Annex: Annotated checklist

*The annotations, written within each box in italics, summarise the ongoing work by DG CONNECT in revising the impact assessment report.*

### Impact Assessment Quality Checklist for Regulatory Scrutiny Board Opinion

<table>
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<th>Title:</th>
<th>Digital Services Act: deepening the Internal Market and clarifying responsibilities for digital services</th>
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<tr>
<td>AP Reference:</td>
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<td>Date of IAQC (initials A2 Desk):</td>
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### Policy context

The 2000 e-Commerce Directive harmonised the principles for cross-border provision of digital services. Since then the nature and scale of such services have grown significantly. This has generated new social and economic challenges. These include illegal activities and fundamental rights issues. Enforcement of the current Directive remains uncoordinated and the single market continues to be fragmented.

This initiative proposes new rules to frame the responsibilities of digital services, to tackle the risks faced by users and to protect their rights. It follows an evaluation of the e-Commerce Directive. The new obligations aim to ensure enhanced supervision of platforms and effective enforcement.

### Main issues for discussion

1. **What are the inter-linkages between this initiative and related legislation?** Does this broader regulatory framework for digital services contain any overlaps or unclear delineations? If so, will they be addressed in the proposed initiative? How have non-legislative or self-regulatory measures worked so far? What will be their role in the future? [boxes 1, 2 and 5]

2. **What are the main political trade-offs and risks relating to the options?** How was the initial threshold for a ‘very large platform’ set? Who would be covered? To what extent are third country digital services covered, and why? [box 5]

3. **How would the supervisory framework function under the different options?** How would it link to other (existing or planned) supervision structures in the

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1. The Board's assessment is based on the application of the Commission’s guidelines, the evidence base, the scope and depth of the analysis and whether it is proportionate in relation to the type of initiative and likely impacts, as well as the quality of the analysis, the appropriateness of the applied tools/methodology and the reliability of the data used.
(4) On what basis does the assessment conclude in favour of the preferred option? How does it account for stakeholder views? What would be the additional costs imposed on very large platforms under Option 3? [boxes 6, 7 and 9]

1. Context and scope

The report could further explain the regulatory set-up for digital services and what is covered in the e-Commerce Directive as opposed to other horizontal, service-specific or sectoral pieces of legislation. It could also clarify the role – and observed success – of non-legislative (e.g. 2018 Commission Recommendation) and self-regulatory measures in the area. The report should explain how these measures complement each other and where there may be gaps or overlaps.

- We are revising the report to clearly describe the role and perceived success of the soft instruments as well as the gaps resulting from the current regulatory and self-regulatory measures in driver 2.3.4 on the regulatory gap.

Regarding the scope of option 3 and the suggested definition of ‘very large platforms’, the report should specify how it was designed. It should clarify how it would link to the forthcoming definition of ‘very large online platforms acting as gatekeepers’ in the parallel ex-ante/competition tool initiative.

- We are revising the report and describing in more detail the methodology in the main report, as well as in Annex 4. The policy intent of the two definitions is different, and the DMA also considers additional criteria. In the DSA, ‘very large platforms’ are ‘public spaces’ with high impact and high frequency of societal risks, whereas, in the DMA, gatekeeper platforms pose a specific set of economic risks. Consequently, not all very large platforms are expected to also be gatekeeper platforms, but many will likely fall also in this category.

2. Problem definition and use of evaluation

The problem definition points to the problems of the rapid developments in the area of online platforms and the outdated legal framework and its implementation. The report characterises the problems and their magnitude but the analysis could go more in depth in explaining their drivers to more clearly substantiate the choices of options.

- We are revising the presentation of the drivers, in order to provide more details on the specific issues and more clearly link to the choices made in the options. Particular emphasis is put on explaining the issues related to the regulatory gap, emerging risks around algorithmic processes, and advertising.

The report could more clearly present the main trade-offs and risks relating to the
identified problems (e.g. consumer protection vs fundamental rights, transparency vs commercially-sensitive or private information).

◊ This is a particularly important point in this area of regulation and we are clarifying the trade-offs specifically in the description of the first problem 2.2.1, presenting the risks brought by digital services, and in the corresponding drivers.

The report could be clearer on which problems are already (partially) addressed by existing legislation, and which ones are not.

