



2008-001: Draft ISPM - Minimizing pest movement by sea containers

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
1.	G	Editorial	I support the document as it is and I have no comments		English	Jordan
2.	G	Editorial	I support the document as it is and I have no comments		English	Lao People's Democratic Republic
3.	G	Editorial		The scope of this ISPM should be discussed and consulted clearly first. If it covers human/animal health etc. ants, mice, snake etc should be included in the text.	English	Korea, Republic of
4.	G	Editorial	I support the document as it is and I have no comments		English	New Zealand
5.	G	Editorial	I support the document as it is and I have no comments		English	Nepal
6.	G	Editorial	I support the document as it is and I have no comments		English	South Africa
7.	G	Substantive	<p>General Conceptual Comments on the DRAFT ISPM: MINIMIZING PEST MOVEMENT BY SEA CONTAINERS (2008-001)</p> <p>A working group of the Commission on Phytosanitary Measures (CPM), which oversees the implementation of the International Plant Protection Convention (IPPC), has drafted a possible International Standard for Phytosanitary Measures (ISPM) for minimizing pest movements by sea containers, and it has invited general conceptual comments on the draft ISPM.</p> <p>The World Shipping Council (WSC), the Container Owners Association (COA), and the International Chamber of Shipping (ICS) – hereinafter referred to as “we”- respectfully offer these comments with the intent of being of assistance as the CPM further considers the topic. COA has been invited to participate as an expert to the CPM Working Group; WSC and ICS have not been previously contacted by the CPM or its working group.</p> <p>WSC, with offices in Brussels and Washington, D.C., is a non-profit trade association whose member companies carry over 90% of the world’s containerized cargo by sea. WSC members operate approximately 400 regularly</p>	Reviewed on August 23, 2013	English	World Shipping Council

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			<p><u>scheduled services linking the continents of the world. Collectively, these services transport about 60 percent of the value of global seaborne trade, or more than US\$ 4 trillion worth of goods annually. WSC Member companies operate the overwhelming majority of the 17 million containers used to transport maritime commerce. WSC works with various governments and international regulatory agencies to address a wide range of environmental and regulatory issues affecting the liner shipping industry. (1)</u></p> <p><u>COA aims to represent the common interests of container owners worldwide. It has 165 Members of which 70 are full members representing shipping lines, leasing companies and intermodal operators. The full members own 25 million TEUs out of the world's container fleet of 32 mill TEUs (or twenty foot equivalent-units). (2)</u></p> <p><u>ICS is the global trade association for shipowners with a membership comprising national shipowners' associations in 36 countries, representing all sectors and trades and over 80% of the world merchant fleet. (3)</u></p> <p><u>The following comments identify a number of areas where the draft ISPM is deficient and/or requires further consideration. We recommend that the CPM suspend further action on this draft ISPM and defer to the more comprehensive revision of the packing guidelines for cargo transport units (CTUs), which is being finalized by the IMO, ILO and UNECE with a view to making these guidelines a Code of Conduct. WSC, COA and ICS and their member companies and associations are available to provide further information in the future to the CPM working group.</u></p> <p><u>The Background section of the draft states: "Sea containers being moved around the world have been found to be a pathway for the introduction and spread of plant pests and other organisms including invasive alien species." While this statement may be true in one sense at a high and general level, the draft ISPM proposes to regulate only that portion of a sea container's movement that presents the relatively lowest risk of transference of plant pests: the surfaces of a container.</u></p> <p><u>It is generally the contents that are loaded into containers by shippers that are the cause of the existence of any plant pest transference. We are aware that plant pests may be transported in cargoes that a shipper has loaded into a container or loaded onto a ship. We are aware that plant pests may be</u></p>			

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			<p><u>transported in wooden packing materials that a shipper has loaded into a container (e.g., Asian longhorn beetle). (4) Neither of these problems or situations would be effectively addressed by the draft ISPM.</u></p> <p><u>This draft ISPM proposes that governments and industry focus on the cleanliness of the structures of containers, when the greater risk of plant pest transmission is what is put inside containers. And, it does so without acknowledging the fact that the risk of contamination of container structures varies very substantially around the world and is not, and cannot reasonably be assumed to be, the same for all containerized supply chains. The potential risk of contamination of a container structure with Dutch beer moving from the brewery in Amsterdam via the port of Rotterdam to a consignee in New York is significantly and inarguably lower than a container of forest products being moved from the Pacific region to New Zealand. (5) One risk may be negligible, while the other may be significant.</u></p> <p><u>We agree that a shipping company should provide its shipper customer with a clean empty container for that shipper's loading and use. The CMP working group recognizes that ocean carriers generally have, as a matter of commercial and operating practice and/or contractual obligations, policies to clean empty containers before the containers are dispatched to shippers for loading. The CMP Working Group also has recognized that other international organizations (the International Maritime Organization, the International Labour Organization, and the United Nations Economic Commission for Europe), governments, and industry have been working to revise the existing guidelines for the packing and handling of cargo transport units to become a Code of Practice. As part of this revision, phytosanitary requirements for containers have been included in the Code of Practice.</u></p> <p><u>The draft ISPM lacks any discussion or explanation of why that on-going effort is inadequate to address the issues that this draft seeks to address.</u></p> <p><u>The draft ISPM also lacks any discussion or explanation of why a non-risk based requirement addressing only one element of the potential container pathway – the structures of the container -- should be pursued in all trade lanes around the globe when documents available to the CPM working group very clearly demonstrate that the risk of contamination of the container structures differs from country/region to country/region.</u></p>			

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			<p>The IMO/ILO/UNECE effort is more comprehensive than the current draft ISPM because it addresses the responsibilities of each of the parties that receive, load and unload containers, and does so with an understanding and appreciation for the different parties' roles and responsibilities. By comparison, this draft ISPM is limited by the fact that it appears to address only the responsibility of shipping companies, and does not address the responsibility of other parties, such as shippers/consignors or consignees.</p> <p>Accordingly, we recommend that the CMP should postpone further work on this draft ISPM until such time as the IMO/ILO/UNECE revision of the container Code of Practice has been completed, and it can assess whether that Code is sufficient, or whether further standard setting is needed. Such a postponement would also allow the CMP to review and analyse the results of the surveys regarding pest interceptions on sea containers that NPPOs are now – belatedly in our view – invited to undertake (see also our explanation on Requirements, in Section 1 of this draft ISPM).</p> <p>WSC, COA and ICS recognize that minimizing pest movements around the globe is a difficult challenge. The shipping industry has been working within the IMO and with various governments about ballast water discharges as a potential vector for the transference of invasive aquatic species, and we recognize the difficulty and many issues involved in that challenge. WSC and its member lines have worked with Canadian and U.S. authorities on addressing the risk of Asian gypsy moth egg masses on ships and containers at certain times of years. WSC and its member companies have worked with shippers and shipper organizations to ensure their awareness of phytosanitary requirements applicable to wood packing materials in order to minimize the risk of movement of Asian longhorn beetles and similar insects that may be in wood packing material. WSC member companies work closely and cooperatively with Customs authorities that wish to inspect containers of goods (especially agricultural goods) that may present a risk of carrying plant pests. WSC and ICS are members of the Group of Experts that has been revising the existing IMO/ILO/UNECE guidelines for packing CTUs to become a Code of Conduct, and which has unanimously agreed to recommend to these three UN organizations that the Code of Conduct include phytosanitary measures to be undertaken by container operators, shippers and consignees, respectively.</p> <p>Each of these efforts is in support of addressing a defined, specific risk with a response that has a logical chance of mitigating, if not preventing, that risk.</p>			

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			<p>The problems with this draft ISMP are that it is too broad, too burdensome, and not risk focused and based. It seeks to address potential contamination of container structures in a global and uniform way that is de-linked from the <i>modus operandi</i> of international containerized commerce, and without appropriate recognition that the potential for such contamination varies very significantly between geographic regions. Finally, the draft ISMP fails to address the risk of the contents and the cargo handling practices applicable to what is put inside the container, which constitute a relatively higher risk for plant pest infestation. The draft ISMP should be reconsidered.</p> <p>Footnotes:</p> <p>(1) More information about WSC and the liner shipping industry can be obtained at www.worldshipping.org.</p> <p>(2) Additional information about COA and its members is available at www.containerownersassociation.org.</p> <p>(3) Additional information about ICS is available at www.ics-shipping.org.</p> <p>(4) See, e.g., "Pest risk assessment of insects in sea containers" (Australian Journal of Entomology (2001) 40, 180-192), page 185: "...the lack of apparent damage to floors of containers suggest that the timber pests collected are more likely to be associated with the cargo in the containers, particularly timber dunnage, rather than the floors themselves". See also <i>ibid.</i>, page 182: "[Pests of stored products] were often associated with residual foodstuffs, mostly cereal, that had not been cleaned from containers". (The same conclusion regarding organic residues, not removed by the consignees, potentially attracting pests is stated on page 185). The article has been registered with IPPC as document EWG2011/SeaCon/DOC006.</p> <p>(5) "Empty containers from the Pacific region are much more frequently contaminated with soil and live arthropods than containers elsewhere in the world" in Biosecurity Monitoring Group: Monitoring Research and Pathway Review: Sea Containers July-September 2006". New Zealand (page 10). The same review also commented on the very significant difference in external contamination rates identified under the Australian and New Zealand inspection regimes, observing that "different container origins and suppliers, as well as different standards for contamination, may account for at least some of the differences in the [rates]"(page 53). The review has been registered with the</p>			

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8.	G	Substantive	<p><u>IPPC as document Fom2011/SCDF/DOC010.</u></p> <p><u>Position of EPPO on the draft ISPM on Minimizing pest movement by sea containers</u></p> <p><u>Despite the major efforts of the working group and steering group for this standard, and the steward in particular, the draft ISPM on Minimizing pest movement by sea containers as currently drafted is not considered ready for further progress in the standard setting process. Significant changes are needed to address the following elements in further developing the possible standard: - How to achieve the objective that sea containers, whether empty or loaded, are clean at the time of import - Identify whether the NPPO of the exporting country has any role beyond awareness raising of the industry involved in their country - The role of the NPPO of the importing country. To raise awareness of the IPPC's role and the need for action to be taken in the short term during the time needed for the possible further development of the standard, CPM is encouraged to develop a CPM recommendation with the following elements: For the preamble: - At the moment insufficient requirements for NPPOs of exporting and importing countries have been identified to be able to develop this standard further - The CPM recognizes the progress made by IMO/ILO/UNECE in incorporating several elements of phytosanitary relevance, e.g. information on possible pests and contamination and guidelines for cleanliness and cleaning, into the revision of the Code of Practice for packing of cargo transport units. - Sea containers moved internationally should be clean, i.e. free from pest and other contamination to reduce the risk of pest movement For the recommendations</u></p> <p><u>1. The scale, nature and links of contamination of sea containers with certain trades or with certain movements is insufficiently known. NPPOs are encouraged to participate in the survey of sea containers, as agreed by CPM 2013 and developed by the SC in order to justify the further development of the standard and to target measures if possible. It is important to distinguish between contamination of sea containers and contamination of the cargo in sea containers.</u></p> <p><u>2. CPM should encourage CBD and OIE to endorse the CPM recommendation or develop in parallel a recommendation with similar actions towards their members and industry</u></p> <p><u>3. CPM should encourage IMO, ILO and UNECE and their members to adopt the</u></p>	<p>This is a general comment produced by the steward for the European Region and edited by the EPPO Panel on CPM affairs, as a summary of all the substantive comments produced by EPPO member countries.</p>	English	EPPO, Estonia, Norway

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			<p><u>revised code of practice and the industry to implement the phytosanitary elements of this code of conduct.</u></p> <p><u>4. NPPOs are encouraged to communicate to those involved in container movements in and out of their country the risk of pest movement with containers and encourage them to implement the relevant parts of ILO/IMO/UNECE code of practice.</u></p> <p><u>5. The IPPC secretariat should work with IMO, ILO and UNECE to raise awareness amongst their members of the risks involved in international movement of containers and the benefit of ensuring that containers are clean.</u></p> <p><u>6. IPPC secretariat should explore the possibilities and the finances to develop a brochure addressed in particular to consignors, consignees and logistic operators, to highlight the risk of pest movement with sea containers and how these risks could be best addressed. »¿</u></p>			
9.	G	Substantive	<p><u>1) We believe that to decide if this ISPM should move forward, the following points should firstly be clarified and agreed:</u></p> <ul style="list-style-type: none"> • <u>Responsibilities of each actor involved (shipping companies, Exporters, transporters, owners of depots, cargo transfer, etc) in the movement of sea containers. Without having clearly defined these responsibilities it would be very difficult to determine the NPPO potential roles in this process maybe carrying out accreditation or auditing activities.</u> • <u>How the implementation of this standard will be performed, specially related to the obligations of NPPOs and stakeholders and their operative activities (including accreditation and audit or verification). This should be very clear because of the complexity of the worldwide logistic containers, considering specially the impacts of the ISPM implementation in international trade.</u> • <u>Even minimum requirements of accreditation and audit. by NPPO will be very difficult to implement, for that reason we believe that this ISPM, as it is being developed, would be very difficult to implement.</u> • <u>An estimation of the actual pest risk posed by the international movement of sea containers, should be available in order to justify further development of this standard, because NPPO should not spend resources to implement an ISPM without knowing the actual</u> 	See general comments	English	Uruguay

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			<p><u>phytosanitary risk</u></p> <p><u>2) We consider this ISPM would have impacts difficult to estimate at this stage on the activities of NPPOs and other authorities as well as on International trade</u></p> <p><u>3) The outcomes of the survey, currently being developed could be an input to decide to continue the development of this standard and also to identify where to focus the content of the ISPM</u></p> <p><u>4) Nevertheless we are not sure if the outcomes of such a voluntary survey will provide the required information that justifies the efforts needed to implement such a ISPM, but at least the ISPM should not be developed until the results of the survey approved by CPM 8</u></p> <p><u>5) Moreover it would be important to know how the application of the Code of Practice for Packing of Cargo Transport Units by the industry would address IPPC concerns regarding the criteria for clean containers</u></p> <p><u>6) Although this standard will be used by industry and NPPOs, and should be clear for readers from industry, terms with specific meaning under IPPC should not be used with another meaning. For instance the term contamination which is relevant to this standard</u></p> <p><u>7) Finally, we request the SC and steward to present a report of the outcome of this preliminary member consultation to CPM 9, before further develop this ISPM through the standard setting process</u></p>			
10.	G	Substantive	<p><u>1) We believe that to decide if this ISPM should move forward, the following points should firstly be clarified and agreed:</u></p> <ul style="list-style-type: none"> <u>Responsibilities of each actor involved (shipping companies, Exporters, transporters, owners of depots, cargo transfer, etc) in the movement of sea containers. Without having clearly defined these responsibilities it would be very difficult to determine the NPPO potential roles in this process maybe carrying out accreditation or auditing activities.</u> <u>How the implementation of this standard will be performed, specially related to the obligations of NPPOs and stakeholders and their operative activities (including accreditation and audit or verification). This should be very clear because of the complexity of the worldwide</u> 	See general comments	English	COSAVE, Paraguay, Chile, Argentina, Brazil

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			<p><u>logistic containers, considering specially the impacts of the ISPM implementation in international trade.</u></p> <ul style="list-style-type: none"> <u>Even minimum requirements of accreditation and audit. by NPPO will be very difficult to implement, for that reason we believe that this ISPM, as it is being developed, would be very difficult to implement.</u> <u>An estimation of the actual pest risk posed by the international movement of sea containers, should be available in order to justify further development of this standard, because NPPO should not spend resources to implement an ISPM without knowing the actual phytosanitary risk</u> <p><u>2) We consider this ISPM would have impacts difficult to estimate at this stage on the activities of NPPOs and other authorities as well as on International trade</u></p> <p><u>3) The outcomes of the survey, currently being developed could be an input to decide to continue the development of this standard and also to identify where to focus the content of the ISPM</u></p> <p><u>4) Nevertheless we are not sure if the outcomes of such a voluntary survey will provide the required information that justifies the efforts needed to implement such a ISPM, but at least the ISPM should not be developed until the results of the survey approved by CPM 8</u></p> <p><u>5) Moreover it would be important to know how the application of the Code of Practice for Packing of Cargo Transport Units by the industry would address IPPC concerns regarding the criteria for clean containers</u></p> <p><u>6) Although this standard will be used by industry and NPPOs, and should be clear for readers from industry, terms with specific meaning under IPPC should not be used with another meaning. For instance the term contamination which is relevant to this standard</u></p> <p><u>7) Finally, we request the SC and steward to present a report of the outcome of this preliminary member consultation to CPM 9, before further develop this ISPM through the standard setting process</u></p>			
11.	G	Substantive	<p>1. <u>It is an important standard but there are questions as to whether it is a standard that can be properly implemented in small developing countries such as those in the Caribbean.</u></p>	There are several issues as outlined that should be considered in the further development of this standard	English	Suriname, Trinidad and Tobago,

