



ISO/TMB/WG Risk Management  
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Title:	Comments on ISO DIS 31000
Source:	ISO TMB WG on Risk Management Convenor/Secretariat
TO	Member bodies and liaison organizations that sent experts to the WG on Risk Management
TO	ISO TMB WG on Risk Management Experts
Circulated for:	Discussion in the Singapore meeting
Contents	Result of voting Comments on ISO DIS 31000: <b>Pages 1-82</b> Proposal from NEN: <b>Page 83</b> Proposal from NSAI: <b>Page 84-last</b>
NOTE	The convenor filled in his observations on editorial comments, and comments that duplicate comments that have already been discussed. However, the RMWG will discuss those comments if an expert present specifically calls for the WG to discuss it.
Medium:	ISO/Livelink <a href="http://www.iso.org/rm">www.iso.org/rm</a> , folder "03.Projects"

### Ballot Information

<b>Reference</b>	ISO/DIS 31000	<b>Committee</b>	ISO/TMB
<b>Edition number</b>	1		
<b>English title</b>	Risk management -- Principles and guidelines on implementation		
<b>French title</b>	Management du risque -- Principes et lignes directrices de mise en application		
<b>Start date</b>	2008-04-01	<b>End date</b>	2008-09-01
<b>Opened by ISO/CS on</b>	2008-04-01 00:00:37	<b>Closed by ISO/CS on</b>	2008-09-03 00:04:04
<b>Status</b>	Closed		
<b>Voting stage</b>	Enquiry	<b>Version number</b>	1
<b>Note</b>			

### Result of voting

**Member bodies voting: 3 negative votes out of 29 = 10 % (requirement <= 25%)**

*Approved*

Votes by members					
Country	Member	Status	Approval	Disapproval	Abstention
Argentina	IRAM		X		
Australia	SA		X *		
Austria	ON		X		
Belgium	NBN			X *	
Brazil	ABNT		X *		
Canada	SCC		X *		
China	SAC		X *		
Colombia	ICONTEC		X		
Denmark	DS		X		
Finland	SFS		X *		
France	AFNOR		X *		
Germany	DIN				X *
India	BIS		X		
Ireland	NSAI		X *		
Israel	SII		X *		
Italy	UNI			X *	
Japan	JISC		X *		
Malaysia	DSM		X		
Netherlands	NEN		X *		
New Zealand	SNZ		X *		
Norway	SN		X		
Portugal	IPQ		X		
Singapore	SPRING SG		X		
South Africa	SABS		X *		
Spain	AENOR		X *		
Sweden	SIS		X *		
Switzerland	SNV		X *		
Thailand	TISI		X		
United Kingdom	BSI		X *		
USA	ANSI			X *	
<b>TOTALS</b>			26	3	1
(*) A comment file was submitted with this vote					

MB	Clause Number	Line numbers (e.g. 61)	Type of comment	Comment (justification for change) by the MB	Proposed change by the MB	Convenor observations on each comment submitted
BE			ge	The proposed draft standard does not reflect well enough the full and actual risk management best practices in use. Therefore, the Draft International Standard ISO/DIS 31000 cannot neither apply for being above other standards and guidelines nor FOR BEING used as a normative reference for further elaboration of them.	Revise the whole approach and modernize the concepts ; be open to the other parties working on RMgt principles and methodologies.	1.
BE			ge	Actual objectives of ISO are not clear: what is the aim of the standard if not for certification?		2.
BE			ge	ISO ignores other standards, commonly accepted methodologies, concepts and principles; no reference to COSO, . Objective of Statement 169 – 170 – 171 is not achieved	ISO should check its compatibility with COSO and other mandatory standards	3.
BE			Ge	ISO does not define the different roles and responsibilities within the organisation (managers, auditors, controllers, board, Audit Com, external bodies, Risk Com, ...) : who does what?	Define them	4.
BE			Ge	ISO does not consider the link between “risk and objectives”	Should clearly link them and explain	5.
BE			Ge	It is not the appropriate standard for those who want to meet the world wide best practices ;	ISO should revise its approach in the light of what are the today’s trends for risk management	6.
BE			Ge	ISO prevents from considering various risk analysis perimeters	ISO should encourage to practice of “multi level analysis” and cover also the possibility to aggregate various perimeters	7.
BE			Ge	The “return on experience” concept and techniques are key elements to prevent and manage risks ; They are not considered in the draft	consider these concept and techniques	8.
BE			Ge	ISO does not make any reference neither to the “internal control system” of the organisation nor to the link between RMgt and internal control systems	Include this	9.
BE			Ge	The reading of the standard leaves the impression that	The notion of a “reasonable assurance should	10.

				"absolute assurance" is given to those who follow the ISO rules	prevail"	
BE			Ge	External reporting only considers those kinds of reporting linked with legal compliances ;	There are many other types of external reporting to be considered	11.
CA 1	General			The draft is much improved and is considered to be acceptable as an ISO standard for <u>Risk Management – Principles and guidelines on implementation</u> . The working group has done a good job and should be congratulated.		12. Noted
DE 001	—	—	ge	<b><u>Justification for the German voting behaviour</u></b> <i>The German working group appreciates very much the considerable progress which has been achieved by the development of the ISO/DIS 31000. There are still important modifications/comments for ISO/DIS 31000 in discussion. Therefore the German working group has decided to abstain from voting.</i>	—	13. Noted
DE 002	—	—	ed	A rule for the sorting of listings should be decided.  The sorting by alphabetical order is not appropriate (is depending on the language), the sorting according to priorities is not appropriate as depending on the special circumstances	The sorting should be done according the process for managing risk (Clause 6).	14.
IL				It is require to link between clauses 5.3.6 and 5.3.7: Every external information should be forwarded to relevant internal factors		15.
ISOC S			ed	Editorial correction.	1) Boilerplate text in Foreword is not totally correct, needs to be modified.  2) Remove "should" (recommendation) from Introduction.  3) Third part of Figure 1 is illegible.	16.

					4) Delete "ISO/IEC Guide 73" from Bibliography because it is already listed as Normative reference (Clause 2).	
ES		109, 110 117, 119, 137, 180, 193, 225, 241, 287, 296, 316, 325, 347, 355, 375, 494, 500, 550, 553, 555, 582, 626, 641, 651, 654  110, 117, 184, 198, 287,	ge	Use of "effective" and "efficient" is inconsistent. Are we really meaning: <ul style="list-style-type: none"> <li>• efficiency: doing things "right", i.e. in the best and most economical way</li> <li>• effectiveness: doing "right" things, i.e. setting right targets to achieve an overall goal (the effect)</li> </ul>	Review the use of 'effective' and 'efficient' so their use is consistent along the document.	17.
FR	All the document	na	Te	<p>How could a norm be used if it does not respect an international treatise applied by the World Trade Organization (WTO)?</p> <p>The Agreement on the Application of Sanitary and Phytosanitary Measures (SPS Agreement) indicates that the methodology for evaluating the risks shall follow the standards established by the Codex Alimentarius Commission (CAC) as regards food safety, and the World Organization for Animal Health (OIE) as regards animal health. Both adopted a same nomenclature that is now used in many countries' legislation, e.g. in EU and USA, but this nomenclature differs from the one in the ISO/CEI Guide 73 and the present DIS.</p> <p>In the hope this DIS is used in these crucial economic sectors, it is suggested to recognize the CAC/OIE nomenclature through appropriate footnotes.</p>	<p>Suggestion of footnotes:</p> <p>"Risk assessment" in ISO/CEI 73 includes "Risk assessment" and the first step of "Risk management" according to CAC and OIE.</p> <p>"Risk analysis" in ISO/CEI 73 corresponds only to the process leading to the "Risk characterization".</p> <p>Yet "risk characterization" is the last component of "risk assessment" according to CAC and OIE.</p> <p>The later process and "risk communication" as well do not belong to the "risk management" according to CAC and OIE.</p> <p>Please remind that "risk analysis" according to CAC and OIE has three components: (1) "risk assessment" (composed of "risk identification", "hazard assessment", "exposure assessment" and "risk characterization"), (2) "risk management" and (3) "risk communication"</p>	18.
IT	Whole document		te	Our position is definitely negative for the following fundamental reasons:		19.

				<ul style="list-style-type: none"> <li>- given the negative votes of Italy and other European Countries (Germany, France, Spain and Sweden) in the previous enquiry, we expected a much more significant review of the document, whereas most of those comments have evidently not been taken into account. In this sense, our comments to the previous draft are still fundamentally valid;</li> <li>- given the mandate of TMB/RMWG, it is necessary to avoid a MS approach; nevertheless, even in the current DIS, a lot of references are still present. We deem this fact to be unacceptable since - at least for the time being - "risk management" has to be seen only as a <b>synergistic management tool</b>;</li> <li>- given the mandate of TMB/RMWG, particular attention should have been paid to the needs of SMEs, whereas the current framework is clearly oriented to big companies and, therefore, its applicability is inevitably limited;</li> <li>- the terminological consistency with ISO/IEC Guide 73 is highly improvable, given the noticeable presence of terms and expressions which have not been defined or that are incorrect;</li> <li>- clause 5 is far from being acceptable, as far as a DIS version of document is concerned, and we still do not see any added value in Annex A.</li> </ul>		
SE	All document		Te	<p>The verb "managing risk" (i.e. handling, treating, etc) is not the same thing as the entire concept "Risk management" (which covers both the framework and the process). "Managing risk" should later on lead to problems during translation into some other languages.</p>	<p>The secretariat should go through the standard and replace "managing risk" with "risk management" where appropriate</p>	<p>20. Already discussed in the WG in the past meetings and have decided to use both expressions.</p>
SE	All document		Ge	<p>Has ISO31000 been compared with other frameworks like Basel II/CRD and Solvency II? Mainly in the aspect of describing regulatory oversight.</p>		<p>21.</p>
SE	All document		Ed	<p>The order of the terms "external" and "internal" changes in</p>	<p>Always use external and internal in the same order</p>	<p>22. Accepted</p>

				the document		
CN	Introduction	79-82	ed	The second paragraph is an explanation to the first one.	Combine the two paragraphs to one.	23.Accepted
NZ	Introduction	79	te	Because the meaning of “risk” is at the heart of the whole standard, the Introduction should commence by outlining the concept of “risk” on which it is based. The proposed change also provides an opportunity to convey from the start, a broad concept of “organisation”.	Insert new line before line 79 as follows. “Risks are the uncertainties associated with people and their organisations pursuing objectives – including the pursuit of opportunities.”	24.
NZ	Introduction	79	te	Further reinforce the broad concept of “organisation” from the outset so that those not in conventional “organisations” do start their reading by questioning the relevance of the document to their own situation	Commence existing line 79 “Society, its members and its many types of organisations face .....”	25.
IE	Introduction	80	ed	Current wording “the organization’s activities” does not read well	Rephrase to: These objectives can relate to a range of <b>organisational activities</b> , ...	26.Accepted
AU	Introduction	81-82	ed	List of outcomes and impacts is incomplete; in a time where triple bottom line reporting becomes increasingly accepted, environmental and social outcomes and impacts should be included.	Revise to read: “... reflected in terms of strategic, operational, financial, environmental, social and reputational and other outcomes and impacts as appropriate to the organisation.”	27.Accepted
BR1	Introduction	81	te	Include regulatory impacts, because in some industries, like telco, energy, petrochemical and so on, this kind of risk is so relevant.	...financial, <b>regulatory</b> , ...	28.
DE 003	Introduction	81	ge	The significance of risk management for the fulfilment of compliance requirements is not considered to a sufficient extent. Only casual mention is made that this International Standard can help “to comply with legal and regulatory requirements...”. This indirect reference does not give sufficient regard to the value of compliance management and the role that a modern risk management system should	Add at the end of line 81: “...strategic, operational, financial, <u>compliance-related</u> , ...”	29.

				play in this regard.		
ES	Introduction	81	te	'environmental' and 'human health and safety' are relevant, used in the document and they are missing in the introduction	Complete sentence: "...and be reflected in terms of strategic, operational, financial, <b>environmental, human health and safety</b> and reputational ..."	30.
DE 004	Introduction	82	te	Important outcomes for activities like environmental and social are missing.	Add "environmental, social" to read as follows (see also DE 003!):  "These objectives can relate to a range of the organization's activities, from strategic initiatives to its operations, processes and projects, and be reflected in terms of strategic, operational, financial, <i>compliance-related</i> , <b>environmental, social</b> and reputational outcomes and impacts."	31.
US	0 - Introduction	82	te	Even though risk is defined in Guide 73, We feel it would be helpful to the reader to be given clarification of the concept of risk in a complete thought as it is used in this risk management standard. This clarification should be given early in the introduction section, after line 82.	The objective of risk management is to effect the uncertainty of potential events or consequences on an organizations' ability to achieve its objectives. These effects may be positive or negative in relationship to risk criteria based on the context of the risk management application.	32.
JP	Introduction	83,88,90,92,101	ed	Regarding risk, singular form and plural form are mixed in this standard, e.g. involve risks (83), treating risk (88), reviewing risk (90), complexity of risks (92), treat risk (101).	It is better to use plural form throughout this standard.	33.
CN	Introduction	83-84	te	RM not only aids decision making but execution as well.	Risk management aids decision making <u>and execution</u> by taking account of uncertainty and its effect on achieving objectives and assessing the need for any actions.	34.
DE 005	Introduction	83	ed	Assure simple and consistent language: Use "support" instead of similar expressions like aids, helps.	Substitute "aids" with "support" to read as follows:  All activities of an organization involve risks. Risk management <del>aids</del> <b>supports</b> decision making by	35.Accepted

					taking account of uncertainty and its effect on achieving objectives and assessing the need for any actions.	
FR	Introduction	3 <sup>rd</sup> paragraph	te	We consider that one element is missing in this sentence.  Evaluate the necessity of each action is one part. But the Risk management help also to prioritize actions.	Modify the sentence as follow:  Risk management aids decision making by taking account its effect on achieving objectives and assessing an assessing the needs for any actions and <b>prioritizing them</b>	36.
NL	Introduction	84-85	te	After the general description of the function of risk management in line 84, line 85 suddenly addresses the risk management process. Some additional information should be given about the relationship between risk management and risk management processes first	Insert the following new paragraph: "According to this International Standard, risk management is based on a number of principles as described in clause 4, can best be implemented in the organization by applying a framework for managing risks as described in clause 5 and ensures that risk management processes are conducted throughout the organization, as described in clause 6."  As an alternative it could be considered to replace lines 85 to 91 to after line 130.	37.
UK	Introduction	84	ed	Refers to risk management assessing the 'need for' action, but a more general and more accurate statement would additionally refer to the 'value of' action. A control may be highly valuable even if it is not necessary.  Arguably most controls implemented are not, individually, essential for survival, but they are worthwhile.	Add "and value of" after "need for"	38.Accepted
IE	Introduction	85	ed	To improve readability	Add in: <b>The</b> risk management process ...	39.Accepted
NL	Introduction	85	ed	"Risk management process" does not read well	Change into: "Risk management processes involve..." or: " <u>The</u> risk management process involves..."	40.2 <sup>nd</sup> suggestion accepted: " <u>The</u> risk management process involves..."
UK	Introduction	85	Ed	Missing 'the' at the start of the sentence.	Add 'the'	41.Accepted

IE	Introduction	86-91	Ed	The order of the bullet points should be reviewed. Establishing the context is the first and most important step. The following 3 bullet points follow logically in the order of steps you would take. However communication and consultation should be the last point – this is an ongoing stage.	Move first bullet point to the end of the sequence.	42.
NL	Introduction	86	ed	It is more logic to start the list of bullets with 'establishing the context'	Replace the first bullet to after line 90	43.
UK	Introduction	86	ed	Inconsistent wording	Change to "communicating and consulting"	44.
FI	Introduction	87	ge	The word frame was added to highlight the need to have general frame in place when planning the implementation of RM-process in an organization	- establishing the frame and the context	45.
NZ	Introduction	87	te	Need to make clear that the "context" that is to be established is the risk management context	Amend to read "establishing the context of the risk management activity"	46.
BR2	Introduction	88	te	Include strategy, because risk management enables an organization to (re)define its strategies.	...any <b>strategy</b> , activity, process, function...	47.
AU	Introduction	89	ed	Include obligations	product, service, asset or obligation;	48.Accepted
ACOS	Introduction	91	Ge	Recording comprehends not the overall necessity of archiving of risks for lessons learned and tracking activities.	Add "archiving" as underlined: - recording, <u>archiving</u> and reporting...	49.
BR3	Introduction	91	te	As "recording and reporting the results appropriately are not included in the ISO31000 Figure 3, consider to move this bullet as a new paragraph.	"All risk management activities should record and report results appropriately"	50.
DE006	Introduction	92	ed	Stress the principles and implementation	Add "the" twice to read as follows:  This International Standard recognizes the variety of the nature, level and complexity of risks and provides generic guidelines on <b>the</b> principles and <b>the</b> implementation of risk management	51.Accepted
AU	Introduction	93-95	ed	Poor English	Change "To apply these generic guidelines...." To "This International Standard describes how these	52.Accepted

					generic guidelines can be applied to a specific situation.”	
NZ	Introduction	93	ed	Second sentence doesn't make sense. A standard of itself can't "apply" anything	Amend 2 <sup>nd</sup> sentence to commence: "To enable these generic guidelines to be applied in a specific situation ....."	53. Accepted
IE	Introduction	96	Ed	"at any time" seems to not to be followed up in the sentence.	... as well as to specified functions and activities at specific stages.	54. Accepted
ES	Introduction	98, 99	te	"When implemented and maintained in accordance with this International Standard..." This phrase seems to open the door to certification, which would enter in conflict with line 172.	Eliminate "in accordance with this International Standard".	55.
FI	Introduction	98	te	Definition of the risk and the Risk Management is missing. However, risk is defined in the ISO/IEC Guide 73. The goal of Risk Management should be defined like we are proposing. Goals related to the standard are well defined.	"The Risk Management is elementary part of strategic and business development and management system".	56.
IE	Introduction	98	ed	Use the terms that are currently in use	Rephrase: "When implemented ... Standard, <b>the management of risk</b> enables an organisation to, ..."	57. Accepted
NZ	Introduction	99	te	Of the list of results of applying risk management, the most important has been omitted	Add as new first bullet point "increase likelihood of achieving objectives"	58.
DE 007	Introduction	100-115	te	In the list it should be made clear that the implementation of this Standards also helps prevent malicious and fraudulent acts (anti-fraud management).	Add as further list item: "— anti-fraud-management"	59.
SE	Introduction	100-115	Ge	The introduction is long and repetitive. Some parts of the text do not add any significant value	Limit the number of examples (row 100 to 115)	60.
BR4	Introduction	100	te	Insert new item	<b>Improve the operational reliability</b>	61.
UK	Introduction	100	ed	Improve wording	Delete "rather than reaction"	62. Accepted
ES	Introduction	103, 107, 109	ed	Risk management enables an organization to do many things, but the aspiration is that it supports or helps to "better comply", or establish a "more reliable basis for decision making", or it "helps to effectively allocate and use resources". As it reads in the current draft, it can be interpreted that risk management is a necessity for compliance or sound decision making or resource	Improve the wording with the words in bold: 103: " <b>better</b> comply with relevant..." 107: "stablish a <b>more</b> reliable basis for decision making..."	63.

				allocation.	109: “ <b>helps to</b> effectively allocate and use resources...”	
JP	Introduction	103-104	te	An organization can improve organization’s performance and business strategy	Insert “ <b>improve organization’s performance</b> ” and “ <b>improve business strategy</b> ” as new dashes before LN 104.	64.
CH	Introduction	103	Ed	There should be used either "norms" or "standards"	Replace "norms" by " <u>standards</u> "	65. Use the term prescribed in ISO rules
DE 008	Introduction	104	te	Improvement of only financial reporting is not enough!!	Substitute “financial” with “mandatory and voluntary”: “.. improve <b>mandatory and voluntary financial</b> reporting;”	66.
NZ	Introduction	104	te	Too specific as to type of reporting. Other forms of reporting also benefit. Make more general	Delete “financial”	67.
US	0 - Introduction	105	Te	The term “corporate” as in corporate governance generally applies to private industry. Improved governance in Federal, State and local government would result from application of this standard. For this standard to be universal the term “organizational” should be used as it is elsewhere throughout the standard.	Change corporate governance to organizational governance	68.
NZ	Introduction	107	te	Although it is essential to reliability of planning and decision making, risk management cannot of itself ensure same	Amend as follows: “contribute to establishing a reliable.....”	69.
ES	Introduction	109	te	“ <b>effectively</b> allocate and use resources for risk treatment;” <b>Efficiently</b> seems to be a better choice.  Substitute <b>effectively</b> for <b>efficiently</b> .	“ <b>efficiently</b> allocate and use resources for risk treatment;”	70.
ES	Introduction	110, 117	te	“improve operational <b>effectiveness and efficiency</b> ;”  The emphasis should be on <b>efficient</b> . Otherwise it would seem that organizations which didn’t apply this Norm would be operationally ineffective.  Suppress <b>effectiveness</b> .	“improve operational <b>efficiency</b> ;”	71.