◊ As per the point made in Box 1, we are further expanding on this issue in the report in particular in the driver 2.3.4 on the regulatory gap.

Some of the presented examples of societal risks posed by online platforms also occur in the offline world:

- Advertising has always been targeted. By choosing to publish their ads in certain newspapers and magazines or next to certain television programmes, advertisers have always aimed to reach certain audiences, and has in that sense been discriminatory. (§45)

- The ‘lack of transparency around political advertising’ is not regulated by legislation on digital platforms, but is an issue for electoral rules (e.g. transparency on electoral spending). (§45)

◊ We will further elaborate on the specific issues raised around online advertising and clarify the scope of the issues this impact assessment covers, and what falls outside of scope (both in the driver and in Annex 12). The particular challenges related to political and electoral advertising are assessed in the context of the European Democracy Action Plan, also in terms of responsibilities of other players such as political parties.

◊ For the Digital Services Act, the concern is mostly related to transparency deficits across all types of online advertising: both as regards information users have access to, and the supervision and detection of societal concerns, as they emerge. Practices such as behavioural advertising are unique to the online environment in their scale and scope, as well as regards the opacity of the systems. Online advertising is a prominent point raised in the reports by the European Parliament.

◊ Emerging concerns around discrimination are linked to the delivery of the ads, with some research showing that vulnerable groups can be unfavourably treated e.g. in credit or housing communications. This is typically an emerging concern with uncertain consequences.

3. Subsidiarity and EU value added

The report demonstrates the necessity for action at EU level because of the cross border nature of digital services. A patchy framework of national rules has turned out to be counterproductive for the functioning of the internal market and the protection of consumers and businesses.
4. Objectives and intervention logic

The policy objectives match the described problems and the report logically connects the problems with the objectives and options. However, it is not clear to what extent the general objective and specific objectives are consistent with broad policy strategies and other relevant policy initiatives. For example, to what extent can the specific objective of “ensuring the best conditions for innovative cross-border digital services” be achieved through this initiative? A weakness of the intervention logic is that it is not clear what the success of the initiative would look like in practical terms, nor how it would be measured.

- We are further clarifying the intervention logic in this regard and the precision of the specific objectives in describing success. This is complemented by a clearer and more specific identification of indicators in section 10 of the revised report.
- The specific objective on the conditions for innovative cross-border services is particularly important for the success of the intervention, understood as addressing the current and emerging legal fragmentation and limiting costs in the cross-border provision of services in particular for start-ups. Immediate success, in this regard, stems from the harmonisation of rules across the single market, but also their coherent application. This can be monitored through specific metrics on the joint enforcement actions vs derogations from the system by Member States, and a general monitoring of potential new laws adopted by Member States. Impacts of these measures can be monitored through the market evolution of European start-ups and scale-ups offering digital services.

5. Baseline and options

The report should better substantiate the baseline by bringing in available evidence of how the situation would evolve under a no-policy change scenario. The uncertainties and risks of the baseline should be assessed.

- We are revising the presentation of the baseline scenario with further information on the expected evolution of illegal content online, absent further intervention. Additional risks are related to the protection of fundamental rights online, where enforcement continues to be privatised by online platforms with no clear supervision and redress. Information asymmetries between service providers and authorities, but also society, are also an evolving concern.

Against this background, we will also explain the risks of further legal fragmentation, and the expected consequences for service providers. In this context, we can further elaborate on the difficulties in enforcing the rules of the E-Commerce Directive, absent a convincing EU alternative to the legal fragmentation.

The way the options are currently constructed seems artificial. It is not clear whether there would be any alternative ways to group the different measures under the options. For instance, could EU-level governance have been relevant also for option 2? Why is a (voluntarily) coregulatory framework not already envisaged for options 1 and 2? Only option 3 addresses all problems (problems of very large platforms; clarify status of new types of services). Would there be any alternative sub-options for option 3 (e.g. see further down on supervisory mechanisms)? The current description of the options is high-level, leaving questions open as to their actual content and how they would be implemented in
We are clarifying the rationale and the details of each of the options in their presentation in section 5.2: There are also more detailed explanations in the main note.

