



2014-001: Draft specification: Guidance on pest risk management

Comm no.	Para no.	Comment type	Comment	Explanation	Country
1.	G	Editorial	<p>Under Tasks section - add 2 new points after 1. about pest risk management option identification:</p> <p>1.a Application of pest risks management options;</p> <p>2.b Control of Pest risk management options.</p>	Application and control if measures are successful are the most important part of pest risk management! therefore those should be added in the section - Tasks.	Latvia
2.	G	Substantive	I support the document as it is and I have no comments		Singapore, Georgia, Australia, Guyana, New Zealand, Ghana, Congo
3.	G	Substantive	<p>Pas de nécessité de créer une autre NIMP. La gestion des risques phytosanitaires pourrait être une annexe à la NIMP 11. aussi il y a lieu de renommer la NIMP 11: "ANALYSE ET GESTION DU RISQUE POUR LES ORGANISMES DE QUARANTAINES...."</p>	Eviter des redondants dans les NIMP	Burundi
4.	G	Substantive	<p>Suggest the draft specification for ISPM written in several extensively used language including Chinese.</p>	In convenience of review by contracting parties.	China
5.	G	Substantive	<p>This draft as it is written, does not give the sufficient support that justify the need of an ISPM for Pest Risk Management, so it is proposed a new redaction in more depth of the reason, purpose, scope and tasks.</p>	The reason of the standard as it is written is too general and it does not justify the need to develop a new standard about this concept. In order to have an ISPM related to Pest Risk Management, useful and easy to implement by contracting parties, the standard must take into account the current needs of NPPOs, giving more guidance to address specific cases, considering at least some examples of current difficulties indicating type of product (e.g. fresh fruits, grains, etc.), risk categories and regulated pest groups associated with the commodity.	COSAVE, Brazil, Uruguay, Peru, Argentina, Chile

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6.	G	Substantive	<u>This draft as it is written, does not give the sufficient support that justify the need of an ISPM for Pest Risk Management, so it is proposed a new redaction in more depth of the reason, purpose, scope and tasks.</u>	The reason of the standard as it is written is too general and it does not justify the need to develop a new standard about this concept. In order to have an ISPM related to Pest Risk Management, useful and easy to implement by contracting parties, the standard must take into account the current needs of NPPOs, giving more guidance to address specific cases, considering at least some examples of current difficulties indicating type of product (e.g. fresh fruits, grains, etc.), risk categories and regulated pest groups associated with the commodity.	Paraguay
7.	G	Substantive	<u>Rather than a stand-alone standard, this should be considered as annex to ISPM 11, or an appendix for providing specific examples; alternatively the existing standatd on PRA stage 3 (ISPM 11) could be amended.</u>	To avoid proliferation of related standards.	South Africa
8.	G	Translation	<u>"management" should be translated into Spanish as "manejo", all over the text.</u>	"management" should be translated into Spanish as "manejo", all over the text.	COSAVE, Brazil, Uruguay, Peru, Argentina, Chile
9.	G	Translation	<u>"management" should be translated in to Spanish as "manejo".</u> <u>all over the text</u>	"management" should be translated into Spanish as "manejo", all over the text.	Paraguay
10.	1	Translation	Draft specification for ISPM: <i>Guidance on pest risk management (2014-001)</i>	Translate to Spanish the term "management" as "manejo".	OIRSA
11.	4	Translation	<i>Guidance on pest risk management (2014-001).</i>	Translate to Spanish the term "management" as "manejo".	OIRSA
12.	5	Substantive	Reason for the standard	The US suggests that requirements for transparency be included in this section.	United States of America
13.	5	Translation	Reason for the standard	Translate to Spanish "Justificación de la norma".	OIRSA
14.	6	Editorial	Il existe diverses normes internationales pour les mesures phytosanitaires (NIMP) conceptuelles, mais les NIMP expressément consacrées à des organismes nuisibles et à des marchandises font l'objet d'une demande croissante. De plus, la tendance semble être d'incorporer des éléments liés à la gestion du risque phytosanitaire dans les NIMP, alors qu'il n'existe pas d'indications convenues à ce	pour plus de clarté	Algeria