JP	Introduction	111-112	te	An organization can protect environment by risk management.	Insert " <b>protect environment</b> " as a new dash before LN 112.	72.
ACOS	Introduction	111	Te	Environmental protection and security topics are missing, see also line 145, 183,184	Modify the line by adding the words as underlined. - enhance <u>aspects to</u> health and safety, <u>security and environmental protection</u> .	73.
DE009	Introduction	111	te	One important area of improvement is missing: environmental protection	Add "as well as environmental protection" to read as follows: - enhance health and safety; <b>as well as environmental protection</b>	74.
FI	Introduction	111	te	To expand the standard to cover also soft areas	- enhance health, safety and well-being	75.
IE	Introduction	111	te	The term health and safety does not cover public health concerns arising from poor hygiene – legislation 178/2002	Enhance health and safety including public health	76.
UK	Introduction	111	te	Enhance health and safety what? Health and safety is a fairly abstract term.	Add "performance" to end of line.	77.
FI	Introduction	112	ed	First preventions and then incidents if possible	- improve prevention and incident management	78.Accepted
ES	Introduction	114, 115	ed	Bullets start with capital letters, whereas the rest start with lower case "Improve organizational learning; and" "Improve organizational resilience."	Consistent use of lower and upper case: "improve organizational learning; and" "improve organizational resilience."	79.Use lower case
NL	Introduction	114/115	ed	Change first characters to small letters	improve	80.Accepted
NZ	Introduction	114 & 115	ed		Change capital "I" in 'improve' to lower case	81.Accepted
BR5	Introduction	114	Ed	Every line in the list starts with lower letters.	<b>improve</b> organizational learning; and	82.Accepted
BR6	Introduction	115	Ed	Every line in the list starts with lower letters.	<b>improve</b> organizational resilience.	83.Accepted
BR7	Introduction	115	te	Insert new items, because these are important benefits achieved with risk management.	- <b>get a common language;</b> - <b>establish trade-off risk correlations;</b> - <b>Improve synergy through an integrated risk approach.</b>	84.
ES	Introduction	115	te	Line 115 should be completed at the end with the idea of	Add at the end of line 115 "improve organizational	85.

				creation of value	resilience <b>and create value.</b> "	
FI	Introduction	115	te	To add some lines to improve description and meaning of the standard for an organization	- Improving organizational security like personnel, IT and premises - To define applicable enforcement and guidelines - To ensure continuity & recovery of operation and businesses	86.
ES	Introduction	117	te	"Risk management should thus help avoid <b>ineffective and inefficient</b> responses." If something is <b>ineffective</b> , it cannot be <b>efficient</b> . The emphasis here is on "ineffective". Suppress <b>inefficient</b> .	"Risk management should thus help avoid <b>ineffective</b> responses"	87.
AU	Introduction	120	te	Risk management has an important role to play in corporate governance provided it links to strategy, focuses on the material risks and doesn't solely get trapped in the minutiae. As such we suggest that the word "strategy" be added to this list.	Add "strategy and planning" after "management,"	88.
NL	Introduction	120	Ed/te	The philosophy of an organization is not a very clear concept. In line 268 reference is made to the values of an organization; this is a much clearer concept.	Change 'philosophy' to 'values'	89.
CA 2	Introduction	121-123	ed	The list to which risk management applies is given <u>in line 88-89 as</u> "activity, process, function, project, product, service or asset" <u>in lines 121-122 as</u> "projects, defined functions, assets, and products or activities", <u>in line 164 as</u>	<u>Modify lines to read (Bold is insert):</u>  The same risk management approach can be adopted for all activities of an organization including <b>processes, functions</b> , projects, <del>defined functions, products, services, or assets, and products or activities</del> and will in turn strengthen the linkages between these activities	90.Accepted

				<p>“activities, processes, functions, projects, products, services, assets, operations and decisions”,</p> <p><u>And in line 445 as</u></p> <p>“activity, process, function, project, product, service or asset”</p> <p>In all cases the list is intended to describe the range of applications of risk management. It seems that one list should be used to avoid misinterpretation as to intent. This can be done by modifying lines 121 and 122 to match the other similar lists.</p>	and the organization’s overall objectives	
CN	Introduction	121-122	te	<p>Confusion caused by logic. Suggest explaining the application of risk management approach with line 164.</p>	<p>The same risk management approach can be adopted for all activities of an organization including <del>projects, defined functions, assets, and products or activities</del> <u>processes, functions, projects, products, services, assets, operations, and decisions</u> and will in turn strengthen the linkages between these activities and the organization’s overall objectives.</p>	91.
US	0 - Introduction	121 to 123	te	<p>Perhaps it is misleading to say that the same risk management approach can be adopted for all activities of an organization. While many underlying principles are the same, some applications embrace the benefits of additional risk while others will target only risk reduction.</p> <p>Replace lines 121 to 123</p>	<p>While the approach to risk treatment will vary between the differing services of an organization such as projects, defined functions, assets, and products or activities, the adoption of the underlying principles of risk management amongst all these activities will strengthen the linkages between these activities and the organization’s overall objectives.</p>	92.
NZ	Introduction	121	ed	<p>Not clear what it is the “same” as</p>	<p>Commence para “An integrated approach to risk management can .....</p>	93.Accepted
AU	Introduction	122	ed	<p>“activities” is repeated as a sub-set of “activities” already mentioned in line 121</p>	<p>Delete “or activities” after “products”</p>	94.Accepted
BR8	Introduction	122	te	<p>All activities of an organization includes activities?</p>	<p>... <del>assets, and products or activities</del>, and will...</p>	95.
US	0 - Introduction	122	Te	<p>The organization components number 5 here and 9 on line 164</p>	<p>Add the other 4 components: “processes, services, operations and decisions”.</p>	96.

US	0 - Introduction	122	Ge	The addition of the term "services" is inclusive of the industries, including government, that provide services as their primary "product". It will serve to broaden the acceptance and application of the standard.	Add the term "services" after the word assets or use it to replace the word "activities" in line 122.	97.
IE	Introduction	125 & 127	ed	There does not appear to be a great difference between line 125 and line 127 i.e. line 127 appears to be an unnecessary replication of line 125. Need to difference better between the two lines.	Change line 125 to: Those responsible for <b>developing</b> Risk Management <b>policy</b> with in their organisations	98.Accepted
BE	Introduction	126,133-134	Ge	On the contrary of what is said at line 126, the standard is not detailed enough to help people "to ensure that an organisation manages risk"	Remove lines 126, 133-134, also because, according to what the draft announces, certification is not the purpose of the ISO31000 standard	99.
CN	Introduction	128	ed	The expression used should be consistent.	– those <del>needing</del> <u>who need</u> to evaluate an organization's practices in managing risk; and	100.Accepted
IE	Introduction	128	Te	Good governance is important and should be included.	Add in an additional point: <b>Those who need to demonstrate good governance</b>	101.
US	0 - Introduction	129	Te	"context" is not defined	Delete bullet or define context.	102.
NZ	Introduction	133-134	ed	Poor language	Amend last sentence to read "This standard provides management with additional tools to compare and evaluate their processes."	103.Accepted
DE 010	Introduction	137	ed	Stress the area of this International Standard.	Add "the principles and" to read as follows: "The generic approach described in this International Standard provides <b>the principles and</b> guidelines on implementing..."	104.Accepted
IE	Introduction	139	Te	Important to have RM implemented in a systematic way	Add in: " <b>....a systematic</b> transparent and credible ...	105.
NZ	Introduction	142	te	First of a series of amendments to more explicitly relate risk and risk management to the organisation's objectives. This para should be closely aligned to the later defined activity of setting the context – it should not just pick and choose some items. Also need to clarify that setting context does	Amend 2 <sup>nd</sup> sentence to read "Establishing the context will capture the objectives of the organisation, the environment in which it pursues those objectives, its stakeholders and the diversity of its risk criteria – all of which will help reveal and	106.

				not in itself reveal the nature and complexity of risk.	assess the nature and complexity of its risks."	
DE 011	Introduction	145	ed	One word is missing!	Substitute "environment" with "environmental protection" to read as follows:  "Some areas of risk management within, for example, the areas of safety, human health and environmental <b>protection</b> , impose criteria that reflect an aversion to negative consequences. "	107.Accepted
IE	Introduction	145		Omission of public health	Some areas of risk management within, for example, the areas of safety, human health, <b>public health and environment</b>	108 Not accepted. Human health also covers public health.
IE	Introduction	145	ed	Reword to improve readability	Add in: Some areas ... <b>human safety, health and environment</b>	109.Not accepted as human health is more specific.
CH	Introduction	147	Ed	There should be used either "norms" or "standards"	Replace "norms" by " <u>standards</u> "	110. Use the term prescribed in ISO rules
CH	Introduction	150	Ed	There should be used either "norms" or "standards"	Replace "norms" by " <u>standards</u> "	111. Use the term prescribed in ISO rules
CH	Introduction	151	Te	There are various 'relationships', not just one.	Revise sentence to read:  "The <u>relationships</u> between the principles for managing risk, the risk management framework and the risk management process described in this standard <u>are</u> shown in Figure 1.	112.
BE	Figure 1	153	Ge	Despite what is said in fig 1 (153) ISO does not consider the "human and social factors" of the organisations ; an organisation is not a only a machinery ;	Better consider the human and social factors that drives also the management of risks	113.
BR1	Figure 1	153	ed	Diagram of processes is unreadable (clause 6)	Insert new version of the figure more legible	114.Noted

0					(readable)	
BR9	Figure 1	153	ed	Missing “the” in 5.3	5.3 Design of <b>the</b> framework	115.Accepted
CH	Introduction	153	Te	Fig. 1 shows relationship arrows between the left and centre frames which are not 100% correct.	Delete the two arrows connecting ‘Principles’ to the centre frame and <u>replace</u> them by one arrow connecting ‘Principles’ to box ‘5.2’	116.
CH	Introduction	153	Te	Fig. 1 shows a relationship arrow between the centre and right hand frames which are not 100% correct. (The right hand frame is an expansion of the ‘DO’ in box 5.4.	The arrow between the centre and right hand frames should be <u>replaced</u> by an arrow going between box 5.4 and the right hand frame.	117.
CH	Introduction	153	Te	The diagram in the right hand frame is too small and too complex to be read. There is no need to show three diagrams where the frame title is ‘Process’ (singular). Also there is no need for the diagram to be inside yet another small frame.	Delete the present content of the right hand frame and <u>replace</u> it with one small size diagram exactly the same as Fig. 3. Add in brackets <u>(Figure 3)</u>	118.
CH	Introduction	153	Te	Clarity and the link to the later diagrams can be further improved.	Under the bracketed clause numbers at the bottom of the centre and right hand frames, <u>add</u> in brackets the respective Fig. Number: <u>(Figure 2) (Figure 3)</u> .	119.
SE	Figure 1	153	Ed	It is not possible to read the text in the squares about clause 6	Delete text or adjust the figure so it is possible to read	120.Notod
SE	Figure 1	153	Ed	Why is there two right arrows instead of one, between the principles box and the framework box?	Delete one arrow	121.
UK	Introduction, Figure 1	153	te	Improve clarity of diagram.	Possibly reproduce the middle figure in a similar format as expressed in the process diagram. It will be a true representation of figure two as it appears in the text.	122.
BE	Figure 1	154	Ge	Figure 1 : line 154 : relationship between the three blocs is not clear	Revise and on line 154 replace “principles” by “objectives”	123.

FR	Introduction	Figure 1	Ed	When you read the figure 1, you ask yourself why 5.1 is not included in the figure. This is not logical	Delete the reference to numbering of the clauses and sub clauses or delete the title of 5.1 general	124.
NZ	Introduction	Fig 1	ed	The title of each box should be at the top in order to help the reader make sense of what is below	Re-arrange titles in each box and in title, capitalise Principles, Framework and Process	125.
NZ	Introduction	Fig 1	ed	The "principles" are a mix of parts of speech – some are descriptors, some are outcomes. Needs a collective introduction	Insert "Risk management:" before the list	126.
ES	Introduction		ed	Add the end of the introduction there should be a sentence saying that in order to complete a global vision of risk management it is recommended the reading of ISO 31010 and ISO Guide 73.	Add after 154 a sentence like: "In order to complete a global vision of risk management it is also recommended the reading of ISO 31010 and ISO Guide 73."  Or similar wording.	127.
SE	Title		Te	This standard covers more than just the implementation phase, that reference should therefore be deleted.	Change to "Risk management – Principles and guidelines"	128.
NZ	Title Page		te	There are already many existing methods in use for managing risk. All organisations currently manage risk in some way. The purpose of this standard is to capture and standardise the most effective method. Its name should reflect this.	Rename the Standard "Effective Risk Management – Principles and Guidelines on Implementation"	129.
ACOS	Scope		Ge	As this document is not appropriate for safety issues and to avoid reference to this standard in further revisions of ISO/IEC Guide 51, safety has to be excluded from the scope	Add a further sentence: "ISO/IEC Guide 51 applies for safety related aspects"	130.
NZ	1 Scope	158 & 160	ed	'Generic' appears in both lines and is clumsy	Delete 'generic and' in 160	131.Accepted
NZ	1 Scope	158	ed	grammar	Replace "on" with "for the"	132.Accepted
SE	1	158	Te	This standard covers more than just implementation	Add "...and application of risk management"	133.
BE	1	159-160	Ge	ISO is for a restrictive use only; it is not universal. It is not applicable uniformly for all types of risks, all organisations (type and size), ...	Revise the "scope" (157)  Revise line 159 – 160  Different levels of implementation should be considered (maturity model approach)	134.

BE	1	159-160	Ge	ISO cannot not apply to situations where interface (intertwining) between organisation and bodies is a major component	Restrict the area of application in lines 159 – 160	135.
AU	1	159	ed	Risk management can be applied to countries. This is not immediately clear when using the term “public enterprise”	Add “country, region,” prior to “public”.	136.
CN	Scope	159	ed	For the purposes of better linkage to Introduction and Note below, and easy to read.	This International Standard can be applied to any <u>organization that may be</u> public, private or community enterprise, association, group or individual.	137. Accepted
IE	Scope	159	Ed	Repeated words. Simplify	Replace: “This International Standard..” with “It..”	138. Not accepted in light of previous decisions of the WG
US	1	160	Te	Individual is too small of a scope for this IS. Organization needs to balance risks and opportunities	Delete individual	139.
IE	1 Scope	161	Ed	The word “addressees” is correct but seems overly complicated/	Use the word “users”	140.
BR1 1	1 Scope	163	te	Include strategy, because risk management enables an organization to (re)define its strategies.	...to a wide range of <b>strategy</b> , activities, ...	141.
NL	1	163	ed	“Throughout the life of an organization...” is not very clear	Change ‘life’ into ‘life-cycle’	142.
AU	1	164	ed	Include liabilities	“services, assets, liabilities, operations and decisions.”	143.
ES	1 Scope	165, 169	ed	There is a conflict between “not intended to impose uniformity of risk management across organizations” and “intends to harmonize risk management processes in existing and future standards”.  It should be clear that the standard does not provide a common approach, but the “commonalities in the approaches”.	Proposed wording for line 169:  “This International Standard <b>intends to provide a reference for</b> risk management processes...”	144.
NZ	1 Scope	165	te	The word “uniformity” is confusing. The whole concept of standardisation is uniformity. It IS intended that all risk management activity should be conformant with the standard even though specific techniques will differ according to context etc.	Amend to read: “Although this International Standard provides generic guidelines and therefore promotes uniformity of risk management process, the design and implementation of risk management activity will take into account the varying .....”	145.

AU	1	167 and 168	ed	The order of activities or needs should be consistent	Compare with lines 122/122 and line 164	146.
IE	Scope	169	Ed	English. A document can't intend anything.	Replace "This IS intends to.." with "It is intended that this International Standard be utilised to..."	147.Accepted
DE 012	1	172	te	Intention is a very weak word. To avoid the standard to be misused (as it happened and happens nowadays with the most of the generic standards of this kind) an intention has no value. The proposed (draft) International Standard is intended to be generic and to give general guidance, therefore any certification is not even not intended, but also impossible or worthless. If a certification is intended or even allowed, this International Standard shall not be a generic one and therefore shall not be aimed to risk management for risks to health and safety of persons and environment.	Change into: "This International Standard is not applicable for the purpose of certification".	148.
FR	1	Add a new paragraph	Te	It is not explicitly mentioned in the existing scope that the standards applies to any types of risk.	Add a new paragraph :  The present international standard can be applied to any type of risk whatever its nature, whether having positive or negative consequence	149.
ES	2	173-176	ed	Add reference to ISO 31010	Add reference to ISO 31010.	150.Accepted
NL	2	176	te	A reference should be included to IEC 31010 See also the NL proposal to 6.4.1 to include a reference in the text of ISO 31000 to ISO 31010	Include: IEC 31010 "Risk management – Risk assessment techniques"	151.Accepted
SE	Table A2 verses contents (and thereby the order of textmass as a whole)		Ed	The order in which the different methods are presented is not the same as in the content (and thereby the whole document) There are also examples explained in the document which are not presented in table A2 Example: B19 "Decision tree analysis" B27 "Risk control effectiveness" B28 "FN corves" B29 "Risk indices" B30 "Consequence likelihood matrix" B31 "Cost benefit analysis"	Add Mentioned methods to table A2. Change the order into same as presented in the document	152.

CH	3	178	Te	Switzerland considers the present DIS wording completely sufficient, and recommends against adding any 'selected' definition from Guide 73. Whatever definitions are chosen, some users will consider them 'too few' and others 'too many'.	<u>Maintain</u> the present wording, and <u>do not add</u> any 'selected' definitions from Guide 73.	153.
FR	3		Te	We received many comments indicating the need to introduce all the terms defined in ISO GUIDE 73 in ISO 31000 (clause 3 terms and definitions).  Theses terms and definition are necessary to understand the standard and avoid interpretation.  In addition, many members have indicated that they do not want to pay for 2 documents. Both documents shall be combined in a single one.	Add all the terms and definition used in ISO 31000	154.
FR	3		ge	We received many comments indicating the need to introduce all the terms defined in ISO GUIDE 73 in ISO 31000 (clause 3 terms and definitions).  Theses terms and definition are necessary to understand the standard and avoid interpretation.  In addition, many members have indicated that they do not want to pay for 2 documents. Both documents shall be combined in a single one.	Add all the terms and definition used in ISO 31000	155.
CH	3	176	Ed	ISO 31000 is intended as an independent standard, Whereas ISO/IEC Guide 73 is only a guideline for those who are editing standards. Therefore a standard cannot reference a guideline. We suggest to copy the relevant terms and definitions from ISO/IEC Guide 73 into ISO 31000	Add terms and definitions as defined in ISO/IEC Guide 73: <u>1. Risk</u> <u>2. Risk Management Framework</u> <u>3. Risk Management process</u> <u>4. Risk Assessment</u> <u>5. Risk Identification</u> <u>6. Risk Source</u> <u>7. Event</u> <u>8. Risk Analysis</u>	156.