With regard to alternative grouping of components, some alternatives are possible and we could make qualitative observations in the impact analysis as to how the alternative approaches could strengthen respective options. This allows the reader to form a view on potential alternatives, while preserving the gradual approach to the components and minimising complexity in the presentation of options.

- **On supervision:** the intention was to ensure proportionality between the degree of complexity in the due diligence and the necessary supervisory powers and cooperation. Option 1 could also include the appointment of a central coordinator, but the intention was to cover the widest spectrum of options, not least in light of discussions with MS. The structure of the EU Board is particularly useful in light of the asymmetric approach to very large platforms, whereas the structure seems disproportionate for the supervision of the type of horizontal obligations envisaged in Option 2. Instead, we can clarify that a certain level of information exchanges are ensured in Option 2 through the digital coordinators and supported by the existing E-Commerce Expert group.

- **On liability:** Option 2, which already includes a revision to the liability regime in the E-Commerce Directive, could also be envisaged with the package of liability-related measures included in option 3. As per the general approach, we would preserve the gradual presentation of the options, and refer to the alternatives in the qualitative presentation of impacts.

- **On self-regulation:** we are revising the options and including up-front the continuation of Codes of Conducts and potentially new self-regulatory initiatives in all three options, not just in the baseline and Option 3.

The report should be clearer about which obligations would be fixed in this legal revision, which would be defined in subsequent steps (in implementing legislation), and what role self-regulatory measures would play as a complement (if any).

- **As per explanation above, we are revising the options to explain the role of self-regulatory measures also in options 1 and 2. We will also clarify the areas where, in Option 3, the EU Board will issue guidelines.**

For example:

- **Option 1:** why does the complaint and redress mechanism have to be internal to the company (§151)? This would make it more difficult for start-ups, where outsourcing could be a more viable (initial) solution.

- **We will revise the presentation to make clear that ‘internal’ does not refer to insourcing in this context, but it is rather used by contrast with the use of other, external, out of court dispute mechanisms. Outsourcing of complaint/redress mechanisms is certainly considered a valid option for small as well as large companies and the regulation would not seek to prescribe such business choices. It would only impose an obligation for such systems to be available to the users and ensure supervision and compliance.**
• Option 2: on liability of intermediaries (§157), how would the initiative ‘incentivise’ hosting services to take proactive measures to address illegal activities (legal or voluntary measure)?

◊ The measure would be a legal clarification to remove disincentives for online intermediaries to take proactive measures on a voluntary basis. A legal provision would specify that hosting services that take voluntary measures to detect and remove illegal content, goods or services offered by their users do not lose the liability protection as online intermediaries. We will also clarify the stakeholder input supporting this provision (in particular views from startups). Neither one of the options imposes legal obligations for proactive measures.

• Option 3: what would be the ‘co-regulatory efforts’ to mitigate emerging risks (p26)?

◊ We are providing more detailed explanations on the practical implementation and design of the co-regulatory efforts in section 5.2. Linked to the risk management approach, this will strengthen the current self-regulatory approach with the possibility of mandatory reporting and mitigation of risks.

• Option 3: how was the threshold set for what is a ‘very large platform’ (p30)? Who would be covered?

◊ As regards the threshold for very large platforms, the core element in the assessment relates to the levels of societal risks such services present. We are further elaborating on the methodology and choice of the specific threshold in Annex 4, where a sample list of very large platforms is presented. Further explanations are provided in the main note.

• How would a fundamental rights by design approach work in practice? What does “crisis response cooperation” stand for?

◊ The ‘fundamental rights by design’ approach is a requirement for the service providers to be observant of users’ rights such as freedom of expression or non-discrimination, when taking measures in compliance with the Digital Services Act.
◊ In response to a number of incidents online, for example the viral spread of depictions of a terrorist attack or coordinated cyberattacks, multi-stakeholder crisis response protocols have been established. The proposed initiative would proscribe certain design and transparency requirements of these types of protocols into law to ensure that there is a basic level of oversight and, when crisis measures are deployed, fundamental rights and freedoms are protected.
◊ We will further develop these points in section 2.3.1 and 2.4 as well as in the description of the options.

Regarding enforcement and supervision, the report should clarify the challenges to effectively identify and tackle misuse of algorithms to capture or steer users’ attention, and how the options would address them.

