

Comments of Lawrence Tannenbaum  
U.S. Army Center for Health Protection and Preventive Medicine

(Mr. Tannenbaum has indicated that his comments represent his own views and not those of his employer.)

- From ERA's beginnings through to the present day, there has never been a means for assessing ecological "risk".

- It doesn't matter that we have no means of assessing ecological "risk"; ecological "risk" is the entirely wrong entity to be pursuing, and this is evident from the features of the sites we have to work with.

- What is needed in place of "ecological risk assessment" is "ecological effects assessment" or "ecological impact assessment".

- There exists a vastly advanced approach to study (far surpassing the abilities of the current ERA methodology), with the capability of rendering what are for all intents and purposes, definitive determinations of ecological receptor health.

\* Two useful references regarding the above are:

Tannenbaum, L.V., 2003. Can Ecological Receptors Really Be At Risk? Human and Ecological Risk Assessment, Volume 9(1): 5-13.

Tannenbaum, L.V., 2005. A Critical Assessment of the Ecological Risk Assessment Process: A Review of Misapplied Concepts. Integrated Environmental Assessment and Management, Volume 1(1): 66-72.