					<p><u>9. Uncertainty</u></p> <p><u>10. Risk Evaluation.</u></p> <p><u>11. Risk Treatment.</u></p>	
UK	3	176	Te	<p>For such an important, generic work not to embody its vocabulary, within its own covers or in a companion part of a series of standards (such as ISO 9000 and ISO 14000) is without precedent.</p> <p>A guide is not a standard, but a document produced to provide guidance on a particular topic, for those developing standards dealing with that topic.</p> <p>ISO/IEC guides are not adopted by CEN/CENELEC for publication as Euronormes, so there would be no logical link to Guide 73.</p> <p>ISO/IEC guides should, therefore, not be cited as normative references in international standards, and never intended as the sole source of the specialist vocabulary that standard uses.</p>	<p>The appropriate risk management terms (ie, those used in the standard) should be included within ISO 31000. Need to check whether it is possible to refer to Guide 73 (or any Guide) as a normative reference because it is not a norm.</p>	157.
DE 013	3	178 ff	te	<p>The 32 terms from ISO/IEC Guide 73 which are addressed in ISO 31000 have to be inserted here and referenced by ISO/IEC Guide 73</p>	<p>Copy the following terms and definitions (including the notes) into ISO 31000:</p> <ul style="list-style-type: none"> <li>risk,</li> <li>risk management,</li> <li>risk management framework,</li> <li>risk management policy,</li> <li>risk management plan,</li> <li>risk management process,</li> <li>communication and consultation,</li> <li>stakeholder,</li> <li>risk perception,</li> <li>external context,</li> <li>internal context,</li> <li>risk criteria,</li> <li>risk assessment,</li> <li>risk identification,</li> <li>event,</li> <li>risk owner,</li> <li>risk analysis,</li> <li>uncertainty,</li> <li>likelihood,</li> <li>consequence,</li> <li>resilience,</li> <li>control,</li> </ul>	158.

					level of risk, risk evaluation, risk attitude, risk appetite, risk aversion, risk treatment, residual risk, monitoring, review risk profile.	
NL	3	178	Te/ed	Given the majority decision of WG/RM to not merge ISO 31000 and ISO/IEC guide 73, NL considers it important to discuss at the next WG/RM meeting which terms and definitions from ISO/IEC Guide 73 should (also) be included in ISO 31000 for a proper understanding of that standard. In the Annex to these comments, we provide a number of terms that we think should be considered for inclusion.	See the Annex for terms that should be considered for inclusion in ISO 31000	159. The Annex is attached at the end of this document.
NZ	3 Terms and Definitions	178	ed	Insert (largest) handful of terms permitted by ISO. NZ regrets the decision of the ISO editors to restrict the list. As a general principle selection should include pairings such as antonyms or related words (see links next column)	Handful to include: Risk & uncertainty , treatment & control; consequence & likelihood; threat & vulnerability;	160.
FR	4	Page 1 Paragraph 1	Te	The Top management of the organization (and not only organization's risk management) shall also adhere to the risk management principle listed in this clause to ensure the success in the implementation and the control of the activities	Replace by the following :  To be most effective, an organization's Top management and risk management should adhere to the following principle :  Pour optimiser l'efficacité, il convient que la direction et le management du risque de tout organisme adhèrent aux principes suivants.	161.
NL	4	181-220	ed	Consider a different lay-out to clearly distinguish between the principles (bulleted sentences) and the explanatory text		162. Noted
ES	4 Principles for managing risk	181	ed	There is no assurance that risk management does create value (whether it does depends on many things)	Change 181 into: a) Risk management <b>should create</b> value	163.
UK	4	181	te	Risk management is about more than creating value – it is also preserving and enhancing	Change to: "creates and protects added value"	164.
IE	4	182-185	Ed	Some similar wording is included in the introduction see lines 98-115. Is there a need to list out all the examples	Reword to: "Risk Management contributes to the achievement of objectives and improvement of	165.

				here again? Remove from the introductions to reduce repetition. Current wording does not read well	performance in for example human health and safety....	
JP	4	182-185	te	The content written at LN 182-185 is the same as the content written at LN 98-115. It is better to avoid duplication.	Delete the sentence after "for example".	166.
US	4	182	Te	Left out security risks	Add "security"	167.
BR1 2	4.	184	te	Include "project implementation" as a great use for risk management	... product quality, <b>project implementation</b> , efficiency in operations, ...	168.
BR1 3		184		Include operational reliability in the item 184	product quality, <b>operational reliability</b> , efficiency in operations	169.
US	4	184	Te	The term "corporate" as in corporate governance generally applies to private industry. Improved governance in Federal, State and local government would result from application of this standard. For this standard to be universal the term "organizational" should be used as it is elsewhere throughout the standard.	Change corporate governance to organizational governance	170.
CN	4	187-189	te	There are some logical problems in the order of the two sentences.	Change the order of the two sentences in this paragraph. Read: <u>Risk management is not a stand-alone activity which is separate from the main activities and processes of the organization.</u> Risk management is part of the responsibilities of management and an integral part of the normal organizational processes as well as of all project and change management processes. <del>Risk management is not a stand-alone activity which is separate from the main activities and processes of the organization.</del>	171.
ACO S	4	188	Te	Not only change management is configuration management. (change + release management); Requirements engineering is also not visible but is really important because analysing requirements contents RM.	Add "configuration" as underlined. ...all project <u>configuration</u> and change management...	172.
BR1 4	4 Principles of managing risk	188	te	Include this item, because risk management enables an organization to (re)define its strategies.	... organizational processes <b>and strategic objectives</b> ...	173.
UK	4	191 & 2	Te	'can' is insufficiently directive.	Remove both of the 'can' and extend both of the 'help' to 'helps'	174.

DE 014	4	191	ed	Assure simple and consistent Language: Use “support” instead of similar expressions like aids, helps	Substitute “helps” with “support” to read as follows: “Risk management <del>helps</del> <b>supports</b> decision makers make informed choices.”	175.Accepted
ES	4 Principles for managing risk	193	te	“whether risk treatment will be <b>adequate and effective</b> .”  <b>Adequate</b> looks redundant. If it is <b>effective</b> , it will also be adequate.  Suppress “adequate”.	“whether risk treatment will be <b>effective</b> .”	176.
FR	4	d)	Te	We consider that it is the nature of the uncertainty and not uncertainty	Replace by the following  Risk management explicitly addresses the nature of the uncertainty	177.
US	4d	194	ed	Better clarify statement	Insert “responding to” in front of “uncertainty”	178.Accepted
NZ	4 Principles for managing risk	195	te	Standard doesn’t deal with those aspects of decision making that are uncertain, it helps clarify and analyse parameters that are uncertain	Change “deals with those aspects of decision making that are uncertain” to read “explicitly takes account of uncertainty”	179.
ES	4 Principles for managing risk	198	sp	“A systematic, timely and structured approach to risk management contributes to efficiency and consistent, comparable and reliable results.” The approach contributes to two things: efficiency and ...results. Need to include a “to” before consistent.	Add a missing ‘to’: “A systematic, timely and structured approach to risk management contributes to efficiency and <b>to</b> consistent, comparable and reliable results.”	180.
IE	4	198	te	It is important to include effectiveness of the system	Add in: A systematic, ... to efficiency, <b>effectiveness</b> and consistent, ...	181.
UK	4	201-203	Te	No mention is made of the need for consensus	Add ‘consensus viewpoints’ to the list of ‘sources’	182.
BR1 5	4 Principles for managing risk	202	te	Include historical data, because this is an important information source.	...are based on information sources as experience, <b>historical data</b> , feedback...	183.
UK	4	204	te	Should also be sensible and balanced. This is a big concern for UK business and should be a fundamental principle of any approach to risk management. “tailored” may well include this concept but it is not clear, especially with current explanation in line 205	Add to end: “and proportionate”	184.
AU	4	207	ed	“the organisations” is superfluous. Line 180 gives the context as “an organisations...”	Delete “the organisation’s”	185.Accepted

IE	4	207	Ed	Risk management is a system – reword.	Add in: The organisation's <b>systems for managing risk</b> recognises the capabilities ...	186.Accepted
IE	4	208	Te/ed	The use of the words "facilitate or hinder achievements" does not read well and can confuse. Surely the key thing is the affect on achieving the organisations objectives. Also use consistent terms, change internal people to internal stakeholders	Reword to: "...internal <b>stakeholders which can affect the</b> achievement of the ....	187.
IE	4	214-216	Ed	Current wording does not read well – review.	Change to: "As internal and external events occur that affect an organisation; the context for an organisation can change. By regularly reviewing the context the risk criteria may change, therefore new risks can emerge while others disappear. Therefore RM enhances the preparedness of an organisation for change!"	188.
DE 015	4	217	ed	Avoid duplication!! Improvement includes enhancement .	Eliminate "and enhancement" to read as follows: "Risk management facilitates continual improvement <del>and enhancement</del> of the organization."	189.Accepted
CH	4 k)	217	Te	The use of the term 'enhance' with respect to the organization is awkward. Elsewhere in the Standard it is used with respect to processes..	Delete the words "and enhancement".	190.Accepted
BE	4	220	Ge	ISO does not encourage to capitalise on outputs (audit evaluation, ...) and results produced by other major key players such as professionals (including certification from independent experts) and other stakeholders	ISO should adhere to the single audit principle (to be added in section 4)	191.
CN	5	221-359	te	It is better to explain what the generic process is. This will then explain why people need the framework and how the framework works.	Move Chapter 5 after Chapter 6.	192.
IE	5	All	Te	Currently the section for Framework for managing risk does not follow a logical sequence. Also the diagram is not a good representation of the framework and how the process work together. Most of the content is present however the sequence is not correct. This should be reworded	Re-word this section per the re-structured section 5 submitted with these comments. This reworded sections included a diagram of the proposed framework as outlined in the re-worded section 5. This is a proposed diagram and would need further fine tuning by graphic experts. We strongly recommend that diagram 15 from document ISO/TMB/WG RM N031 be included in ISO 31000. To date this diagram best represents how the framework and process link together.	193. Proposal from Ireland is included at the end of this document.
SE	5	221	Ed	"Risk management" is not the same thing as "managing risk" (see general comment above)	Change to "Risk management framework"	194.

IE	5.1	223	Te	The context here is within an organization. Current wording is repetitive and confusing	Change: "to be successful RM... within an <b>organisational</b> framework which provides the foundations and arrangements that will assist in embedding it throughout ....."	195.
NZ	5.1	223	te	As written, implies that frameworks are optional but the fact is that frameworks exist – good or bad. The standard should make the connection between effective risk management and appropriate frameworks	Amend to read "The success of risk management will depend on the effectiveness of the framework in which it is conducted as this provides the foundations ....."	196.
AU	5.1	224	ed	The use of "organizational arrangements" rather than just arrangements seems confusing. The term "organisational" means to restrict the arrangements to only those that are within the organisation. This seems incorrect.	Delete the word "organizational".	197.
US	5.1	224	te	Replace "all" with "appropriate".	Replace "all" with "appropriate"	198.
IE	5.1	225	ed	The word "organisation" is overused in this line.	Reword to: "The framework assists in managing risks effectively through the application of the risk management process (see clause 6) at varying levels and within specific contexts of the organization	199.
IE	5.1	227	Ed	Change word order to improve readability.	Rephrase: "The framework should ensure <b>information about risk</b> derived ..."	200.
NZ	5.1	230-231	ed	language	Change "Implementing" to "Implementation of"	201.
NZ	5.1	Fig 2 and also 253	ed	language	Add "of" between "Understanding" and "the organisation"	202. Accepted
UK	Figure 2	After 230 (pp 3)	te	The figure needs to more clearly illustrate the need to renew commitment and mandate.	The diagram should be redrawn such that 5.2 should be inserted into the loop before 5.3 and after 5.6. Circular.	203.
TC98	Figures 2 and 3		te	Difference between "framework" and "process" is unclear. The relation between these two figures should be clearly stated.		204.
IE	Figure 2			Same comment as Figure 1 above, also the flowchart arrow system treats 5.2 as a once off it should all link in as a continuous loop		205.
SE	Figure 2	231	Te	The figure and the headings (5.3 to 5.6) is confusing since	Delete text: 5.3.1-7 and 5.4.1-2	206.

				the "-ing form" is used differently and some squares refers to the framework while others to risk management (which covers both framework and process)	Change headings to: 5.3 Designing the risk management framework 5.4 Implementing the risk management framework 5.5 Monitoring and review of the risk management framework 5.6 Continually improving the risk management framework This will also have an effect on row 252, 331, 346 and 356	
UK	Figure 2	231	te	The diagram lacks a key to explain what types of object the boxes and arrows are. What do the arrows mean?	Add a suitable key saying the arrows represent a sequenced activity	207.
SE	Figure 2	232	Ed		Change to "Components of the risk management framework"	208.
CH	5.1	233	Te	The word 'describe' is not precise enough.	<u>Change</u> "describe" to " <u>prescribe</u> ".	209.
NL	5.1	233	ed	The framework is not intended <u>to describe</u> a management system, but is not intended to <u>function as</u> a management system	Change 'to describe' into 'function as'	210.
NZ	5.1	234	ed	language	Change "within" to "into"	211.Accepted
US	5.1	237	te	What is the definition of the word "formal"?	Define what we mean by "formal" in Guide 73	212.
ES	5.1 General	238-239	te	The assessment against this standard is not necessarily the basis for determining their adequacy, but it can be an element to consider when assessing the adequacy of a risk mgmt system or –process.	Change the wording in 238-239 as follows: (...) and assessed against this International Standard <b>as an aspect</b> for determining their adequacy.	213.
NL	5.1	238-239	ed	"...these should be critically reviewed and assessed against this International Standard <u>as the basis for determining</u> their adequacy." The intent of this sentence can be clarified by modifying the underlined words as proposed.	Change 'as the basis for determining' into 'in order to determine': "...these should be critically reviewed and assessed against this International Standard <u>in order to determine</u> their adequacy."	214.Accepted
NZ	5.1	238	te	Useful to make a link here to Annex A	Add after the words "International Standard" (including the indicators contained in Annex A"	215.
NZ	5.1	239	ed	Needs to be more than 'adequate'	Add "and effectiveness" at end of sentence	216.Accepted

UK	5.2	240 – 251 (inclusive)	te	Mention needs to made here of risk management culture	<p>After line 251, add the following: The organization should monitor and develop its risk management culture through, for example:</p> <ul style="list-style-type: none"> <li>• demonstrating effective risk management leadership at senior levels as an example to others;</li> <li>• monitoring and communicating the value added by risk management;</li> <li>• providing education and training in risk management, including practical examples;</li> <li>• including risk management within individual objectives and performance appraisals;</li> <li>• monitoring attitudes to risk management; and</li> <li>• ensuring that formal risk management policies and procedures extend into all organizational processes, including strategic planning, operational processes, and programme, project and change management;</li> <li>• commitment to continually maintaining and</li> </ul>	217.
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					improving risk management.	
AU	5.2	242	ed	Commitment should also be reflected in the support for the risk management process throughout the organisation. I believe the on-going effectiveness particularly requires organisational support, not just management support.	After the word "planning" add "to achieve commitment at all levels".	218.Accepted
NL	5.2	244	ed	Defining a policy is a more commonly used term (see e.g. ISO 14001)	Change 'articulate' into 'define'	219.Accepted
FR	5.2.	2 <sup>nd</sup> dash		What do you mean by "organizational performance indicators" ? Do you mean "Performance indicators of the organization" ?	Replace by Performance indicators of the organization	220.
US	5.2	246	te	Replace the term "ensure alignment of..." with "align"	Replace the term "ensure alignment of..." with "align"	221.
NZ	5.2	247	te	Needs to related to risk management activity	Add "..of risk management activity"	222.
AU	5.2	248	ed	All employees can be held accountable for various outcomes or processes without having to be a manager.	Delete the word "management".	223.
NZ	5.2	248	te	Needs to relate to risk management activity	Insert "for risk management" after "responsibilities"	224.
UK	5.3	252-330 (inclusive)	te	This section should also include reference to Risk Management Strategy as well as policy.	Mention Risk Management Strategy (as well as policy) - possibly in 5.3.2.	225.
US	5.3.1	254 – 262	Te	Good ideas but no guidance on what the reader is supposed to do with the information. What do you want the reader to do? 5.2 tells the reader "Management should"...do stuff. 5.3.1 has no such direction or guidance. It only tells me that someone unspecified should understand the context and that aspects of context appear on the lists.	Before starting the design and implementation of the framework for managing risk, it is important to <b>evaluate and</b> understand both the internal and external context of the organization since these can influence significantly the design of the framework.  <b>Evaluating</b> the organization's external context <b>may</b> include, but not limited to:  - the cultural, political, legal, regulatory, financial, technological, economic, natural and competitive environment, whether international, national, regional or local;  - key drivers and trends having impact on the	226.

					objectives of the organization; and - perceptions and values of external stakeholders. <b>Evaluating</b> the organization's internal context <b>may</b> include, but not limited to:	
CA 3	5.3.1	254-256	ed	Reads better with slight rearrangement of word order	Modify lines to read ( <b>Bold</b> is insert);  Before starting the design and implementation of the framework for managing risk, it is important to understand both the internal and external context of the organization since these can <b>significantly</b> influence <del>significantly</del> the design of the framework.	227.Accepted
NZ	5.3	254	te	Emphasise key role of the organisation's objectives	Insert at end of line "articulate the organisation's objectives, and"	228.
CH	5.3.1	255	Ed	"... can influence significantly ..." is not correct.	Change to "... can <u>significantly influence</u> ..."	229.Accepted
JP	5.3.1 6.3.2 6.3.3	257-270 410-414 425-433	te	The texts, those are written at LN 257-270, are repeated at LN 410-414 and LN 425-433. 5.3.1 is the one step of "framework design". On the other hand, 6.3.2 and 6.3.3 are steps of "risk management process". Therefore the concept of 5.3.1 should be different from that of 6.3.2 and 6.3.3. If the same texts are written in 5.3.1 and 6.3.2, 6.3.3, it is difficult to understand this difference and it will hinder the popularization of this standard.	Change the sentence of 254-255 to as follows: ....., it is important <b>to establish a system</b> to understand both ..... And, delete sentences from 257 to 270.	230.
CN	5.3.1	257-270	ed	Overlap of the explanation of external and internal context should be avoid.	If switched the order of Chapter 5 & 6, the explanation of organizational context will not be needed in this chapter.	231.
BR1 6	5.3.1	257-261	te	Text exact copied (repeated) in 6.3.2 (lines 410-414)	Consider to maintain in just one place for example in 5.3.1 and refer to the content in 6.3.2	232.
AU	5.3.1	257	ed	Missing word.	Change to "but are not limited to"	233.Accepted
AU	5.3.1	257	ed	Grammar	Insert "are" between "but" and "not"	234.Accepted
AU	5.3.1	257	ed	typo: "but not limited to:"	"but are not limited to:"	235.Accepted

AU	5.3.1	257	ed	Clarity required	Insert “are” after “but”	236.Accepted
CA 4	5.3.1	257	ed	Reads better with a verb in statement	<u>Modify line to read (Bold is insert):</u> Aspects of the organization’s external context include, but <b>are</b> not limited to:	237.Accepted
IE	5.3.1	257	ed	Grammar	Insert word “Aspects...., but <b>are</b> not limited to:”	238.Accepted
NL	5.3.1	257	ed	Verb missing	Include ‘are’ between ‘but’ and ‘not’: ...include, but <u>are</u> not limited to:	239.Accepted
NZ	5.3.1	257	ed	language	Add “are” before “not limited to”	240.Accepted
AU	5.3.1	258-259	te	social seems to be missing from the list of environments	‘financial, technological, economic, natural, social and competitive environment’	241.
IE	5.3.1	258	Ed	Reword to improve readability.	Suggest rephrase to: Political, Economic, Social & Cultural, Technological, Legislative, Environmental, Regulatory, Physical (to include safety, health, fire, security) Managerial/professional, customer/citizen, legal (to include claims) issues & concerns whether at international, national regional or local.	242.
JP	5.3.1	258	ge	Social environment is also important.	Insert “ <b>social</b> ” after economic.	243.
AU	5.3.1	261	Te	Additional facet of the external context. It is important to be aware of relationships, especially contracts, with key partners	Add new dot point: “relationships, contractual or otherwise, with partners including suppliers and customers”	244.
FR	5.3.1	3rd dash	Te	Interested parties have stakes for the organization.	Add : Perceptions, <u>stakes</u> and values of external stake holder	245.
BR17	5.3.1	262-270	te	Text exact copied (repeated) in 6.3.3 (lines 425-433)	Consider to maintain in just one place for example in 5.3.1 and refer to the content in 6.3.3	246.
AU	5.3.1	262	ed	typo: “but not limited to:”	“but are not limited to:”	247.Accepted
AU	5.3.1	262	ed	Clarification required	Insert “are” after “but”	248.Accepted
IE	5.3.1	262	ed	Grammar	Insert word “Aspects...., but <b>are</b> not limited to:”	249. Accepted
NL	5.3.1	262	ed	Verb missing	Include ‘are’ between ‘but’ and ‘not’: ...include, but <u>are</u> not limited to:	250. Accepted
NZ	5.3.1	262	ed	language	Add “are” before “not limited to”	251. Accepted

