**template for comments on THE draft report of discussions OF the Online Forum on Risk Assessment and Risk Management**

**(29 January-12 February 2018)**

**Comments Helmut Gaugitsch/Austria**

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| **Paragraph ID #** | **Suggested change1** | **Explanation** |
| 43 | Add the following text at the end of paragraph 43: “However, there were also comments that suggested the need for additional guidance, such as on LM animals and on how to ensure that risk assessment is carried out in a scientifically sound and transparent manner. One submitter supported specific guidance in general, based on needs from the Parties. Moreover, see section 3 for additional specific needs for guidance.” | See submissions 8862, 8869, 8871, 8901, 8968, think it would be adequate to refer here to section 3.  |
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| Title of paragraph 62 | Change the title to: “Perceived gaps on specific classes of organisms, techniques and risk assessment approaches” | In order to reflect the two additions (14 and 15) below. |
| 62 | Add at the end of the list:14. Guidance on how to perform a “per se” risk assessment (e.g. where a comparator is not available)15. Guidance on how to implement the concept of “limits of concern” in LMO risk assessment | See submissions 8877, 8918, 8969 |
| Title of paragraph 81 | Change the title to: Perceived gaps in RA currently (delete “No” at the beginning) | The title is giving a wrong impression and would prejudge the debate, where indeed gaps in RA were identified. |
| 81 | Change the second sentence to: “Two submitters noted that at this stage no identification of specific topics in need of further guidance has taken place at the European Union level.Add at the end of the paragraph (after the second sentence): “However, as can be seen from the submissions to the forum, some EU Member States have identified specific needs in their national submissions”.  | This better reflects the situation in the EU. For sentence 2, see the wording in submission 8874. |
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1 Proposals to add, move or delete text in the draft document may be accompanied by a brief explanation.