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			<p>2. Should it be a standard or should it be guidelines?</p> <p>3. Given the degree of capital and human input that will be required it is felt that it will require technical and financial assistance to implement.</p> <p>4. Does this standard also address the issue of containers in transit</p> <p>5. The IPPC should consult with international bodies such as the IMO and the international shipping organizations and sensitize them to the implications of this standard.</p> <p>6. The SC should consider giving guidelines on storage and transportation through a country.</p>			Barbados, Dominica
12.	G	Substantive	<p>1) We believe that to decide if this ISPM should move forward, the following points should firstly be clarified and agreed:</p> <ul style="list-style-type: none"> • Responsibilities of each actor involved (shipping companies, exporters, transporters, owners of depots, cargo transfer, etc) in the movement of sea containers. Without having clearly defined these responsibilities it would be very difficult to determine the NPPO potential roles in this process maybe carrying out accreditation or auditing activities. • How the implementation of this standard will be performed, specially related to the obligations of NPPOs and stakeholders and their operative activities (including accreditation and audit or verification). This should be very clear because of the complexity of the worldwide logistic containers, considering specially the impacts of the ISPM implementation in international trade. On the other hand operative activities involved are not clear in the draft. The draft should provide guidance regarding how and where each operation would be performed • Even minimum requirements of accreditation and audit, by NPPO will be very difficult to implement, for that reason we believe that this ISPM, as it is being developed, would be very difficult to implement. • An estimation of the actual pest risk posed by the international movement of sea containers, should be available in order to justify further development of this standard, because NPPO should not spend resources to implement an ISPM without knowing the actual phytosanitary risk. • It is suggested to limit the scope to empty containers, taking into account the difficulties in the application of inspection and treatment 	See general comments	English	Ecuador, Mexico, OIRSA, Belize, Costa Rica

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			<p><u>activities in loaded containers. It is also suggested to include containers in transit.</u></p> <p><u>2) We consider this ISPM would have impacts difficult to estimate at this stage on the activities of NPPOs and other authorities as well as on International trade</u></p> <p><u>3) The outcomes of the survey, currently being developed could be an input to decide to continue the development of this standard and also to identify where to focus the content of the ISPM</u></p> <p><u>4) Nevertheless we are not sure if the outcomes of such a voluntary survey will provide the required information that justifies the efforts needed to implement such a ISPM, but at least the ISPM should not be developed until the results of the survey approved by CPM 8.</u></p> <p><u>5) Moreover it would be important to know how the application of the Code of Practice for Packing of Cargo Transport Units by the industry would address IPPC concerns regarding the criteria for clean containers.</u></p> <p><u>6) Although this standard will be used by industry and NPPOs, and should be clear for readers from industry, terms with specific meaning under IPPC should not be used with another meaning. For instance the term contamination which is relevant to this standard.</u></p> <p><u>7) Finally, we request the SC and steward to present a report of the outcome of this preliminary member consultation to CPM 9, before further develop this ISPM through the standard setting process</u></p>			
13.	G	Substantive	<ol style="list-style-type: none"> 1. <u>It is an important standard but there are questions as to whether it is a standard that can be properly implemented in small developing countries such as those in the Caribbean.</u> 2. <u>Should it be a standard or should it be guidelines?</u> 3. <u>Given the degree of capital and human input that will be required it is felt that it will require technical and financial assistance to implement.</u> 4. <u>Does this standard also address the issue of containers in transit</u> 5. <u>The IPPC should consult with international bodies such as the IMO and the international shipping organizations and sensitize them to the implications of this standard.</u> 	There are several issues as outlined that should be considered in the further development of this standard.	English	Jamaica

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			6.The SC should consider giving guidelines on storage and transportation through a country.			
14.	G	Substantive	<p><u>Position of EU on the draft ISPM on Minimizing pest movement by sea containers</u></p> <p><u>Despite the major efforts of the working group and steering group for this standard, and the steward in particular, the draft ISPM on Minimizing pest movement by sea containers as currently drafted is not considered ready for further progress in the standard setting process. Significant changes are needed to address the following elements in further developing the possible standard:</u></p> <ul style="list-style-type: none"> - <u>How to achieve the objective that sea containers, whether empty or loaded, are clean at the time of import</u> - <u>Identify whether the NPPO of the exporting country has any role beyond awareness raising of the industry involved in their country</u> - <u>The role of the NPPO of the importing country. To raise awareness of the IPPC's role and the need for action to be taken in the short term during the time needed for the possible further development of the standard,</u> <p><u>CPM is encouraged to develop a CPM recommendation with the following elements:</u></p> <p><u>For the preamble:</u></p> <ul style="list-style-type: none"> - <u>The aim is to minimize introductions of pests with sea containers moved internationally.</u> - <u>At the moment insufficient requirements for NPPOs of exporting and importing countries have been identified to be able to develop this standard further.</u> - <u>The CPM recognizes the progress made by IMO/ILO/UNECE in incorporating several elements of phytosanitary relevance, e.g. information on possible pests and contamination and guidelines for cleanliness and cleaning, into the revision</u> 	This is a general comment by the EU, based on a text produced by the steward for the European Region as edited by EPPO. EU has made some further modification to reflect the EU's opinion.	English	European Union

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			<p><u>of the Code of Practice for packing of cargo transport units.</u></p> <p><u>For the recommendations:</u></p> <p><u>1. Sea containers moved internationally should be clean, i.e. free from pests and other contamination to reduce the risk of pest movement.</u></p> <p><u>2. The scale, nature and links of contamination of sea containers with certain trades or with certain movements is insufficiently known. NPPOs are encouraged to participate in the survey of sea containers, as agreed by CPM 2013 and developed by the SC in order to justify the further development of the standard and to target measures if possible. It is important to distinguish between contamination of sea containers and contamination of the cargo in sea containers.</u></p> <p><u>3. CPM should encourage CBD and OIE to endorse the CPM recommendation or develop in parallel a recommendation with similar actions towards their members and industry</u></p> <p><u>4. CPM should encourage IMO, ILO and UNECE and their members to adopt the revised code of practice and the industry to implement the phytosanitary elements of this code of conduct.</u></p> <p><u>5. NPPOs are encouraged to communicate to those involved in container movements in and out of their country the risk of pest movement with containers and encourage them to implement the relevant parts of ILO/IMO/UNECE code of practice.</u></p> <p><u>6. The IPPC secretariat should work with IMO, ILO and UNECE to raise awareness amongst their members of the risks involved in international movement of containers and the benefit of ensuring that containers are clean.</u></p> <p><u>7. IPPC secretariat should explore the possibilities and the finances to develop a brochure addressed in particular to consignors, consignees and logistic operators, to highlight the risk of pest movement with sea containers and how these risks could be best addressed.</u></p>			
15.	G	Substantive	<p>1. <u>It is an important standard but there are questions as to whether it is a standard that can be properly implemented in small developing</u></p>	There are several issues as outlined that should be	English	Saint Kitts And

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			<p><u>countries such as those in the Caribbean.</u></p> <p>2. <u>Should it be a standard or should it be a guideline?</u></p> <p>3. <u>Given the degree of capital and human input that will be required, it is felt that it will require technical and financial assistance to implement.</u></p> <p>4. <u>Does this standard also address the issue of containers in transit?</u></p> <p>5. <u>The IPPC should consult with international bodies such as the IMO and the international shipping organizations and sensitize them to the implications of this standard.</u></p> <p>6. <u>The SC should consider giving guidelines on storage and transportation through a country.</u></p>	considered in the further development of this standard		Nevis
16.	G	Substantive		It is acknowledged that there is a need for this standard to provide guidelines to ensure proper implementation at a workable level by all member countries. However, it would seem that the current preliminary standard did not address this ie practical guidelines for member countries. It is strongly suggested that the Code of Conduct for Packaging of Cargo Transport Units be consulted before working towards this draft standard. More time & efforts are still needed for NPPOs to find out & liaise with relevant national agencies involved to assess on the feasibility of this standard. Most NPPOs will need time to consult the industry as typically NPPOs do not have any interaction with the system involved in handling of sea containers at the depot as they may not have the resources to conduct inspection of containers at depot to have a better understanding of the system or procedures involved.	English	Singapore
17.	G	Substantive	<p><u>We agreed to move forward with the development of this draft standard, once it is intended to prevent the movement of pests, but clarifications in some points still need to be addressed:</u></p> <p>1. <u>It is noted that it needs more orientation on how the implementation of this standard will be performed and by whom;</u></p> <p>2. <u>The minimum requirements of audits, accreditation and authorization need to be clarified.</u></p> <p>3. <u>The outcomes of the survey to the NPPOs, currently under development, may</u></p>	Need for further development with more clarifications	English	NEPPO, Algeria

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			<p><u>provide better clarification on the implementation of this standard, and might promote more discussions at national level.</u></p> <p><u>4. Better clarification on a system for cleaning sea containers (inside the container and the examination for external contamination of the sea container and then cleaning) and better determination when the cleaning should be performed, if prior to export and import;</u></p> <p><u>5. Also, this standard still needs to contain more information on the activities that will be performed by the shipping companies and the NPPOs. The differentiation and real clarification on the responsibilities of each different players still need to be clarified very carefully and be prescriptive. This should be made very clear, due the NPPOs obligations and the complexity of the worldwide logistics of sea containers, especially when measuring the impacts of the implementation of this standard (including auditing, accreditation and / or authorization). Also, this standard still lacks the information on operational activities involved.</u></p>			
18.	G	Substantive	<p><u>(1) General remarks</u></p> <p><u>The WCO supports the survey to gather information on the rate of pest interceptions on sea containers as decided in the May 2013 Standards Committee meeting. This will inform the further standard setting process with practical data and the way ahead. In addition the WCO would like to suggest that more information is gathered about the operations of global supply chains, the related complexities, the goods and information flows, reporting requirements and the timing thereof, the actors involved both from the private sector and government agencies, the different roles that these actors can play in global supply chains depending on contractual arrangements to determine the best options for achieving the desired results in the most efficient and cost effective way, not only for inspection agencies but also for legitimate traders. WCO is of the opinion that addressing challenges in international trade require electronic advance cargo and conveyance information, a risk assessment approach, the use of non intrusive inspection technology based on risk assessment and cooperation with the private sector and other government agencies to optimize border management.</u></p>	<p>(1) General remarks The WCO supports the survey to gather information on the rate of pest interceptions on sea containers as decided in the May 2013 Standards Committee meeting. This will inform the further standard setting process with practical data and the way ahead. In addition the WCO would like to suggest that more information is gathered about the operations of global supply chains, the related complexities, the goods and information flows, reporting requirements and the timing thereof, the actors involved both from the private sector and government agencies, the different roles that these actors can play in global supply chains depending on contractual arrangements to determine the best options for achieving the desired results in the most efficient and cost effective way, not only for inspection agencies but also for legitimate traders. WCO is of the opinion that addressing challenges in international trade require electronic advance cargo and conveyance information, a risk assessment approach, the use of non intrusive inspection technology based on risk assessment and cooperation with the private sector</p>	English	World Customs Organization

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
				and other government agencies to optimize border management.		
19.	G	Substantive		<p>1. The audience of the draft ISPM should be the NPPOs. The way it is currently written, the draft sometimes addresses the NPPO and, at other times, the industry. 2. The US would prefer third-party accreditation to certify shipping lines, as opposed to NPPO-direct or self-certification. NPPOs may be understaffed or may lack the resources to provide accreditation to a number of shipping lines. Industry may have a problem with this suggestion because it will impact them economically. 3. The draft ISPM includes requirements for empty containers (i.e. cleaning) and implementing practices to prevent the contamination of clean containers. For clarity, we suggest that the draft ISPM provide a phased-in approach on the implementation of the standard, starting with empty containers, then containers for repositioning, and then fully loaded containers. 4. The draft ISPM should clarify the audit criteria and process for compliance with cleanliness requirements. The audit criteria should focus on the process to achieve compliance with cleanliness requirements. 5. The standard should not include container verification of cleanliness because this is neither necessary nor feasible. Verification of cleanliness would be too difficult for NPPOs or third parties to accomplish by looking at records. In addition, these records would not guarantee freedom of contamination, even after a container has been recently examined, cleaned, and loaded. The process of cleaning a container lowers the pest risk associated with sea containers and this would be a great accomplishment already. Certifying shipping lines to follow guidelines for cleanliness and auditing should remain in the standard. We suggest the verification process should not be included in this standard for reasons stated above. 6. Accountability is lacking in this document because, in general, sea containers are not cleaned between every voyage. It should be considered whether a guidance document would be more appropriate. A guidance document could be written for</p>	English	United States of America

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				any audience, while still being beneficial to NPPOs and industry.		
20.	G	Substantive		-Malaysia would like to have more discussion on the implementation: i) who will be responsible (NPPO/stakeholders/port authority?) ii) the practicality of the ISPM iii) procedures of implementation -Malaysia suggested that the operational part should be refined - Malaysia suggested that a thorough survey on the implementation of this ISPM should be carried out	English	Malaysia
21.	G	Substantive	<p><u>En el taller regional del OIRSA para revisión de los proyectos de NIMF, los delegados al taller de los países miembros del OIRSA revisaron el perfil de la propuesta de esta NIMF y realizaron los comentarios siguientes:</u></p> <ol style="list-style-type: none"> <u>Se considera como una norma de fuerte impacto tanto en el accionar de las ONPF y otras autoridades, como en el comercio internacional dadas las implicaciones operativas que conlleva su implementación;</u> <u>Se encontraron algunas cuestiones operativas que se deberán de detallar mejor en el proyecto, por ejemplo: a) en contenedores llenos, con limitaciones de espacio y poca visibilidad dentro del contenedor dificultaría la detección de las plagas;</u> <u>Los agentes evaluadores de la conformidad deberían tener competencia técnica para determinar los organismos que estarían reglamentados;</u> <u>Es recomendable clarificar lo que se interpretará como un contenedor limpio;</u> <u>Se ha incluido el término "especies exóticas invasoras" no usado en las NIMF (no es un término definido en la NIMF No. 5);</u> <u>En el apartado de incumplimientos no se especifica la acción a tomar cuando el contenedor ha sido certificado, pero al momento de su ingreso se detecta una plaga cuarentenaria o no trae a la vista el certificado;</u> <u>Puede darse el caso de plagas asociadas a un artículo (no necesariamente un producto vegetal) que se encuentra dentro del contenedor. Si el producto se descarga para proceder con la inspección visual de contenedor hay probabilidad de escape de la plaga;</u> <u>Es recomendable que el ámbito se limite únicamente a contenedores vacíos, esto por cuestiones operativas, como la inspección visual y tatomientos (esto requerirá que para llenar un contenedor, esté previamente certificado);</u> <u>Este proyecto debería ser examinado por la OMC dado a las implicaciones comerciales potenciales que conlleva;</u> 	Estos comentarios se hicieron para clarificar las especificaciones de la norma y porque esta norma tendrá un efecto significativo en el comercio internacional	Español	El Salvador

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
			<p>10. No se especifican los lugares de descontaminación ni se describen en detalle los métodos de descontaminación;</p> <p>11. En Bitácoras adheridas (internamente) debería de registrarse las fechas de inspección;</p> <p>12. En dado caso que la norma incluyera los contenedores llenos, es recomendable que en la bitácora se registre la carga;</p> <p>13. Es recomendable que la norma contemple los contenedores en tránsito.</p>			
22.	G	Substantive	<p>Containers are mainly made of metallic material but in some other cases they made up of wood. Therefore there is need for guidance on how to deal with the different types of containers such as those lined with wood that may harbour pests.</p> <p>Implementation of this standard may be a challenge to African NPPOs in terms of capabilities available withn NPPOs</p> <p>NPPO may be limited in the examination of containers especially if they are considered confidential eg. fast track systems</p> <p>Since this standard is new of its kind to NPPOs, there is need for support in formulating the accreditation and authroisation procedures, standards and parameters. This can be done in form of appendix/annex</p> <p>Although in this standard examination is prefered, the suggestion is to use inspection to compliment the duties of NPPOs to eliminate the risk of pests that may associated with containers.</p> <p>Responsibility given to importing countires in this standard should also be give to the exporting NPPOs</p> <p>There is need for data on pests risks associated with sea containers to justify the need for the standard.</p>	general considerations during the drafting of the standard	English	Mozambique, Ghana, Zambia, Lesotho
23.	G	Substantive		Australian imports are 2.8 million containers a year, in 2010. Australia has strict phytosanitary measures to ensure container cleanliness, but has serious concerns with the requirements in this draft standard. These	English	Australia