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			<u>sujet. spécifiques à la gestion du risque phytosanitaire.</u>		
15.	6	Technical	While there is a variety of concept ISPMs available, the demand for pest and commodity-specific ISPMs is increasing. In addition, there seems to be a trend to include various elements related to pest risk management in ISPMs, but there is <u>insufficient</u> no agreed-to guidance on this element.	Some agreed guidance is present in ISPMs 11 and 21, so the sentence should be rectified to reflect this.	EPPO, European Union, Azerbaijan
16.	6	Technical	While there is a variety of concept ISPMs available <u>that address pest risk management (ISPMs 1:2006, ISPM 2:2007, ISPM 11:2013 and ISPM 21:2004), IPPC members have begun developing</u> , the demand for pest and commodity-specific ISPMs <u>is increasing. In addition, and</u> there seems to be a trend to include various elements <u>of related to</u> pest risk management in <u>these specific</u> ISPMs, but there is no agreed-to guidance on this element. <u>A broader standard on pest risk management will avoid a lack of harmonization in these specific standards that include elements of pest risk management.</u>	Changes proposed because there is agreed guidance on pest risk management. There is a basic principle in ISPM 1 (managed risk). The term is defined in ISPM 5 for quarantine and for regulated non quarantine pests. There are 3 concept ISPMs addressing these issue (2, 11 and 21).	COSAVE, Brazil, Uruguay, Peru, Argentina, Chile
17.	6	Technical	While there is a variety of concept ISPMs available <u>that address pest risk management (ISPM 1:2006, ISPM 2:2007, ISPM 11:2013 and ISPM 21:2004), IPPC members have begun developing</u> , the demand for pest and commodity-specific ISPMs <u>is increasing. In addition, and</u> there seems to be a trend to include various elements <u>of related to</u> pest risk management in <u>these specific</u> ISPMs, but there is no agreed-to guidance on this element. <u>A broader standart on pest risk management will avoid a lack of harmonization in these specific standards that include elements of pest risk management</u>	Changes proposed because there is agreed guidance on pest risk management. There is a basic principle in ISPM 1 (managed risk). The term is defined in ISPM 5 for quarantine and for regulated non quarantine pests. There are 3 concept ISPMs addressing these issue (2, 11 and 21).	Paraguay
18.	6	Translation	While there is a variety of concept ISPMs available, the demand for pest and commodity-specific ISPMs is increasing. In addition, there seems to be a trend to include various elements related to pest risk management in ISPMs, but there is no agreed-to guidance on this element.	Translate to Spanish the term “management” as “manejo”.	OIRSA
19.	7	Editorial	Because zero-risk is not a reasonable option, the guiding principle for <u>pest</u> risk management should be to manage risk to achieve the required degree of safety that can be justified and is feasible within the limits of available options and resources. The uncertainty related to economic consequences and the probability of introduction, noted during Stage 2 of a PRA, should also be considered and included in the selection of a pest management option.	For consistency with the Title.	EPPO, European Union, Azerbaijan
20.	7	Editorial	Étant donné que le risque zéro ne constitue pas une option réaliste, le principe directeur en matière de gestion du risque <u>phytosanitaire</u> devrait être de parvenir au <u>degré niveau</u> de sécurité <u>demandé exigé</u> , c'est-à-dire le degré qui peut être justifié et qui semble pouvoir être obtenu dans les limites des possibilités et des ressources disponibles. L'incertitude quant à	plus de clarté	Algeria

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			l'incidence économique et à la probabilité d'introduction, évaluées à l'étape 2 d'une analyse du risque phytosanitaire (ARP), devrait aussi être envisagée et prise en compte lors de la sélection d'une modalité de lutte contre un organisme nuisible.		
21.	7	Substantive	Because zero-risk is not a reasonable option <u>for all cases</u> , the guiding principle for risk management should be to manage risk to achieve the required degree of safety that can be justified and is feasible within the limits of available options and resources. The uncertainty related to economic consequences and the probability of introduction, noted during Stage 2 of a PRA, should also be considered and included in the selection of a pest management option.	This is not an option for all cases but several.	Latvia
22.	7	Substantive	<u>When considering pest risk management options, Because zero-risk is not a reasonable option,</u> the guiding principle for risk management should be to manage risk to <u>an acceptable level</u> achieve the required degree of safety that can be justified and is feasible within the limits of available options and resources. The uncertainty related to economic consequences and the probability of introduction, noted during Stage 2 of a PRA, should also be considered and included in the selection of a pest management option.	The mention of zero risk could be misleading and is better avoided. The suggested rewording reflects that concern.	EPPO, European Union, Azerbaijan
23.	7	Substantive	Because "zero-risk" is not a reasonable option, the guiding principle for risk management should be to manage risk to achieve the required degree of <u>safety</u> <u>phytosanitary protection</u> that can be justified and is feasible within the limits of available options and resources. The uncertainty related to economic consequences and the probability of introduction, noted during Stage 2 of a <u>pest risk analysis (PRA)</u> , should also be considered and included in the selection of <u>an appropriate pest risk</u> management option.	Where referring to "zero-risk" an existing ISPM/RSPM should be referenced.	United States of America
24.	7	Technical	Because zero-risk is not a reasonable option, <u>†The guiding principle for pest risk management should be the principle of managed risk (ISPM 1:2006). Contracting parties should apply phytosanitary measures based on a policy of managed risk, recognizing that the risk of spread and introduction of pests always exists when importing regulated articles. †</u> to manage risk to achieve the required degree of safety that can be justified and is feasible within the limits of available options and resources. Pest risk is determined during the Stage 2 of PRA. If the pest risk is unacceptable, then the first step in pest risk management is to identify possible phytosanitary measures that will reduce the risk to or below an acceptable level. Appropriate measures should be chosen based on their effectiveness and on considerations, which include several of the phytosanitary principles of ISPM 1:2006 specially the principles of managed risk, minimal impact and equivalence. Phytosanitary measures should be cost-effective and feasible. The uncertainty related to economic consequences and the	Although deleted text is included in ISPM 11, it is more appropriate not to refer to zero-risk, but to refer to the principles in ISPM 1. Text added to refer to the basic principles during pest risk management stage.	COSAVE, Brazil, Uruguay, Peru, Argentina, Chile