IE	5.3.1	263	ed	Clarity	Replace first word “the” with “its ...”	252. Accepted
AU	5.3.1	265	ed	Redundant comma	Delete the comma after “information flows”	253. Accepted
AU	5.3.1	269	ed	We don’t understand the relevance of the word “models” when referring to standards and references. We believe the “guidelines” are a more generally used term	Change “reference models” to “guidelines”	254. Accepted
CH	5.3.2	272	Te	“... clarify ...” is too vague for policy.	<u>Change</u> to “... policy should <u>clearly state</u> the ...”	255.
ES	5.3.2	273	te	It may not be necessary to specify every single of the listed points in a policy document so as not to be too restrictive.	Change the end of sentence in 273 so as not to be restrictive:  (...) to risk management <b>and consider specifying the following:</b> ”	256.
NL	5.3.1	274	ed	Reverse the sentence to clarify its meaning	Change sentence as follows: - links between <u>the organization’s policies and objectives</u> and the risk management policy	257.
NL	5.3.2	275	ed	Make this bullet the first one	Move this sentence to before line 274	258.
BR1 8	5.3.2	276	te	Include this clause, because this is the essential information in a risk management policy.	- <b>Objectives, drivers and guidelines for risk management.</b>	259.
CA 5	5.3.2	278	ed	While either risk aversion or risk attitude could be used in this line, it is suggested that risk attitude is the more general term since it allows for positive or negative risk consequences	<u>Modify line to read (Bold is insert):</u> — the organization’s risk appetite or risk <b>attitude aversion</b> ;	260.
CN	5.3.2	278	te	Risk appetite and risk aversion is different. And, in this place, risk appetite is appropriate.	— the organization’s risk appetite <del>or risk aversion</del> ;	261.
ACOS	5.3.2	279-283	Te	The indents in lines 279-283 are not “policy aspects” but “process, method and tools aspects”. Therefore they should be listed under 5.3.3.	Move lines 279-283 to sub-clause 5.3.3	262.
UK	5.3.2	280	te	This is too detailed for a policy statement, also starts to duplicate what is in 5.3.5	Add at beginning of sentence: “commitment to make the necessary”	263.
US	5.3.3	280	Ed	The term “business” adds nothing to the meaning of the sentence and may imply private sector activities.	Suggest the word “Business” be removed.	264.
ZA	5.3.2	280	Ed	Ensuring that the sentence includes both accountable and responsible	resources available to assist those accountable and/or responsible for managing risk	265.
AU	5.3.2	281 and 283	ed	Line 284 is a separate statement, not part of lines 272 - 283	Move “and” from line 283 to the end of line 281	266. Accepted

CA 6	5.3.2	281-283	ed	The list “and” seems to have been misplaced in the editing process	Modify lines to read ( <b>Bold is insert</b> ):  — the way in which risk management performance will be measured and reported; <b>and</b> — commitment to the periodic review and verification of the risk management policy and framework and its continual improvement; <del>and</del>	267. Accepted
NL	5.3.2	281	ed	This is the one but last indent	Put ‘and’ after the semicolon	268. Accepted
NZ	5.3.2	281	ed	grammar	Add “and” at end of line	269. Accepted
IE	5.3.2	282	Te	The standard mentions periodic review but it also needs to consider a review which may be triggered by an internal or external event.	- the nature of internal or external influence which might trigger a reactive review of the risk management policies and plans	270.
NL	5.3.2	283	ed	This is the last indent	Remove ‘and’ after the semicolon	271. Accepted
NZ	5.3.2	283	ed	Typo	Delete “and” at end of line and insert full stop	272. Accepted
NZ	5.3.3	After 283	te	Need to clarify that while organisational culture needs to be aligned with r.m. policy, the reverse is also true to avoid the r.m. policy inadvertently subverting an otherwise effective organisational culture (example: Google)	Insert new line “There should be alignment of the risk management policy and the organisational culture.”	273.
ES	5.3.3 Integration into organizational processes	286, 287	te	“business processes so that it is <b>relevant, effective and efficient</b> ” The emphasis should be on <b>efficient</b> . Otherwise it would seem that organizations which didn’t apply this Norm would have ineffective processes. Suppress <b>effective</b> .	“business processes so that it is <b>relevant and efficient</b> ”	274.
IE	5.3.3	286	ed	English	Replace the words “so that it is” with “ <b>in a way that is</b> ”	275. Accepted
AU	5.3.3	289	te	We would contend that ‘review and monitoring’ is also a key process into which risk management should be embedded and that this should be inserted into this clause.	Add “review” after “planning”	276.
NL	5.3.3	290-291	ed	Improve language and clarify intent of the sentence	Change ‘is’ to ‘will be’ ...to ensure that the risk management policy <u>will be</u> implemented and that risk management <u>will be</u> embedded in all the organization’s practices and	277. Accepted

					business processes.	
AU	5.3.3	290	te	For small organisations such a plan may not be necessary. The wording here suggested a written plan.	Replace “There should” with “It is often desirable for there to”	278.
ES	5.3.3.	291-292	te	Embedding risk management in all the organization’s practices and business processes may be overdoing it. Judgement and practicality should always precede	Add ‘where appropriate’ at the end of 292: “embedded in all the organization’s practices and business processes <b>where appropriate</b> ”	279.
US	5.3.3	291	Ed	The addition of the word “of” after the word “all” would make the sentence read more easily.	Add the word “of” after the word “all”	280. Accepted
US	5.3.3	291	Ed	The term “business” adds nothing to the meaning of the sentence and may imply private sector activities.	Suggest the word “business” be removed.	281. Accepted
AU	5.3.3	292	te	A risk management plan can be part of a wider, strategic or project plan. Indeed, this is preferable.	Add “The risk management plan can be part of another organisational plan such as a strategic plan or a project plan.	282.
JP	5.3.4	294-296	te	<ol style="list-style-type: none"> <li>Responsibilities of all people in an organization should be defined. In that sense, the word of “responsibility” is more suitable than the word of “accountability”.</li> <li>Necessary authority should be defined based on each person’s responsibility.</li> <li>It should be ensured that each person has necessary and appropriate competency.</li> </ol>	Change the sentence to as follows: “The organization should ensure <b>the assignment of necessary authorities according with their responsibilities</b> for managing risk,.....risk management process, <b>ensure the appropriate and necessary competency of the people</b> , and ensure the adequacy.....risk control.”	283.
UK	5.3.4	294	Te	The sentence beginning on this line has some kind of grammatical fault or perhaps some missing words.	Revise the sentence. The organization should ensure that there is accountability and authority for managing risks, implementation and maintaining the risk management process and ensuring the adequacy and effectiveness of any risk controls.	284.
ES	5.3.4 Accountability	295, 296	te	<p>“ensure the <b>adequacy and effectiveness</b> of any risk controls”</p> <p>To be consistent with rest of the rest of the document, it is necessary to add “<b>efficiency</b>”.</p>	“ensure the adequacy, effectiveness <b>and efficiency</b> of any risk controls”	285.

IE	5.3.4	295	ed	Clarity	Insert words "it should" before "ensure the adequacy and effectiveness of..."	286. Accepted
ES	5.3.4	296	te	Risk ownership is not given due importance. It is only mentioned that accountability can be facilitated by specifying risk owners (lines 294-296, 299-300).	Last sentence in Line 296 should be changed to: "Specifying risk owners for implementing risk treatment, maintaining risk controls and reporting of relevant risk information is paramount. Other activities that facilitate accountability are:"	287.
JP	5.3.4	297		Responsibilities of all people in an organization should be defined.	Change the sentence to as follows: "– <b>specifying the responsibilities of people at all level in the organization</b> for the development....."	288.
ES	5.3.4	299	te	Description of risk owner's tasks (implementing risk treatment, maintaining risk controls and reporting of relevant risk information) does not fit with Guide 73 definition (person or entity with the accountability and authority for managing the risk and any associated risk treatments)	Use Guide 73 text in line 299	289.
IE	5.3.4	299	ed	English	Replace "specifying" with "identifying" or "nominating"	290.
JP	5.3.4	301	te	Not only reporting but also recording is important.	Add " <b>recording</b> " before reporting.	291.
ES	5.3.4	303	te	In line 303 "reward" comes to be synonym of "recognition", so it seems to be unnecessary; "sanction" seems to be ambiguous and not adequate.	Eliminate "reward" and "sanction" in line 303 , leaving the sentence in the following way: "ensuring appropriate levels of approval and recognition".	292.
AU	5.3.5	305	ed	Unnecessary word	Delete "the" before "practical"	293. Accepted
IE	5.3.5	305	ed	Simplicity	Delete words "develop the practical means to"	294. Not accepted
AU	5.3.5	307	ed	Correct spelling of "competences"	Change to "competencies"	295. Accepted
JP	5.3.5	310	ge	It is better to add a consideration of training and practicing to acquire competences	Add new dash after LN 310. – <b>training and practicing programs and procedures</b>	296.
IE	5.3.6	311		Suggest adding in something about how effective communication supports ownership of risk by staff before line 312.	Add new line before 312 " Establishing effective internal communication supports and encourages responsibilities and ownership of risk"	297.

IL		312		It is required to write a Procedure for the internal communication process. Instead of the word “mechanism” write “ <b>Procedure</b> ”		298.
IL	5.3.6	316		The purpose of the internal reporting is also to follow rules and regulations		299.
IL	5.3.7	323		Instead of the word “Plan” write “ <b>Procedure</b> ”		300.
AU	5.3.7	326 – 327	ed	line 327 is already contained in 326	remove line 327	301. Accepted
CA 7	5.3.7	326-327	ed	Line 327 is redundant since it is fully contained in line 326, therefore line 327 can be removed	<u>Modify lines to read:</u> — external reporting to comply with legal, regulatory, and corporate governance requirements; — <del>making legally required disclosures;</del>	302. Accepted
IE	5.3.7	327	ed	Superfluous	Delete line. Already covered by previous line.	303. Accepted
FR	5.3-7	New paragraph	Te	Consistency with 5.3.6. Paragraph (line 320 and 321) applies also for 5.3.7 Add paragraph	Add the following paragraph:  These mechanisms should include processes to consolidate risk information where appropriate from a variety of sources within the organization taking into account its sensitivity	304.
SE	5.4	331	Te	This section is about implementing the risk management framework, which includes implementing the RM process	Change heading to "Implementing the risk management framework" and erase heading 5.4.1 and 5.4.2	305.
US	5.4	331	Te	5.4.1 – “Developing a plan for implementation” that was found at line 318 in the 2007—06-15 (N47) was useful and important.	Reinsert language that was found in lines 318-320 in (N47).	306.
AU	5.4.1	334	ed	Given the need to review the framework we should change the wording “an appropriate timing”. Implementation is ongoing and hence this work suggests it is done once.	Change “an appropriate timing” to “the appropriate timing”	307. Accepted
NL	5.4.1	334	te	It is critical for the implementation process that someone is responsible and accountable for this	Include the following sentence as the first indent: - <u>designate a person responsible and accountable for implementation of the framework;</u>	308.

CH	5.4.1	336	Te	Present wording is too vague and will result in differences in application.	Continue the sentence on line 336 as follows: "...requirements <u>applicable to its activities.</u> "	309.
AU	5.4.1	337, 338	ed	This sentence relates to the development of the framework not the implementation stage. This must be due to an editorial error.	Delete 337 -338	310.
NL	5.4.1	337	te	This indent has been changed a couple of times from WD.3 to DIS, however, the original meaning is now almost lost; rephrase as proposed to make the original intent clear again	Change sentence as follows: - <del>document justified</del> <u>ensure that</u> decision making, including the development and setting of objectives, <u>which are</u> <del>is</del> aligned with the outcomes of <del>the</del> risk management processes;	311.
UK	5.4.2	343 and 344	Te	This paragraph does not point out the need to implement the risk management process appropriately wherever it is used, leaving the impression that identical procedures and techniques should be used everywhere.	Change to: "... in Clause 6 is proportionately applied at all relevant levels and functions ...  Add new sentence to this paragraph:  "Procedures and techniques should be implemented that are suited to each application and yet are consistent with the overall process described in Clause 6. "	312.
JP	5.4.2	343	ed	This sentence should be written by using "should".	Change the sentence to as follows: Risk management <b>should be</b> implemented by...	313. Accepted
IL	5.4.2	344		After the word " <b>function</b> " add " <b>through a risk-management plan</b> "		314. Accepted
US	5.4.2	345	Ed	The term "business" adds nothing to the meaning of the sentence and may imply private sector activities.	Suggest the word "business" be removed.	315.
IL	5.4.3			Please add a new clause called: <b>RISK MANAGEMENT PLAN</b> – the Work Plan is a tool for following up the implementation of the risk management process. The Work Plan should include details of activities, schedules and		316.

				persons responsible for the implementation.		
AU	5.5	349	te	Need to use the KPIs to measure performance.	Change to “establish performance measures and periodically review the organisation against these targets.”	317.
FR	5.5	1st dash	Te	We consider that the notion of evaluation of the effectiveness of the measures.	Modify first dash as follow: Establish performance measures and evaluate their effectiveness	318.
IE	5.5	349	ed	Clarity.	Insert words: “establish <b>risk management</b> performance measures”	319. Accepted
IL	5.5	349		Add the word “ <b>maintain</b> ”		320.
JP	5.5	349	ge	Judging from the context and LN 245, “performance” means risk management performance. If so, it should be clearly written to differentiate from organizational performance.	Add “ <b>risk management</b> ” before performance.	321. Accepted
JP	5.5	349	ge	Not only (risk management) performance measures but also effectiveness measures are important.	Add “ <b>and effectiveness measures</b> ” after performance measures.	322.
CA 8	5.5	353-354	ed	The present text is awkward and can be improved by taking the last part of line 353 and making a new bullet point – note that the text is not changed other than eliminating the “and” which is not longer required	Modify lines to read ( <b>Bold is insert</b> ): — report on risks, progress with the risk management plan <del>and</del> — ensure how well the risk management policy is being followed; and	323.
ACOS	5.5	353	Te	Ensure the process is effective and followed, check the policy in accordance to organisations overall policy, e.g. quality values, business objectives...frequently to be on right track for companies strategy	Change the latter part of Line 353 and Line 354 into the following sentence as underlined. ...ensure how well the risk management <u>process is effective and the policy is known and followed everywhere in the organization</u> ; and ...	324.
AU	5.5	353	ed	Editorial and English errors here. It should read “report on progress”	Delete “risks” and “ensure”	325.
IE	5.5	353	ed	English.	Replace words: “ensure <b>how well</b> the...” with “ensure <b>that</b> the...” or with “ <b>determine</b> how well the...”	326.
IE	5.5	355	ed	Clarity.	Add words “on an annual basis at least.”	327.
CH	5.6	357	Ed	The passive form (“Something should be done”) is not as good as the active form (The organization should .....”)	Change to “Based on the review, <u>the organization should decide</u> on how ...”	328. Accepted

AU	5.6	358 and 359	ed	Suggested improvement to the wording. My suggestion may reduce the scope of the sentence so I am not fully committed to the suggested wording.	Change “the organization’s risk management, and risk management culture” to the organization’s management of risk and risk management culture”.	329. Accepted
IL	5.6			The improvement process will be based on data measured by a measuring method of your choice		330. Noted
NL	5.6	358	ed	Wrong punctuation	Delete the comma between ‘management’ and ‘and risk’	331. Accepted
US	5.6	359	TE	The section lacks sufficient detail.	“Information obtained from the Monitoring and Review (5.5) should be the driver in continual improvement. Accordingly, the framework, process and performances should be revised to address the desired outcomes”.  “Based on the review, decisions should be made on how the risk management framework, policy and plan can be improved, such as ISO 9001 Clause 8.5.1 Continual improvement.”	332.
CN	6	360-600	te	It is better to explain what the generic process is. This will then explain why people need the framework and how the framework works.	Move Chapter 6 before Chapter 5.	333.
ES	6		te	“Risk acceptance” is missing in Clause 6.  In fact, surprisingly, an activity of such importance as risk acceptance does not appear in the whole document.  Risk acceptance aims to ensure that residual risk (risk remaining after risk treatment) is explicitly accepted by the managers of the organization.  Risk acceptance is a relevant concept which is missing in the whole document 31000 and particularly in clause 6.  See for instance ISO/IEC 27005. In this standard there are above 30 references to ‘risk acceptance’.	Risk acceptance should be included in clause 6 and in figure 3.  Risk acceptance should be included in the process for managing risk of clause 6.  This would require a new clause 6.7 (and current 6.7 Recording... would turn to 6.8).  Add within Clause 6 a subclause for Risk acceptance.  The subclause for Risk acceptance should be placed between Risk treatment and Monitoring and review. This subclause should:  • Explain risk acceptance and its role within managing risks.	334.

				<ul style="list-style-type: none"> <li>• Provide additional considerations on risk acceptance criteria, explaining that these criteria depend on an organization’s internal policy, goals, objectives and the interests of stakeholders</li> </ul> <p>A proposal for the treatment of risk acceptance is made below following FDIS 27005:</p> <p>“The risk acceptance activity has to ensure residual risks are explicitly accepted by the managers of the organization. This is especially important in a situation where the implementation of controls is omitted or postponed, e.g. due to cost.”</p> <p>“Risk acceptance criteria</p> <p>Risk acceptance criteria should be developed and specified. Risk acceptance criteria often depend on the organization's policies, goals, objectives and the interests of stakeholders.</p> <p>An organization should define its own scales for levels of risk acceptance. The following should be considered during development:</p> <ul style="list-style-type: none"> <li>- Risk acceptance criteria may include multiple thresholds, with a desired target level of risk, but provision for senior managers to accept risks above this level under defined circumstances</li> </ul>	
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					<ul style="list-style-type: none"> <li>- Risk acceptance criteria may be expressed as the ratio of estimated profit (or other business benefit) to the estimated risk</li> <li>- Different risk acceptance criteria may apply to different classes of risk, e.g. risks that could result in noncompliance with regulations or laws may not be accepted, while acceptance of high risks may be allowed if this is specified as a contractual requirement</li> <li>- Risk acceptance criteria may include requirements for future additional treatment, e.g. a risk may be accepted if there is approval and commitment to take action to reduce it to an acceptable level within a defined time period</li> </ul> <p>Risk acceptance criteria may differ according to how long the risk is expected to exist, e.g. the risk may be associated with a temporary or short term activity. Risk acceptance criteria should be set up considering the following:</p> <ul style="list-style-type: none"> <li>- Business criteria</li> <li>- Legal and regulatory aspects</li> <li>- Operations</li> <li>- Technology</li> <li>- Finance</li> <li>- Social and humanitarian factors”</li> </ul>	
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				<p>“Risk acceptance:</p> <p>Input: Risk treatment plan and residual risk assessment subject to the acceptance decision of the organization’s managers.</p> <p>Action: The decision to accept the risks and responsibilities for the decision should be made and formally recorded (this relates to ISO/IEC 27001 paragraph 4.2.1 h)).</p> <p>Implementation guidance:</p> <p>Risk treatment plans should describe how assessed risks are to be treated to meet risk acceptance criteria (see clause 7.2 Risk acceptance criteria). It is important for responsible managers to review and approve proposed risk treatment plans and resulting residual risks, and record any conditions associated with such approval.</p> <p>Risk acceptance criteria can be more complex than just determining whether or not a residual risk falls above or below a single threshold.</p> <p>In some cases the level of residual risk may not meet risk acceptance criteria because the criteria being applied do not take into account prevailing circumstances. For example, it might be argued that it is necessary to accept risks because the benefits accompanying the risks are very</p>	
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					<p>attractive, or because the cost of risk reduction is too high. Such circumstances indicate that risk acceptance criteria are inadequate and should be revised if possible. However, it is not always possible to revise the risk acceptance criteria in a timely manner.</p> <p>In such cases, decision makers may have to accept risks that do not meet normal acceptance criteria. If this is necessary, the decision maker should explicitly comment on the risks and include a justification for the decision to override normal risk acceptance criteria.</p> <p>Output: A list of accepted risks with justification for those that do not meet the organization's normal risk acceptance criteria.”</p>	
SE	6	360	Ed	"Risk management" is not the same thing as "managing risk" (see general comment above)	Change to "Risk management process"	335.
UK	6.1	361	Ed	Improve English	Add 'the' after 'in' in line 362	336. Accepted
AU	6.1	364	ed	Editorial error. Figure 3 shows 7 processes, not 5.	Change "five" to "seven"	337.
IE	6.1	364		Rephrase: The effective management of risk has five key activities:	Change to: An <b>effective</b> risk management process includes....	338.
UK	6.1	364	Ed/Te	Improve English	Replace ' the risk.....activities' in line 364 with 'namely'.	339.
UK	6.1	365	Te	Need to include recording and reporting	Add 'recording and reporting' after 'review' in line 365.	340.
UK	6.1	365	Ed/Te	Improve meaning	Add 'also' after 'as'	341.