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				include issues relating to the requirement for a PRA for additional requirements, amount of information that would need to be stored and exchanged, the need for 100% inspection irrelevant to the pest risk, increased costs that will flow through the system to consumers and delays at wharfs. So a very complex system with huge costs to set up globally for example cost of machinery to inspect bottoms of containers. Container cleanliness is more than checking for quarantine pests, it covers all contamination eg soil, Inspection for cleanliness should be carried out just prior to loading the containers, to be valid as there may be recontamination of containers at depots, depending on individual depots. A more useful standard would be one that provides guidance to NPPOs on how to check for cleanliness as this is much more within the capacity of many plant countries and will help to reduce the risk of plant pests. Deletion of sections 2 and 3 and more details for section 1 would support this.		
24.	G	Substantive		China and Japan provided general comments and their comments will be reflected in their country reports	English	Bangladesh
25.	G	Substantive	This draft standard must be further discussed because the standard can't provide clear guidance for NPPO and shipment company etc. Suggest Expert working group drafting this standard again after collecting information and comments.	1.The guidance for NPPO is weak. 2.It's not clear whether the certification is required to issue, and which organization issue certification if need. 3.This standard does not explain how to manage when noncompliance. 4.The scope of this standard is inconsistent. The scope of the fifth paragraph is quarantine pests, and the 23th paragraph is invasive alien species. 5.Suggest to link up with the Code of Practice for Packing of Cargo Transport Units (2013 Draft revision) (the CTU Code) which is being updated jointly by the International Maritime Organization (IMO), the United Nations Economic Commission for Europe (UNECE) and the International Labour Organization (ILO). 6.This standard does not clarify how to manage non quarantine pests when inspection.	English	China
26.	G	Substantive	Paragraph 8: on a supprimé 'autorisation' et on a gardé 'autorisation' On a gardé la première définition, on a supprimé la deuxième définition.	Para. 8: En référence aux dispositions de la CIPV relatives aux missions dévolues aux ONPV Para. 21: Recommandation : Clarifier le partenariat entre les sociétés maritimes de nettoyage agréées (tous les	Français	Gabon

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
			<p>Paragraph 21: Sur quelle base l'ONPV peut donner une autorisation si elle n'a pas constaté l'existence d'une station de nettoyage</p> <p>Paragraph 21: Les compagnies maritimes, les destinataires et les dépôts se partagent des conteneurs maritimes vides.)</p> <p>Footnotes 1 et 3</p>	autres acteurs) et les ONPV Para. 21: Ajouter le terme dépôt au chapitre des définitions pour améliorer la compréhension du document Footnotes 1 et 3: il serait nécessaire de se conformer aux dispositions de la CIPV sur les missions confiées à l'ONPV et non aux arrangements entre Etats		
27.	G	Substantive	<p>1. General Comments Japan endorses the objective of this ISPM to keep sea containers free from contamination from the point of view of minimizing pest movement by sea containers. Considering the huge numbers of sea containers moving around the world, with a view to minimizing interference with international movement of commodities, Japan suggests that the ISPM be reviewed if it is technically justified, consistent with the pest risk involved and represents the least restrictive standard, and if it provides a workable guideline which ensures all member countries can implement at the same level. Also, it would be vitally important to gain full understanding and cooperation of relevant stakeholders such as shipping companies, terminal operators, depots and consignees, etc. for proper implementation of the ISPM.</p> <p>2. Points to be reviewed Based on the above general comments, Japan would like to suggest that the following points should be considered before further discussion on this draft ISPM.</p> <p>2-1. Consistency between the pest risk involved and requirements On the basis of the survey and information on pest interceptions on sea containers in accordance with a guidance to be developed by the SC as agreed at CPM-8, the pest risk involved needs to be identified, and the requirements proposed in the draft ISPM need to be reviewed in terms of consistency with the risk. The balance between measures and economic feasibility needs to be</p>	Refer to the comment.	English	Japan

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
			<p>considered.</p> <p>2-2. Workable guideline for proper implementation at the same level among all member countries The ISPM have to provide a workable guideline which all member countries can implement properly at the same level with a view to the fairness and prevention of non-compliances.</p> <p>(a) Visual examination of sea containers for contamination (paragraph 24) It would be next to impossible to strictly enforce visual examination of all sides of all sea containers as requested in the draft ISPM because of the huge numbers of sea containers moving every day. It might be better to focus on examining only exterior sides of containers excepting roof and underside of the containers stored in depots.</p> <p>(b) Verification of cleanliness and preventing the contamination of clean containers (paragraph 27 to 28) Even though visual examination and cleaning of sea containers are thoroughly conducted at depots, there is still a possibility of recontamination during time to departure and in transit; in other words, verification of cleanliness of sea containers in depots does not mean the cleanliness of containers is verified when they reach importing country. In such cases, it is difficult to identify the cause and origin of recontamination.</p> <p>(c) Certification procedures for shipping companies (paragraph 26) According to the draft ISPM, each shipping company certified would have its systems for cleanliness validated by a conformance assessment body (CAB) or the NPPO. However, a common guidance (or standard) for procedures to be followed by each shipping company to gain certification is not clear, which may result in a concern whether proper implementation could be ensured among all countries at the same level. Therefore, it would be requested to provide a common guidance (or standard) to undertake such specific procedures.</p> <p>(d) Differences of infrastructure, handling number of sea containers and NPPOs and industries' capacities by country. To ensure the implementation of the ISPM at the same level by all countries, it is requested to take account of various factors which may lead to contamination resulting from the infrastructure differences in container terminals, the number of sea containers handled and the capacities of the NPPOs and stakeholders</p>			

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
			<p>involved.</p> <p>2-3. Opinions of stakeholders in Japan</p> <p>(a) Visual examination and verification of cleanliness by shipping companies The ownership, management and movement of sea containers are quite complicated. If a shipping company is NOT the cause of contamination or the body responsible for clean sea containers, it is impossible to assume it is the responsibility of shipping companies for non-compliances. In the case that sea containers are leased or owned by the consignee, they are carried to terminal with seals and the shipping companies do not have access to examine the inside of containers.</p> <p>(b) Additional burdens for examination and verifying cleanliness It should be noted that additional costs, personnel and time required for examination and verifying cleanliness will be burdens on stakeholders, which require discussion when developing the ISPM.</p> <p>(c) Difference of the objective from current practice for checking sea containers It is suggested that the ISPM be considered in the light of difference of objective between the draft ISPM and current practice for checking containers which is being conducted by the industry and focuses on checks for damage.</p> <p>(d) Responsibility for verification of cleanliness and preventing the contamination of clean containers Given the point mentioned in 2-2. (b), it may be impossible to assume it is the responsibility of shipping companies for verifying them as clean.</p> <p>3. Suggestion Japan would like to suggest that the draft ISPM be reviewed on the basis of the result of the survey and information on pest interceptions on sea containers in order to address the above-mentioned points. It is also suggested that the CPM consider more feasible options than development of the ISPM, i.e. strengthening of further cooperation and information exchange between relevant international organizations representing the industry and the IPPC for the purpose of proper implementation of industry guidance by relevant stakeholders at national level such as "Code of Practice for Packing of Cargo Transport Unit (CTU Codes)" which is being revised by the IMO/UNECE/ILO. For this purpose,</p>			

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			the NPPOs are requested to liaise with and encourage relevant stakeholders to implement the industry guidance at national level.			
28.	G	Substantive		<p>It is recognized that plant pests are moving with sea containers in and of themselves, irrespective of the container's contents. For example, the outside surfaces of a container may harbour molluscs, plant seeds and other propagules, insect egg masses, and soil that could contain pests. Historical and recent interceptions of plant pests on containers that are not necessarily associated with plant commodities, have highlighted Canada's concerns regarding this pathway for pest introduction. As such, guidance to reduce the risk of introduction of plants pest associated with the movement of sea containers is supported in principle. It is also recognized that significant work needs to be done on how this guidance would be developed and implemented. It is critical to consider guidelines developed by the industry for the packing and handling of cargo transport units, elements of which could be included in the standard. Also, it would be important to consider the role of the various parties, i.e. shipper, consignee, packer, and other parties involved that have custody and control of a container during its transit. Responsibilities with regards to activities such as cleaning, disposal, reporting obligations need to be elaborated. The staged international implementation of ISPM 15 between 2002 and 2009 and its gradually increasing levels of compliance need to be studied, reviewed and lessons learnt identified, which should be considered in the development of a standard for sea containers. In addition to current industry practices, the draft standard needs to consider potential changes to industry practices and potential costs to the industry if requirements of the standard were to be implemented. Some factors to be considered during the development of the draft standard are: container availability and the turn-around time between the ordering and the arrival of the container; establishment of container cleaning depots; infrastructure changes that need to be made at depots; special handling techniques for containers with liners or food-grade containers; additional costs for</p>	English	Canada

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
				cleaning containers and overall cost to the industry; and implications to the environment including utilization of water and other products for cleaning. The linear process envisioned in the draft standard - in which a container arrives at a port and is then emptied and transported to a depot where it is re-loaded for export – is one of the many scenarios that occur in trade. Containers may not always be stored at a single depot, but at multiple locations in any given city that a given shipping company either owns or rents. This should be taken into consideration when further developing a standard on minimizing pest movement by sea containers.		
29.	G	Substantive	<p><u>We agreed to move forward with the development of this draft standard, once it is intended to prevent the movement of pests, but clarifications in some points still need to be addressed:</u></p> <p>1. <u>It is noted that it needs more orientation on how the implementation of this standard will be performed and by whom;</u></p> <p>2. <u>The minimum requirements of audits, accreditation and authorization need to be clarified.</u></p> <p>3. <u>The outcomes of the survey to the NPPOs, currently under development, may provide better clarification on the implementation of this standard, and might promote more discussions at national level.</u></p> <p>4. <u>Better clarification on a system for cleaning sea containers (inside the container and the examination for external contamination of the sea container and then cleaning) and better determination when the cleaning should be performed, if prior to export and import;</u></p> <p>5. <u>Also, this standard still needs to contain more information on the activities that will be performed by the shipping companies and the NPPOs. The differentiation and real clarification on the responsibilities of each different players still need to be clarified very carefully and be prescriptive. This should be made very clear, due the NPPOs obligations and the complexity of the worldwide logistics of sea containers, especially when measuring the impacts of the implementation of this standard (including auditing, accreditation and / or authorization). Also, this</u></p>	Need for further development with more clarifications	English	Morocco

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
			<u>standard still lacks the information on operational activities involved.</u>			
30.	5	Editorial	<p>Champ d'application</p> <p>La présente norme donne des indications sur la façon de réduire le risque d'introduction et de dissémination d'organismes de quarantaine qui est associé au déplacement des conteneurs maritimes, <u>vides ou pleins</u>, faisant l'objet d'un commerce international, vides ou pleins, indépendamment de la cargaison connexe.</p>	Clairté du document	Français	Gabon
31.	5	Editorial	<p>Champ d'application</p> <p>La présente norme donne des indications sur la façon de réduire le risque d'introduction et de dissémination d'organismes de quarantaine qui est associé au déplacement des conteneurs maritimes <u>vides ou pleins</u> faisant l'objet d'un commerce international, vides ou pleins, indépendamment de la cargaison connexe.</p>	plus de clarté	Français	Burundi
32.	5	Substantive	<p>Scope</p> <p>This standard provides guidelines on how to reduce the risk of the introduction and spread of quarantine pests associated with the movement of sea containers in international trade, empty or full, regardless of associated cargo.</p>	The draft ISPM describes the “scope” of the proposal as follows: “This standard provides guidelines on how to reduce the risk of the introduction and spread of quarantine pests associated with the movement of sea containers in international trade, empty or full, regardless of associated cargo.” In fact, the draft ISPS does no such thing. First, the draft ISPM does not address the responsibilities of the shipper/consignor in loading or “packing” the container. As the relatively highest potential threat of plant pest transmission arises from what is put in the container during the loading/packing process, this omission ensures that the standard does not address the risks that may be present in “full [containers], regardless of associated cargo”. Shipping companies do not load the contents of a container; shippers do. Shipping companies do not open a container once the shipper seals it; consignees do. Second, the draft ISPS does not address the responsibilities of the consignee when it finds a plant pest in the delivered container, or what its cleaning/disposal/reporting obligations may be to reduce the risk presented by that pest(1). Third, the draft ISPM does not address the responsibilities of other parties that have custody and control of a container during its transit, and tries to address this	English	World Shipping Council

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
				significant omission by assigning unrealistic responsibilities only to the "shipping company" (a term that is not defined in the draft ISPM). Footnotes: (1)Non-reporting and other failures to address potential pest infestation at "transitional facilities", i.e., locations where packed containers are de-vanned, was identified as a major concern in the review mentioned in footnote 5 of our General Comment, e.g., "those transitional facilities operating without [accredited persons], approved procedures or proper equipment demonstrate a lack of appreciation of their role and responsibility in biosecurity" (page 56).		
33.	5	Substantive	Scope This standard provides guidelines on how to reduce the risk of the introduction and spread of quarantine pests associated with the movement of sea containers in international trade, empty or full, regardless of associated cargo at the depot.	To scope down the depot instead of leaving it wide to cover all locations that the containers may be located which is impractical to implement.	English	Singapore
34.	5	Substantive	Champ d'application La présente norme donne des indications sur la façon de réduire le risque d'introduction et de dissémination d'organismes de quarantaine qui est associé au déplacement des conteneurs maritimes <u>vides ou pleins</u> faisant l'objet d'un commerce international, vides ou pleins , indépendamment de la cargaison connexe.	Clarté du document	Français	Mauritania
35.	5	Substantive	Scope This standard provides guidelines on how to reduce the risk of the introduction and spread of quarantine pests associated with the movement of sea containers in international trade, empty or full , regardless of associated cargo <u>at the depot</u>	-It's impossible to inspect full containers. -add the word "at the depot" for clarity.	English	Thailand
36.	5	Substantive	Scope This standard provides guidelines on how to reduce the risk of the introduction and spread of quarantine pests associated with the movement of sea containers in international trade, empty or full, regardless of associated cargo.	1. The scope should include contaminants because several sections address contamination. 2. It should be considered whether the scope should include hitchhikers or contaminating pests because sea containers are a pathway for these, of which some may be quarantine pests.	English	United States of America
37.	5	Substantive	Scope This standard provides guidelines on how to reduce the risk of the introduction	To insert the word "empty" in the para, referring to sea containers -Singapore suggested to add the word "at	English	Bangladesh

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
			and spread of quarantine pests associated with the movement of sea containers in international trade, empty or full , regardless of associated cargo <u>at the depot</u> .	the depot"		
38.	5	Substantive	<p>Scope</p> <p>This standard provides guidelines on how to reduce the risk of the introduction and spread of quarantine pests associated with the movement of sea containers in international trade, empty or full, regardless of associated cargo.</p> <p><u>Suggest to restrict the scope of the ISPM to empty sea containers being dispatched to shippers for cargo loading.</u></p>	1. To inspect a packed container, all the goods have to be unloaded before the inspectors can visually inspect a container. It is a tedious, time consuming and expensive process that is not always practical to carry out. 2. Operator needs to get consent from the shipper/consignee before they can open a packed container. 3. Pests associated with a loaded container may originate from the goods. Emptying the containers for inspection and cleaning and putting contaminated goods inside may not be able to get rid of the pest problem. 4. A packed container in voyage may be still undergoing phytosanitary treatment process such as cold treatment or fumigation process. Opening such packed containers may be hazardous or may interrupt the PTP. 5. It is anticipated that if a sea container is found to be clean when it leaves the port of origin, the chance of re-infestation during transshipment would be reasonably low and it is impractical to unload the container and empty its content for inspection.	English	China
39.	5	Substantive	<p>Champ d'application</p> <p>La présente norme donne des indications sur la façon de réduire le risque d'introduction et de dissémination d'organismes de quarantaine qui est associé au déplacement des conteneurs maritimes <u>vides ou pleins</u> faisant l'objet d'un commerce international, vides ou pleins, indépendamment de la cargaison connexe.</p>	clarté du document	Français	Congo, DR*
40.	8	Substantive	accréditation [ou autorisation] : Procédure grâce à laquelle une organisation nationale de la protection des végétaux (ONPV) autorise une organisation tierce à conduire des procédures spécifiques à un niveau requis	Le groupe a opté pour le terme autorisation et pour la première définition en référence aux dispositions de la CIPV relatives aux missions dévolues aux ONPV	Français	Gabon
41.	8	Substantive	accréditation [ou AUTORISATION autorisation] : Procédure grâce à laquelle une organisation nationale de la protection des végétaux (ONPV) autorise une organisation tierce à conduire des procédures spécifiques à un niveau requis	En référence aux dispositions de la CIPV relatives aux missions dévolues aux ONPV	Français	Congo, DR*
42.	8	Substantive	accréditation [ou autorisation] Procédure grâce à laquelle une organisation nationale de la protection des végétaux (ONPV) autorise une organisation tierce à conduire des procédures spécifiques à un niveau requis	autorisation est le terme usuel de la CIPV; de même la première définition est conforme aux prescrits de la CIPV relatives aux missions dévolues aux ONPV	Français	Burundi