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			probability of introduction, noted during Stage 2 of a PRA, should also be considered and included in the selection of a pest management option.		
25.	7	Technical	Because zero-risk is not a reasonable option, t The guiding principle for pest risk management should be <u>the principle of managed risk (ISPM 1:2006). Contracting parties should apply phytosanitary measures based on a policy of managed risk, recognizing that the risk of spread and introduction of pests always exists when importing regulated articles to manage risk to achieve the required degree of safety that can be justified and is feasible within the limits of available options and resources. Pest risk is determined during the Stage 2 of PRA. If the pest risk is unacceptable, then the first step in pest risk management is to identify possible phytosanitary measures that will reduce the risk to or bellow an acceptable level. Appropriate measures should be chosen based on their effectiveness and on considerations, which include several of the phytosanitary principles of managed risk, minimal impact and equivalence. Phytosanitary measures should be cost . effective and feasible</u> The uncertainty related to economic consequences and the probability of introduction, noted during Stage 2 of a PRA, should also be considered and included in the selection of a pest management option.	Although deleted text is included in ISPM 11, it is more appropriate not to refer to zero-risk, but to refer to the principles in ISPM 1. Text added to refer to the basic principles during pest risk management stage.	Paraguay
26.	7	Translation	Because zero-risk is not a reasonable option, the guiding principle for risk management should be to manage risk to achieve the required degree of safety that can be justified and is feasible within the limits of available options and resources. The uncertainty related to economic consequences and the probability of introduction, noted during Stage 2 of a PRA, should also be considered and included in the selection of a pest management option.	Translate to Spanish "zero-risk" as "riesgo cero"	OIRSA
27.	9	Editorial	An ISPM providing guidance on pest risk management could help decrease the divergence between ISPMs that address elements of pest risk management and increase <u>harmonization, transparency and consistency in the guidance on application of pest risk management measures.</u>	For clarity	United States of America
28.	9	Editorial	Une NIMP donnant des indications sur la gestion du risque phytosanitaire pourrait contribuer à atténuer les incohérences entre les NIMP qui abordent certains éléments de la gestion du risque phytosanitaire et à <u>une harmonisation dans l'identification des mesures et les indications relatives à pour cette la gestion du risque phytosanitaire.</u>	pour une meilleure compréhension	Algeria
29.	9	Technical	An ISPM providing guidance on pest risk management could help decrease the divergence between ISPMs that address elements of pest risk management and increase harmonization in the guidance on pest risk management <u>identifying the appropriate pest risk management measures.</u>	The suggested changes remove the redundant wording that would repeat the beginning of the sentence ("An ISPM providing guidance on pest risk management")	EPPO, European Union, Azerbaijan