ES	6.1	367		Risk acceptance is missing in Figure 3	<p>Insert 'Risk acceptance like in this figure of FDIS 27005:</p>	342.
UK	Figure 3	367	Te	<p>This diagram lacks a key to explain what type of object is represented by the boxes and arrows. It would also be helpful to distinguish the different types of arrow with different symbols. We know there are at least two types of connection (arrow) because 6.3 and 6.5 and connected to 6.6 by two arrows. Either some of these arrows should be deleted or they represent different kinds of connections.</p>	<p>Add a key to explain the central arrows are sequence of events and the double headed arrows are flow of information.</p>	343.
ES	6.2		te	<p>Communication and consultation is restricted to a plan aiming at communication/consultation <b>about</b> the implementation of the risk management process. I miss information, communication and consultation <b>as part of</b> the risk management process. Note: The word "training" is not</p>	<p>Add <b>Information</b>, to communication and consultation aspects of the risk management process itself to paragraph 6.2</p>	344.

				present in clause 6.		
CN	6.2	369	te	The communication and consultation as described here does not belong to the generic risk management process.	Move the content of the section to previous chapter: risk management framework.	345.
AU	6.2	370	ed	Unnecessary words	Delete “as far as necessary”	346. Accepted
IE	6.2	370	Ed	“as far as necessary” seems to be a throw away phrase without value. A plan for communication will be developed and this will specify when and to what depth communication should take place	Delete “as far as necessary”	347. Accepted
UK	6.2	370	Ed/Te	Sentence is vague	Add ‘but as much as possible’ after ‘necessary’.	348. Not accepted due to deletion of “as far as necessary”
AU	6.2	371	ed	Communication and consultation should occur during all stages (stronger emphasis).	Delete “at each stage” and replace with “during all stages”.	349. Accepted
AU	6.2	372, 373 392	te	There concern that the standard requires the creation of lots of ‘plans’ inferring written plans. More importantly is that the organisation should have a process for consultation and communication.	Replace “plan” by “process” in lines 372, 373 and 392	350.
UK	6.2	372 - 374	Ed/Te	Improve meaning	Add ‘programme’ after ‘risk’. Replace ‘its’ with ‘the risks identified, their’ before ‘consequences’ and ‘likelihoods’ after ‘consequences’. Replace ‘it’ with ‘them’ at the end of 374	351. Accepted
FR	6.2	2 <sup>nd</sup> paragraph	te	Add the notion of cause (event at the origin of) in the last sentence	This plan should address issues relating to the risk itself, its causes, its consequences (if know) and the measures being taken to manage it	352.
NZ	6.2	372	te	Consultation may be required with other than stakeholders in order, for example, to obtain information. The same techniques will be necessary in order to ensure this is done effectively.	Add after “stakeholders” the words “and where necessary others”	353.
CN	6.2	375	ed	Syntax error. The passive voice should be used.	“... communication and consultation should <del>take place</del> <u>be taken</u> to ensure to ensure that...”	354.
ES	6.2 Communication and consultation	375	te	“Effective <b>internal and external</b> communication and consultation” Unnecessary wording. Suppress <b>internal and external</b> .	“Effective communication and consultation”	355.

AU	6.2	376	ed	Suggestion for clearer wording.	Change "... implementing the risk management process and stakeholders understand ..." to "... implementing the risk management process and other affected stakeholders understand ..."	356.
DE 016	6.2	378 to 386	te	"a consultative team approach is useful to...develop a...consultation plan". What comes first ?	Delete the word " <i>consultative</i> " in line 378.	357.
AU	6.2	378	ed	Clumsy construct	"A consultative team approach may:"	358. Accepted
AU	6.2	378	te	Consultation is extremely important to the development, testing and implementation of the criteria for evaluating risk.	Add a bullet point: " - Help define the risk analysis criteria and test their appropriateness."	359.
AU	6.2	379 to 386	ed	Given that communication and consultation are important at every stage of the risk management process it would make more sense to arrange these bullet points in the same order as the process.	Swap lines 381 and 382. Swap lines 384 and 385.	360.
NZ	6.2	379-386	ed	grammar	Convert all verbs to present participle – e.g. "helping" rather than "help"	361.
NZ	6.2.	379	te	Make clear standard is referring to the risk management context	Insert "risk management" before "context"	362.
UK	6.2	383	Te	Improve meaning	Add 'and that a consensus gets built'	363.
AU	6.2	388	ed	Repetition	Second "Perceptions of risk" should be changed to "These perceptions"	364. Accepted
BR19	6.2	389-390	ed	Consider to use "should" as a guideline	<del>It is important that the</del> The stakeholder's perception is <b>should be</b> identified...	365. Accepted
AU	6.2	390	ed	Plural required	Change "perception is" to "perceptions are"	366. Not accepted due to acceptance of Comment 365
IE	6.2	390	Ed	English	Replace word. "perception is identified.." with "perception is <b>established</b> , "	367. Not accepted due to acceptance of Comment 365
NZ	6.2	390	ed	plural	Change to "...perceptions are..."	368. Not accepted due to

						acceptance of Comment 365
US	6.2	390	Te	"...the stakeholder's perception is identified..." How exactly is the reader supposed to do this? This is an impossible requirement.	Change to "viewpoint" or other more suitable word	369.
NZ	6.2	392-394	ed	A plan can't be an exchange of information, convey messages etc. Information might or might not be based on evidence without detracting from its value. The last bullet point is trite.	Reword these lines to read "The communication and consultation plan should facilitate honest, relevant, accurate and understandable exchanges of information."	370.
CA 9	6.2	394-395	ed	The bullet points seem to have been put together and should be separated into two separate ideas, the verb should be moved to be the same as the other bullet points.	<u>Modify lines to read (Bold is insert):</u> — convey messages which are honest, accurate, understandable and based on evidence; <del>and</del> — be useful; and — <b>assess</b> the value of the contributions <del>be assessed</del> .	371.
BR2 0	6.2	394	te	What means "honest messages": simple, correct, ?	.. messages which are honest, accurate...	372.
AU	6.2	395	ed	"be useful; and the value of the contributions be assessed" is difficult to understand.	Separate into two bullet points at the word "and". Correct the list grammar by deleting the word "and" from the end of line 394. Change "the value of the contributions be assessed" to "confirm the value of the contributions."	373.
CN	6.2	395	te	"Useful" is not a proper word here. "Operable" may be a better word to describe "a plan".	— be useful; <del>and the value of the contributions be assessed</del> operable.	374.
CN	6.2	395	te	What does it mean by "the value of the contributions be assessed"?	Delete or change to some other expressions.	375.
IE	6.2	395	Ed	Simplicity. The last 8 words do not add anything.	Delete last 8 words. " and the value of the contributions be assessed"	376.
SE	6.2	395	Te		Add a 4th bullet with: "consider confidential and personal integrity aspects"	377.
FR	6.2	Dash list		Missing element regarding stakeholders	-add anew paragraph	378.

					- Make sure that the interfaces and the levels of interactions with the internal and external stakeholders are defined;-	
NZ	6.3	398 & 400	ed	Re-order for consistency with what follows	"external and internal" instead of "internal and external"	379. Accepted
NZ	6.3	398	ed	Need to make clear that the starting point is the organisation's objectives	Insert "articulates its objectives and" before the word "defines"	380. Accepted
AU	6.3.1	398	ed	Missing comma after the word context.	Change "By establishing the context the organization defines ..." to "By establishing the context, the organization defines ..."	381. Accepted
AU	6.3.1	399	ed	Correction to grammar	Replace "... risk, and setting the scope ..." with "... risk, the scope ..."	382. Accepted
FR	6.3.1	399	ed	Verb form is not correct	and sets (to replace and setting)	383. Accepted
FR	6.3.1	399-400	ed	Redundant as information is in the preceding sentence	Remove the sentence "The context should include both internal and external parameters relevant to the organization"	384.
NZ	6.3	400, 415, et seq	te	<p>1) The expression "context" has become over-used in the standard. Fig 6.3 speaks of one "context" but there are then several "contexts". These elements are actually 'environments' rather than 'contexts' At present, the key issue of "objectives" gets lumped into "internal context but that is not correct. The objectives are the objectives.</p> <p>2) Such a change will allow a less woolly explanation of the context to be used in 6.3.1 which at present does not adequately explain what is involved in setting the context.</p> <p>3) If the expression "environments" as suggested here does not translate well, then the WG could consider 'conditions' or 'factors' as an alternative. The main thing is to avoid multiple uses of context and deal more explicitly with the 'objectives'.</p>	<p>Amend headings by replacing "context" with the word "environment" and then make consequential amendments to all subsequent references.</p> <p>Replace 398-403 as follows</p> <p>"Risk arises because the organisation's objectives must be pursued against the external and internal environment of the organisation. It is this overlay that defines the organisation's risks.</p> <p>The context articulates the organisational objectives, defines the external and internal environments, identifies the stakeholders, sets risk criteria against which risks will be evaluated and for particular risk management activities, defines the responsibilities, scope and purpose of those activities and the relationship to other activities. Some of the environmental factors will also have a bearing on shaping the overall risk management</p>	385.

				3) There is a need for a short sub section in 6.3 to clarify what is meant by “stakeholders” as a generic concept and irrespective of whether they are internal and external stakeholders	framework (see 5.3.1)  Insert new sub section of 6.3 after 6.3.3 “6.3.X <b>Stakeholders</b>  The aspirations and needs of people both external to and inside the organisation can be a source of risk and also may have relevance to the manner in which risk is assessed or treated. Such considerations may constrain or facilitate risk management activity. It is therefore necessary as part of setting the context to identify <b>stakeholders</b> .”	
IE	6.3.1	400	Ed	English	Replace word: “relevant for...” with “relevant to...”	386. Accepted
IE	6.3.2	404		Reword to improve readability.	Suggest rephrase to: Political, Economic, Social & Cultural, Technological, Legislative, Environmental, Regulatory, Physical (to include safety, health, fire, security) Managerial/professional, customer/citizen, legal (to include claims) issues & concerns whether at international, national regional or local.	387.
NZ	6.3.2	405	ed	Language	Add “the” before “external”	388. Accepted
CN	6.3.2	406-407	ed	Confused expression.	Understanding the external context is important to ensure that <del>external stakeholders, their objectives and concerns</del> <u>the objectives and concerns of external stakeholders</u> are considered when developing risk criteria.	389. Accepted
IE	6.3.2	407-409	Ed	Simplicity. Sentence confuses rather than clarifies.	Delete sentence beginning with “It is based on...”	390.
BR2 1	6.3.2	410-414	te	Text exact copied (repeated) in 5.3.1 (lines 257-261)	Consider to remove from here	391.
TC98	6.3.2	L.411-414	ed	Same expression as Clause 5.3.1 L.258-261	Add NOTES indicate as indicated left.	392.
FI	6.3.2 Establishing the external context	412	ge	The word international is not covering the whole globe	environment, whether global, international, national, regional or local	393.
FR	6.3.2 & 6.3.3	Line 414 & 4.3.1	ed	Different writing:  “ <i>External context can include :</i>  <i>perception and values of external stakeholders</i> ”	write line 4.3.1 :  <i>Internal context can include :</i>  <i>perception and values of internal stakeholders</i>	394. Accepted

				<i>Internal context can include : perception and values</i>		
NZ	6.3.3	416	ed	Language	Add “the” before “internal”	395. Accepted
NZ	6.3.3	417-420	te	There are muddled ideas here. The relevance of the internal environment lies in the overlay on the organisation’s objectives – not in relation to the ‘risk management process or framework’. (These are dealt with earlier) In light of earlier recommended changes, this needs re-wording. While the words are true, they conceal the real relevance of the objectives as a source, rather than a context. Without the objectives there can be no risks nor, therefore, any need to manage risks.	Delete 416 – 422 and line 425 and replace with “The internal environment is those features and conditions internal to the organisation which can impact on the organisations pursuit of its objectives and thereby give rise to risk. It includes but is not limited to .... [and then go directly to line 426] [See also NZ suggestion of deletion of 423-4 for different reason]	396.
US	6.3.3	417	Te	In addition to the alignment issues raised in line 417, the risk management process should be aligned with an organization’s overall strategy.	At the end of this line, after the word structure, insert the words “...and strategy”	397.
FI	6.3.3 Establishing the internal context	420	ge	To ensure that RM-process (maybe not a function) is covering the whole life cycle of strategic planning	risk management takes place in the context of objective settings and the objectives of the organization;	398.
BR2 2	6.3.3	421	te	Insert process	... particular project, <b>process</b> or activity...	399.
FI	6.3.3 Establishing the internal context	421 - 422	ge	RM-process is not only covering risks that needs to be mitigated but also including identification of possible opportunities and ensuring proper management actions for them	- a major risk for some organizations is failure to recognize existing opportunities or to achieve their strategic, project or business objectives, and this risk affects ongoing organizational commitment, credibility, trust and value	400.
NZ	6.3.3	423-4 And section generally	te	While the statement in 423-4 might be true, the standard shouldn’t be defining what is and what is not a risk or a major risk – in effect it is just providing an example.	Delete 423-4	401.
BR2 4	6.3.3	425-433	te	Text exact copied (repeated) in 5.3.1 (lines 262-270)	Consider to remove from here	402.

IE	6.3.3	425, 426	Ed	English. Repetition of “in terms of”.	Change 425 to read “It is necessary to understand <b>different aspects of</b> the internal context. For example.” Change 426 to – “the capabilities <b>of the organisation</b> in terms of...”	403.
BR2 3	6.3.3	425	ed	Maintain the exact text from 5.3.1 (lines 262)	<del>It is necessary to understand the internal context, in terms of, for example:</del> <b>Aspects from internal context include, but not limited to:</b>	404.
NL	6.3.3	425	ed	Align this introductory sentence with the sentence in 410; both sentences have the same function, namely what the internal/external context can include. It is not necessary to “understand the internal context” because this is already explained in lines 419-424 (“It should be established because....”)	Replace sentence by: “The internal context can include, but is not limited to:”	405.
IE	6.3.3	426-433	Ed	Improve readability and understanding by reordering the bullet points	reordering bullet points: Line 426 becomes point 3 Line 428 becomes point 5 Line 429 becomes point 6 Line 430 becomes point 2 Line 431 becomes point 4 Line 432 becomes point 7 Line 433 becomes point 1	406.
TC98	6.3.3	L.426-433	ed	Same expression as Clause 5.3.1 L.258-261	Add NOTES indicate as indicated left.	407.
AU	6.3.3	426	ed	Clarification required	Insert “of the organisation” after “capabilities”	408.
AU	6.3.3	428	ed	Redundant comma	Delete the comma after “information flows”	409.
UK	6.3.3	429	Te	Incomplete bullet	Add to the end ‘, who will need to be engaged in and by the risk management processes’	410.
US	6.3.3	429	Te	Regarding the internal context, the list bullet in this list should include needs and risk appetite of stakeholders.	Rewrite line 429 to read, “internal stakeholders needs and risk appetite.”	411.
IE	6.3.3	431-432	Ed	Editorial	Delete “and” at end of line 431. Insert in 432	412. Accepted
AU	6.3.3	431	ed	Remove “and” as this line is not the second last line in sub-paragraph.	Remove “and” as this line is not the second last line in sub-paragraph.	413. Accepted
NL	6.3.3	431	ed	This is not the last but one indent	Replace ‘and’ after the semicolon to line 432	414. Accepted

US	6.3.3	431	ED	Grammar.	Remove “and” at the end of the phrase.	415. Accepted
AU	6.3.3	432	ed	We don't understand the relevance of the word “models” when referring to standards and references. “Guidelines” seems a more widely used term	Change “reference models” to “guidelines”	416.
AU	6.3.3	432	ed	This is second last line of sub-paragraph.	Remove full stop, add “;and”.	417. Accepted
US	6.3.3	432	ED	Grammar	Add the end of the phrase add “; and”.	418. Accepted
AU	6.3.3	433	te	Include contractual relationships as part of context	Add new dash point: “ - form and extent of key contractual relationships”	419.
NZ	6.3.4	434	te	This is introducing a further concept of “context” and should be avoided	Change heading to read “Establishing the scope and setting of particular risk management activities” and make consequential changes	420.
AU	6.3.4	441	te	Context is often affected by the organizations appetite for risk and its objectives such as entering a new market segment. I believe this is a good example to include despite the list being non-exclusive.	Add new bullet point: “Defining the organisation’s objectives and risk appetite in relation to the particular activity, process, function, project, product, service or asset.”	421.
IE	6.3.4	442-452	Ed	To improve the logic of the sequence of points they should be re-ordered	Suggest reordering: Line 442 becomes point 8 Line 443 becomes point 3 Line 445 becomes point 1 Line 447 becomes point 2 Line 449 becomes point 4 Line 450 becomes point 7 Line 451 becomes point 6 Line 452 becomes point 5	422.
DE 017	6.3.4	442	te	Statements should also be made on the roles and responsibilities within the risk management process. In particular the role of the central risk manager responsible for steering the process of gathering and assessing risks should be clearly distinguished from the role of the risk officers who primarily bear responsibility for risk controlling and the actual risk management.	Change line 442 as follows: “— defining responsibilities for <u>and within</u> the risk management process;”	423.

				Given their sometimes high degree of integration within the internal controlling system, the role of the “control owner” should also be defined, who is not necessarily identical to the “risk owner”.		
JP	6.3.4	445-446	ge	Goal and objectives of risk management process should be defined at initial step.	Delete “ <b>as well as its goal and objectives</b> ” from the sentence. And, add “– <b>defining goal and objectives of risk management process;</b> ” before LN 442 as a new dash.	424.
BR2 5	6.3.4	447	te	Insert process	... particular project, <b>process</b> or activity and other projects, <b>processes</b> and activities...	425.
IE	6.3.4	449	te	If reference is made to risk assessment methodologies some guidance must be given on available methods. No such guidance or models are available in ISO /DIS 31000. Consideration should be given in including reference to Risk Assessment methods and standards such as IEC 31010	- Reference to risk assessment methodologies such as those outlined in IEC 31010 should be referenced in Annex A	426.
JP	6.3.4	450	ge	Evaluation of performance and effectiveness is a pair.	Add “ <b>and effectiveness</b> ” after performance.	427.
FI	6.3.4 Establishing the context of the risk management process	453	te	It is relevant to integrate RM reporting to be part of ordinary management reporting procedures	- Including risk management reporting to the organizational reporting processes	428.
AU	6.3.4	455	ed	I believe the intent here may have been to go from the specific to the general in which case the following minor grammar change is required.	Change “...to the situation of the organization ...” to “...to the situation, the organization ...”	429.
IE	6.3.4	455	Ed	English	Replace word. “situation” with “ <b>circumstances</b> ”	430.
NL	6.3.5	456-462	ed	Inconsistency is using the words ‘developing’ and ‘defining’ risk criteria (see lines 6.3.5, 457, 461 and 462.	We prefer the word ‘define’	431.
AU	6.3.5	457	ed	Poor English	Change “that are” to “to be”	432. Accepted
AU	6.3.5	457	ed	The risk criteria must reflect the organisations values, objectives and resources. The use of the word “can” is too	At end of line 457 change “can” to “should”.	433. Accepted

				weak.		
AU	6.3.5	458	ed	Punctuation required	Insert an apostrophe into “organisations”	434. Accepted
AU	6.3.5	460	ed	Repetition from previous sentence	Change “Risk criteria” to “They”	435.
CN	6.3.5	460-461	te	Before risk management process, one may not know all the risks. Therefore it is impossible to development risk criteria that are appropriate.	Risk criteria should be developed before risk evaluation and risk treatment process and continually be reviewed.	436.
IE	6.	461	ed	Improve readability.	Remove: be ...	437.
NZ	6.3.5	461	ed	grammar	Change to read “...and should be reviewed continually.”	438.
FI	6.3.5 Developing risk criteria	462	ge	To highlight how significant it is to balance the treatments of the risks and the opportunities in RM-process	When defining risk criteria of opportunities or threats, factors to be considered could include the following	439.
FR	6.3.5	1st dash	te	The notion of cause is missing	Replace by the following: Nature and types of cause and consequences....	440.
NZ	6.3.5	463	ed	Language	Add “the” before “nature”	441. Accepted
IE	6.3.5	465	Ed	English.	Delete space and add (s), “the <b>timeframe(s)</b> of the likelihood and/or consequence <b>(s)</b> ”	442. Accepted
AU	6.3.5	468	te	Risk criteria do not define the level of risk that requires treatment.	Delete 468	443.
IE	6.3.5	469	Ed	“Whether combinations of multiple risks should be taken into account” does not address the permutations to be considered	Change to “Whether combinations of multiple risks should be taken into account and, if so, which combinations should be considered”	444. Accepted
NZ	6.3.5	469	te	incomplete	Add “and how”	445. Accepted
NL	6.4.1	472	te	Here a reference should be included to IEC 31010	Include the following sentence: Reference is made to IEC 31010 for further information on risk assessment techniques.	446.
ES	6.4.2		te	Clause 6.4 should refer to risk assessment techniques described in ISO 3101	Include a sentence with a following wording or similar: “For risk assessment techniques please see	447.