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
43.	21	Substantive	<p>CONTEXTE</p> <p>Les conteneurs maritimes qui circulent tout autour du monde se sont avérés être une filière d'introduction et de diffusion d'organismes nuisibles et autres organismes, notamment les espèces exotiques envahissantes.</p> <p>Compte tenu du nombre considérable de conteneurs déplacés dans le monde entier et de la rapidité avec laquelle ils entrent dans les ports et en sortent, il est concrètement impossible pour les ONPV d'inspecter chaque conteneur maritime afin de s'assurer qu'il est exempt d'organismes nuisibles lorsqu'il est déplacé à l'échelle internationale. Cependant, les procédures d'examen et de nettoyage mises en œuvre par les compagnies maritimes pourraient être complétées par un examen visuel et, le cas échéant, un nettoyage pour éliminer les organismes nuisibles à des végétaux, en vue de réduire les risques d'introduction et de diffusion d'organismes nuisibles. C'est pourquoi, il est utile d'élaborer un système international qui délivre un agrément aux compagnies maritimes, de manière à ce qu'elles puissent garantir l'efficacité des processus de nettoyage des conteneurs.</p> <p>Les compagnies maritimes, les destinataires et les dépôts dépôts se partagent la responsabilité de veiller à ce que chaque conteneur soit maintenu exempt d'organismes nuisibles et autres organismes, notamment les espèces exotiques envahissantes. Cependant, les dépôts sont particulièrement importants à cet égard parce que ce sont les lieux où les conteneurs maritimes font normalement l'objet d'un examen visuel et, le cas échéant, d'un nettoyage. (Dans le cadre de la présente norme, un dépôt désigne un lieu autre qu'un parc à conteneurs, qui est géré par les compagnies maritimes ou en leur nom et dans lequel les expéditeurs ou les destinataires peuvent prendre ou déposer des conteneurs maritimes vides.)</p> <p>Il est entendu que le mandat de la CIPV pour la présente norme concerne principalement les organismes nuisibles. Cependant, la CIPV reconnaît aussi les incidences potentielles des organismes non autochtones sur la diversité biologique, la santé humaine et animale et les infrastructures. C'est pourquoi, la présente norme comporte des conseils visant à empêcher l'introduction et la diffusion d'autres organismes, notamment les espèces exotiques envahissantes.</p>	Ajouter le terme dépôt au chapitre des définitions pour améliorer la compréhension du document	Français	Gabon
44.	21	Substantive	<p>CONTEXTE</p> <p>Les conteneurs maritimes qui circulent tout autour du monde se sont avérés être</p>	Au regard de la complexité de la tâche à remplir par l'ONPV, sur quelle base cette dernière pourrait donner une autorisation si elle n'a pas constaté l'existence	Français	Congo, DR*

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
			<p>une filière d'introduction et de diffusion d'organismes nuisibles et autres organismes, notamment les espèces exotiques envahissantes.</p> <p>Compte tenu du nombre considérable de conteneurs déplacés dans le monde entier et de la rapidité avec laquelle ils entrent dans les ports et en sortent, il est concrètement impossible pour les ONPV d'inspecter chaque conteneur maritime afin de s'assurer qu'il est exempt d'organismes nuisibles lorsqu'il est déplacé à l'échelle internationale. Cependant, les procédures d'examen et de nettoyage mises en œuvre par les compagnies maritimes pourraient être complétées par un examen visuel et, le cas échéant, un nettoyage pour éliminer les organismes nuisibles à des végétaux, en vue de réduire les risques d'introduction et de diffusion d'organismes nuisibles. C'est pourquoi, il est utile d'élaborer un système international qui délivre un agrément aux compagnies maritimes, de manière à ce qu'elles puissent garantir l'efficacité des processus de nettoyage des conteneurs.</p> <p>Les compagnies maritimes, les destinataires et les dépôts se partagent la responsabilité de veiller à ce que chaque conteneur soit maintenu exempt d'organismes nuisibles et autres organismes, notamment les espèces exotiques envahissantes. Cependant, les dépôts sont particulièrement importants à cet égard parce que ce sont les lieux où les conteneurs maritimes font normalement l'objet d'un examen visuel et, le cas échéant, d'un nettoyage. (Dans le cadre de la présente norme, un dépôt désigne un lieu autre qu'un parc à conteneurs, qui est géré par les compagnies maritimes ou en leur nom et dans lequel les expéditeurs ou les destinataires peuvent prendre ou déposer des conteneurs maritimes vides.)</p> <p>Il est entendu que le mandat de la CIPV pour la présente norme concerne principalement les organismes nuisibles. Cependant, la CIPV reconnaît aussi les incidences potentielles des organismes non autochtones sur la diversité biologique, la santé humaine et animale et les infrastructures. C'est pourquoi, la présente norme comporte des conseils visant à empêcher l'introduction et la diffusion d'autres organismes, notamment les espèces exotiques envahissantes.</p>	d'une station de nettoyage Comme recommandation:Clarifier le partenariat entre les sociétés maritimes de nettoyage agréées (ou tous les autres acteurs impliqués) et les ONPV		
45.	21	Substantive	<p>CONTEXTE</p> <p>Les conteneurs maritimes qui circulent tout autour du monde se sont avérés être une filière d'introduction et de diffusion d'organismes nuisibles et autres organismes, notamment les espèces exotiques envahissantes.</p>	Sur quelle base l'ONPV peut donner une autorisation si elle n'a pas constaté l'existence d'une station de nettoyage Recommandation : Clarifier le partenariat entre les sociétés maritimes de nettoyage agréées (tous les autres acteurs) et les ONPV (Contexte à retouché et ajouter le terme dépôt au chapitre des définitions pour améliorer la compréhension du	Français	Burundi

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
			<p>Compte tenu du nombre considérable de conteneurs déplacés dans le monde entier et de la rapidité avec laquelle ils entrent dans les ports et en sortent, il est concrètement impossible pour les ONPV d'inspecter chaque conteneur maritime afin de s'assurer qu'il est exempt d'organismes nuisibles lorsqu'il est déplacé à l'échelle internationale. Cependant, les procédures d'examen et de nettoyage mises en œuvre par les compagnies maritimes pourraient être complétées par un examen visuel et, le cas échéant, un nettoyage pour éliminer les organismes nuisibles à des végétaux, en vue de réduire les risques d'introduction et de diffusion d'organismes nuisibles. C'est pourquoi, il est utile d'élaborer un système international qui délivre un agrément aux compagnies maritimes, de manière à ce qu'elles puissent garantir l'efficacité des processus de nettoyage des conteneurs.</p> <p>Les compagnies maritimes, les destinataires et les dépôts se partagent la responsabilité de veiller à ce que chaque conteneur soit maintenu exempt d'organismes nuisibles et autres organismes, notamment les espèces exotiques envahissantes. Cependant, les dépôts sont particulièrement importants à cet égard parce que ce sont les lieux où les conteneurs maritimes font normalement l'objet d'un examen visuel et, le cas échéant, d'un nettoyage. (Dans le cadre de la présente norme, un dépôt désigne un lieu autre qu'un parc à conteneurs, qui est géré par les compagnies maritimes ou en leur nom et dans lequel les expéditeurs ou les destinataires peuvent prendre ou déposer des conteneurs maritimes vides.)</p> <p>Il est entendu que le mandat de la CIPV pour la présente norme concerne principalement les organismes nuisibles. Cependant, la CIPV reconnaît aussi les incidences potentielles des organismes non autochtones sur la diversité biologique, la santé humaine et animale et les infrastructures. C'est pourquoi, la présente norme comporte des conseils visant à empêcher l'introduction et la diffusion d'autres organismes, notamment les espèces exotiques envahissantes.</p>	document)		
46.	22	Substantive	<p>REQUIREMENTS</p> <p>The minimum requirement for this standard is to have clean containers to reduce the level of possible contamination. Any additional requirements by an importing country should be technically justified by conducting a pest risk analysis (PRA).</p>	The "Requirements" section's introduction and Section 1 of the draft ISPM, which propose a container cleanliness standard, are drafted in the passive voice and do not identify what parties are responsible for the container's cleanliness. It does not identify what parties are expected to perform the "visual examination" described in section 1.1 (1). It does not identify any time or frequency for the inspection function. The scope of the draft ISPM is not limited to empty containers being	English	World Shipping Council

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
				<p>dispatched by a shipping company to shippers for loading with cargo. Instead, the draft ISPM would appear to apply to all containers in all locations at all times. This represents a potentially overwhelming and unsustainable burden if it means that there is a constantly recurring obligation for a visual inspection of a container or at every change of possession. The draft ISPM is silent, however, on when a cleanliness inspection under the standard is necessary. The draft ISPM states that "If a container has no visible contamination, it is considered to be clean. Documentary verification of the cleanliness will be required." This raises a number of issues. First, the draft ISPM's cleanliness standard would appear to require an extensive and intensive manual examination by a human being of a container that could not be performed remotely (2). For example, the draft states the hollow spaces inside a container's corner castings are to be checked, which requires a manual process by a human being that is incompatible with another portion of the draft that states: "pole-mounted remote cameras should be used..." This would require a huge potential cost when applied to all container moves. The draft ISPM compounds the problem with a requirement that every cleanliness examination have some kind of "documentary verification" which must be stored electronically and made available to any importing country at any time upon request. The recordkeeping systems needed to capture, store and retrieve documentary verification of the cleanliness of every container moving in ocean carriers' global operations would be an enormous burden to create and operate. Such a universal documentation system would also be completely disconnected from generally accepted principles for pest risk assessment, including the IPPC's own guidelines for proper pest risk analysis (PRA) (3). We note in this regard that after having spent considerable time already in developing this draft IPSPM, only in May of this year did the CPM request "the SC, with input from the Secretariat, to develop guidance for a survey to be carried out by volunteer NPPOs to</p>		

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
				<p>gather information on the rate of pest interceptions on sea containers” and, further, “encouraged NPPOs to voluntarily take part in the survey and gather information on pest interceptions on sea containers, over a limited time, and submit this information to the Secretariat for analysis and reporting” (4). We believe that this approach for developing a regulatory standard before determining the scope of the problem is wrong and deficient, and does not meet basic standards for a regulatory process, including – arguably – the IPPC’s own guidelines for proper pest risk analysis. This is one more reason why the draft ISPM should be suspended. Rather, documentation of any substantial risk of plant pest from particular geographic locations should be systematically obtained together with the identification of those risks and other relevant pest management data, e.g., time of year of prevalent risk of infestation, so that authorities and industry could understand the risk at issue and could develop appropriate, specific remedial responses. For example, the Canadian and U.S. response to the risk of Asian gypsy moths’ laying eggs on ship and container surfaces at certain times of year in certain North Asian geographies is a targeted response to an identified risk. It would not justify a global, year-round container inspection response – just as the current draft ISPM and its lack of systematic documentation regarding pest infestation on the structures of sea containers cannot, in our view, justify the proposed globally applicable requirements. The liner shipping industry operates roughly 17 million containers globally. If one assumes that containers on average carry cargo shipments for approximately five and half shippers per year, more than 100 million empty containers are being dispatched to shippers around the world per year. The industry already incurs substantial costs in providing clean empty containers to shippers for their use. There are literally many hundreds of millions of changes in container custody during any year. It would be completely unreasonable to require a cleanliness inspection by human beings at each one, and unreasonable to expect “documentary verification”</p>		

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
				<p>of cleanliness at each one. Even if that much documentation could be created and processed, who would review it, when, at whose expense and for what purpose? The CPM has demonstrated sensitivity to costs that it might incur under such a standard. Explaining its decision not to become involved in accrediting “shipping companies”, it stated that such a responsibility “could potentially have huge financial and image impacts for the organization.” The financial impacts of the proposal on the industry deserve equal consideration, particularly when the proposal is not targeted at a specific or defined or documented risk. Footnotes: (1) For example, it is not uncommon for a container to undergo a “street turn”, where it is unloaded at a consignee’s premises and then repositioned directly to the next consignee/shipper without ever being returned to a “yard”, “depot”, or port. Today, the shipper agrees to clean such a container, if the consignee has not done so. Would the draft ISPM allow the relevant commercial parties to continue to allocate such responsibilities amongst themselves? (2) The draft ISPM defines a “visual examination” to be the “physical examination of plants, plant products, or other regulated articles using the unaided eye, lens, stereoscope or microscope to detect pests or contaminants without testing or processing” (emphasis added). (3) For a general discussion of pest risk analysis and management, see “Biological Invasions: Assessment and Management of Environmental Risk” bulletin by D.A. Andow, University of Minnesota. Incidentally, and referencing the article mentioned in footnote 4 above, the bulletin notes that “the wood from which the containers were made was not an important dispersal pathway for timber pests, but wood inside the containers could be an important one. Moreover, the containers could be an important pathway for pests that found shelter in the container, or for pests associated with the contents of the containers” (page 10). The bulletin has been registered with the IPPC as document EWG2011/SeaCon/Doc005. (4) Source: “Sea Containers (2008-001)” summary of events to date.</p>		

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
				Available at https://www.ippc.int/core-activities/standards-setting/expert-drafting-groups/expert-working-groups/sea-containers		
47.	22	Substantive	REQUIREMENTS The minimum requirement for this standard is to have clean containers to reduce the level of possible contamination. Any additional requirements by an importing country should be technically justified by conducting a pest risk analysis (PRA).	There should be a consistent approach throughout the standard if the intent is to include pests AND organisms including invasive alien pests i.e. any reference to "pest" should include "pests and invasive alien pests" as the definition of the pest under ISPM No 5 excludes invasive alien pest.	English	Singapore
48.	22	Substantive	REQUIREMENTS The minimum requirement for this standard is to have clean containers to reduce the level of possible contamination. Any additional requirements by an importing country should be technically justified by conducting a pest risk analysis (PRA).	Does this mean that for each pathway, each pathway would require a PRA if there are additional requirements. For major exporters, this is a huge work load.	English	Australia
49.	22	Substantive	REQUIREMENTS The minimum requirement for this standard is to have clean containers to reduce the level of possible contamination. Any additional requirements by an importing country should be technically justified by conducting a pest risk analysis (PRA).	The various requirements contained in the standard need to consider the role of the various parties along the sea container movement pathway. Documentation verification and system maintenance should be re-examined as those could be onerous and costly. Options considered need to be economically feasible to trade to garner their support for the standard. Consultation with trade could identify potential existing systems, which could be modified and implemented for the purpose of preventing phytosanitary risks associated with the movement of sea container.	English	Canada
50.	23	Substantive	1. Clean Containers For the purposes of this standard, a clean container is one that, after visual examination, is considered free from contamination and organisms, including invasive alien species, i.e. all life stages of insects, snails, slugs, fungi, seeds or other plant parts. Contamination includes such things as soil, organic residues from previous cargoes, dunnage.	This section is contradictory with ISPM 5 definition for contamination. For example, in Section 1, invasive alien species may not necessarily be a pest or regulated article.	English	United States of America
51.	23	Substantive	1. Clean Containers For the purposes of this standard, a clean container is one that, after visual examination, is considered free from contamination and organisms, including invasive alien species, i.e. all life stages of insects, snails, slugs, <u>mice</u> fungi,	-China and Myanmar proposed to include mice and snakes -Thailand required more discussion on "invasive alien species"	English	Bangladesh

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
			seeds or other plant parts. Contamination includes such things as soil, organic residues from previous cargoes, dunnage.			
52.	23	Substantive	<p>1. Clean Containers</p> <p>For the purposes of this standard, a clean container is one that, after visual examination, is considered free from contamination and organisms, including invasive alien species, <u>quarantine pests</u>. i.e. all life stages of insects, snails, slugs, fungi, seeds or other plant parts. Contamination includes such things as soil, organic residues from previous cargoes, dunnage.</p>	The scope of all ISPMs is quarantine pests, and the scope of this standard is specified in the fifth paragraph. So invasive alien species should not be in the scope of the standard.	English	China
53.	24	Substantive	<p>1.1 Visual examination of sea containers for contamination</p> <p>The interior and exterior of all six sides of the sea container (i.e. roof, underside, side walls and end walls, including doors) should be visually examined for potential contamination and should include the following areas:</p> <ul style="list-style-type: none"> - refrigeration intake screens and condenser coils - removable equipment (<u>give examples of removable equipment</u>) - hollows in the container structure such as forklift pockets, corner castings, damaged areas, etc. <p>Equipment to aid visual examination such as adequate lighting, mirrors on poles, roof access structures, container stands and pole-mounted remote cameras should be used when necessary.</p> <p>The examination would be carried out by the agent of the body certified <u>by the NPPO</u> to manage the visual examination and cleaning if necessary of the sea containers. This could be the staff of a depot working at a depot as employed by a shipping company.</p> <p>If a container has no visible contamination, it is considered to be clean. Documentary verification of the cleanliness will be required.</p>	There should be an annex with a diagram or pictures giving an idea of some of these parts of the container.	English	Suriname, Jamaica, Saint Kitts And Nevis, Trinidad and Tobago, Barbados, Dominica
54.	24	Substantive	<p>1.1 Visual examination of sea containers for contamination</p> <p>The interior and exterior of all six sides of the sea container (i.e. roof, underside, side walls and end walls, including doors) should be visually examined for</p>	(24) 1.1. Visual examination of sea containers for contamination When it comes to requiring documentary verification of cleanliness, the WCO suggest the use of electronic information according to international	English	World Customs Organization