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30.	9	Technical	An ISPM providing guidance on pest risk management could help decrease the divergence between ISPMs that address elements of pest risk management and increase harmonization in the guidance on pest risk management <u>for regulated pests, including harmonization of criteria related to the strength of phytosanitary measures.</u>	There is not divergence between ISPMs, but on how they are applied by pest risk analysts. The main reason for this ISPM is to provide guidance on pest risk management for regulated pests (quarantine and regulated non quarantine pests) or commodities, including guidance on the strength of measures. The purpose is to harmonize pest risk management based on a long list of phytosanitary measures for which guidance already exist in adopted ISPMs (e.g. systems approach, pest free áreas, treatments and to evaluate more simple measures)	COSAVE, Brazil, Uruguay, Peru, Argentina, Chile
31.	9	Technical	An ISPM providing guidance on pest risk management could help decrease the divergence between ISPMs that address elements of pest risk management and increase harmonization in the guidance on pest risk management <u>for regulated pests, including harmonization of criteria related to the strength of phytosanitary measures.</u>	There is not divergence between ISPMs, but on how they are applied by pest risk analysts. The main reason for this ISPM is to provide guidance on pest risk management for regulated pests (quarantine and regulated non quarantine pests) or commodities, including guidance on the strength of measures. The purpose is to harmonize pest risk management based on a long list of phytosanitary measures for which guidance already exist in adopted ISPMs (e.g. systems approach, pest free áreas, treatments and to evaluate more simple measures)	Paraguay
32.	9	Translation	An ISPM providing guidance on pest risk management could help decrease the divergence between ISPMs that address elements of pest risk management and increase harmonization in the guidance on pest risk management.	Translate to Spanish the term “management” as “manejo”.	OIRSA
33.	10	Editorial	ISPM 2:2007 (<i>Framework for pest risk analysis</i>) assists national plant protection organizations (NPPOs) in identifying, evaluating and selecting appropriate risk management measures following the completion of the ‘pest risk assessment stage’ (Stage 2) of a pest risk analysis (PRA). Some guidance on how to complete Stage 3 of a PRA ‘pest risk management’ is addressed in ISPM 11:2013 (<i>Pest risk analysis for quarantine pests</i>) but additional detailed guidance would be useful.	As for ISPM 2 at the beginning of the sentence, the title of ISPM 11 should be given for consistency with other specifications. In the initial wording, only the number of the ISPM is present.	EPPO, European Union, Azerbaijan
34.	10	Editorial	ISPM 2:2007 (<i>Framework for pest risk analysis</i>) assists national plant protection organizations (NPPOs) in identifying, evaluating and selecting appropriate risk management measures following the completion of the ‘pest risk assessment stage’ (Stage 2) of a pest risk analysis (PRA).	For clarity	United States of America

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			General Some guidance on how to complete Stage 3 of a PRA 'pest risk management' is addressed in ISPM 11:2013 but additional detailed guidance would be useful.		
35.	10	Editorial	La NIMP 2:2007 (<i>Cadre de l'analyse du risque phytosanitaire</i>) aide les organisations nationales de la protection des végétaux (ONPV) à identifier, évaluer et sélectionner les mesures de gestion du risque qui conviennent, à l'issue de l'étape d'évaluation du risque phytosanitaire (étape 2) d'une analyse du risque phytosanitaire (ARP). La NIMP 11:2013 (analyse du risque phytosanitaire pour les organismes de quarantaine) donne quelques indications sur la manière de conduire l'étape 3 d'une ARP: «gestion du risque phytosanitaire», mais il serait utile de disposer d'indications supplémentaires plus précises.	rajouter l'intitulé de la NIMP 11 pour harmoniser avec le reste du texte	Algeria
36.	10	Substantive	ISPM 2:2007 (<i>Framework for pest risk analysis</i>) assists national plant protection organizations (NPPOs) in identifying, evaluating and selecting appropriate risk management measures following the completion of the 'pest risk assessment stage' (Stage 2) of a pest risk analysis (PRA). Some guidance on how to complete Stage 3 of a PRA 'pest risk management' is addressed in ISPM 11:2013 but additional detailed guidance would be useful.	This paragraph, initially present under the "purpose" section, in fact addresses a wider theme, and would be more appropriately placed just after paragraph 7 because it is part of the reason for the standard.	EPPO, European Union, Azerbaijan
37.	10	Substantive	ISPM 2:2007 (<i>Framework for pest risk analysis</i>) and ISPM 11: 2013 assists national plant protection organizations (NPPOs) in identifying, evaluating and selecting appropriate risk management measures following the completion of the 'pest risk assessment stage' (Stage 2) of a pest risk analysis (PRA). Some guidance on how to complete Stage 3 of a PRA 'pest risk management' is addressed in ISPM 11:2013 but additional detailed guidance would be useful to complement existing ISPMs, taking into account the development of the Standards part of the IPPC Framework for Standards and Implementation .	Given existing ISPMs related to pest management and development of commodity-based ISPMs, this draft ISPM should be in line with the Standards part of the IPPC Framework for Standards and Implementation for better understanding and implementation by the contracting parties.	Japan
38.	10	Technical	ISPM 2:2007 (<i>Framework for pest risk analysis</i>) assists national plant protection organizations (NPPOs) in identifying, evaluating and selecting appropriate risk management measures following the completion of the 'pest risk assessment stage' (Stage 2) of a pest risk analysis (PRA). Some guidance on how to complete Stage 3 of a PRA 'pest risk management' is addressed in ISPM 11:2013 and ISPM 21:2004 but additional detailed guidance would be useful.	ISPM 21 includes guidance on pest risk management for regulated non quarantine pests.	COSAVE, Brazil, Uruguay
39.	10	Technical	ISPM 2:2007 (<i>Framework for pest risk analysis</i>) assists national plant protection organizations (NPPOs) in identifying, evaluating and selecting appropriate risk management measures following the completion of the 'pest risk assessment stage' (Stage 2) of a pest risk analysis (PRA). Some	ISPM 21 includes guidance on pest risk management for regulated non quarantine pests.	Paraguay