◊ We are providing more detailed explanations of these issues both in the
With regard to enforcement and supervision in option 3, this will essentially build on the risk management and auditing obligations on very large platforms, analyzed by the competent digital services coordinator. Further inspections are possible if triggered by an insufficient reporting on risk assessed and mitigated.

The report should also explain what kind of data access rights would be given to public authorities and how these would be aligned with those envisaged under the parallel ex-ante / competition tool initiative. The report should clarify which researchers (public interest based?) would be able to access data.

We are further clarifying the parameters for these provisions in the presentation of the options. In brief:

- The options include two types of data access for authorities: first, when competent authorities supervise the underlying service intermediated by a platform (e.g. holiday accommodations offered online), the cooperation requirements would allow authorities to request data strictly limited to their supervisory competence, as specified in national law. Second, the competent digital services coordinator will be able to request further data from the very large platform strictly for supervising its compliance with the due diligence obligations. Both such obligations are designed in compliance with the General Data Protection Regulation, and in observance of the service providers’ legitimate interests, including the protection of their trade secrets.

- In the third option, the vetted researchers will be permitted data access in compliance with criteria set by the EU Board. The set-up requires a case-by-case approach, depending on the risks at stake and data security and privacy concerns.

The report should further specify the proposed supervision framework set out in the options. How would the Digital clearing house be set up, by whom, what functions and powers would it have? What would be expected from the national Digital coordinators? How would they link to Digital clearing house? What would be the added value of a new EU body? Why was no alternative considered to an independent agency (e.g. expert group, other kind of EU network or platform)? How would this structure link or delineate with CPC authorities or other related supervisory functions? Could the new Board integrate the Commission’s new supervisory responsibilities under the parallel digital markets act?

We are revising and further explaining the architecture and components of each option in the revised IA. This is further detailed in the main note.

As regards the integration of supervisory responsibilities of the Board with the new Commission powers under the Digital Markets Act, this option does not meet the independence requirements and would not address a main objective for the Board in establishing a smooth cooperation and assistance across digital services coordinators. Further details can be found in the main note.

Given the Commission’s commitment to respond to European Parliament's legislative initiative resolutions, the report should further clarify to what extent the options align or deviate (and if so, why) to the EP’s own initiative reports on the single market, illegal content, protection fundamental rights.
Following the adoption of the three own initiative reports from the IMCO, JURI and LIBE committees in the European Parliament, voted in plenary on 20 October 2020, we are including in the revised IA a more detailed analysis of the alignment of the options/preferred option in an additional Annex explicitly mapping the EP points to the impact assessment report.

In essence, the three EP reports are broadly complementary and converge towards the elements of the preferred option in the IA report: preserving the core principles of the E-Commerce Directive, harmonising notice-and-action procedures, including appropriate safeguards for fundamental rights online, addressing content amplification and transparency on online advertising, enhanced supervision of online platforms at EU level through a EU body for a harmonized approach with strong coordination at national level.

The one notable exemption refers to the invitation to the Commission to explore harmonizing measures for the (secondary) liability of marketplaces with regard to unsafe product distributed by sellers through their platform. The issue is analysed in Annex 7 but discarded from the scope of the impact assessment, as it concerns a sector-specific issue.

The report should better clarify whether suggestions from stakeholders (e.g. in box p. 28) are integrated in the options. If not, why not?

We are robustly revising the presentation of stakeholders’ views throughout the report, in particular with regard to their views with regard to the components of the options and in Annex 2, along the explanations in the main note.

Given the global character of the sector, the report should explain to what extent the EU’s action would be in line with or deviate from the EU’s international obligations? It should specify more clearly how the options would apply to digital service providers established outside the EU, including on enforcement.

We are clarifying these issues in particular in section 6.2, along the further details provided in the main note.

To what extent would this new horizontal legislation replace existing sectoral legislation?

The report will revise the language to ensure more clarity in section 5.2 on the relationship of the proposed options to sector-specific legislation. Further clarifications can be found in the main note.

The report examines options discarded at an early stage but it should more clearly describe the reasons for discarding.

The revised report will clarify further the reasons for discarding the options in Section 5.3 drawing on the overview of discarded options for changing the liability regime in Section 3 of Annex 9, and the evaluation report of the E-Commerce Directive in Annex 5.

