General comments on section 2

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As I said in my posting from Monday August 17, I will send some general comments.

And explanations behind my suggestions.

1. On simplifying text. I read the rationales and points to consider many times. However, I did not change the text. I did one deletion and some editorial suggestions. For instance, separating a paragraph to two. (See e.g. comment ID 33).

I have suggested as a solution to this summaries, simple text to the beginning of paragraphs. For instance, both to rationale para and points to consider para. Make them for instance to “text boxes”. We could also think of schematic flowcharts to clarify some issues. See my specific comments.

Also related to this are additional issues to use of terms. Whether use of terms should appear also/partly/in some cases on the page in question, and not only at the end of the Guidance.

1. See e.g. ID 199 related to methodology. I have not suggested adding text on methodology (or any other specific issue for that matter). But I have been wondering whether we should add specific references into the text. However, I am doubtful. Reference when it is use of terms or text book reference could maybe be referred within the text. But the problem of e.g. referring to methods within the text is that this type of info will be outdated very quickly. And updating would be more difficult within the text than adding new info at the end of each step (background material).

Also use of terms section should be kept as use of terms, not glossary.

We need to discuss this.

1. Use of terms.

Here is a list of terms that I think may need to be added.

This is of course only a suggestion.

Iterative

“The process may be repeated one or more times until a sufficiently complete and defensible result is achieved” (Suter II, 2007).

Direct, Undirect

see e.g. EFSA guidance, COM decision 2002/623 on Annex II that are included in the background material

Immediate, Delayed

see e.g. EFSA guidance, COM decision 2002/623 on Annex II that are included in the background material

Protection goals

see e.g. EFSA guidance, Suter II (2000, 2007; in 2007 protection goals are called generic endpoints/Generic Ecological assessment endpoints).

Ecosystem functions

A synonym for process.

A reference (maybe already in the background material) and a few examples maybe needed.

Ecosystem services

The benefits people obtain from ecosystems.

A reference (maybe already in the background material) and a few examples maybe needed.

Non-target organisms

See e.g. EFSA guidance.

Scenarios

“A possible future condition, given certain assumed actions and environmental conditions. In risk assessment, a scenario is a set of hypothetical or actual conditions under which exposure may occur and for which risks will be characterized.” (Suter II, 2007).

Pathway(s)

Pathways can refer to metabolic, biochemical etc. pathways.

But also to route to exposure is used as a synonym for pathway to exposure.

The text also uses pathway and causal link as “synonyms”. Clarify.

Causal link(s)

A link between two things in which one causes the other.

Likelihood – quantitative vs qualitative (see e.g. EFSA guidance, background material)

1. I will get back to problem formulation latest when commenting section 1.