron@aphis.usda.gov](mailto:david.s.heron@aphis.usda.gov)) in response to the invitation 2 March 2018 by Marianela Araya, of the Biosafety and Biosecurity Unit, Secretariat of the Convention on Biological Diversity to use this template to provide comments on the draft report provided in the email of 2 March 2018.

<b>Paragraph ID #</b>	<b>Suggested change<sup>1</sup></b>	<b>Explanation</b>
		Many thanks to the moderator for moderating the online discussions and summarizing the diverse perspectives and experiences of the online contributors. It is always challenging to distill complex comments into a constructive summary report.
		Let me suggest that as the first paragraph under each topic area that an additional paragraph states how many participants contributed to each of the three topics during the online discussion. This will help readers of the report to have a better understanding of the breadth or scarcity of contributions overall.
Throughout		In order to provide context to readers of the report, it will be useful if there is a greater attempt to quantify how many online contributors voiced similar views (e.g., replace whenever possible terms such as “some”, “many” with an indication of how many contributors voiced support for certain ideas.
18	<p>18. A participant from the United States of America pointed out the need for RA/RM to include expertise that recognizes our current understanding of the innate plasticity of genomes (e.g., transposable elements, etc.), and that genetic changes in and of themselves are not indications of likely environmental risks.</p> <p>19. Another comment noted that for environmental risk assessments, countries have worked in a variety of international forums to develop practical, systematic approaches to evaluate the environmental safety of all organisms, regardless of whatever genetic modification techniques that might have been used (e.g., plant pathogens and arthropod pests, as</p>	The draft report condenses three different “experiences” into a single paragraph. It will be easier for the reader to see each of these if presented in three distinct paragraphs (one on innate plasticity of the genome regardless of human intervention; one on the need to focus primarily on phenotype in RA/RM rather than genetic modification techniques employed by humans; one on the value gained from international technical exchanges that explore areas of commonalities in RA/RM beyond the domestic frameworks under which the RA/RM is conducted as part of a biosafety framework (this last observation is key to reducing unnecessary redundancies and resource needs among countries).

	<p>well as those problematic or undesirable plants that are often referred to as "weeds").</p> <p>20. A participant from the United States of America noted the mutual benefits gained from the technical exchanges among environmental risk assessors, including the decades-long technical discussions held among assessors of the United States, Canada, and Mexico.</p>	
21	<p>...(current para 21 would be appended with the following sentence)</p> <p>Several of the views expressed online and summarized here did not appear to reflect the decision that was made in in 2016 at COP/MOP 8 regarding the end of the AHTEG on RA/RM and the specific instruction that no further topics in RA/RM be taken up without the specific instruction coming from a decision of the Parties (link to relevant decision).</p>	<p>This paragraph summarizes views expressed online, but many of these did not appear to take into account the most recent decision of the Parties in 2016 at COP/MOP 8 regarding the AHTEG on RA/RM and additional topics (let alone the lack of endorsement by the Parties of the most recent draft guidance document produced by the AHTEG). Readers unfamiliar with this context would benefit from some additional text, especially if the terms such as “quasi-agreements” are included in the summary of online interventions.</p>
	<p>Additional rows can be added to this table by selecting “Table” followed by “insert” and “rows below”</p>	

1 Proposals to add, move or delete text in the draft document may be accompanied by a brief explanation.