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			guidance on how to complete Stage 3 of a PRA 'pest risk management' is addressed in ISPM 11:2013 and ISPM 21:2004 but additional detailed guidance would be useful.		
38.	10	Technical	ISPM 2:2007 (<i>Framework for pest risk analysis</i>) assists national plant protection organizations (NPPOs) in identifying, evaluating and selecting appropriate risk management measures following the completion of the 'pest risk assessment stage' (Stage 2) of a pest risk analysis (PRA). Some guidance on how to complete Stage 3 of a PRA 'pest risk management' is addressed in ISPM 11:2013 and ISPM 21:2004 but additional detailed guidance would be useful.	ISPM 21 includes guidance on pest risk management for regulated non quarantine pests.	Peru, Argentina, Chile
41.	10	Translation	ISPM 2:2007 (<i>Framework for pest risk analysis</i>) assists national plant protection organizations (NPPOs) in identifying, evaluating and selecting appropriate risk management measures following the completion of the 'pest risk assessment stage' (Stage 2) of a pest risk analysis (PRA). Some guidance on how to complete Stage 3 of a PRA 'pest risk management' is addressed in ISPM 11:2013 but additional detailed guidance would be useful.	Translate to Spanish the term "management" as "manejo".	OIRSA
42.	11	Editorial	The standard It should also address aspects of pest risk management such as: when is it necessary, to what extent should it be applied (appropriate level of protection (ALOP) , acceptable level of risk), how do key concepts such as managed risk, technical justification, ALOP appropriate level of protection and equivalence relate to pest risk management, and how can countries improve harmonization further when it comes to managing risk.	More appropriate wording	United States of America
43.	11	Technical	It should also address aspects of pest risk management such as: when is it necessary, to what extent should it be applied, how do key concepts such as managed risk, technical justification, appropriate level of protection and equivalence relate to pest risk management, and how can countries improve harmonization further when it comes to managing pest risk.	To be consistent with ISPM 5.	COSAVE, Brazil, Uruguay
44.	11	Technical	It should also address aspects of pest risk management such as: when is it necessary, to what extent should it be applied, how do key concepts such as managed risk, technical justification, appropriate level of protection and equivalence relate to pest risk management, and how can countries improve harmonization further when it comes to managing pest risk.	To be consistent with ISPM 5.	Paraguay
43.	11	Technical	It should also address aspects of pest risk management such as: when is it necessary, to what extent should it be applied, how do key concepts such as managed risk, technical justification, appropriate level of protection and equivalence relate to pest risk management, and how can countries improve harmonization further when it comes to managing pest risk.	To be consistent with ISPM 5.	Peru, Argentina, Chile

