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

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

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| **Paragraph ID #** | **Suggested change1** | **Explanation** |
| 21 second sentence | Remove the word “quasi” in the term “quasi-‘agreement’. | Yes, a submitter did indeed use this term, but I do not believe this should be carried on further. I as a participant in the online forum took exception to this term, even if I did not verbally protest, as we indeed have several COP-MOP decisions tasking the AHTEG on risk assessment to develop the guidance. I would hardly call this a “quasi-agreement”. In the interest of holding a civil and professional tone to the coming discussions at SBSTTA I request either deleting this somewhat inflammatory term or add an explanation that there are COP-MOP decisions tasking development of the guidance to the AHTEG. A COP-MOP decision is an international agreement in the full meaning of the term. |
| 21 third sentence | Rephrase the sentence to; “In a similar vein, some participants welcomed the guidance produced by the RARM AHTEG and have found it ‘useful’, others have found it ‘adequate’, and others disagree as to the value of the guidance. | The present sentence is too negative and does not reflect the full range of comments made in the online forum. Rephrase the sentence to reflect the full range of comments on the usefulness of the guidance on risk assessment. See comments #8919, 8918, 8891 etc. |
| 22 first sentence | Change “**One** intervention…” to “**Several** interventions…” | See also comments in #8859, 8875 among others |
| 43 heading and paragraph | Move the heading and paragraph 43 to Section 3, as it is here the topic of identifying the need for additional guidance on specific topics is presented | # 43 is an “orphan” paragraph. The document is more readable if all comments pertaining to a question/topic are combined under the relevant heading. The submission belongs to topic 3 even if it was submitted under topic 2. A combined consideration of the question is only possible if editorial corrections are made to bring submissions together in the proper place in the document. |
| 44 and heading | Editorial move to place para 44 and its heading to the proximity of paragraphs 57- 61 where assessment of benefits is more thoroughly discueed. | The document is more readable if all comments pertaining to a question/topic are combined under the relevant heading. The submission belongs to topic 3 even if it was submitted under topic 2. A combined consideration of the question is only possible if editorial corrections are made to bring submissions together in the proper place in the document. |
| Heading above paragraph 47. | Change the heading to,” Perceived shortcomings in the AHTEG Guidance” | Paragraphs 47 – 51 all identify shortcomings in the present guidance. There are no paragraphs under this heading that identify perceived gaps in the guidance, for which guidance should be developed. These gaps are identified and proposals for topics to be developed are in paragraphs 61- 73. |
| Heading above 62 | Change heading to “Perceived gaps in guidance on risk assessment of living modified organisms” | The present heading reflects only some of the perceived gaps and need to develop more guidance. Paragraph 70 & 72 are not about “specific classes of organisms”. |
| 81 second sentence | Change the sentence to read; “Two submitters noted that at this stage no specific topics in need of further guidance have yet to be identified at the European level.” Add a sentence to the end of paragraph 81 “However, as can be seen from the submissions to the online forum as well as responses to a CBD notification, some EU Member States have identified specific needs.” | This revised wording reflects the actual situation in the EU. The discussion within the EU will most certainly continue in the near future. See also #8874. |
| 82 | Change heading above paragraph 82: “Views that guidance is sufficiently covered at present” | The paragraphs are not just about no gaps identified, but also include many points that should be considered and addressed when using guidelines, such as complexities in definitions, methodologies, need to improve search engines in the BCH et. Keep the headings positive to encourage willingness to compromise. |
| 84, 88 and 90 | Regroup these paragraphs to a common section with a heading “Development of methodology, capacity and training” | These three paragraphs highlight a common theme, that besides the question of developing guidance, we need to consider the need for further development of risk assessment methodologies (paras 88 & 90), training and developing capacity in conducting and assessing risk assessments (para. 84). |

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