6. Impacts

The risks and uncertainties associated with the impact of each option have not sufficiently been identified.
Based on the precisions made in the description of the options and their components (as per box 5 and the main note), we are reviewing the qualitative assessment of impacts and are explaining the risks. Further details can be found in the main note.

The report should consider how a lack of global agreement on regulating web content, and different rules for providers in and outside the EU, may have negative consequences for digital service users.

We are exploring the potential negative consequences of the international dimension affecting EU users. A primary international consideration stems from the potential retaliation strategy of other states – however, we explain in the main note the general alignment of the rules considered in each option with the EU’s commitments in GATS.

The measures considered in each option impose procedural obligations to ensure a fair balance of safety and fundamental rights protection; they do not, as such, harmonise in any way legal standards for the content itself. Illegal content remains defined through national and other EU laws, but the procedural obligations set in the Digital Services Act reinforce the possibility to tackle illegal content online.

Such procedural obligations appear particularly important in a context of relative political instability on the global level, with Chinese platforms increasingly important, and US political discussions on the review of the legal framework corresponding to the EU rules set in the E-Commerce Directive. The regulatory design aims at protecting EU users’ rights along European values, shielding them from the unstable international developments. These regulatory standards could also serve as benchmark to third-countries.

The report should further elaborate the impacts on businesses and their competitiveness. It should make an effort to estimate the additional costs imposed on very large platforms under Option 3. Given that the latter should be covered under ‘costs and administrative burdens on digital services’, it is unclear why option 3 receives the same score as option 2 for this assessment criterion (cf. table 3).

We are enhancing the analysis with additional data made available in the meantime. This includes macro-economic comparison of the options, computed together with the JRC, and more precise estimates of costs for the due diligence obligations for the very large platforms under option 3.

We are reviewing the scores throughout the visual tables and reflecting a more nuanced comparison.

Other assessment scores in table 3 could be better justified in the text. For instance, the degree of variation in fundamental rights scores between options 2 and 3 is not always clear.

We are further clarifying the qualitative assessment of the impact on fundamental rights, to more precisely reflect the distinctions between the options.

7. Comparison of options and proportionality

The options are compared against the baseline scenario and criteria of effectiveness, efficiency, coherence and proportionality. The report should clarify how comparison
Table 5 links and is coherent with Table 3 on impacts.

- We will include the insights from Table 3 into the comparison section, in particular with a view to inform the presentation on the effectiveness criterion and efficiency criterion (in particular the presentation of costs on companies and administrations).

The scoring on efficiency should include a separate score for comparing costs. Showing only scores for the cost-benefit estimate hides the differences in costs and mainly repeats the effectiveness scores.

- We will amend the table to include clearly the scoring on costs, in a cumulative presentation compared to the more granular Table 3.

The report should clarify how the efficiency and proportionality scores should be interpreted (e.g. the more +++ the worse the option scores?)

- This will be revised, also in light of the cost presentation. In the current presentation, +++ means more efficient (ratio effectiveness/costs); similarly, +++ indicates a better assessment on the proportionality criterion.

The report is written towards the preferred option (option 3) and leads the reader towards pre-set conclusions. The report should present all options more objectively. The superiority of option 3 as opposed to option 2 should be better argued. It should explain to what extent it would be supported by stakeholders and how potential concerns have been addressed.

- With the further precisions explained above on the specific design of the options, we can more clearly substantiate throughout the comparison of options the precise distinctions, in particular in light of the more granular calculations on costs.

- The third option will continue to be overall the most effective option. It entails a series of cost savings for service providers linked to the legal clarity and predictability (e.g. regarding key concepts such as the liability exemption) as well as for authorities (i.e. the more important administrative costs for the supervisory system does not reflect the efficiency gains and the mutual assistance across Member States, compared to the current system).

- Overall, the third option is also the most expensive in terms of direct costs – on supervisory authorities, at EU level, and for very large platforms. We have computed additional cost estimates for very large platforms and are revising the report along these lines.

- We are also expanding a more granular presentation of the stakeholders’ views (as per box 5).

The coherence analysis could explore possibilities to align governance mechanisms between this initiative and the parallel digital markets act.