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46.	11	Technical	It should also address aspects of pest risk management such as: when is it necessary, to what extent should it be applied, how do key concepts such as managed risk, technical justification, appropriate level of protection and equivalence relate to pest risk management, and how can countries improve harmonization further when it comes to managing risk.	While evaluating the risk management options, there may be need to give guidance on evaluating the cost-benefit aspects of a particular measure. When is a measure deemed too expensive? Measures that are too expensive can be a form of trade barrier, importing countries should be able to propose equivalent options.	Kenya
47.	11	Translation	It should also address aspects of pest risk management such as: when is it necessary, to what extent should it be applied, how do key concepts such as managed risk, technical justification, appropriate level of protection and equivalence relate to pest risk management, and how can countries improve harmonization further when it comes to managing risk.	Translate to Spanish the term "management" as "manejo".	OIRSA
48.	12	Translation	Scope	Translate "Scope" as "Ámbito" only	OIRSA
49.	13	Substantive	This ISPM should focus on providing guidance for the management of the risk of introduction of pests associated with the international movement of regulated articles.	The risk of pest is better, because it is more comprehensive.	OIRSA
50.	13	Technical	This ISPM should focus on providing guidance for pest risk the management for pests of the risk of introduction of pests associated with the international movement of plants, plant products, and other of regulated articles or potentially regulated articles .	For consistency with accepted glossary terminology for clarity in the scope, and to allow for the possibility of decisions on article regulation.	EPPO, European Union, Azerbaijan
51.	13	Technical	This ISPM should focus on providing guidance for the on pest risk management of the risk of introduction of <u>for regulated</u> pests associated with the international movement of regulated articles.	The ISPM should include guidance for both types of regulated pests. The draft should also include guidance on pest risk management of biological control agents and other beneficial organisms, we are proposing a new task in this regard.	COSAVE, Brazil, Uruguay, Peru, Argentina, Chile
52.	13	Technical	This ISPM should focus on providing guidance for the on pest risk management of the risk of introduction of <u>regulated</u> pests associated with the international movement of regulated articles.	The ISPM should include guidance for both types of regulated pests. The draft should also include guidance on pest risk management of biological control agents and other beneficial organisms, we are proposing a new task in this regard.	Paraguay
53.	13	Translation	This ISPM should focus on providing guidance for the management of the risk of introduction of pests associated with the international movement of regulated articles.	Translate to Spanish the term "management" as "manejo".	OIRSA
54.	16	Substantive	<ol style="list-style-type: none"> 1. Describe processes for the identification of pest risk management options, including: <ol style="list-style-type: none"> 1. Basis for decisions in the pest risk management process 2. Identification of risk management options 	technically could not add here as new points	Latvia

Comm no.	Para no.	Comment type	Comment	Explanation	Country
			<ol style="list-style-type: none"> 3. Evaluating measures 4. Selecting measures 5. Determining what documentation is needed 6. Monitoring and re-evaluation of options 7. <u>NEW 2 TASKS SUGGESTED IN GENERAL COMMENTS</u> 		
55.	16	Substantive	<ol style="list-style-type: none"> 1. Describe processes for the identification of pest risk management options, including: <ol style="list-style-type: none"> 1. Basis for decisions in the pest risk management process 2. Identification of risk management options 3. Evaluating measures <u>for their availability, feasibility, cost-effectiveness and proportionality for achieving the appropriate level of protection</u> 4. <u>Identification and selection of appropriate measures</u> Selecting measures 5. Determining what documentation is needed 6. Monitoring and re-evaluation of options 	The suggested modifications take into account the need for the type of evaluation measures should undergo, and the need for measures to be identified and then selected, in accordance with the principles and terminology used in Pest Risk Analysis	EPPO, European Union, Azerbaijan
56.	16	Substantive	<ol style="list-style-type: none"> 1. Describe processes for the identification of pest risk management options, including: <ol style="list-style-type: none"> 1. <u>The rational relationship between the risks identified in the pest risk assessment and the strength of measures needed to manage the risk</u> 2. Basis for decisions in the pest risk management process 3. Identification of risk management options 4. Evaluating measures 5. Selecting measures 6. Determining what documentation is needed <u>(explicitly related to risk management when evaluating and selecting the measures)</u> 7. Monitoring and re-evaluation of options 	Suggest adding a new task under 1 and clarifying 6.	United States of America
57.	16	Substantive	<ol style="list-style-type: none"> 1. Describe processes for the identification of pest risk management options, including: <ol style="list-style-type: none"> 1. Basis for decisions in the pest risk management process 2. Identification of <u>pest</u> risk management options 3. Evaluating <u>phytosanitary</u> measures 	To be consistent with ISPM 5.	COSAVE, Brazil, Uruguay, Peru, Argentina, Chile