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			<p>potential contamination and should include the following areas:</p> <ul style="list-style-type: none"> - refrigeration intake screens and condenser coils - removable equipment - hollows in the container structure such as forklift pockets, corner castings, damaged areas, etc. <p>Equipment to aid visual examination such as adequate lighting, mirrors on poles, roof access structures, container stands and pole-mounted remote cameras should be used when necessary.</p> <p>The examination would be carried out by the agent of the body certified to manage the visual examination and cleaning if necessary of the sea containers. This could be the staff of a depot working at a depot as employed by a shipping company.</p> <p>If a container has no visible contamination, it is considered to be clean. Documentary verification of the cleanliness will be required.</p> <p>(24) 1.1. Visual examination of sea containers for contamination</p> <p>When it comes to requiring documentary verification of cleanliness, the WCO suggest the use of electronic information according to international standards such as the WCO Data Model.</p>	standards such as the WCO Data Model.		
55.	24	Substantive	<p>1.1 Visual examination of sea containers for contamination</p> <p>The interior and exterior of all six sides of the sea container (i.e. roof, underside, side walls and end walls, including doors) should be visually examined for potential contamination and should include the following areas:</p> <ul style="list-style-type: none"> - refrigeration intake screens and condenser coils - removable equipment - hollows in the container structure such as forklift pockets, corner castings, 	The staff of a depot may not be qualified to examine the contamination.	English	Thailand

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
			<p>damaged areas, etc.</p> <p>Equipment to aid visual examination such as adequate lighting, mirrors on poles, roof access structures, container stands and pole-mounted remote cameras should be used when necessary.</p> <p>The examination would be carried out by the agent of the body certified to manage the visual examination and cleaning if necessary of the sea containers. This could be the staff of a depot working at a depot as employed by a shipping company.</p> <p>If a container has no visible contamination, it is considered to be clean. Documentary verification of the cleanliness will be required.</p>			
56.	24	Substantive	<p>1.1 Visual examination of sea containers for contamination</p> <p>The interior and exterior of all six sides of the sea container (i.e. roof, underside, side walls and end walls, including doors) should be visually examined for potential contamination and should include the following areas:</p> <ul style="list-style-type: none"> - refrigeration intake screens and condenser coils - removable equipment - hollows in the container structure such as forklift pockets, corner castings, damaged areas, etc. <p>Equipment to aid visual examination such as adequate lighting, mirrors on poles, roof access structures, container stands and pole-mounted remote cameras should be used when necessary.</p> <p>The examination would be carried out by the agent of the body certified to manage the visual examination and cleaning if necessary of the sea containers. This could be the staff of a depot working at a depot as employed by a shipping company.</p> <p>If a container has no visible contamination, it is considered to be clean. Documentary verification of the cleanliness will be required.</p>	<p>For major trading countries, there are billions of containers dealt with every year. What amount of information is necessary? How long would it need to be stored? This would require a huge IT requirement. Documentary verification will be required. Does this mean records would need to be supplied to the NPPO, which would drown in them. 'All containers' implies 100% inspection, irrelevant of risk. This is a huge impost, with major cost implications. An impost on industry for what benefit? It could also lead to wharf congestion. Costs will be passed on. So a risk based approach may be necessary. Australia is undertaking a risk return project to determine where the greatest need is. Some countries may have processes in place already, for example, Australia has contracted shipping lines/container parks to clean inside containers. With the movement of nearly 3 million containers out of the country, Australia would find it impossible to inspect every one without delays and greatly increased costs. How will the documentary verification evidence be stored? This presumably will be separate from the phytosanitary certificate. What will it be?</p>	English	Australia

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57.	24	Substantive	<p>1.1 Visual examination of sea containers for contamination</p> <p>The interior and exterior of all six sides of the sea container (i.e. roof, underside, side walls and end walls, including doors) should be visually examined for potential contamination and should include the following areas:</p> <ul style="list-style-type: none"> - refrigeration intake screens and condenser coils - removable equipment - hollows in the container structure such as forklift pockets, corner castings, damaged areas, etc. <p>Equipment to aid visual examination such as adequate lighting, mirrors on poles, roof access structures, container stands and pole-mounted remote cameras should be used when necessary.</p> <p>The examination would be carried out by the agent of the body certified to manage the visual examination and cleaning if necessary of the sea containers. This could be the staff of a depot working at a depot as employed by a shipping company.</p> <p>If a container has no visible contamination, it is considered to be clean. Documentary verification of the cleanliness will be required.</p>	Thailand suggested to delete: "This could be the staff of a depot working at a depot as employed by a shipping company. " as it is unnecessary	English	Bangladesh
58.	24	Substantive	<p>1.1 Visual examination of sea containers for contamination</p> <p>The interior and exterior of all six sides of the sea container (i.e. roof, underside, side walls and end walls, including doors) should be visually examined for potential contamination and should include the following areas:</p> <ul style="list-style-type: none"> - refrigeration intake screens and condenser coils - removable equipment - hollows in the container structure such as forklift pockets, corner castings, damaged areas, etc. 	delete: "This could be the staff of a depot working at a depot as employed by a shipping company. " as it is unnecessary	English	Korea, Republic of

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			<p>Equipment to aid visual examination such as adequate lighting, mirrors on poles, roof access structures, container stands and pole-mounted remote cameras should be used when necessary.</p> <p>The examination would be carried out by the agent of the body certified to manage the visual examination and cleaning if necessary of the sea containers. This could be the staff of a depot working at a depot as employed by a shipping company.</p> <p>If a container has no visible contamination, it is considered to be clean. Documentary verification of the cleanliness will be required.</p>			
59.	24	Substantive	<p>1.1 Examen visuel des conteneurs maritimes pour vérifier la contamination</p> <p>L'intérieur et l'extérieur des six faces du conteneur maritime (c'est-à-dire le toit, le plancher, les parois latérales et les parois situées aux extrémités, y compris les portes) devraient faire l'objet d'un examen visuel pour vérifier la contamination potentielle. L'examen devrait aussi porter sur les zones suivantes:</p> <ul style="list-style-type: none"> - les grilles d'entrée et les serpentins condenseurs du système de réfrigération - le matériel amovible - les cavités présentes dans la structure du conteneur, telles que les passages de fourches pour chariots élévateurs, les coins de fixation, les zones endommagées, etc. <p>Du matériel susceptible de faciliter l'examen visuel, tel qu'un éclairage suffisant, des miroirs fixés sur des perches, des structures d'accès au toit, des supports de conteneurs et des caméras commandées à distance montées sur des perches, devrait être employé si nécessaire.</p> <p>L'examen serait réalisé par l'agent de l'organisme ayant reçu l'agrément pour effectuer l'examen visuel et, le cas échéant, le nettoyage des conteneurs maritimes. Il pourrait s'agir d'un membre du personnel d'un dépôt, qui travaille au dépôt et est employé par une compagnie maritime.</p> <p>Un conteneur qui ne présente aucune contamination visible est considéré comme propre. Les documents relatifs à la vérification de la propreté seront</p>	Clarifier le partenariat entre les sociétés maritimes de nettoyage agréées (tous les autres acteurs) et les ONPV	Français	Gabon

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
			demandés.			
60.	24	Substantive	<p>1.1 Visual examination of sea containers for contamination</p> <p>The interior and exterior of all six sides of the sea container (i.e. roof, underside, side walls and end walls, including doors) should be visually examined for potential contamination and should include the following areas:</p> <ul style="list-style-type: none"> - refrigeration intake screens and condenser coils - removable equipment (examples of removable equipment) - hollows in the container structure such as forklift pockets, corner castings, damaged areas, etc. <p>Equipment to aid visual examination such as adequate lighting, mirrors on poles, roof access structures, container stands and pole-mounted remote cameras should be used when necessary.</p> <p>The examination would be carried out by the agent of the body certified (who certifies the body) to manage the visual examination and cleaning if necessary of the sea containers. This could be the staff of a depot working at a depot as employed by a shipping company.</p> <p>If a container has no visible contamination, it is considered to be clean. Documentary verification of the cleanliness will be required.</p>	Examples of equipment should be provided as a guide in some form	English	Guyana
61.	24	Substantive	<p>1.1 Examen visuel des conteneurs maritimes pour vérifier la contamination</p> <p>L'intérieur et l'extérieur des six faces du conteneur maritime (c'est-à-dire le toit, le plancher, les parois latérales et les parois situées aux extrémités, y compris les portes) devraient faire l'objet d'un examen visuel pour vérifier la contamination potentielle. L'examen devrait aussi porter sur les zones suivantes:</p> <ul style="list-style-type: none"> - les grilles d'entrée et les serpentins condenseurs du système de réfrigération - le matériel amovible - les cavités présentes dans la structure du conteneur, telles que les passages 	Clarifier le Partenariat entre les Sociétés maritimes de nettoyage agréées (tous les acteurs impliqués) et les ONPV	Français	Congo, DR*

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
			<p>de fourches pour chariots élévateurs, les coins de fixation, les zones endommagées, etc.</p> <p>Du matériel susceptible de faciliter l'examen visuel, tel qu'un éclairage suffisant, des miroirs fixés sur des perches, des structures d'accès au toit, des supports de conteneurs et des caméras commandées à distance montées sur des perches, devrait être employé si nécessaire.</p> <p>L'examen serait réalisé par l'agent de l'organisme ayant reçu l'agrément pour effectuer l'examen visuel et, le cas échéant, le nettoyage des conteneurs maritimes. Il pourrait s'agir d'un membre du personnel d'un dépôt, qui travaille au dépôt et est employé par une compagnie maritime.</p> <p>Un conteneur qui ne présente aucune contamination visible est considéré comme propre. Les documents relatifs à la vérification de la propreté seront demandés.</p>			
62.	24	Substantive	<p>1.1 Examen visuel des conteneurs maritimes pour vérifier la contamination</p> <p>L'intérieur et l'extérieur des six faces du conteneur maritime (c'est-à-dire le toit, le plancher, les parois latérales et les parois situées aux extrémités, y compris les portes) devraient faire l'objet d'un examen visuel pour vérifier la contamination potentielle. L'examen devrait aussi porter sur les zones suivantes:</p> <ul style="list-style-type: none"> - les grilles d'entrée et les serpentins condenseurs du système de réfrigération - le matériel amovible - les cavités présentes dans la structure du conteneur, telles que les passages de fourches pour chariots élévateurs, les coins de fixation, les zones endommagées, etc. <p>Du matériel susceptible de faciliter l'examen visuel, tel qu'un éclairage suffisant, des miroirs fixés sur des perches, des structures d'accès au toit, des supports de conteneurs et des caméras commandées à distance montées sur des perches, devrait être employé si nécessaire.</p> <p>L'examen serait réalisé par l'agent de l'organisme ayant reçu l'agrément pour effectuer l'examen visuel et, le cas échéant, le nettoyage des conteneurs</p>	Clarifier le partenariat entre les sociétés maritimes de nettoyage agréées (tous les autres acteurs) et les ONPV dans ce paragraphe	Français	Burundi

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
			maritimes. Il pourrait s'agir d'un membre du personnel d'un dépôt, qui travaille au dépôt et est employé par une compagnie maritime. Un conteneur qui ne présente aucune contamination visible est considéré comme propre. Les documents relatifs à la vérification de la propreté seront demandés.			
63.	25	Substantive	<p>1.2 Methods to eliminate contamination</p> <p>The contamination removal method should be the most effective for the particular contaminant contamination present. Consideration should be given to confinement and treatment of sea containers that are contaminated with pests that have a potential to become established and spread. In some cases the NPPO may request that specimens be collected for identification purposes.</p> <p>Methods to eliminate contamination may include:</p> <ul style="list-style-type: none"> - sweeping out or vacuum cleaning the interior of the sea container, using an absorbent powder when necessary - using low pressure water wash - scraping or using a sanding disk or wire brush - using a high pressure water wash with cold or hot water, with or without detergent - using a steam clean method, with or without detergent - using abrasive blasting - heat treatment - fumigation - removal of seeds or plant parts from air intake fans on refrigerator units. 	This wording is more acceptable.	English	Suriname, Jamaica, Trinidad and Tobago, Barbados, Dominica

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
			<p>- or a combination of methods</p> <p>Methods for the disposal of contamination should be sufficient to prevent spread of pests and may include:</p> <ul style="list-style-type: none"> - bagging - incineration - deep burial - containment - where sea containers are stored for some time, pesticides may need to be applied. <p>Disposal of wash water must be appropriate to the risk and in accordance with national or local regulations.</p>			
64.	25	Substantive	<p>1.2 Methods to eliminate contamination</p> <p>The contamination removal method should be the most effective for the particular contaminant contamination present. Consideration should be given to confinement and treatment of sea containers that are contaminated with pests that have a potential to spread <u>and become established</u>. In some cases the NPPO may request that specimens be collected for identification purposes.</p> <p>Methods to eliminate contamination may include:</p> <ul style="list-style-type: none"> - sweeping out or vacuum cleaning the interior of the sea container, using an absorbent powder when necessary - using low pressure water wash 	This term is more acceptable.	English	Saint Kitts And Nevis

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
			<ul style="list-style-type: none"> - scraping or using a sanding disk or wire brush - using a high pressure water wash with cold or hot water, with or without detergent - using a steam clean method, with or without detergent - using abrasive blasting - heat treatment - fumigation - removal of seeds or plant parts from air intake fans on refrigerator units. - or a combination of methods <p>Methods for the disposal of contamination should be sufficient to prevent spread of pests and may include:</p> <ul style="list-style-type: none"> - bagging - incineration - deep burial - containment - where sea containers are stored for some time, pesticides may need to be applied. <p>Disposal of wash water must be appropriate to the risk and in accordance with national or local regulations.</p>			

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
65.	25	Substantive	<p>1.2 Methods to eliminate contamination</p> <p>The contamination removal method should be the most effective for the particular contamination present. Consideration should be given to confinement and treatment of sea containers that are contaminated with pests that have a potential to spread. In some cases the NPPO may request that specimens be collected for identification purposes.</p> <p>Methods to eliminate contamination may include:</p> <ul style="list-style-type: none"> - sweeping out or vacuum cleaning the interior of the sea container, using an absorbent powder when necessary - using low pressure water wash - scraping or using a sanding disk or wire brush - using a high pressure water wash with cold or hot water, with or without detergent - using a steam clean method, with or without detergent - using abrasive blasting - heat treatment - fumigation - removal of seeds or plant parts from air intake fans on refrigerator units. <p>Methods for the disposal of contamination should be sufficient to prevent spread of pests and may include:</p> <ul style="list-style-type: none"> - bagging 	<p>(25) 1.2. Elimination of Contamination Regarding the methods of eliminating contamination, the measures need to take into consideration the health risks posed to private sector and government parties that deal with containers afterwards which is especially the case for fumigation. Numerous incidents occur where Customs officers are unaware of the fumigation of containers when performing controls leading to dangerous and sometimes deadly situations.</p>	English	World Customs Organization

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
			<ul style="list-style-type: none"> - incineration - deep burial - containment - where sea containers are stored for some time, pesticides may need to be applied. <p>Disposal of wash water must be appropriate to the risk and in accordance with national or local regulations.</p> <p>(25) 1.2. Elimination of Contamination</p> <p>Regarding the methods of eliminating contamination, the measures need to take into consideration the health risks posed to private sector and government parties that deal with containers afterwards which is especially the case for fumigation. Numerous incidents occur where Customs officers are unaware of the fumigation of containers when performing controls leading to dangerous and sometimes deadly situations.</p>			
66.	25	Substantive	<p>1.2 Methods to eliminate contamination</p> <p>The contamination removal method should be the most effective for the particular contamination contaminant present. Consideration should be given to confinement and treatment of sea containers that are contaminated with pests that have a potential to be introduced, established and spread. In some cases the NPPO may request that specimens be collected for identification purposes.</p> <p>Methods to eliminate contamination may include:</p> <ul style="list-style-type: none"> - sweeping out or vacuum cleaning the interior of the sea container, using an absorbent powder when necessary - using low pressure water wash - scraping or using a sanding disk or wire brush 	This wording is more appropriate	English	Guyana