					ISO/IEC 31010.”	
UK	6.4.2	474-477	Te	<p>This paragraphs insists on complete identification of risks, but the standard provides no means of ensuring or checking that a risk list is complete.</p> <p>Instead, it goes on to say that risks associated with opportunities not taken should also go on the list, making this a requirement to identify every possible course of action that might be favourable (opportunities) and list risks related to not taking them.</p> <p>It's not clear what this means, how it might be done, or even that it is possible in practice or in theory.</p>	<p>Either provide a means of ensuring complete coverage or remove this requirement and suggest aiming for a high level of coverage.</p> <p>Change para to read: The organization should identify sources of risk, areas of impacts, events and their causes and their potential consequences. The aim of this step is to generate a comprehensive list of risks based on those events that might enhance, prevent, degrade or delay the achievement of the objectives. Comprehensive identification is critical, because a risk that is not identified at this stage may not be included in further analysis. Identification should include risks whether or not their source is under control of the organization. It is also important to identify the risks associated with not pursuing opportunities.</p>	448.
AU		474	te	Although the definition of event now includes changes in circumstances, this is not common usage and as these changes are so important, they should be mentioned here.	Include “ including changes in circumstances” after “events”	449.
NZ	6.4.2	474	te	incomplete	Add “exposure pathways” before “events”	450.
UK	6.4.2	474	Te	This line mentions ‘sources of risk’ but this key phrase is not explained or contained within Guide 73.	Explain what a ‘source of risk’ is or put it in Guide 73.	451.
CN	6.4.2	475-476	ed	It is verbose and unnecessary to use 4 verbs “enhance, prevent, degrade or delay” here. Delete “degrade” to make the sentence more concise.	The aim of this step is to generate a comprehensive list of risks based on those events that might enhance, prevent, <del>degrade</del> or delay the achievement of the objectives.	452.
JP	6.4.2	476-477	te	Risk management is widely used to manage risks associated with not pursuing an opportunity. From this point of view, the word “also” should be deleted.	Delete “ <b>also</b> ” from the sentence.	453.
AU	6.4.2	476	ed	For consistency we should add “create” and “accelerate” given that “prevent” and “delay” are listed.	Change “...might enhance, prevent, degrade or delay ...” to “...might create, enhance, prevent, degrade, accelerate or delay ...”	454.
AU	6.4.2	476	ed	Unnecessary word	Delete “the” before “objectives”	455. Accepted

AU	6.4.2	476	ed	Word required	Insert "the" before "control"	456. Accepted
BR2 6	6.4 / 6.4.2	477	ed	It is also important to identify the risks associated with "not pursuing" an opportunity... is hard to understand and not easily translated to other languages. It is also not applicable for positive risks.	Consider remove the sentence.	457.
AU	6.4.2	478 and 479	ed	Missing word "the" in front of "control" but also these risks should have a limit applied so that they are within the scope of the risk assessment. Otherwise it opens the assessment to "all risk".	Change "Identification should include risks whether or not their source is under control of the organization." to "Identification should include risks that are within the scope of work whether or not their source is under the control of the organization."	458.
NZ	6.4.2	479	te	1) There is a need to highlight the requirement to look for risks which include the possibility of cascading consequences (snowball effect) or consequences which become an event and thus a source of risk which can impact on some other set of objectives (or risks).  2) There is also a need to highlight that significant risk may still exist even though an event pathway can not be identified. It is sufficient to identify the consequences without the risk source.	Add a new line "Risk identification should include examination of the follow on effects of particular consequences either in terms of the set of objectives under consideration or the effect on some other set of objectives and therefore risks."  Add a further new line "In considering risks to the resilience of an organisation, risk identification should include severe consequences even though the risk source or event pathway may not be able to be identified."	459.
US	6.5.3	479	Te	The management of risks associated with rare catastrophic events (e.g a hurricane) and long latency periods (exposure to cancer-causing agents) occur over a time frame that may be different from other management processes. Individual stakeholders may be unaware of the risks until irreversible damage is done. The treatment and management of such risks needs to be explicitly addressed to ensure integration into the organization's overall management system.	For example: "The management of risks associated with rare catastrophic events (e.g a hurricane or tsunami) and long latency periods (exposure to cancer-causing agents) occur over a time frame that may be different from other management processes. Individual stakeholders may be unaware of the risks until irreversible damage is done. The treatment and management of such risks should be explicitly addressed to ensure integration into the organization's overall management system."	460.
IE	6.4.2	482	Te	There is no apparent mention of the risks associated with incomplete information or predictions. The risk	Add sentence. "In the case of any information used for risk identification which is subjective or	461.

				identification should be based on "precautionary principles"	predicted, a precautionary approach should be used and such areas of risk prioritised for more frequent review."	
IE	6.4.2	482	Ed	English	Replace word "suitable" with " <b>appropriate</b> "	462. Accepted
AU	6.4.2	483	ed	Poor English. Also one does not always identify events first. One may identify consequences then think how it might happen.	Change "After" to "As well as"	463. Accepted
AU	6.4.2	483	te	Suggested improvement to emphasis the benefits of a team approach and stakeholder involvement.	Insert a new sentence saying "A team approach will often enhance the integrity of the process." After "risks"	464.
TC98	6.4.2	L.483	te	"People with appropriate knowledge" can be explained as "expert".	Review as "People with appropriate knowledge: expert"	465.
AU	6.4.2	485	ed	All significant consequences as well as causes are considered.	Change "All significant causes should be considered." to "All significant causes and consequences should be considered."	466.
UK	6.4.2	485	Te	The final sentence requires that all significant causes be considered. Causal chains extend backwards in time without practical limits, and any event in the parent set of an event may be significant. Clearly the requirement of the standard is not achievable as stated.	Delete: "All significant causes should be considered".	467.
IE	6.4.3	487-489	Ed	English. Poorly constructed sentence.	Alternative. "Risk analysis provides an input to risk evaluation, <b>informing</b> decisions on whether <b>or not</b> risks need to be treated and on the most appropriate risk treatment strategies and methods."	468. Accepted
CN	6.4.3	487	te	Vague and useless.	Delete. <del>Risk analysis is about developing an understanding of the risk.</del>	469.
AU	6.4.3	489	te	A major role for risk analysis is not mentioned here: the distinguishing of options where uncertainty exists.	Add a new sentence: "Risk Analysis can provide an input to making decisions where choices must be made and the options involve different types and levels of risk"	470.
CN	6.4.3	493-494	ed	The relationship between this sentence and the others in this paragraph should be made clearer.	Existing risk controls and their effectiveness should <u>also</u> be taken into account.	471. Accepted

ES	6.4.3 Risk analysis	493	te	"Existing risk controls and their <b>effectiveness</b> should be taken into account." To be consistent with rest of the rest of the document, it is necessary to add " <b>efficacy and efficiency</b> ".	"Existing risk controls and their effectiveness, <b>efficacy and efficiency</b> should be taken into account."	472.
IE	6.4.3	494	te	When conducting a hazard analysis (7.4 – ISO 22000) Clause 7.4.4 d) required the likelihood of failure in the functioning of a control to be assessed – e.g. the likelihood of failure to be calculated	Existing risk controls and their effectiveness or likelihood of failure should be taken into account	473.
CN	6.4.3	495-497	te	Mismatch. How to <b>use</b> a risk assessment <b>output</b> ?	Suggest: ...and the purpose for which the risk assessment <b>output method</b> is to be used.	474.
IE	6.4.3	495-498	Te	Intent of statement is not clear Surely how likelihood and consequence are expressed must remain consistent for a particular risk context.	Modify sentence. "The way....level of risk <b>may</b> vary according to the <b>risk context</b> , the information available..."	475.
AU	6.4.3	499	ed	It's the determination of the level of risk, not of risk. Also risk is singular, not plural.	Insert "the level of" before "risk"  Change "their" to "its"	476. Accepted
US	6.4.3	499	ed	Risk is singular, so "their" should be "its"	Replace the word "their" with "its"	477. Accepted
NZ	6.4.3	500	ed	Language	Change "if" to "as"	478.
UK	6.4.3	500-501	Te	Communicating confidence in risk assessments is to be done 'if required'. Surely this is something to be encouraged rather than left to some unspecified party to request?	Replace "if required" with "as appropriate"	479.
AU	6.4.3	501 and 502	te	Another very important consideration is the level of uncertainty that exists in the allocation of consequence and likelihood levels and the associated level of risk. In other words, data uncertainty.	Change: "Factors such as divergence of opinion among experts or limitations on modelling should be stated and may be highlighted" To: "Factors such as divergence of opinion among experts, uncertainty or lack of available information or limitations on modelling should be stated and may be highlighted"	480.
US	6.4.3	503	Te	The quality of the information being used in the risk assessment process is an important consideration and should be mentioned to add strength to the standard.	Add the following at the end of the paragraph that starts at line 507: "The risk analysis needs to consider factors related	481.

				Data precision is an important issue.	to the quality and quantity and uncertainty of information and data available and its applicability to current conditions."	
DE 018	6.4.3	504 to 507	te	The statement that in corporate practice a qualitative assessment of risks is first used which is then followed later by a quantitative assessment of single risks (margin no. 505-507) does not reflect best practice and, as a statement which is not further specified or supported, seems to be not suitable for a standard.	Delete the corresponding sentence, so that lines 504 (beginning with "Analysis can be...") to 507 read as follows: "Analysis can be qualitative, semi-quantitative or quantitative, or a combination of these, depending on the circumstances. When possible and appropriate, one should undertake more specific and quantitative analysis of the risks."	482.
US	6.4.3	504-505	te	The term "semi-quantitative" is not helpful nor is it much used, at least outside of A-NZ. It confuses the essential differences between qualitative and quantitative methods. A "semi-quantitative" approach is just putting numbers to the probability and impact levels of very low, low, moderate, high and very high that are used in qualitative risk analysis.. Calling it "semi-quantitative" implies that it is part-way between purely qualitative and purely quantitative, but that is not the case – it is still a qualitative analysis. This does not make the analysis even remotely a quantitative analysis, e.g., a simulation approach	Delete semi-quantitative.	483.
NZ	6.4.3	507	ed		Delete words "one should"	484. Accepted
AU	6.4.3	508 and 511	te	Likelihood as well as consequences can be determined by modelling	Insert: "and their likelihood" after "Consequences" in line 508 Insert: "or likelihoods" after "consequences" in line 511	485.
CA 10	6.4.4	513-514	ed	The intent of the statement is confused by the sentence structure. A suggested improvement is proposed.	Modify lines to read ( <b>Bold is insert</b> ):  The purpose of risk evaluation is to assist in making decisions, based on the outcomes of risk analysis, about which risks need treatment <b>and the priority for to prioritize</b> treatment	486.

					implementation	
UK	6.4.4	513	Te	The basic premise of this section is wrong. It makes little sense to decide on whether to implement more controls or not without considering the costs of potential controls. Most controls in place today are worthwhile, but not individually necessary.	Change to: The purpose of risk evaluation is to assist in making decisions about which risks need treatment and to prioritize treatment implementation. Reconsider the underlying logic of the approach in the standard and replace it with something that makes more sense. Some decisions may be motivated by legal imperatives, so this mechanism should remain, but many decisions will be made on some form of cost-benefit basis. This should be reflected clearly throughout the standard. The paragraph at line 541 contains a lot of the logic needed and this should be reflected throughout the standard.	487.
AU	6.4.4	514	ed	Remove ambiguity	Insert "and" between "treatment" and "to"	488.
AU	6.4.4	514	ed	Poor English	Change: "treatment to prioritise treatment implementation" to: "treatment and their priority for attention".	489.
IE	6.4.4	514	Ed	English	Insert word "...treatment <b>and</b> to prioritise..."	490.
NZ	6.4.4	514	te	Not correct. Evaluation identifies need for treatment. Priorities arise from consideration of treatment options. In any event, the question of whether and when are different issues	Delete all words after treatment.	491.
UK	6.4.4	514	Ed	Needs clarity	Add 'and' after 'treatment'	492.
US	6.4.4	514	ed	Add the word 'and' after 'treatment'.	Add the word 'and' after 'treatment'.	493.
AU	6.4.4	516	te	Risk evaluation just involves a decision about those risks that deserve treatment. The decision whether treatment actually takes place is part of 'risk treatment' and depends on cost benefit analysis.	Change "should be treated" to "should be considered for treatment"	494.

IE	6.4.4	516	Te	Accuracy.	Replace words. " does not meet risk criteria,.. " with <b>"is outside the tolerable level"</b>	495.
US	6.4.4	516	ED	Grammar	In the phrase "the risk should be treated to change "the" to "then".	496.
UK	6.5.1	517	Te	Clarity and improve meaning	Add sentence at the end of the para: "if the level of risk does meet risk criteria it may still be treated if worthwhile."	497.
CN	6.4.4	518-519	te	Need better wording. What does "parties" mean here ? Maybe "parts" is better ?	Replace "parties" with "parts".	498.
DE 019	6.4.4	519	te	Should is inappropriate. It suggests that following the International Standard has a higher priority than to follow legal requirements. This is a requirement, therefore a shall has to be used. Nevertheless shall can not be applied to "other requirements".	Change sentence to : "Decisions <b>shall</b> be made in accordance with legal requirements. Regulatory and other requirements <b>should be taken into account.</b> "	499.
NZ	6.4.4	519	ed	Improve clarity	Change 'the organisations that benefit' to 'the organisation that benefits'	500.
ES	6.4.4	523-5244	te	The terms "risk appetite" and "risk attitude" are used in ISO DIS 31000 as synonyms ("This decision will be influenced by the organization's <i>risk appetite or risk attitude</i> and the risk criteria that have been established").	It is proposed to delete the term risk attitude as considered unnecessary and introduces confusion.	501.
DE 020	6.4.4	523	te	"Risk appetite" and "risk aversion" are the two aspects of "risk attitude". Consequently, only the latter, more general term should be mentioned here (see line 278).	Rewrite as follows: ... by the organizations <del>risk appetite or</del> risk attitude and the ...	502.
US	6.4.4	523	ED	Grammar	Replace "appetite" with "risk tolerance".	503.
NZ	6.5.1	527	te	Better explain the relationship of treatment and control (also see proposed change to definition of control in Guide 73)	Add new sentence: "Once implemented, treatments add to or modify the risk management controls."	504.
UK	6.5.1	528-530	Te	Clarity and improve meaning	Replace paragraph with: "Risk treatment includes assessing alternative risk treatments until either risk criteria are met and no further improvements are considered worthwhile or risk criteria are not met and no further improvements are possible"	505.
CN	6.5.1	528	ge	Confused expression.	Add the phrase "result of ". Read: "Risk treatment involves a cyclical process of	506.

					assessing a <u>result of</u> risk treatment;...”	
ZA	6.5.1	528	Ed	Sentence is confusing	Risk treatment involves a cyclical process of assessing the effectiveness of a risk treatment;	507.
AU	6.5.1	529	ed	It is the effectiveness of the treatment which is assessed, not the effect.	Change “effect” to “effectiveness”	508.
AU	6.5.1	530	ed	This line is superfluous. Line 528-529 mention deciding if the risk is tolerable.	Delete line 530, “until the residual....”	509.
CA 11	6.5.1	530	ed	Sentence can be improved by removal of unneeded word “reached”	<u>Modify line to read (Bold is insert):</u> until the residual risk <del>reached</del> complies with the organization’s risk criteria.	510.
IE	6.5.1	530	Te	Accuracy.	Replace words: “complies with the organization’s risk criteria” with “ <b>is within the organization’s tolerable risk level</b> ”	511.
FI	6.5.1 General	532	te	To add a line to highlight the need to manage opportunities	- Utilizing the recognized opportunities	512.
NL	6.5.1	532	ed	The word options already includes possibilities; therefore the word ‘can’ is redundant	Delete ‘can’: The options include the following:	513.
FI	6.5.1 General	533	ed	To having a stronger word make a conscious decision what to with a risk	- accepting the risk by choice	514.
CH	6.5.1	534	Te	This ‘option’ is unclear and confusing. Also it disturbs the flow of the usual treatment methods (avoid, reduce, etc.). It needs to be cleaned up and placed at the end of the list.	Delete the content of line 534, and after line 539 add a new option with the wording: “- <u>adopt activities with identified and known increased risk with positive outcome.</u> ”	515.
BR2 8	6.5.1	534	te	The text is not ease to understand. Unless it has another special importance, and as the other clauses talks about the major treatments forms.	Exclude line: “seeking an opportunity ...”	516.
FR	6.5.1	Line 534	Te	<p><u>“Seeking an opportunity ....to create or enhance the risk” is not a risk treatment.</u></p> <p>This sentence is not consistent with the statements line 528 &amp; 529 :Risk treatment involves a cyclical process of assessing a risk treatment; deciding whether residual risk levels are tolerable or not; if not tolerable generating a new risk treatment; and accessing the effect of that treatment until the residual risk reached complies with the organization’s risk criteria</p>	<p>Cancel the line 534 from this paragraph.</p> <p>This statement related to financial or economical risk is specific. It could be considered as a new risk and can be put (if necessary) in §6.4.2 “Risk identification”.</p> <p>Or modify as follow :</p> <p>Seeking an opportunity... to create, enhance or</p>	517.

					<u>reduce</u> the risk	
IE	6.5.1	534	Ed	... "with an activity likely to create or enhance the risk". Enhance does not sound the right word.	Change to ... "with an activity likely to worsen the risk or create new risks".	518.
BR2 7	6.5 / 6.5.1	534	ed	- "seeking an opportunity" by deciding to start or continue... is hard to understand and not easily translated to other languages.	discuss an alternative wording.	519.
AU	6.5.1	536	ed	The dot point "changing the nature and magnitude of the likelihood" does not make sense.	Replace: "changing the nature and magnitude of the likelihood" with "changing the likelihood".	520.
NZ	6.5.1	537	ed	For consistency with 536 but also make clear that likelihood relates to the likelihood of the consequences	1) Add "nature and magnitude of" before "the" 2) Change the order of 536 and 537	521.
SE	6.5.1	537	Ed		Add "...the nature and magnitude of" as in previous bullet (row 536)	522.
NZ	6.5.1	After 539	te	The Standard should flag the fact that most risk treatments have inherent weaknesses / limited reliability and suggest consideration of multiple layers of treatment (the "defence in depth" concept	Add new para: "The inherent reliability of risk treatments should be considered. Depending upon the significance of the change in risk level that is to be achieved, multiple layers or a mix of treatments may be required in order to achieve the required reliability.	523.
SE	6.5.1	539	Ed		Change "choice" to "informed decision"	524.
US	6.5.1		te	Add "financing the risk"		525.
AU	6.5.2	542	ed	Punctuation required.	Insert comma after "derived"	526. Accepted
DE 021	6.5.2	542	ed	Improve understanding of sentences	Add "like" after requirements to read as follows: "... against the benefits derived having regard to legal, regulatory, and other requirements <b>like</b> social responsibility and the protection of the natural environment."	527. Accepted
AU	6.5.2	545	ed	typo	Change "...considered an applied ..." to "...considered and applied ...".	528. Accepted
BR2 9	6.5.2	545	ed	Typing mistake on the sentence "...can be considered an applied..."	...can be considered <b>and</b> applied...	529. Accepted
CA 12	6.5.2	545	ed	Missing "d" in and	<u>Modify line to read (Bold is insert):</u> but rare (low likelihood) risks. A number of treatment options can be considered <b>and</b> applied either individually	530. Accepted

FR	6.5.2	Line 545	ed	Typing error	"... can be considered <del>an</del> and applied either individually ..."	531. Accepted
IE	6.5.2	545	Ed	Missing letter	Correct spelling of "and"	532. Accepted
JP	6.5.2	545	ed	The "an" of "...considered <u>an</u> applied..." is a mistake of "and".	Change an to " <b>and</b> ". This is to say: A number of treatment options can be considered <b>and</b> applied either individually or in combination.	533. Accepted
NZ	6.5.2	545	ed	error	Change "an applied" to "and applied"	534. Accepted
UK	Selection	545	Ed	Improve English'	Insert 'and' after 'considered' not 'an	535. Accepted
US	6.5.2	545	ed	improper word usage	change word "an" to "and"	536. Accepted
UK	Selection	546	Ed	Improve clarity	Add ' normally' before 'benefit' and 'from' after it.	537. Accepted
AU	6.5.2	547	te	Stakeholder values and perceptions affect both whether to treat risk and treatment option selected	Insert "deciding whether to treat risk and" After "When"	538.
ES	6.5.2 Selection of risk treatment options	549, 550	te	Though equally <b>effective</b> , some risk treatments can be more acceptable to stakeholders than others. <b>Efficient</b> seems to be a better choice. Substitute <b>effective</b> for <b>efficient</b> .	Though equally <b>efficient</b> , some risk treatments can be more acceptable to stakeholders than others.	539.
US	6.5.2	549	Te	When stakeholders are impacted by risk treatment options, they should be included in the decision process. This is not reflected as currently written.	On line 549, after organization, insert, "or with stakeholders" Delete "areas".	540.
UK	Selection	550	Ed	Improve English	Add ' some' before stakeholders' and 'to' before 'others'	541. Accepted
DE 022	6.5.2	551	te	Limiting resources cannot be an excuse for deciding against risk mitigation in the case of safety relevance or when legal regulations are concerned.	Delete the first part of the given sentence to read as follows: " <del>If the resources for risk treatment are limited,</del> The treatment plan should clearly identify the priority order in which individual risk treatments should be implemented."	542.
FR	6.5.2	line 551	te	"If the resources for risk treatment are limited, the treatment plan should clearly identify the priority order in which individual risk treatments should be implemented"  Even if these last ones are infinite (theoretical), The organization should also look to improve its efficiency and	In both cases the organization should prioritize  Delete " If the resources..... are limited "	543.

				effectiveness and consequently to identify priorities.		
US	6.5.2	551	Te	Resources are ALWAYS limited.	Delete the first phrase and begin sentence with “The treatment plan should clearly...”	544.
UK	Selection	553&4	Te	Redundant / unhelpful sentence	Delete sentence beginning : ‘A significant risk...’.	545.
CA 13	6.5.2	557-558	ed	Creation of a new sentence rather than a run on sentence improves the text.	<u>Modify lines to read (Bold is insert):</u> These secondary risks should be incorporated into the same treatment plan as the original risk and not treated as a new risk., <del>and</del> The link between the two risks should be identified.	546. Accepted
UK	Selection	558	Ed	Improve English	Add ‘and maintained’ to the sentence’s end.	547. Accepted
US	6.5.2	559+	Te	This para is not really in the right location. It does not pertain to the selection of risk treatment options but more to what needs to occur after the option(s) has been selected.	Move to more appropriate location or create new location. Create new heading “Communications Residual Risk”.	548.
NL	6.5.3	565-571	ed	Put the indents in a logical order	Re-order as follows: — expected benefit to be gained; — persons who are accountable for approving the plan and those responsible for implementing the plan; — proposed actions; — resource requirements; — performance measures and constraints; — reporting and monitoring requirements; and — timing and schedule.	549.
AU	6.5.3	565	ed	Insert word	Insert “the” before “expected”	550. Accepted
AU	6.5.3	566	te	The risk treatment plan should explain the reasons for decision	Insert new dot point “ - reasons for selection of treatment options”	551.