Comm no.	Para no.	Comment type	Comment	Explanation	Country
			<ol style="list-style-type: none"> 4. Selecting phytosanitary measures 5. Determining what documentation is needed 6. Monitoring and re-evaluation of options 		
58.	16	Substantive	<ol style="list-style-type: none"> 1. Describe processes for the identification of pest risk management options, including: <ol style="list-style-type: none"> 1. Basis for decisions in the pest risk management process 2. Identification of pest risk management options 3. Evaluating phytosanitary measures 4. Selecting phytosanitary measures 5. Determining what documentation is needed 6. Monitoring and re-evaluation of options 	To be consistent with ISPM 5.	Paraguay
59.	16	Substantive	<ol style="list-style-type: none"> 1. Describe processes for the identification of pest risk management options, including: <ol style="list-style-type: none"> 1. Basis for decisions in the pest risk management process 2. Identification of risk management options 3. Evaluating options measures 4. Selecting options and formulating measures 5. Level (degree) of protection of measures against risks 6. Determining what documentation is needed 7. Monitoring and re-evaluation of measures options 	For better detail of the most important processes	OIRSA
60.	16	Substantive	<ol style="list-style-type: none"> 1. Décrire les processus permettant d'identifier les différentes options en matière de gestion du risque phytosanitaire, notamment: <ol style="list-style-type: none"> 1. Base des décisions prises dans le cadre du processus de gestion du risque phytosanitaire 2. Identification des différentes options de gestion du risque 3. Évaluation des mesures 4. Identification et sSélection des mesures appropriées 5. Détermination de la documentation requise 6. Suivi et nouvelle évaluation des options 	plus approprié	Algeria
61.	16	Translation	<ol style="list-style-type: none"> 1. Describe processes for the identification of pest risk management options, including: <ol style="list-style-type: none"> 1. Basis for decisions in the pest risk management process 2. Identification of risk management options 	Translation to Spanish suggested: 1. describir los procedimientos para la identificación de opciones para el manejo del riesgo de plagas, en particular: 1.fundamento para la toma de decisiones en el proceso de manejo del riesgo de plagas;	OIRSA

Comm no.	Para no.	Comment type	Comment	Explanation	Country
			<ol style="list-style-type: none"> 3. Evaluating measures 4. Selecting measures 5. Determining what documentation is needed 6. Monitoring and re-evaluation of options 	2.identificación de las opciones para el manejo del riesgo de plagas; 3.evaluación de las medidas; 4.selección de las medidas; 6.determinación de la documentación necesaria; 7.monitoreo y reevaluación de las medidas.	
62.	17	Substantive	<ol style="list-style-type: none"> 1. Consider whether this ISPM could be added as an annex to another ISPM such as ISPM 11:2013 (<i>Pest risk analysis for quarantine pests</i>). <u>Agree to add this ISPM as an annex to ISPM 11:2013 (<i>Pest risk analysis for quarantine pests</i>)</u> 	Some guidance on how to complete Stage 3 of a PRA 'pest risk management' is addressed in ISPM 11:2013, this new ISPM is just a more detailed guidance on Pest Risk Management.	China
63.	17	Substantive	<ol style="list-style-type: none"> 2. Consider whether this ISPM could be added as an annex to another ISPM such as ISPM 11:2013 (<i>Pest risk analysis for quarantine pests</i>). 	The US does not agree with this task. This standard should be a stand-alone concept standard on pest risk management. It should rely heavily on NAPPO's RSPM 40 and should also use the chapters on Risk Management contained in the book "Plant Pest Risk Analysis: Concepts and Application" by Dr. Christina Devorshak.	United States of America
64.	17	Substantive	<ol style="list-style-type: none"> 1. Consider whether this ISPM could be added as an annex to another ISPM such as <u>the part of Stage3: Pest Risk Management of ISPM 11:2013 (<i>Pest risk analysis for quarantine pests</i>)</u>. 	For greater certainty.	Japan
65.	17	Technical	<ol style="list-style-type: none"> 1. <u>2.. Consider whether this ISPM could be added as an annex to another ISPM such as ISPM 11:2013 (<i>Pest risk analysis for quarantine pests</i>).</u> 2. <u>3. Consider to include guidance on pest risk management for the introduction of biological control agents and other beneficial organisms or other specific regulated articles</u> 	We are proposing to include in the scope regulated pests. Guidance is needed for pest risk management for BCA	COSAVE, Brazil, Uruguay, Peru, Argentina, Chile
66.	17	Technical	<ol style="list-style-type: none"> 1. <u>2_ Consider whether this ISPM could be added as an annex to another ISPM such as ISPM 11:2013 (<i>Pest risk analysis for quarantine pests</i>).</u> 2. <u>3. Consider to include guidance on pest risk management for the introduction of biological control agents and other beneficial organisms or other specific regulated articles</u> 	We are proposing to include in the scope regulated pests. Guidance is needed for pest risk management for BCA	Paraguay
67.	18	Technical	<ol style="list-style-type: none"> 1. Consider whether the information on economic consequences <u>of management measures should be</u> included in 	The suggested wording is a much more precise description of what potential modifications would	EPPO, European