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
			<ul style="list-style-type: none"> - using a high pressure water wash with cold or hot water, with or without detergent - using a steam clean method, with or without detergent - using abrasive blasting - heat treatment - fumigation - removal of seeds or plant parts from air intake fans on refrigerator units. - <u>or the use of a combination of the above methods</u> <p>Methods for the disposal of contamination should be sufficient to prevent spread of pests and may include:</p> <ul style="list-style-type: none"> - bagging - incineration - deep burial - containment - where sea containers are stored for some time, pesticides may need to be applied. <p>Disposal of wash water must be appropriate to the risk and in accordance with national or local regulations.</p>			
67.	25	Substantive	<p>1.2 Methods to eliminate contamination</p> <p>The contamination removal method should be the most effective for the particular contamination present. Consideration should be given to confinement and treatment of sea containers that are contaminated with pests that have a</p>	Define specifications for deep burial for uniformity	English	Kenya

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
			<p>potential to spread. In some cases the NPPO may request that specimens be collected for identification purposes.</p> <p>Methods to eliminate contamination may include:</p> <ul style="list-style-type: none"> - sweeping out or vacuum cleaning the interior of the sea container, using an absorbent powder when necessary - using low pressure water wash - scraping or using a sanding disk or wire brush - using a high pressure water wash with cold or hot water, with or without detergent - using a steam clean method, with or without detergent - using abrasive blasting - heat treatment - fumigation - removal of seeds or plant parts from air intake fans on refrigerator units. <p>Methods for the disposal of contamination should be sufficient to prevent spread of pests and may include:</p> <ul style="list-style-type: none"> - bagging - incineration - deep burial 			

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
			<p>- containment</p> <p>- where sea containers are stored for some time, pesticides may need to be applied.</p> <p>Disposal of wash water must be appropriate to the risk and in accordance with national or local regulations.</p>			
68.	26	Editorial	<p>2. Certification</p> <p>Shipping companies <u>or agents</u> may be certified based on their ability to undertake specific procedures that may result in clean sea containers. The procedures may include:</p> <ul style="list-style-type: none"> - visual examinations - cleaning or other methods for removing contamination if necessary, or treatment on assumption that contamination is present - waste disposal, as required. <p>In this case, each shipping company certified would have its systems validated by [a conformance assessment body (CAB)¹] or [the NPPO] and receive approval to operate. Where such systems operate, the CAB or NPPO will be required to verify ongoing compliance with this standard by audit² techniques as described in a manual for each certified shipping company.</p> <p>Shipping companies or their agents should establish systems to include the specific procedures listed above.</p> <p>The certification of a shipping company would mean that its procedures are deemed satisfactory wherever it operates.</p> <p>[The certifying CAB and its certified shipping companies would be subject to auditing by an international accreditation organisation³ to check that they are effective in ensuring that sea containers are clean. Records of these audits should be kept.]</p>	Agents should be included.	English	Guyana

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
			<p>The systems used by shipping companies may include:</p> <ul style="list-style-type: none"> - a quality management system - documentation in a user manual - operators trained and qualified - appropriate recording methods - auditing of the service suppliers - storage areas that prevent recontamination of clean containers. 			
69.	26	Substantive	<p>2. Certification</p> <p>Shipping companies may be certified based on their ability to undertake specific procedures that may result in clean sea containers. The procedures may include:</p> <ul style="list-style-type: none"> - visual examinations - cleaning or other methods for removing contamination if necessary, or treatment on assumption that contamination is present - waste disposal, as required. <p>In this case, each shipping company certified would have its systems validated by [a conformance assessment body (CAB)¹] or [the NPPO] and receive approval to operate. Where such systems operate, the CAB or NPPO will be required to verify ongoing compliance with this standard by audit² techniques as described in a manual for each certified shipping company.</p> <p>Shipping companies or their agents should establish systems to include the specific procedures listed above.</p> <p>The certification of a shipping company would mean that its procedures are deemed satisfactory wherever it operates.</p>	<p>Section 2 of the draft ISPM states: "Shipping companies may be certified based on their ability to undertake specific procedures that may result in clean sea containers." While this would appear to be motivated by a helpful intent, it is unclear what this means, what is intended, or how it would work. First, we note that only "shipping companies" may be so certified. Are shipping companies the only parties that the draft ISPM intends to have an obligation to ensure the cleanliness of a container? Second, as noted above, the scope and frequency of application of the standard are unclear, meaning certification that a shipping company meets the standard would likely engender difficulties, disagreements and confusion. Third, the purpose and value of certification are not stated or clear. Section 2 states: "The certification of a shipping company would mean that its procedures are deemed satisfactory wherever it operates." If a shipping company's procedures are "deemed satisfactory wherever it operates", why would it need to keep records of each individual container's inspection, and present them to an import country upon request? If a shipping company's procedures are "deemed satisfactory", would it be relieved of the obligation to keep records of each individual container's inspection? Fourth, if a shipping company operates in 100 different countries,</p>	English	World Shipping Council

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
			<p>[The certifying CAB and its certified shipping companies would be subject to auditing by an international accreditation organisation³ to check that they are effective in ensuring that sea containers are clean. Records of these audits should be kept.]</p> <p>The systems used by shipping companies may include:</p> <ul style="list-style-type: none"> - a quality management system - documentation in a user manual - operators trained and qualified - appropriate recording methods - auditing of the service suppliers - storage areas that prevent recontamination of clean containers. 	<p>does the party performing the certification/validation need to validate the operation of the company's systems in all 100 locations? If not 100, is one or two countries sufficient? How are the authorities of country A supposed to validate systems or procedures used in country B? Finally, if a certification means that a shipping company's "procedures are deemed satisfactory wherever it operates", then is a certification approved by the authorities in one country automatically to be accepted by the authorities in the 99 other countries where the shipping company may be operating? If not, what criteria would govern?</p>		
70.	26	Substantive	<p>2. Certification</p> <p>Shipping companies <u>or an agent</u> may be certified based on their ability to undertake specific procedures that may result in clean sea containers. The procedures may include:</p> <ul style="list-style-type: none"> - visual examinations - cleaning or other methods for removing contamination if necessary, or treatment on assumption that contamination is present - waste disposal, as required. <p>In this case, each shipping company certified would have its systems validated by [a conformance assessment body (CAB)¹] or [the NPPO] and receive approval to operate. Where such systems operate, the CAB or NPPO will be required to verify ongoing compliance with this standard by audit² techniques as</p>	<p>Not only shipping companies should be certified but any other agent or company that can carry out the cleaning of sea containers. This concept should be included in the other parts of this paragraph when there is reference to the shipping company. The NPPO or the CAB will be trained to do the auditing. Therefore it would not be necessary to have a another layer of auditing to include international auditors. The NPPO would do the monitoring and verification.</p>	English	Suriname, Jamaica, Saint Kitts And Nevis, Trinidad and Tobago, Barbados, Dominica

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
			<p>described in a manual for each certified shipping company.</p> <p>Shipping companies or their agents should establish systems to include the specific procedures listed above.</p> <p>The certification of a shipping company would mean that its procedures are deemed satisfactory wherever it operates.</p> <p>[The certifying CAB and its certified shipping companies would be subject to auditing by an international accreditation organisation³ to check that they are effective in ensuring that sea containers are clean. Records of these audits should be kept.]</p> <p>The systems used by shipping companies may include:</p> <ul style="list-style-type: none"> - a quality management system - documentation in a user manual - operators trained and qualified - appropriate recording methods - auditing of the service suppliers - storage areas that prevent recontamination of clean containers. 			
71.	26	Substantive	<p>2. Certification</p> <p>Shipping companies may be certified based on their ability to undertake specific procedures that may result in clean sea containers. The procedures may include:</p> <ul style="list-style-type: none"> - visual examinations - cleaning or other methods for removing contamination if necessary, or treatment on assumption that contamination is present 	It is unclear that whether certification by the NPPO or CAB of exporting country would be recognised by the NPPO of the importing country. There should a statement to include this.	English	Singapore

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
			<p>- waste disposal, as required.</p> <p>In this case, each shipping company certified would have its systems validated by [a conformance assessment body (CAB)¹] or [the NPPO] and receive approval to operate. Where such systems operate, the CAB or NPPO will be required to verify ongoing compliance with this standard by audit² techniques as described in a manual for each certified shipping company.</p> <p>Shipping companies or their agents should establish systems to include the specific procedures listed above.</p> <p>The certification of a shipping company would mean that its procedures are deemed satisfactory wherever it operates.</p> <p>[The certifying CAB and its certified shipping companies would be subject to auditing by an international accreditation organisation³ to check that they are effective in ensuring that sea containers are clean. Records of these audits should be kept.]</p> <p>The systems used by shipping companies may include:</p> <ul style="list-style-type: none"> - a quality management system - documentation in a user manual - operators trained and qualified - appropriate recording methods - auditing of the service suppliers - storage areas that prevent recontamination of clean containers. 			
72.	26	Substantive	<p>2. Certification</p> <p>Shipping companies may be certified based on their ability to undertake specific</p>	<p>(26) 2. Certification The WCO promotes the concept of trusted traders, e.g. Authorised Economic Operators (AEO) who voluntarily invest in the safety and security of their supply chains in return for tangible benefits such as reduced inspection rates and system based controls</p>	English	World Customs Organization

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
			<p>procedures that may result in clean sea containers. The procedures may include:</p> <ul style="list-style-type: none"> - visual examinations - cleaning or other methods for removing contamination if necessary, or treatment on assumption that contamination is present - waste disposal, as required. <p>In this case, each shipping company certified would have its systems validated by [a conformance assessment body (CAB)¹] or [the NPPO] and receive approval to operate. Where such systems operate, the CAB or NPPO will be required to verify ongoing compliance with this standard by audit² techniques as described in a manual for each certified shipping company.</p> <p>Shipping companies or their agents should establish systems to include the specific procedures listed above.</p> <p>The certification of a shipping company would mean that its procedures are deemed satisfactory wherever it operates.</p> <p>[The certifying CAB and its certified shipping companies would be subject to auditing by an international accreditation organisation³ to check that they are effective in ensuring that sea containers are clean. Records of these audits should be kept.]</p> <p>The systems used by shipping companies may include:</p> <ul style="list-style-type: none"> - a quality management system - documentation in a user manual - operators trained and qualified - appropriate recording methods 	<p>rather than transaction based controls. However, random checks and intelligence driven controls remain possible. AEO programmes may offer coordination and cooperation opportunities for NPPOs in their certification efforts of shipping lines.</p>		

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
			<p>- auditing of the service suppliers</p> <p>- storage areas that prevent recontamination of clean containers.</p> <p>(26) 2. Certification</p> <p>The WCO promotes the concept of trusted traders, e.g. Authorised Economic Operators (AEO) who voluntarily invest in the safety and security of their supply chains in return for tangible benefits such as reduced inspection rates and system based controls rather than transaction based controls. However, random checks and intelligence driven controls remain possible. AEO programmes may offer coordination and cooperation opportunities for NPPOs in their certification efforts of shipping lines.</p>			
73.	26	Substantive	<p>2. Certification</p> <p>Shipping companies may be certified based on their ability to undertake specific procedures that may result in clean sea containers. The procedures may include:</p> <ul style="list-style-type: none"> - visual examinations - cleaning or other methods for removing contamination if necessary, or treatment on assumption that contamination is present - waste disposal, as required. <p>In this case, each shipping company certified would have its systems validated by [a conformance assessment body (CAB)¹] or [the NPPO] and receive approval to operate. Where such systems operate, the CAB or NPPO will be required to verify ongoing compliance with this standard by audit² techniques as described in a manual for each certified shipping company.</p> <p>Shipping companies or their agents should establish systems to include the specific procedures listed above.</p> <p>The certification of a shipping company would mean that its procedures are deemed satisfactory wherever it operates.</p>	<p>Who can certify shipping lines as they are generally flagged in countries other than the exporting country? What are the legal consequences of this? Who will pay for audits? How can least developing countries carry this cost?</p>	English	Australia

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
			<p>[The certifying CAB and its certified shipping companies would be subject to auditing by an international accreditation organisation³ to check that they are effective in ensuring that sea containers are clean. Records of these audits should be kept.]</p> <p>The systems used by shipping companies may include:</p> <ul style="list-style-type: none"> - a quality management system - documentation in a user manual - operators trained and qualified - appropriate recording methods - auditing of the service suppliers - storage areas that prevent recontamination of clean containers. 			
74.	26	Substantive	<p>2. Certification</p> <p>Shipping companies may be certified based on their ability to undertake specific procedures that may result in clean sea containers. The procedures may include:</p> <ul style="list-style-type: none"> - visual examinations - cleaning or other methods for removing contamination if necessary, or treatment on assumption that contamination is present - waste disposal, as required. <p>In this case, each shipping company certified would have its systems validated by [a conformance assessment body (CAB)¹] or [the NPPO] and receive approval to operate. Where such systems operate, the CAB or NPPO will be required to verify ongoing compliance with this standard by audit² techniques as described in a manual for each certified shipping company.</p>	<p>1.The draft does not clearly specify the body to carry out the certification of shipping companies. 2.The draft does not state clearly whether NPPO would also be subject to audit by an international accreditation organization if NPPO is the certifying body. 3.The draft lacks a statement on whether each member state should accept the certification made by the NPPO or CAB of other member states. 4.The certification and auditing criteria/guidelines are not clearly stated in the draft although they are briefly mentioned.</p>	English	China

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
			<p>Shipping companies or their agents should establish systems to include the specific procedures listed above.</p> <p>The certification of a shipping company would mean that its procedures are deemed satisfactory wherever it operates.</p> <p>[The certifying CAB and its certified shipping companies would be subject to auditing by an international accreditation organisation³ to check that they are effective in ensuring that sea containers are clean. Records of these audits should be kept.]</p> <p>The systems used by shipping companies may include:</p> <ul style="list-style-type: none"> - a quality management system - documentation in a user manual - operators trained and qualified - appropriate recording methods - auditing of the service suppliers - storage areas that prevent recontamination of clean containers. <p><u>The organization to carry out the certification should be clearly specified.</u></p>			
75.	26	Substantive	<p>2. Certification</p> <p>Shipping companies may be certified based on their ability to undertake specific procedures that may result in clean sea containers. The procedures may include:</p> <ul style="list-style-type: none"> - visual examinations - cleaning or other methods for removing contamination if necessary, or treatment on assumption that contamination is present 	<p>Certification aspects of the standard need to be clarified, especially when a company has businesses in multiple countries. International Accreditation could be considered (for example, ISPM 15 certification system), which will enable international recognition and central accreditation maintenance for a company.</p>	English	Canada

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
			<p>- waste disposal, as required.</p> <p>In this case, each shipping company certified would have its systems validated by [a conformance assessment body (CAB)¹] or [the NPPO] and receive approval to operate. Where such systems operate, the CAB or NPPO will be required to verify ongoing compliance with this standard by audit² techniques as described in a manual for each certified shipping company.</p> <p>Shipping companies or their agents should establish systems to include the specific procedures listed above.</p> <p>The certification of a shipping company would mean that its procedures are deemed satisfactory wherever it operates.</p> <p>[The certifying CAB and its certified shipping companies would be subject to auditing by an international accreditation organisation³ to check that they are effective in ensuring that sea containers are clean. Records of these audits should be kept.]</p> <p>The systems used by shipping companies may include:</p> <ul style="list-style-type: none"> - a quality management system - documentation in a user manual - operators trained and qualified - appropriate recording methods - auditing of the service suppliers - storage areas that prevent recontamination of clean containers. 			
76.	26	Substantive	<p>2. Agrément</p> <p>Les compagnies maritimes peuvent se voir délivrer un agrément qui soit fondé sur leur capacité à mettre en œuvre des procédures spécifiques dont le résultat peut être des conteneurs maritimes propres. Les procédures peuvent être</p>	<p>Repréciser clairement les rôles des différents acteurs .C'est à l'ONPV de délivrer des agréments conformément aux dispositions de la CIPV</p>	Français	Congo, DR*

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
			<p>notamment les suivantes:</p> <ul style="list-style-type: none"> - examens visuels - nettoyage ou autres méthodes permettant d'éliminer la contamination si nécessaire, ou traitement en cas de contamination supposée - rejet des déchets, conformément aux prescriptions. <p>Dans ce cas, chaque compagnie maritime agréée aurait ses systèmes validés par [un organisme chargé de l'évaluation de la conformité¹] ou [l'ONPV] et recevrait l'autorisation d'opérer. Lorsque de tels systèmes fonctionneront, il incombera à l'organisme chargé de l'évaluation de la conformité ou à l'ONPV de vérifier la conformité permanente à la présente norme, au moyen des techniques d'audit² décrites dans un manuel propre à chaque compagnie maritime agréée.</p> <p>Les compagnies maritimes ou leurs agents devraient établir des systèmes pour intégrer les procédures spécifiques listées plus haut.</p> <p>La délivrance d'un agrément à une compagnie maritime signifierait que ses procédures sont jugées satisfaisantes partout où la compagnie opère.</p> <p>[L'organisme chargé de l'évaluation de la conformité qui délivre l'agrément et les compagnies maritimes à qui il a délivré un agrément feraient l'objet d'un audit par une organisation d'accréditation internationale³ pour vérifier que l'organisme et les compagnies assurent efficacement la propreté des conteneurs maritimes. Les dossiers relatifs à ces audits devraient être conservés.]</p> <p>Les systèmes employés par les compagnies maritimes peuvent être notamment les suivants:</p> <ul style="list-style-type: none"> - un système de gestion de la qualité - une documentation dans un manuel d'utilisation - des opérateurs formés et qualifiés 			