SE	6.5.3	568	Te		Add "...proposed actions and controls"	552.
IE	6.5.3	570	Ed	"resource requirements" should include the idea of contingencies	"resource requirements including contingencies; and"	553. Accepted
AU	Contents and 6.6	37 574	ed	"Monitoring and Review" is bad English. They are intended as nouns (as in "Communication and Consultation") but as both "monitoring" and "review" are also verbs, it causes confusion. We suggest either "Monitor and Review" or "Monitoring and Reviewing" in all cases.	Use verbs instead of nouns for general commentary – as we do with "understanding", "implementing", "establishing" etc., but use nouns for actual steps in the RM process – as we do with "Risk identification", "Risk analysis" etc.	554.
NZ	6.6	575	te	Make clear that monitoring and reviewing are two different requirements	Insert "Both" at the beginning of the line	555.
IE	6.6	578	Te	One of the key aspects of risk management is to establish indicators which can be used as precursors of a more serious event. The obvious example is "near misses" being reported rather than waiting for a major event. In monitoring, the idea of setting up appropriate precursors or indicators should be established.	- recording and analysing near misses and/or indicators which can be used as pre-cursors for more critical events (particularly those where there is zero tolerance).	556.
NL	6.6	579-583	ed	Re-order indents in a more logical order	Replace line 582 to before 579 to become the first indent, because that is the main focus of risk monitoring and review processes in an organization	557.
AU	6.6	580	te	Risk criteria should also be subject to monitor and review.	Insert "risk criteria and" after "changes to"	558.
AU	6.6	581	te	An important purpose of monitoring has been missed	Add dot point after line 578 " - Obtaining further data for improved risk analysis"	559.
Es	6.6 Monitoring and review	582	te	"ensuring that the risk control and treatment measures are <b>effective</b> in both design and operation" To be consistent with rest of the rest of the document, it is necessary to add " <b>efficient</b> ".	"ensuring that the risk control and treatment measures are effective <b>and efficient</b> in both design and operation"	560.
SE	6.6	582	Ed		Risk controls (plural)	561. Accepted
ES	6.6	583	ge	embedding and continual improvement ("closing the loop") not identified as part of the risk management <b>process</b> (only mentioned in clause 5 in relation to the risk management framework).	Add a continual improvement step step to the process after line 583 or extend the monitoring step.	562.
AU	6.6	584	te	Why is progress in implementing treatment the only performance measure mentioned? This could be mentioned as an example but it needs to be more general. There are many process and outcome indicators that could	Replace: "Actual progress in implementing treatment plans provides" with	563.

				be monitored to provide performance measures.	"Data from monitoring can provide"	
NZ	6.6	584	ed	Redundant and misleading	Delete "actual"	564. Accepted
AU	6.6	587-588	ed	Note – regular checking is periodic. Things which are ad hoc are, by nature, unplanned. The English can be improved and the meaning enhanced. There is no real difference between the words "regular" and "periodic".	Change to: "Monitoring and review should be planned. This can involve checking and surveillance on a regular or ad hoc basis."	565.
CA 14	6.6	587-588	ed	Present text is somewhat mixed up – note that it would be difficult to monitor something which is not already present so that idea is redundant.	<u>Modify line to read (Bold is insert):</u> Monitoring and review can involve regular checking or surveillance <b>and of what is already present</b> or can be periodic or ad hoc. Both aspects should be planned.	566.
IE	6.6	587-588	Te	First line states that review can be regular or can be periodic or ad-hoc. This seems confusing. Surely best practice should be included in this guidance document which would be to regularly review and monitor what is present to see if it is working	Change to "Monitoring and review <b>should</b> involve regular checking of is already present. Monitoring and review activities should be planned.	567.
NL	6.6	587-588	ed	Clumsy sentences; rephrase as proposed	Rephrase sentence as follows: Monitoring and review <u>should be planned and can</u> involves regular checking or surveillance of what is already present. <del>or</del> <u>It</u> can be periodic or ad hoc. <del>Both aspects should be planned.</del>	568.
UK	Monitoring & Review	587 - 588	Ed	Improve English	Delete 'can involve' and replace with 'should include both' Delete 'or can be' and replace with 'as well as'.  Add 'testing' after 'ad-hoc' Delete last sentence	569.
UK	Monitoring & Review	588	Ed	Suggesting that all testing need be planned may be (unintentionally) limiting	Delete last sentence	570.
ACOS	6.7	591	Te	Not only recording of RM process, we have to archive at least all high risk topics for verification and lessons learned. (see also line 91)	Change the title of the sub-clause into the following. Documentation of the risk management process	571.
BE	6.7	591	Ge	591 - ISO does not cover adequately the "documentation	Revise and include it in the wording	572.

				process” which is also lacking in “fig 3”		
IE	6.7	591	Ed	Do not this the current title reads well or relates to the context of this section	Re-word to "Traceability within the Risk Management Process".	573. Accepted
FI	6.7 Recording the risk management process	594	te	To highlight the fact that improved risk management is based on organizational learning rather than to the individual mitigation actions	- organization's needs for continuous learning	574.
DE 023	6.7	600	te	Take into account the wording given in line 202/203.	Rewrite line 600 as follows: "— sensitivity and limitation of information."	575.
IE	Annex A	General	Te	The attributes described here are very limited and only address continual improvement, accountability for decision making and stakeholder engagement. The standard outlines a framework and process for Risk management. It would be most useful for users to know that are the attributes of a good framework and process for RM here	Develop further attributes of good practice for RM framework and RM process as outlined in the standard.	576.
US	Annex A	606-609	Ed	This text is well written and should appear in the body of the document, not the Annex.	Move in the introduction section after line #97.	577.
DE 024	A.1	608	ed	Improve wording.	Substitute maximize by “optimize” to read the whole paragraph (lines 606 to 608) as follows: "The ability to manage risk is one of the core competencies of any organization and its employees. Risk management methods and tools assist any organization to plan and implement concrete actions and programs to <del>maximize</del> optimize their opportunities and to control their threats."	578.
NL	A.1	610	te	The aim should not be the highest level of performance but one that is appropriate to the criticality of decisions to be made	Replace 'highest' with 'appropriate'.	579.
US	A.2	615, 624, 643	ed	Three of the five attribute characteristics of enhanced risk management are given by incomplete sentences similar in style to a definition list. The other two are done in	A.2.1 An emphasis is placed on continual improvement in risk management through... A.2.2 Enhanced risk management is comprehensive,	580. Accepted

				complete sentences (complete thoughts). I believe they should be done consistently to aid the reader in understanding the concepts. Revise as shown.	... A2.4 Enhanced risk management includes continual communications...	
AU	A.2.2	624,626,629	ed	"risk controls" is a clumsy construct and is not consistent with Guide 73.	Change all "risk controls to "controls"	581. Accepted
AU	A.2.2	625	te	Word required	Insert "accountability" after "accept"	582. Accepted
AU	A.2.2	631	ed	Incorrect term	Change "introduction" to "induction"	583. Accepted
ES	A.2 Attributes	641, 642	te	"for effective and prudent governance." <b>Prudent</b> looks redundant. If it is <b>effective</b> , it will also be prudent. Suppress " <b>prudent</b> ".	"for effective governance."	584.
IE	A.2.4	645-647	Ed	This sentence is too long and the intent is not clear. Reword	Change to: "Stakeholders are clearly regarded as an integral and essential component of RM. Communication with stakeholders takes place at each activity of the RM process. Communication is rightly seen ...."	585. Accepted
AU	A.2.4	646	ed	Statement too long winded and repeats itself from earlier in the sentence.	Remove "so that communication with stakeholders can" replace with "should".	586. Not accepted due to acceptance of comment 585
IE	A.2.5	656-659	Te	The indicators here are very subjective. This section should be much stronger on what is expected at top management level	Review and re-word. Should reflect strong commitment by top level management. Indicated by written and endorsed RM policy etc- see RM framework -	587.
AU	A.2.5	658	te	Several policies may relate to risk management	Change "that" to "those"	588.
US	A.2.5	658	ed	Replace "that" with "those"; statements is plural	Replace "that" with "those"	589. Accepted
NZ	Annex A	601 et seq	te	Accepting that the WG wishes to include some risk management performance indicators, NZ considers those chosen must be succinct and sufficiently generic to be relevant to all forms of organisation and not give the impression of cherry-picking particular sections of the standard. As presently written, some imply a need for a highly documented risk management "superstructure" whereas the thrust of the standard is that risk management activity should be integrated into general management –	Amend line 604 to read "Attributes of effective risk management" Delete the remainder of the Appendix and substitute as follows: <b>A.1 Key Outcomes</b> A1.1 The organisation has a current, correct and comprehensive understanding of its risks A1.2 The organisation's risks are within its risk	590.

				<p>the style of which varies between organisations. By contrast, the flavour of the draft as written appears to have particular types of organisation in mind and does not, for example, seem to contemplate very agile organisations or small organisations attempting to minimise process while still staying highly focused on the objectives. NZ therefore proposes that the Appendix be extensively re-worded into short but over-arching outcome statements supported by key risk management characteristics around which specific measures can be developed that are appropriate to the organisation and its culture . It is also considered that the Annex is misnamed as the word “enhanced” is relative and implies that something less may also be fit for purpose whereas surely what is fit for purpose is that the standard is applied in its entirety. In setting performance measures, the standard should use the criteria of “effectiveness” as this will be a question of fact and not relativity. It also avoids implying that some parts of the standard are less important than others. Finally, the contents of Appendix A should be expressed briefly rather than at length to convey a simple conceptual grasp. This will help address a common problem whereby organisations expend considerable effort on risk management activity without understanding its purpose.</p>	<p>criteria</p> <p><b>A.2 Risk Management Characteristics</b></p> <p>A2.1 Risk is anticipated rather than reacted to, with decisions on risk treatment made concurrently with the decisions that give rise to or modify the risk.</p> <p><b>OR</b> Decisions explicitly consider risk.</p> <p>A2.2 Risk management activities are an established part of normal management activities and are reflected in the organisation’s allocation of responsibilities, personal development, documentation and culture.</p> <p>A2.3 There is appropriate risk management communication and consultation with stakeholders</p> <p>A2.4 Context, risks and risk controls are routinely monitored according to their relative importance.</p> <p>A2.5 There is a general acceptance that effective risk management is a core competency critical to achieving objectives and accordingly, risk management performance is both management driven and an integral part of the organisation’s system of individual performance assessment.</p>	
FR	ANNEX A	A.2 Last paragraph French version		<p>Editorial mistake</p> <p>"Cela doit ressortir des discours tenus par les <del>des</del> dirigeants, ainsi que..."</p>	<p>Replace by the following</p> <p>Cela doit ressortir des discours tenus par les dirigeants, ainsi que...</p>	591.
NL	Bibliography		ed	This is rather arbitrary list and will soon become outdated	Delete the bibliography	592.
SE	Bibliography		Ge	The secretariat should go over the list of references and see which ones are really relevant.	<p>Reference 9, 10, 11, 12, 13 and 14 should be removed.</p> <p>AS/NZS 4360:2004 should be added since it has had a major influence on this standard.</p>	593.
UK	Bibliography			Review bibliography for relevant documents. There	Delete or list separately such as motorcycles,	594.

				are industry and sector specific documents that should not be included.	and medical devices.	
US	Bibliography		Te	ISO/IEC 16085 is an existing general risk management standard.		595.
US	Bibliography		Te	“financial performance” risks should be elaborated in the Bibliography addition	Add to Bibliography: <i>Internal Controls – Integrated Framework</i> , COSO 1992	596.
US	Bibliography		Te	“financial” risks should be elaborated in the Bibliography addition	Add to Bibliography: <i>Internal Controls – Integrated Framework</i> , COSO 1992	597.
US	Bibliography		Te	Risks involving “legally required disclosures;” include financial disclosure; should be elaborated in the Bibliography addition	Add to Bibliography: <i>Internal Controls – Integrated Framework</i> , COSO 1992	598.
US	Bibliography		Te	Risks involving “legally required disclosures;” include financial disclosure; should be elaborated in the Bibliography addition	Add to Bibliography: <i>Internal Controls – Integrated Framework</i> , COSO 1992	599.
US	Bibliography	81	Te	“financial” risks should be elaborated in the Bibliography addition	Add to Bibliography: <i>Internal Controls – Integrated Framework</i> , COSO 1992	600.
US	Bibliography	101	Te	“financial reporting” risks should be elaborated in the Bibliography addition	Add to Bibliography: <i>Internal Controls – Integrated Framework</i> , COSO 1992	601.
UK	Bibliography	661-702	Te	Essential references are missing.	Add reference to OHSAS 18001 2007, eg in its BS-OHSAS form. Also include ISO:  27005 27799 29321	602.

					29322 80001 8002 14001 27011 PAS 22399	
CH	Bibliography	661	Te	The list does not contain several significant ISO Standards which even contain the word 'risk' in the title. A more complete list would be of benefit to users of the Standard.	Add other ISO Standards from the attached list.  (This list is developed from a search on <a href="http://www.iso.org">www.iso.org</a> for standard issued or under development with 'risk' in the title.)	603.
FR	Bibliography	Line 661	te	ISO 22000:2005 which specifies requirements for a food safety management system shall be added to the bibliography.	Add ISO 22000:2005 Food safety management systems -- Requirements for any organization in the food chain	604.
US	Bibliography	661	Ge	Add reference to COSO Enterprise Risk Management guidelines	<i>Enterprise Risk Management — Integrated Framework</i> , by COSO, 2004	605.
US	Bibliography	661	Ge	Add reference to COSO <i>Internal Controls – Integrated Framework</i>	<i>Internal Controls – Integrated Framework</i> , COSO 1992	606.
BR3 0	Bibliography	662	te	Insert ISO/IEC 27000 Information Security Standards	ISO/IEC 27001: 2005 - <b>Information technology -- Security techniques -- Information security management systems -- Requirements</b>  ISO/IEC 27002: 2005 - <b>Information technology -- Security techniques -- Code of practice for information security management</b>  ISO/IEC 27005:2008 – <b>Information technology -- Security techniques -- Information security risk</b>	607.

					<b>management</b>	
IE	Bibliography	703	ed	Inclusion of ISO 22000 – Food Safety Management Standard due to clause reference 7.4 above	703[27] ISO 22000:2005 Food Safety Management Systems – requirement for any organisation in the food chain	608.
FR	Introduction	Ligne 120	ed	<b><u>French version :</u></b> Translation issue  The term « consignment » is not the correct translation of the term « reporting ».	Keep reporting in the French version of the document	609. Comment Number 609 to the last comment will be considered when translating FDIS version into French.
FR	Introduction	Page vi french version	Ed	<b><u>French version :</u></b> Translation issue  "Toutefois la direction pourrait envisager de revoir sérieusement ses pratiques et processus ..."	Delete "sérieusement"  Replace by "de manière critique"	610.
FR	Introduction (page vii)	Page vi french version	Ed	<b><u>French Translation</u></b>  Missing word	Correct the sentence as follow :  "Certains domaines de management du risque, notamment en matière de sécurité, de santé des personnes et d'environnement, imposent des critères reflétant un refus <u>avec</u> des conséquences négatives."	611.
FR	Introduction	Page VII French version	Ed	<b><u>French version</u></b>  Translation issue  "Vis-à-vis" means "en face de" it is not a correct translation of	Modify the sentence as follow  ... à remplir ses obligations légales et réglementaires ou <u>à l'égard</u> de normes internationales, ainsi que d'améliorer ses performances.	612.
FR	Introduction	Page VII Figure 1 French	Ed	<b><u>French version</u></b>  Writing mistake for the word : « principes » instead of "principles"	<u>Modify as follow</u>  <del>Principles</del> Principes de management du risque (article 4)	613.

		version				
FR	1 Domaine d'application	Paragraph after the note French version	Ed	<b>French version</b> Translation issue une large gamme d'activités, de processus, de ....., d'actifs, d'activités opérationnelles et de décision.	Replace " <u>d'activités opérationnelles</u> " by " <u>opérations</u> "	614.
FR	§ Domaine d'application	Paragraph 1 French version	Ed	<b>French version</b> Translation issue "La présente norme internationale n'a pas vocation à servir de base à une certification" is not a correct translation of : :"This international standard is not intended to be used for the purpose of certification"	Modify as follow : « La présente norme internationale <b><u>n'est pas destinée</u></b> à servir de base à une certification »	615.
FR	2	French version Page 1	Ed	<b>French version</b> Translation : "ISO/CEI Guide 73 Management du risqué" is not correct	Replace by the following : ISO/CEI Guide 73, Management du risque <u>e</u>	616.
FR	4 Principes de management du risque	j) French version	Ed	<b>French version</b> Translation issue The term " révision des résultats" is not a correct translation of the term "review" in this context	Replace : " révision des résultats " par "revue"	617.
FR	5.1	Paragraph 1 Last sentence French version	Te	<b>French version</b> Translation issue The use of the term " responsabilités financières " is very restrictive for this standard which wants to be generic and which can be apply to any public, private, non-profit , organization .The responsibility can also be penal, legal, moral.....	Replace by : Responsabilité ayant obligation de rendre des comptes	618.
FR	5.1	Last paragraph French	Te	<b>French version</b> Translation issue	Replace by the following :	619.

		version		The translation of the following paragraph is not correct : "...Then these should be critically reviewed..."  "il convient que ceux-ci soient sérieusement revus et évalués"	"Il convient que ceux-ci soient revus et évalués de manière critique"	
FR	5.2	1st paragraph French Version	Te	<b>French version</b> Translation issue The translation of by " ainsi que l'établissement d'un plan stratégique rigoureux" is not correct	Replace by  " ainsi qu'une planification stratégique et rigoureuse"	620.
FR	5.2	5th Dash French version	Te	<b>French version</b> Translation issue The use of the term " responsabilités financières " is very restrictive for this standard which wants to be generic and which can be apply to any public, private, non-profit , organization .The responsibility can also be penal, legal, moral...	Replace by : Responsabilité ayant obligation de rendre des comptes	621.
FR	5.3.1	Last dash French version	Te	<b>French version</b> Translation issue The use of the term " responsabilités financières " is very restrictive for this standard which wants to be generic and which can be apply to any public, private, non-profit , organization .The responsibility can also be penal, legal, moral.....	Replace by : Responsabilité ayant obligation de rendre des comptes	622.
FR	5.3.2	Page 5 French version	ED	<b>French version</b> Translation issue ... ; et	Modify as follow : ... ; et il convient que la politique...  or	623.