- The two proposals follow different approaches as to the governance systems put in place for the supervision of the respective services in scope. This follows from the different objectives they pursue:
  - In the Digital Services Act, the EU level coordination aims at setting up a system for smooth cooperation in a context where the main competence and responsibility for the supervision of digital services (including very large platforms) remains with the country of origin. The system allows other
Member States to surface issues they encounter. In option 3, it also provides for a system of assistance and joint investigations and eventually allows for the Commission to take on some supervisory and sanctioning actions, adding pressure in the enforcement system and ensuring the protection of all European citizens.

- In the Digital Markets Act, the intervention requires EU level intervention, which can largely be ensured through the existing structures within the Commission. It does not build on a cooperation between Member States individual supervisory powers.

It should also analyse in more detail to what extent certain aspects of existing (sectoral) legislation are covered by the proposed digital services act. It should discuss whether these possible overlaps would need to be removed.

- The coherence with other instruments will be further developed, as explained in the main note.

8. Future monitoring and evaluation

It is not clear how success would be measured. The report proposes monitoring arrangements, as a system for data collection and monitoring is an essential part of the preferred option. Data collection would be qualitative, as the report states that “quantitative indicators are not set here as key performance indicators, as the framework is designed to adapt to the dynamic challenges of the digital world”. However, an impact assessment should be able to say more about how an initiative would be monitored and evaluated to pave the way for establishing such a system.

- We are amending the presentation of the monitoring approach, not least in light of the clarifications brought in the presentation of the preferred option, similar to examples presented in Box 2.

The report states that a review of the initiative “should be planned” five years after entry into force. Will this be an evaluation and when will it take place?

- This refers to the final provisions we would include in the legal instrument, announcing an evaluation of the instrument within 5 years from entry into force, in addition to annual reports from the new EU Board. We can consistently clarify this in the Impact Assessment report.

9. Consultation, information base and methodology

All relevant stakeholders have been identified and consulted via open and targeted consultations, bilateral and expert group meetings, interviews, seminars and workshops over de last years.

Annex 2 should present a more granular analysis of the public consultation. It should discuss the large number of responses coming from individuals (8749 out of 8961 replies — cf. p.20). Where were the respondents from? Were any campaigns identified? Also for other replies, a more granular stakeholder analysis should be provided of who has
responded – e.g. from which Member States, third countries, representing which interests?

◊ We are revising the synopsis report of the open public consultation in Annex 2. The public consultation, closed on 8th September 2020, gathered 2,863 replies by a diverse group of stakeholders. Additionally, around 300 position papers.

◊ Most feedback was received by citizens (66% from EU citizens, 8% from non-EU citizens), companies/businesses organizations (7.4%), business associations (6%), and NGOs (5.6%). We are amending the report with a much more granular analysis of the demographics, and, on this basis, more nuanced presentation of the positions of the different stakeholder groups on the most prominent issues.

◊ In the Annex, we are also currently presenting responses to other past consultations, including the 2018 consultation with 8,961 replies, where we have consulted on horizontal and specific measures for tackling illegal content online. We do not observe a significant difference in public attitudes of citizens replying compared to the latest open public consultation. In revising the Annex, for ease of presentation, we would streamline the text.

The main report should be clearer on divergent stakeholder views or concerns. It should specify how concerns of stakeholders have been addressed in the options, and, if they have not been taken on board, why.

◊ As clarified in box 5.

The use of analytical methods is sparse and limited to the cost of non-Europe (legal distance and cross border traffic). This is included in Annex 4 and partly in the report. The report should better explain which methods and resulting evidence are used.

◊ We can more clearly reflect in Annex 4 all the analytical methods used, currently focusing on the econometric models developed together with the Joint Research Centre. We will expand on the methodology for estimating costs and qualitative approach to the assessment, as well as the methodology for establishing thresholds.

10. Presentation

The report is repetitive at times and sentences are too long, incorrect, or incomplete (in the Annexes). The glossary is not complete, some abbreviations are missing. A spell check has not been carried out. The tables of contents and page numbers do not match. Margins should not be reduced and text boxes should not use a smaller font size to artificially lower the number of pages.

Footnotes rather than endnotes should be used to help the reader.

◊ We are conducting an additional editorial check throughout the main report and the Annexes, including updates of the cross-references in the tables of content and glossary

◊ We will revise the formatting and transform the endnotes into footnotes.