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
			<ul style="list-style-type: none"> - des méthodes d'enregistrement adaptées - un audit des prestataires de services - des zones de stockage qui évitent une nouvelle contamination des conteneurs propres. 			
77.	26	Substantive	<p>2. Agrément</p> <p>Les compagnies maritimes peuvent se voir délivrer un agrément qui soit fondé sur leur capacité à mettre en œuvre des procédures spécifiques dont le résultat peut être des conteneurs maritimes propres. Les procédures peuvent être notamment les suivantes:</p> <ul style="list-style-type: none"> - examens visuels - nettoyage ou autres méthodes permettant d'éliminer la contamination si nécessaire, ou traitement en cas de contamination supposée - rejet des déchets, conformément aux prescriptions. <p>Dans ce cas, chaque compagnie maritime agréée aurait ses systèmes validés par [un organisme chargé de l'évaluation de la conformité¹] ou [l'ONPV] et recevrait l'autorisation d'opérer. Lorsque de tels systèmes fonctionneront, il incombera à l'organisme chargé de l'évaluation de la conformité ou à l'ONPV de vérifier la conformité permanente à la présente norme, au moyen des techniques d'audit² décrites dans un manuel propre à chaque compagnie maritime agréée.</p> <p>Les compagnies maritimes ou leurs agents devraient établir des systèmes pour intégrer les procédures spécifiques listées plus haut.</p> <p>La délivrance d'un agrément à une compagnie maritime signifierait que ses procédures sont jugées satisfaisantes partout où la compagnie opère.</p> <p>[L'organisme chargé de l'évaluation de la conformité qui délivre l'agrément et les compagnies maritimes à qui il a délivré un agrément feraient l'objet d'un audit par une organisation d'accréditation internationale³ pour vérifier que l'organisme et les compagnies assurent efficacement la propreté des conteneurs maritimes.</p>	<p>repréciser clairement les rôles des différents acteurs. C'est à l'ONPV de délivrer des agréments conformément aux dispositions de la CIPV.</p>	Français	Burundi

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
			<p>Les dossiers relatifs à ces audits devraient être conservés.]</p> <p>Les systèmes employés par les compagnies maritimes peuvent être notamment les suivants:</p> <ul style="list-style-type: none"> - un système de gestion de la qualité - une documentation dans un manuel d'utilisation - des opérateurs formés et qualifiés - des méthodes d'enregistrement adaptées - un audit des prestataires de services - des zones de stockage qui évitent une nouvelle contamination des conteneurs propres. 			
78.	26	Technical	<p>2. Agrément</p> <p>Les compagnies maritimes peuvent se voir délivrer un agrément qui soit fondé sur leur capacité à mettre en œuvre des procédures spécifiques dont le résultat peut être des conteneurs maritimes propres. Les procédures peuvent être notamment les suivantes:</p> <ul style="list-style-type: none"> - examens visuels - nettoyage ou autres méthodes permettant d'éliminer la contamination si nécessaire, ou traitement en cas de contamination supposée - rejet des déchets, conformément aux prescriptions. <p>Dans ce cas, chaque compagnie maritime agréée aurait ses systèmes validés par [un organisme chargé de l'évaluation de la conformité¹] ou [l'ONPV] et recevrait l'autorisation d'opérer. Lorsque de tels systèmes fonctionneront, il incombera à l'organisme chargé de l'évaluation de la conformité ou à l'ONPV de vérifier la conformité permanente à la présente norme, au moyen des techniques</p>	repréciser clairement, au paragraphe 8, les rôles des différents acteurs. C'est à l'ONPV de délivrer des agréments conformément aux dispositions de la CIPV.	Français	Gabon

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
			<p>d'audit² décrites dans un manuel propre à chaque compagnie maritime agréée.</p> <p>Les compagnies maritimes ou leurs agents devraient établir des systèmes pour intégrer les procédures spécifiques listées plus haut.</p> <p>La délivrance d'un agrément à une compagnie maritime signifierait que ses procédures sont jugées satisfaisantes partout où la compagnie opère.</p> <p>[L'organisme chargé de l'évaluation de la conformité qui délivre l'agrément et les compagnies maritimes à qui il a délivré un agrément feraient l'objet d'un audit par une organisation d'accréditation internationale³ pour vérifier que l'organisme et les compagnies assurent efficacement la propreté des conteneurs maritimes. Les dossiers relatifs à ces audits devraient être conservés.]</p> <p>Les systèmes employés par les compagnies maritimes peuvent être notamment les suivants:</p> <ul style="list-style-type: none"> - un système de gestion de la qualité - une documentation dans un manuel d'utilisation - des opérateurs formés et qualifiés - des méthodes d'enregistrement adaptées - un audit des prestataires de services - des zones de stockage qui évitent une nouvelle contamination des conteneurs propres. 			
79.	26	Technical	<p>2. Certification</p> <p>Shipping companies may be certified based on their ability to undertake specific procedures that may result in clean sea containers. The procedures may include:</p> <ul style="list-style-type: none"> - visual examinations 	<p>-Due to constraints in the implementation of the ISPM by Least Developed and Developing countries due to capacity constraints, the standards should provide guidelines on authorization for inspection by accredited services(This could be in form of annex or appendix to the draft ISPM). This should be standardized to ensure uniformity in implementation. -NPPOs from which containers originate should be given responsibility to</p>	English	Kenya

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
			<p>- cleaning or other methods for removing contamination if necessary, or treatment on assumption that contamination is present</p> <p>- waste disposal, as required.</p> <p>In this case, each shipping company certified would have its systems validated by [a conformance assessment body (CAB)¹] or [the NPPO] and receive approval to operate. Where such systems operate, the CAB or NPPO will be required to verify ongoing compliance with this standard by audit² techniques as described in a manual for each certified shipping company.</p> <p>Shipping companies or their agents should establish systems to include the specific procedures listed above.</p> <p>The certification of a shipping company would mean that its procedures are deemed satisfactory wherever it operates.</p> <p>[The certifying CAB and its certified shipping companies would be subject to auditing by an international accreditation organisation³ to check that they are effective in ensuring that sea containers are clean. Records of these audits should be kept.]</p> <p>The systems used by shipping companies may include:</p> <ul style="list-style-type: none"> - a quality management system - documentation in a user manual - operators trained and qualified - appropriate recording methods - auditing of the service suppliers - storage areas that prevent recontamination of clean containers. 	<p>work with shipping companies to ensure containers pose minimum risks of transmitting contaminants, organisms, including invasive species.</p>		

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
80.	26	Translation	<p>2. Agrément</p> <p>Les compagnies maritimes pourraientpeuvent se voir délivrer un agrément qui soit fondé sur leur capacité à mettre en œuvre des procédures spécifiques dont le résultat peut être des conteneurs maritimes propres. Les procédures peuvent être notamment les suivantes:</p> <ul style="list-style-type: none"> - examens visuels - nettoyage ou autres méthodes permettant d'éliminer la contamination si nécessaire, ou traitement en cas de contamination supposée - rejet des déchets, conformément aux prescriptions. <p>Dans ce cas, chaque compagnie maritime agréée aurait ses systèmes validés par [un organisme chargé de l'évaluation de la conformité¹] ou [l'ONPV] et recevrait l'autorisation d'opérer. Lorsque de tels systèmes fonctionneront, il incombera à l'organisme chargé de l'évaluation de la conformité ou à l'ONPV de vérifier la conformité permanente à la présente norme, au moyen des techniques d'audit² décrites dans un manuel propre à chaque compagnie maritime agréée.</p> <p>Les compagnies maritimes ou leurs agents devraient établir des systèmes pour intégrer les procédures spécifiques listées plus haut.</p> <p>La délivrance d'un agrément à une compagnie maritime signifierait que ses procédures sont jugées satisfaisantes partout où la compagnie opère.</p> <p>[L'organisme chargé de l'évaluation de la conformité qui délivre l'agrément et les compagnies maritimes à qui il a délivré un agrément feraient l'objet d'un audit par une organisation d'accréditation internationale³ pour vérifier que l'organisme et les compagnies assurent efficacement la propreté des conteneurs maritimes. Les dossiers relatifs à ces audits devraient être conservés.]</p> <p>Les systèmes employés par les compagnies maritimes peuvent être notamment les suivants:</p>	Amélioration de la clarté du document	Français	Gabon

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
			<ul style="list-style-type: none"> - un système de gestion de la qualité - une documentation dans un manuel d'utilisation - des opérateurs formés et qualifiés - des méthodes d'enregistrement adaptées - un audit des prestataires de services - des zones de stockage qui évitent une nouvelle contamination des conteneurs propres. 			
81.	26	Translation	<p>2. Agrément</p> <p>Les compagnies maritimes peuvent pourraient se voir délivrer un agrément qui soit fondé sur leur capacité à mettre en œuvre des procédures spécifiques dont le résultat peut être des conteneurs maritimes propres. Les procédures peuvent être notamment les suivantes:</p> <ul style="list-style-type: none"> - examens visuels - nettoyage ou autres méthodes permettant d'éliminer la contamination si nécessaire, ou traitement en cas de contamination supposée - rejet des déchets, conformément aux prescriptions. <p>Dans ce cas, chaque compagnie maritime agréée aurait ses systèmes validés par [un organisme chargé de l'évaluation de la conformité¹] ou [l'ONPV] et recevrait l'autorisation d'opérer. Lorsque de tels systèmes fonctionneront, il incombera à l'organisme chargé de l'évaluation de la conformité ou à l'ONPV de vérifier la conformité permanente à la présente norme, au moyen des techniques d'audit² décrites dans un manuel propre à chaque compagnie maritime agréée.</p> <p>Les compagnies maritimes ou leurs agents devraient établir des systèmes pour intégrer les procédures spécifiques listées plus haut.</p> <p>La délivrance d'un agrément à une compagnie maritime signifierait que ses</p>	Amélioration de la clarté du document	Français	Congo, DR*

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
			<p>procédures sont jugées satisfaisantes partout où la compagnie opère.</p> <p>[L'organisme chargé de l'évaluation de la conformité qui délivre l'agrément et les compagnies maritimes à qui il a délivré un agrément feraient l'objet d'un audit par une organisation d'accréditation internationale³ pour vérifier que l'organisme et les compagnies assurent efficacement la propreté des conteneurs maritimes. Les dossiers relatifs à ces audits devraient être conservés.]</p> <p>Les systèmes employés par les compagnies maritimes peuvent être notamment les suivants:</p> <ul style="list-style-type: none"> - un système de gestion de la qualité - une documentation dans un manuel d'utilisation - des opérateurs formés et qualifiés - des méthodes d'enregistrement adaptées - un audit des prestataires de services - des zones de stockage qui évitent une nouvelle contamination des conteneurs propres. 			
82.	26	Translation	<p>2. Agrément</p> <p>Les compagnies maritimes pourraient peuvent se voir délivrer un agrément qui soit fondé sur leur capacité à mettre en œuvre des procédures spécifiques dont le résultat peut être des conteneurs maritimes propres. Les procédures peuvent être notamment les suivantes:</p> <ul style="list-style-type: none"> - examens visuels - nettoyage ou autres méthodes permettant d'éliminer la contamination si nécessaire, ou traitement en cas de contamination supposée 	Amélioration de la clarté du document	Français	Burundi

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
			<p>- rejet des déchets, conformément aux prescriptions.</p> <p>Dans ce cas, chaque compagnie maritime agréée aurait ses systèmes validés par [un organisme chargé de l'évaluation de la conformité¹] ou [l'ONPV] et recevrait l'autorisation d'opérer. Lorsque de tels systèmes fonctionneront, il incombera à l'organisme chargé de l'évaluation de la conformité ou à l'ONPV de vérifier la conformité permanente à la présente norme, au moyen des techniques d'audit² décrites dans un manuel propre à chaque compagnie maritime agréée.</p> <p>Les compagnies maritimes ou leurs agents devraient établir des systèmes pour intégrer les procédures spécifiques listées plus haut.</p> <p>La délivrance d'un agrément à une compagnie maritime signifierait que ses procédures sont jugées satisfaisantes partout où la compagnie opère.</p> <p>[L'organisme chargé de l'évaluation de la conformité qui délivre l'agrément et les compagnies maritimes à qui il a délivré un agrément feraient l'objet d'un audit par une organisation d'accréditation internationale³ pour vérifier que l'organisme et les compagnies assurent efficacement la propreté des conteneurs maritimes. Les dossiers relatifs à ces audits devraient être conservés.]</p> <p>Les systèmes employés par les compagnies maritimes peuvent être notamment les suivants:</p> <ul style="list-style-type: none"> - un système de gestion de la qualité - une documentation dans un manuel d'utilisation - des opérateurs formés et qualifiés - des méthodes d'enregistrement adaptées - un audit des prestataires de services - des zones de stockage qui évitent une nouvelle contamination des conteneurs propres. 			

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
83.	27	Substantive	<p>3. Verification of Cleanliness</p> <p>When a container has been visually examined and found to be clean it should be verified as clean.</p> <p>Information including whether the sea container was visually examined and found to be being clean and the date of last visual examination should be made available upon import.</p>	Who to do the verification of cleanliness is unclear in this paragraph. In addition, the verification period should be mentioned clearly as a caveat. Should also include the "how" verification is to be carried.	English	Singapore
84.	27	Substantive	<p>3. Verification of Cleanliness</p> <p>When a container has been visually examined and found to be clean it should be verified as clean.</p> <p>Information including whether the sea container was visually examined and found to be being clean and the date of last visual examination should be made available upon import.</p> <p>(27) 3.Verification of Cleanliness</p> <p>Concerning the exchange of information regarding the cleanliness of the container and the last visual inspection, the WCO would like to suggest the use of electronic information and international standards (e.g. WCO Data Model) and consideration of how government agencies can work together. Please remember that private sector and government agencies IT systems may need to be changed and that such a process takes time and money.</p>	(27) 3.Verification of Cleanliness Concerning the exchange of information regarding the cleanliness of the container and the last visual inspection, the WCO would like to suggest the use of electronic information and international standards (e.g. WCO Data Model) and consideration of how government agencies can work together. Please remember that private sector and government agencies IT systems may need to be changed and that such a process takes time and money.	English	World Customs Organization
85.	27	Substantive	<p>3. Verification of Cleanliness</p> <p>When a container has been visually examined and found to be clean it should be verified as clean.</p> <p>Information including whether the sea container was visually examined and found to be being clean and the date of last visual examination should be made available upon import.</p> <p>Validity period of the verification has not been specified in the draft ISPM under each circumstance, including the containers have to stopover or to be</p>	1.Validity period of the verification should be specified. And It is practically operated . 2. In view of the huge numbers of containers turnover, documentary verification in paper form is impractical. It is essential to have a computer system that can be accessed by the shipping companies and NPPOs to track the cleanliness and the whereabouts of the containers. However, the ISPM did not provide much elaboration on what type of system to be used to track the cleanliness of the containers. It is noted in the Expert Working Group (EWG) Report of May, 2012 that some features of the industry's Bayplan/Stowage Plan Occupied and Empty Locations (BAPLIE) System and the United Nations World Custom Organization (WCO) Cargo	English	China

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
			<p>transshipped at different ports before reaching the final destination.</p> <p>The draft ISPM does not provide much elaboration on documentary verification.</p>	Report which can fulfill the purpose. Nevertheless, EWG's recommendation only outlines the features needed and no detailed design and actual testing on the capability of the system have been done. In addition, whether the owner of these systems allow their system to be used for such purpose and the cost implication for using these systems have not been addressed in EWG's recommendation. It's more operated.		
86.	27	Substantive	<p>3. Vérification de la propreté</p> <p>Quand un conteneur a fait l'objet d'un examen visuel et a été jugé propre, son statut de conteneur propre devrait être vérifié.</p> <p>Les informations relatives, notamment et le cas échéant, au fait que le conteneur maritime a fait l'objet d'un examen visuel et a été jugé propre et la date du dernier examen visuel devraient être mises à disposition au moment de l'importation.</p>	Préciser qui devrait procéder à cette vérification du statut de conteneur propre	Français	Gabon
87.	27	Substantive	<p>3. Vérification de la propreté</p> <p>Quand un conteneur a fait l'objet d'un examen visuel et a été jugé propre, son statut de conteneur propre devrait être vérifié.</p> <p>Les informations relatives, notamment et le cas échéant, au fait que le conteneur maritime a fait l'objet d'un examen visuel et a été jugé propre et la date du dernier examen visuel devraient être mises à disposition au moment de l'importation.</p>	Préciser qui devrait procéder à cette vérification du statut de conteneur propre	Français	Congo, DR*
88.	27	Substantive	<p>3. Vérification de la propreté</p> <p>Quand un conteneur a fait l'objet d'un examen visuel et a été jugé propre, son statut de conteneur propre devrait être vérifié.</p> <p>Les informations relatives, notamment et le cas échéant, au fait que le conteneur maritime a fait l'objet d'un examen visuel et a été jugé propre et la date du dernier examen visuel devraient être mises à disposition au moment de l'importation.</p>	Préciser qui devrait procéder à cette vérification du statut de conteneur propre	Français	Burundi
89.	28	Substantive	<p>4. Preventing the Contamination of Clean Containers</p>	First, when a container is at a location where it is being packed or unpacked, it is not in the custody of the	English	World Shipping

