MARJA’S COMMENTS ON FRAN’S “LIST”.

APRIL 12-13, 2015

Dear Subgroup and Secretariat!  
As I mentioned in my previous message, I am adding some general comments and/or issues that I have identified through reading the two sections (roadmap and general comments). I hope these might be helpful in following discussions with the whole AHTEG and with the online forum at due time…..  
1.- Scope. There seems to be a need on explicitly recapitulating on scope of the roadmap and targeted audience, I feel there is not an agreement on these issues.

I AGREE. I HOPE TO POINT OUT THE DIFFERENT AIM/USE OF THE MANUAL AND THE GUIDANCE.  
2.- I found out that some of those who went through the testing process did it in a way that to my eyes may have been not too useful. They designed a methodology that included testing the guidance by using BCH reports on previous risk assessments, but expecting them to be aligned and consistent with the guidance (or vice versa?). This is circular in nature, the analysis is then confusing because he or she who analyses is probably expecting something beforehand that the guidance will not provide.

A VERY VALID POINT. WE SHOULD CLARIFY THAT WHAT WE HAVE IN THE BCH REPORTS IS NOT NECESSARILY THE FULL RA; OFTEN NOT MUCH MORE THAN A SUMMARY.  
3.-Several information gaps were identified and it might be useful to analyze them.

THIS WE NEED TO DISCUSS MORE.  
4.- Some comments are related to a lack of logical linkage (in spanish we say "hilo conductor") between the different steps&sections in the roadmap and how these also relate to the different sections with the specific documents (trees, mosquitoes, stacked genes, etc).

THIS ISSUE CLEARLY NEEDS A CLARIFICATION AND WE NEED TO LOOK INTO THIS. WE ALSO NEED TO DISCUSS THIS – IN PRINCIPLE STEPS IN THE ERA OR ANY RA NEED TO BE FIRST CARRIED OUT INDEPENDENTLY. HAZARDS – THEN ONLY CONSEQUENCES – THEN LIKELIHOOD ETC. THE SPECIFIC DOCUMENTS HAVE TO BE LOOKED INTO AS WELL.  
5.- Several comments deal with an absence on "human health issues".

NOTED  
6.- The Roadmap should be more general and less focussed on plants.

NEEDS CHECKING  
7.- The need of including examples.

NOTED  
8.- Several comments talk about the need of mentioning the benefits derived from LMOs and not only focussing on the possible risks…….this is not convincing to me in particular because the whole point of the guidance is trying to "guide" on what the Cartagena Protocol calls on for in relation to "risk assessment"….i.e., benefits are not the point in this exercise all together (that does not mean that the Protocol does not recognize that potential benefits are to be expected and welcomed, but it should´t be part of this guidance)…

NOTED. NEEDS POSSIBLY A CLARIFICATION.  
9.- Several comments advice taking into account in a formal manner in the guidance all the accumulated knowledge on non LMOs, as for comparative approach when doing the risk assessment.

NOTED.

I WOULD LIKE TO POINT OUT A FEW MORE THINGS.

WE NEED TO LOOK INTO THE LANGUAGE AND SEE, IF IT CAN/NEEDS TO BE SIMPLIFIED IN SOME PARTS.

THE ISSUE OF FIELD TRIALS NEEDS TO BE LOOKED INTO.

THANKS FRAN FOR THIS COMPILATION.

I THINK IT WILL BE FURTHER DEVELOPED AS OUR WORK PROCEEDS.