				Il convient que la politique... Is not correct in French	... . Et il convient que la politique...	
FR	5.3.2	3rd dash French version	Te	<b><u>French version</u></b> Translation issue The use of the term " responsabilités financières " is very restrictive for this standard which wants to be generic and which can be apply to any public, private, non-profit , organization .The responsibility can also be penal, legal, moral...	Replace by : Responsabilité ayant obligation de rendre des comptes	624.
FR	5.3.2	Paragraph 6	te	<b><u>French version</u></b> Translation issue Translation of "appetite" is not correct	Replace "appétit" par " appétence"	625.
FR	5.3.4	Titre French version	ed	<b><u>French version</u></b> Translation issue The use of the term " responsabilités financières " is very restrictive for this standard which wants to be generic and which can be apply to any public, private, non-profit , organization .The responsibility can also be penal, legal, moral...	Replace by : Responsabilité ayant obligation de rendre des comptes	626.
FR	5.3.4	1st paragraph French version	Te	<b><u>French version</u></b> Translation issue The use of the term " responsabilités financières " is very restrictive for this standard which wants to be generic and which can be apply to any public, private, non-profit , organization .The responsibility can also be penal, legal, moral...	Replace by : Responsabilité ayant obligation de rendre des comptes	627.
FR	5.3.4	1st paragraph	Ed	<b><u>French version</u></b> Missing word "celles"	Modify as follow :	628.

		French version			Il convient que l'organisme définisse les responsabilités ayant obligation de rendre des comptes en matière de management du risque, y compris <u>celles</u> concernant la mise en œuvre et la maintenance du processus de management du risque, et s'assure de l'adéquation et de l'efficacité des moyens de maîtrise du risque.	
FR	5.3.4	2 <sup>nd</sup> and 3rd dash French version	Te	<b>French version :</b> Translation issue "Consignation" is not the correct translation of "reporting" "Reporting" is widely used in France	Replace "consignation" by "reporting"	629.
FR	5.3.6	1st paragraph French version	Te	<b>French version :</b> Translation issue "Consignation" is not the correct translation of "reporting" "Reporting" is widely used in France	Replace "consignation" by "reporting"	630.
FR	5.3.4	1st paragraph French version	• Ed	<b>French version</b> Missing word "celles"	Modify as follow :  Il convient que l'organisme définisse les responsabilités ayant obligation de rendre des comptes en matière de management du risque, y compris <u>celles</u> concernant la mise en œuvre et la maintenance du processus de management du risque, et s'assure de l'adéquation et de l'efficacité des moyens de maîtrise du risque.	631.
FR	5.3.6	2 <sup>nd</sup> dash French Version	Te	<b>French version :</b> Translation issue "Rapport" is not the correct translation of "reporting" "Reporting" is widely used in France..	Replace "rapport" by "reporting"	632.

FR	5.3.6	Last paragraph French version	Te	<p><b><u>French version :</u></b></p> <p>Translation issue</p> <p>The term "faciliter" is not the correct translation of "consolidate"</p>	Replace "faciliter" par "consolider"	633.
FR	5.3.7	2 <sup>nd</sup> dash French Version	Te	<p><b><u>French version :</u></b></p> <p>Translation issue</p> <p>"Rapport" is not the correct translation of "reporting"</p> <p>"Reporting" is widely used in France....</p>	Replace "rapport" by "reporting"	634.
FR	5.3.7	4th dash French version	Te	<p><b><u>French version :</u></b></p> <p>Translation issue</p> <p>"Consignation" is not the correct translation of "reporting"</p> <p>"Reporting" is widely used in France</p>	Replace "consignation" by "reporting"	635.
FR	5.5	4th dash French version	Te	<p><b><u>French version :</u></b></p> <p>Translation issue</p> <p>"Rapport" is not the correct translation of "reporting"</p> <p>"Reporting" is widely used in France....</p>	Replace "rapport" by "reporting"	636.
FR	6.1	Figure 3 French version	Ed	<p><b><u>French version</u></b></p> <p>The figure is not consistent with the English version</p>	Modify the figure of the French version to be consistent with the English one	637.
FR	6.2	5th paragraph French version	Te	<p><b><u>French version</u></b></p> <p>"Consignées" is not the right translation of the term "recorded"</p> <p>"il est important que la perception des parties prenants soit identifiée, <b><u>consignée</u></b> et prise en compte dans le processus de décision</p>	<p>Modify as follow:</p> <p>il est important que la perception des parties prenants soit identifiée, <b><u>enregistrée</u></b> et prise en compte</p>	638.

FR	6.2 Communication et consultation	Line 384	te	Do you consider that all organization have implemented change management ?  <b>French version</b> : the translation is not clear	Replace by the following:  Renforcer de manière approprié le management du changement...	639.
FR	6.2 Communication et consultation	Ligne 390 de la version anglaise	ed	<b>French version</b>  Translation issue  The term « consignée » is not a correct translation of the term « recorded »	Replace by the following:  « enregistrée »	640.
FR	6.3.3	Last dash  French version	ed	<b>French version :</b>  Translation issue  "Responsabilités financière" is not the correct translation of "Accountability"	Replace by :  "Responsabilité ayant obligation de rendre des comptes"	641.
FR	6.3.4	1st paragraph last sentence  French version	Te	<b>French version:</b>  Translation could be improved	Replace by the following:  "Cela suppose de recenser les ressources nécessaires, de définir les responsabilités et autorités et de préciser les enregistrements nécessaires."	642.
FR	6.3.5	2 <sup>nd</sup> and 3rd dash  French	Ed	<b>French version</b>  Translation of Likelihood is not correct.	Replace "vraisemblance" by "éventualité"	643.
FR	6.4.2	1st paragraphe 2 <sup>nd</sup> sentence  French version	Te	<b>French version</b>  Translation could be improve:  "a pour objectif de dresser une liste exhaustive" : ce dernier mot semble peu réaliste et peut faire peur aux organismes	a pour but de dresser la liste <b>complète</b> des risques	644.
FR	6.4.2	1st paragraphe	ed	<b>French version</b>	Replace by the following:	645.

		last sentence French version		Translation could be improve « il convient que l'identification inclue les risques que leur source soit ... »	il convient que l'identification incluse <b><u>l'ensemble</u></b> risques, que leur ...	
FR	6.4.3	All clause	ed	<b><u>French version</u></b> Translation issue Translation of "Likelihood" is not correct.	Replace "vraisemblance" by "éventualité"	646.
FR	6.4.4	Last paragraph	ED	<b><u>French version</u></b> Translation issue Translation of "appetite" is not correct	Replace "appétit" par " appétence"	647.
FR	6.5.1	4th dash	ed	<b><u>French version</u></b> Translation issue Translation of "Likelihood" is not correct.	Replace "vraisemblance" by "éventualité"	648.
FR	6 .5.3	5th dash French version	ed	<b><u>French version :</u></b> Translation issue "Consignation" is not the correct translation of "reporting" "Reporting" is widely used in France	Replace "consignation" by "reporting"	649.
FR	6 .6	French version	ed	<b><u>French version :</u></b> Translation issue "Rapport" is not the correct translation of "reporting" "Reporting" is widely used in France	Replace "rapport" by "reporting"	650.
FR	6 .6	Last paragraph French	ed	<b><u>French version</u></b> Translation issue	Replace by the following: « enregistrée »	651.

		version		The term « consignée » is not a correct translation of the term « recorded »		
FR	A.2.2	1st sentence French version	ed	<b>French version :</b> Translation issue "Responsabilités financière" is not the correct translation of "Accountability"	Replace by : "Responsabilité ayant obligation de rendre des comptes"	652.
FR	A.2.2	2 <sup>nd</sup> paragraph last sentence French version	ed	<b>French version :</b> Translation issue "Responsabilités financière" is not the correct translation of "Accountability"	Replace by : "Responsabilité ayant obligation de rendre des comptes"	653.
FR	A.2.2	Last paragraph French version	ed	<b>French version :</b> Translation issue "Responsabilités financière" is not the correct translation of "Accountability"	Replace by : "Responsabilité ayant obligation de rendre des comptes"	654.
FR	Annexe A	A.2.5 Last paragraph French version	Te	<b>French version :</b> Translation issue The translation is not correct « Cette <u>qualité doit</u> être vérifiée » :	Préférer le terme « attribut » Il convient de vérifier les attributs lors ....	655.
FR	A.2.2	1st sentence French version	• ed	<b>French version :</b> Translation issue "Responsabilités financière" is not the correct translation of "Accountability"	Replace by : "Responsabilité ayant obligation de rendre des comptes"	656.

## **Comment No. 159**

### **Annex to NEN comments on ISO/DIS 31000 (Comment No. 159)**

#### **Terms and definitions that should be included in ISO 31000**

The NEN mirror committee considered which terms and definitions should be included in ISO 31000, because they are necessary for a proper understanding of the standard.

The committee did not reach consensus on a single top 10 of terms; following two lists got support and are provided to the TMB/WG on RM for consideration at its next meeting.

#### **List 1 – top 10**

1. Risk.
2. Risk Management Framework.
3. Risk Management proces.
4. Risk Assesment.
5. Risk Identification.
6. Risk Source.
7. Event.
8. Risk Analysis.
9. Uncertainty.
10. Risk Evaluation.
11. Risk Treatment.

#### **List 2 - top 13**

Risk  
consequence  
event  
uncertainty  
risk management  
risk management framework  
risk management process  
external context  
internal context  
risk assessment  
risk identification  
risk analysis  
risk treatment

#### **Additional terms mentioned**

Risk control  
Risk Culture



Date: 2009-09-26.

**To: Secretariat of ISO/TMB/WG/RM**

**Subject: Position paper regarding the restructuring of section 5 – Framework for managing risk in ISO/DIS 31000**

Following a review of ISO/DIS 31000 by the national Risk Management experts group the following position paper was developed. The proposed restructuring of section 5 is to improve the logic and flow of this section. The new re-structured section titles are listed below with any new wording marked in ***bold italics***.

5.0 Framework for managing Risk

5.1 General

**5.2** (previously 5.3) Design of framework for managing risk

**5.2.1** (previously 5.3.1) Understanding the organisation and its context

**5.2.2** (previously 5.2) Mandate and ***establishing management*** commitment

**5.3** (previously 5.3.2) ***Establishing*** Risk Management policy

**5.3.1** (previously 5.3.4) ***Management*** Accountability

**5.4 *Planning and development (New)***

**5.4.1** (previously 5.3.3) Integration into organisational processes

**5.4.2** (previously 5.3.5) Resources

**5.4.3** (previously 5.3.6) Establishing internal communication and reporting mechanisms.

**5.4.8** (previously 5.3.7) Establishing external communication and reporting mechanisms.

**5.5** (previously 5.4) Implementing Risk Management

**5.5.1** (previously 5.4.1) Implementing the framework for managing risk

**5.5.3** (previously 5.4.2) Implementing the risk management process

**5.6** (previously 5.5) Monitor and review of Framework

**5.7** (previously 5.6) Continual improvement of the framework.

The proposed restructuring of the full section including the new section numbering above and using the current DIS wording and line numbers is provided below. The original line number is included so the origin of the wording can be followed from the DIS. Any new wording is also marked in ***bold italics***.

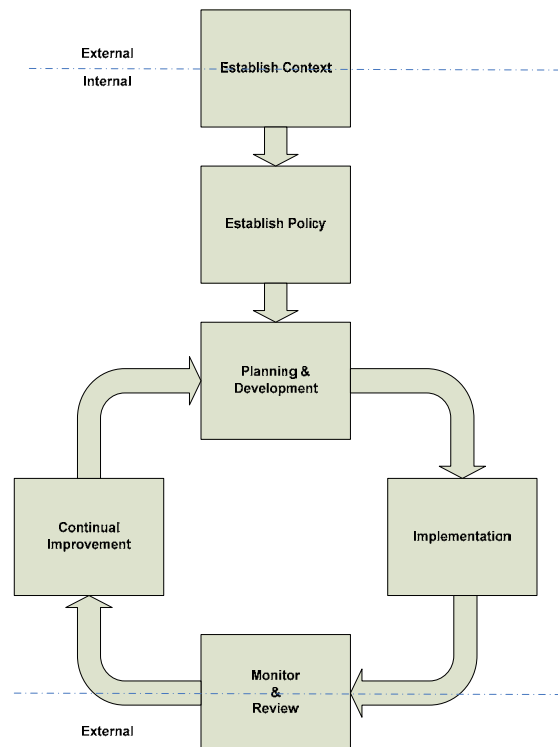
Figure 2 – Components of the framework for managing risk in the DIS has been replaced with a new more simplistic figure. This figure reflects the restructuring of section 5 and incorporates the general titles listed in this section.

**Proposed re-structuring of section 5 of ISO/DIS 31000.**

**5.0 Framework for managing Risk**

**5.1 General**

223 To be successful, risk management should function within a risk management  
224 framework which provides the  
225 foundations and organizational arrangements that will embed it throughout the  
226 organization at all levels. The  
227 framework assists an organization in managing its risks effectively through the  
228 application of the risk  
229 management process (see Clause 6) at varying levels and within specific contexts  
230 of the organization. The  
231 framework should ensure that risk information derived from these processes is  
adequately reported and used  
as a basis for decision making and accountability at all relevant organizational  
levels.  
This clause describes the components of the framework for managing risk that are  
necessary and the way in  
which they interrelate as shown in Figure 2.



**Figure 2 – Components of the framework for managing risk.**

233 This framework is not intended to describe a management system; but rather, it is  
234 to assist the organization to  
235 integrate risk management within its overall management system. Therefore,  
236 organizations should adapt the

235 components of the framework to their specific needs.  
236 If an organization's existing management practices and processes include  
components of risk management or  
237 if the organization has already adopted a formal risk management process for  
particular types of risk or  
238 situations, then these should be critically reviewed and assessed against this  
International Standard as the  
239 basis for determining their adequacy.

## **5.2 (Moved from 5.3) Design of framework for managing risk**

### **5.2.1 (Moved from 5.1.1) Understanding the organization and its context**

254 Before starting the design and implementation of the framework for managing  
risk, it is important to  
255 understand both the internal and external context of the organization since these  
can influence significantly  
256 the design of the framework.  
257 Aspects of the organization's external context include, but not limited to:  
258 — the cultural, political, legal, regulatory, financial, technological, economic,  
natural and competitive  
259 environment, whether international, national, regional or local;  
260 — key drivers and trends having impact on the objectives of the organization; and  
261 — perceptions and values of external stakeholders.  
262 Aspects of the organization's internal context include, but not limited to:  
263 — the capabilities, understood in terms of resources and knowledge (e.g. capital,  
time, people, processes,  
264 systems and technologies);  
265 — information systems, information flows, and decision making processes (both  
formal and informal);  
266 — internal stakeholders;  
267 — policies, objectives, and the strategies that are in place to achieve them;  
268 — perceptions, values and culture;  
269 — standards and reference models adopted by the organization; and  
270 — structures (e.g. governance, roles and accountabilities).

### **5.2.2 (Moved from 5.2 ) Mandate and Establishing management commitment**

241 The introduction of risk management and ensuring its on-going effectiveness  
requires strong and sustained  
242 commitment by management of the organization as well as strategic and rigorous  
planning. Management  
243 should:  
244 — articulate and endorse the risk management policy;  
245 — determine risk management performance indicators that align with  
organizational performance indicators;  
246 — ensure alignment of risk management objectives with the objectives and  
strategies of the organization;  
247 — ensure legal and regulatory compliance;  
248 — assign management accountabilities and responsibilities at appropriate levels  
within the organization;  
249 — ensure that the necessary resources are allocated to risk management;  
250 — communicate the benefits of risk management to all stakeholders; and

251 — ensure that the framework for managing risk continues to remain appropriate.

**5.3 (Moved from 5.3.2) *Establishing Risk Management policy***

272 The risk management policy should clarify the organization's objectives for and commitment to risk

273 management and should specify the following:

274 — links between the risk management policy and the organization's objectives and other policies;

275 — the organization's rationale for managing risk;

276 — accountabilities and responsibilities for managing risk;

277 — the way in which conflicting interests are dealt with;

278 — the organization's risk appetite or risk aversion;

279 — processes, methods and tools to be used for managing risk;

280 — resources available to assist those accountable or responsible for managing risk;

281 — the way in which risk management performance will be measured and reported;

282 — commitment to the periodic review and verification of the risk management policy and framework and its

283 continual improvement; and

284 The risk management policy should be communicated appropriately.

**5.3.1 (Moved from 5.3.4) *Management Accountability.***

294 The organization should ensure that there is accountability and authority for managing risks, including the

295 implementation and maintenance of the risk management process and ensure the adequacy and

296 effectiveness of any risk controls. This can be facilitated by:

297 — specifying who is accountable for the development, implementation and maintenance of the framework for

298 managing risk;

299 — specifying risk owners for implementing risk treatment, maintaining risk controls and reporting of relevant

300 risk information;

301 — establishing performance measurement and internal and/or external reporting and escalation processes;

302 and

303 — ensuring appropriate levels of recognition, reward, approval and sanction.

**5.4 (New Title) *Planning and development***

**5.4.1 (Moved from 5.3.3) *Integration into organisational processes***

286 Risk management should be embedded in all the organization's practices and business processes so that it is

287 relevant, effective and efficient. The risk management process should become part of and not separate from

288 those organizational processes. In particular, risk management should be embedded into the policy

289 development, business and strategic planning and change management processes.

290 There should be an organization-wide risk management plan to ensure that the  
risk management policy is  
291 implemented and that risk management is embedded in all the organization's  
practices and business  
292 processes.

**5.4.2 (moved from 5.3.5) Resources**

305 The organization should develop the practical means to allocate appropriate  
resources for risk management.  
306 should be given to the following:  
307 — people, skills, experience and competences;  
308 — resources needed for each step of the risk management process;  
309 — documented processes and procedures; and  
310 — information and knowledge management systems.

**5.4.3 (moved from 5.3.6) Establishing internal communication and reporting mechanisms**

312 The organization should establish internal communication and reporting  
mechanisms. These should ensure  
313 that:  
314 — key components of the risk management framework, and any subsequent  
modifications, are  
315 communicated appropriately;  
316 — there is adequate internal reporting on the framework, its effectiveness and the  
outcomes;  
317 — relevant information derived from the application of risk management is  
available at appropriate levels and  
318 times; and  
319 — there are processes for consultation with internal stakeholders.  
320 These mechanisms should include processes to consolidate risk information  
where appropriate from a variety  
321 of sources within the organization taking into account its sensitivity.

**5.3.4 (Moved from 5.3.7) Establishing external communication and reporting mechanisms**

323 The organization should develop and implement a plan as to how it will  
communicate with external  
324 stakeholders. This should involve:  
325 — engaging appropriate external stakeholders and ensuring an effective exchange  
of information;  
326 — external reporting to comply with legal, regulatory, and corporate governance  
requirements;  
327 — making legally required disclosures;  
328 — providing feedback and reporting on communication and consultation;  
329 — using communication to build confidence in the organization; and  
330 — communicating with stakeholders in the event of a crisis or contingency.

## **5.5 (moved from 5.4) Implementing risk management**

### **5.5.1 (moved from 5.4.1) Implementing the framework for managing risk**

333 In implementing the organization's framework for managing risk, the organization should:

- 334 — define an appropriate timing and strategy for implementing the framework;
- 335 — apply the risk management policy and process to the organizational processes;
- 336 — comply with legal and regulatory requirements;
- 337 — document justified decision making, including the development and setting of objectives which are aligned
- 338 with the outcomes of the risk management process;
- 339 — hold information and training sessions; and
- 340 — communicate and consult with stakeholders to ensure that its risk management framework remains
- 341 appropriate.

### **5.5.2 (Moved from 5.4.2) Implementing the risk management process**

343 Risk management is implemented by ensuring that the risk management process outlined in Clause 6 is

- 344 applied at all relevant levels and functions of an organization as part of the organization's practices and
- 345 business processes.

### **5.6 (moved from 5.5) Monitoring and review of the framework**

347 To ensure that risk management is effective and continues to support organizational performance, the

348 organization should:

- 349 — establish performance measures;
- 350 — periodically measure progress against, and deviation from the risk management plan;
- 351 — periodically review whether the risk management framework, policy, and plan are still appropriate given
- 352 the organizations' internal and external context;
- 353 — report on risks, progress with the risk management plan and ensure how well the risk management policy
- 354 is being followed; and
- 355 — review the effectiveness of the risk management framework.

### **5.7 (moved from 5.6) Continual improvement of the framework.**

357 Based on the review, decisions should be made on how the risk management framework, policy and plan can

- 358 be improved. These decisions should lead to improvements in the organization's risk management, and risk
- 359 management culture.