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
			<p>Shipping companies should ensure that appropriate measures are taken to prevent the contamination of clean containers. This may involve taking measures when a sea container is moved to / from a depot or terminal to another site to be unpacked, packed or stored or is transiting through another country and may include storing the sea container:</p> <ul style="list-style-type: none"> - an appropriate distance away from pest habitats or pest populations (the distance will depend on the pest) - in areas free of risk from contamination by vegetation, soil, free standing water such as fully paved/sealed storage and handling areas and - in areas away from contaminated containers. <p>Other measures should be applied in specific situations to prevent attracting pests (such as when using artificial lights), or during seasonal pest emergence periods and occasional pest outbreaks.</p> <p>NPPOs should inform shipping companies of any species-specific measures that need to be taken for quarantine pests listed by importing countries.</p>	<p>shipping company, and the packing and unpacking activities are not functions performed by the shipping company, but by the consignor/consignee/shipper. Second, when containers are moved between inland locations, such movements may be under the control of a shipping company, but very often they are not. This section tries to ignore the real world complexities of container custody and operation by arbitrarily assigning responsibility to "shipping companies" to ensure that containers stay clean at all times, even when they are not in the custody of the shipping company. While we recognize the challenge that the ISPM seeks to address, this proposal is unrealistic and unworkable. (1) Footnotes: (1) From our review of the background information describing the draft ISPM, it appears that it was only in May 2013 that it was decided (during the 2013-05 SC discussion) to include loaded (packed) containers' cargoes and packing material in the scope of the ISPM. Up until that point, the discussions had focused exclusively on empty containers. For example, at 2012-04, it appears that the Standards Committee had agreed that: "Contamination at packing is a different topic related to cargo and should not be covered in this draft ISPM at this stage". (Source: https://www.ippc.int/core-activities/standards-setting/expert-drafting-groups/expert-working-groups/sea-containers). While the relatively highest potential pest risk, and the principal challenge, arises from what is put into containers, not the structures of the container itself, and while it is understandable why there may be a desire for an ISPM to address that challenge if it were to be effective, this effort in Section 4 of the draft ISPM to place responsibility on shipping companies to solve all these problems arising when the container is not in the custody of the shipping company is neither credible nor appropriate.</p>		Council
90.	29	Substantive	<p>5. Guidelines for Importing Countries</p> <p>5.1 Inspection for compliance</p>	<p>Section 5.1 of the draft ISPM states: "NPPOs of importing countries should check compliance through inspections or audits." This raises, but does not answer, the fundamental question of "compliance with what?" What is it that an importing country is to be checking? Is</p>	English	World Shipping Council

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
			<p>NPPOs of importing countries should check compliance through inspection or audits. Where an NPPO has confidence in the documentary verification supplied by the shipping company, it should reduce the on-arrival compliance inspections.</p> <p>Where there is no evidence that a visual examination and cleaning system is in place, and the importing country has reason to believe that plant pests may be moved with the sea containers from a specific country, imported containers from that country should be inspected. The pest risks should be identified by conducting a PRA. The specific means of inspecting imported sea containers should be determined by the NPPO of the importing country and the shipping company. To limit the possible spread of pests, the inspections should be undertaken, and any necessary cleaning carried out, before the container leaves the port area. This may depend on the facilities and requirements of the port involved.</p> <p>5.2 Non-compliance</p> <p>Where non-compliance occurs, the importing country may take phytosanitary action as noted in section 5.1.6.1 of ISPM 20:2004.</p> <p>5.3 Notifications</p> <p>Notification of significant non-compliance should follow the requirements of ISPM 13:2001.</p>	<p>the importing country to check only the structures of a container for cleanliness? If the importing country is to check a container for the possible presence of plant pests, the contents of the packed container would be what present the relatively greatest risk, but the draft ISPM does not address that fundamental issue. If it is the content of the container that is to be checked, how would and could the above discussed certification of shipping companies be of any relevance, considering that shipping companies are not responsible for and do not undertake the packing of containers? What constitutes "compliance"? Section 5.1 goes on to state: "Where there is no evidence that a visual examination and cleaning system is in place, and the importing country has reason to believe that plant pests may be moved with the sea containers from a specific country, imported containers from that country should be inspected. The pest risks should be identified by conducting a PRA." We note that Section 5.1 is the first and only time in the draft ISPM that there is any mention of PRA or "pest risk analysis". This entire regulatory proposal lacks any pest risk analysis, until one gets to this point of the draft document. That is a fundamental flaw. (1) The industry can support specific actions based on scientifically justified and documented specific pest risk analysis. For example, as noted above, the U.S. and Canada have established specific inspection regimes for surfaces of ships and containers at certain, defined times of years for ships that have called at certain, defined North Asian ports to protect against Asian gypsy moths. This kind of specific targeted regime to address a known identified risk of invasive species transfer makes sense. A generic proposal for inspecting all sea containers across the globe does not. Section 5.2, entitled "Noncompliance", goes on to state: "Where non-compliance occurs, the importing country may take phytosanitary action as noted in section 5.1.6.1 of ISPM 20:2004". In addition to the confusion about what may constitute "compliance" or "non-compliance", the stated consequences for non-compliance in the draft document are a "cut and paste"</p>		

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				job that have little apparent logic. If the only actions to be taken by an importing country are the kind of container or cargo detention actions mentioned in 5.1.6.1 for remedying situations where an identified plant pest is found, then what is the difference between that state of affairs and the status quo? Footnotes: (1) See also our footnote 5 in General comment, and associated text.		
91.	29	Substantive	<p>5. Guidelines for Importing Countries</p> <p>5.1 Inspection for compliance</p> <p>NPPOs of importing countries should check compliance through inspection or audits. Where an NPPO has confidence in the documentary verification supplied by the shipping company, it should reduce the on-arrival compliance inspections.</p> <p>Where there is no evidence that a visual examination and cleaning system is in place, and the importing country has reason to believe that plant pests may be moved with the sea containers from a specific country, imported containers from that country should be inspected. The pest risks should be identified by conducting a PRA. The specific means of inspecting imported sea containers should be determined by the NPPO of the importing country and the shipping company. To limit the possible spread of pests, the inspections should be undertaken, and any necessary cleaning carried out, before the container leaves the port area. This may depend on the facilities and requirements of the port involved.</p> <p>5.2 Non-compliance</p> <p>Where non-compliance occurs, the importing country may take phytosanitary action as noted in section 5.1.6.1 of ISPM 20:2004.</p> <p>5.3 Notifications</p> <p>Notification of significant non-compliance should follow the requirements of ISPM 13:2001.</p>	(29) 5.1. Inspection for Compliance Inspection for compliance is an area where government agencies could try to coordinate their control activities and cooperate, e.g. by performing joint controls.	English	World Customs Organization

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
			<p>(29) 5.1. Inspection for Compliance</p> <p>Inspection for compliance is an area where government agencies could try to coordinate their control activities and cooperate, e.g. by performing joint controls.</p>			
92.	29	Substantive	<p>5. Directives pour les pays importateurs</p> <p>5.1 Inspection pour vérifier la conformité</p> <p>Les ONPV des pays importateurs devraient vérifier la conformité au moyen d'inspections ou d'audits. Lorsqu'une ONPV a confiance dans les documents relatifs à la vérification qui lui sont fournis par la compagnie maritime, elle devrait alléger les inspections effectuées à l'arrivée pour vérifier la conformité.</p> <p>Lorsque rien n'atteste qu'un système d'examen visuel et de nettoyage est en place et que le pays importateur est fondé à penser que des organismes nuisibles à des végétaux peuvent être déplacés avec les conteneurs maritimes provenant d'un pays spécifique, les conteneurs importés de ce pays devraient faire l'objet d'une inspection. Les risques phytosanitaires devraient être déterminés dans le cadre d'une analyse du risque phytosanitaire. Les modalités précises de l'inspection des conteneurs maritimes importés devraient être fixées par l'ONPV du pays importateur et la compagnie maritime. Pour limiter la diffusion possible d'organismes nuisibles, les inspections devraient être réalisées et le nettoyage éventuellement nécessaire être effectué, avant que le conteneur ne quitte la zone portuaire. Cela peut dépendre des installations et des exigences du port concerné.</p> <p>5.2 Non-conformité</p> <p>En cas de non-conformité, le pays importateur peut prendre des mesures phytosanitaires, comme le décrit la section 5.1.6.1 de la NIMP 20:2004.</p> <p>5.3 Notifications</p> <p>La notification des cas importants de non-conformité devrait suivre les prescriptions de la NIMP 13:2001.</p>	Les modalités d'inspection doivent être précisées et harmonisées afin d'éviter la discrimination dans le commerce international	Français	Gabon
93.	29	Substantive	<p>5. Directives pour les pays importateurs</p>	Les modalités d'inspection doivent être précisées et harmonisées afin d'éviter la discrimination dans le	Français	Congo, DR*

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
			<p>5.1 Inspection pour vérifier la conformité</p> <p>Les ONPV des pays importateurs devraient vérifier la conformité au moyen d'inspections ou d'audits. Lorsqu'une ONPV a confiance dans les documents relatifs à la vérification qui lui sont fournis par la compagnie maritime, elle devrait alléger les inspections effectuées à l'arrivée pour vérifier la conformité.</p> <p>Lorsque rien n'atteste qu'un système d'examen visuel et de nettoyage est en place et que le pays importateur est fondé à penser que des organismes nuisibles à des végétaux peuvent être déplacés avec les conteneurs maritimes provenant d'un pays spécifique, les conteneurs importés de ce pays devraient faire l'objet d'une inspection. Les risques phytosanitaires devraient être déterminés dans le cadre d'une analyse du risque phytosanitaire. Les modalités précises de l'inspection des conteneurs maritimes importés devraient être fixées par l'ONPV du pays importateur et la compagnie maritime. Pour limiter la diffusion possible d'organismes nuisibles, les inspections devraient être réalisées et le nettoyage éventuellement nécessaire être effectué, avant que le conteneur ne quitte la zone portuaire. Cela peut dépendre des installations et des exigences du port concerné.</p> <p>5.2 Non-conformité</p> <p>En cas de non-conformité, le pays importateur peut prendre des mesures phytosanitaires, comme le décrit la section 5.1.6.1 de la NIMP 20:2004.</p> <p>5.3 Notifications</p> <p>La notification des cas importants de non-conformité devrait suivre les prescriptions de la NIMP 13:2001.</p>	commerce international		
94.	29	Substantive	<p>5. Directives pour les pays importateurs</p> <p>5.1 Inspection pour vérifier la conformité</p> <p>Les ONPV des pays importateurs devraient vérifier la conformité au moyen d'inspections ou d'audits. Lorsqu'une ONPV a confiance dans les documents relatifs à la vérification qui lui sont fournis par la compagnie maritime, elle devrait alléger les inspections effectuées à l'arrivée pour vérifier la conformité.</p>	Les modalités d'inspection doivent être précisées et harmonisées afin d'éviter la discrimination dans le commerce international	Français	Burundi

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
			<p>Lorsque rien n'atteste qu'un système d'examen visuel et de nettoyage est en place et que le pays importateur est fondé à penser que des organismes nuisibles à des végétaux peuvent être déplacés avec les conteneurs maritimes provenant d'un pays spécifique, les conteneurs importés de ce pays devraient faire l'objet d'une inspection. Les risques phytosanitaires devraient être déterminés dans le cadre d'une analyse du risque phytosanitaire. Les modalités précises de l'inspection des conteneurs maritimes importés devraient être fixées par l'ONPV du pays importateur et la compagnie maritime. Pour limiter la diffusion possible d'organismes nuisibles, les inspections devraient être réalisées et le nettoyage éventuellement nécessaire être effectué, avant que le conteneur ne quitte la zone portuaire. Cela peut dépendre des installations et des exigences du port concerné.</p> <p>5.2 Non-conformité</p> <p>En cas de non-conformité, le pays importateur peut prendre des mesures phytosanitaires, comme le décrit la section 5.1.6.1 de la NIMP 20:2004.</p> <p>5.3 Notifications</p> <p>La notification des cas importants de non-conformité devrait suivre les prescriptions de la NIMP 13:2001.</p>			
95.	30	Substantive	<p>6. Cooperation</p> <p>Cooperation among importing and exporting countries' NPPOs and shipping companies may include:</p> <ul style="list-style-type: none"> - improvement of the cleanliness measures when non-compliances have been found - research on methods to prevent contamination - information exchange including inspection results. 	Some countries may have processes in place already, for example Australia has contracted shipping lines/container parks to clean inside containers.	English	Australia
96.	31	Substantive	<p>Footnote 1 [Note: Une définition de l'organisme chargé de l'évaluation de la conformité devrait être ajoutée. Selon le site Web du système d'accréditation commun à l'Australie et la Nouvelle-Zélande (JAS-ANZ: www.jas-anz.org), les organismes chargés de l'évaluation de la conformité délivrent des agréments et assurent des services d'inspection pour les organisations et sont accrédités par</p>	il serait nécessaire de se conformer aux dispositions de la CIPV relatives aux missions confiées à l'ONPV et non aux arrangements entre Etats	Français	Gabon

Comm. no.	Para. no.	Comment type	Comment	Explanation	Language	Country
			une organisation d'accréditation.]			
97.	31	Substantive	Footnote 1 [Note: Une définition de l'organisme chargé de l'évaluation de la conformité devrait être ajoutée. Selon le site Web du système d'accréditation commun à l'Australie et la Nouvelle-Zélande (JAS-ANZ: www.jas-anz.org), les organismes chargés de l'évaluation de la conformité délivrent des agréments et assurent des services d'inspection pour les organisations et sont accrédités par une organisation d'accréditation.]	Il serait nécessaire de se conformer aux dispositions de la CIPV relatives aux missions confiées à l'ONPV et non aux arrangements entre Etats	Français	Congo, DR*
98.	31	Substantive	Footnote 1 [Note: Une définition de l'organisme chargé de l'évaluation de la conformité devrait être ajoutée. Selon le site Web du système d'accréditation commun à l'Australie et la Nouvelle-Zélande (JAS-ANZ: www.jas-anz.org), les organismes chargés de l'évaluation de la conformité délivrent des agréments et assurent des services d'inspection pour les organisations et sont accrédités par une organisation d'accréditation.]	il serait nécessaire de se conformer aux dispositions de la CIPV relatives aux missions confiées à l'ONPV et non aux arrangements entre Etats	Français	Burundi
99.	33	Substantive	Footnote 3 [Note: Une définition de l'organisation d'accréditation internationale devrait être ajoutée. Dans le système considéré, une organisation d'accréditation pourrait accréditer un organisme chargé de l'évaluation de la conformité, de manière à ce que celui-ci soit habilité à délivrer un agrément pour le système d'assainissement des conteneurs maritimes d'une compagnie maritime.]	il serait nécessaire de se conformer aux dispositions de la CIPV sur les missions confiées à l'ONPV et non aux arrangements entre Etats	Français	Gabon
100.	33	Substantive	Footnote 3 [Note: Une définition de l'organisation d'accréditation internationale devrait être ajoutée. Dans le système considéré, une organisation d'accréditation pourrait accréditer un organisme chargé de l'évaluation de la conformité, de manière à ce que celui-ci soit habilité à délivrer un agrément pour le système d'assainissement des conteneurs maritimes d'une compagnie maritime.]	Il serait nécessaire de se conformer aux dispositions de la CIPV sur les missions confiées à l'ONPV et non aux arrangements entre Etats	Français	Congo, DR*
101.	33	Substantive	Footnote 3 [Note: Une définition de l'organisation d'accréditation internationale devrait être ajoutée. Dans le système considéré, une organisation d'accréditation pourrait accréditer un organisme chargé de l'évaluation de la conformité, de manière à ce que celui-ci soit habilité à délivrer un agrément pour le système d'assainissement des conteneurs maritimes d'une compagnie maritime.]	il serait nécessaire de se conformer aux dispositions de la CIPV relatives aux missions confiées à l'ONPV et non aux arrangements entre Etats	Français	Burundi