Comm no.	Para no.	Comment type	Comment	Explanation	Country
			ISPM 11:2013 and if so make recommendations should be modified.	bear on.	Union, Azerbaijan
68.	18	Technical	1. Consider whether the information on economic consequences included in ISPM 11:2013 should be modified.	Text deleted because economic consequences are assessed in stage 2 of PRA and this ISPM deals with stage 3.	COSAVE, Brazil, Uruguay, Paraguay, Peru, Argentina, Chile
69.	22	Editorial	Funding for the meetings s may be provided from sources other than the regular programme of the IPPC (FAO). As recommended by ICPM-2 (1999), whenever possible, those participating in standard setting activities voluntarily fund their travel and subsistence to attend meetings. Participants may request financial assistance, with the understanding that resources are limited and the priority for financial assistance is given to developing country participants.	For better understanding	OIRSA
70.	22	Translation	Funding for the meeting may be provided from sources other than the regular programme of the IPPC (FAO). As recommended by ICPM-2 (1999), whenever possible, those participating in standard setting activities voluntarily fund their travel and subsistence to attend meetings. Participants may request financial assistance, with the understanding that resources are limited and the priority for financial assistance is given to developing country participants.	Translation to Spanish suggested for the first sentence: "La financiación para las reuniones podrá proceder de fuentes distintas del Programa ordinario de la CIPF (FAO)"	OIRSA
71.	28	Substantive	A group of 6 to -8 members with combined experience in PRA and risk management, including the economic aspects thereof.	Risk management in this case means undertaking selection of corrective measures and an understanding of their economic consequences.	EPPO, European Union, Azerbaijan
72.	28	Translation	A group of 6-8 members with combined experience in PRA and risk management.	Translate to Spanish the term "management" as "manejo".	OIRSA
73.	32	Substantive	The IPPC, relevant ISPMs and other national, regional and international standards and agreements as may be applicable to the tasks, and discussion papers submitted in relation to this work.	We propose to delete the RSPMs that are not relevant on pest risk management or that provide pest risk management options already considered in ISPMs.	COSAVE, Brazil, Uruguay, Peru
74.	32	Substantive	The IPPC, relevant ISPMs and other national, regional and international standards and agreements as may be applicable to the tasks, and discussion papers submitted in relation to this work.	We propose to delete the RSPMs that are not relevant on pest risk management or that provide pest risk management options already considered in ISPMs.	Paraguay, Argentina
75.	33	Substantive	RSPM 3-2011. Guidelines for movement of potatoes into a NAPPo member country. Ottawa, NAPPo.	It is preferable not to quote Standards all coming from the same region of the world.	EPPO
76.	33	Substantive	RSPM 3-2011. Guidelines for movement of potatoes into a NAPPo member country. Ottawa, NAPPo.	It is preferable not to quote Standards all coming of the same region of the world.	European Union

Comm no.	Para no.	Comment type	Comment	Explanation	Country
77.	33	Substantive	RSPM 3. 2011. Guidelines for movement of potatoes into a NAPPO member country. Ottawa, NAPPO.	See comment in para. 32	COSAVE, Brazil, Uruguay, Paraguay, Peru, Argentina, Chile
78.	33	Substantive	Norme régionale pour les mesures phytosanitaires 3. 2011. Guidelines for movement of potatoes into a NAPPO member country (Directives pour le déplacement de pommes de terre destinées à un pays membre de l'Organisation nord-américaine pour la protection des plantes). Ottawa, Organisation nord-américaine pour la protection des plantes.	il faut supprimer cette référence spécifique à une région. cette remarque s'applique également du paragraphe 35 à 40	Algeria
79.	34	Substantive	RSPM 5 (updated annually). NAPPO glossary of phytosanitary terms. Ottawa, NAPPO.	There is no need to quote a regional glossary whilst an IPPC glossary of phytosanitary terms exists (ISPM 5).	EPPO, European Union, Azerbaijan
80.	34	Substantive	RSPM 5 (updated annually). NAPPO glossary of phytosanitary terms. Ottawa, NAPPO.	Reference should be the Glossary of Phytosanitary terms.	COSAVE, Brazil, Uruguay, Peru, Argentina, Chile
81.	34	Substantive	RSPM 5 (updated annually). NAPPO glossary of phytosanitary terms. Ottawa, NAPPO. ISPM 5: 2014. Glossary of phytosanitary terms	Reference should be the Glossary of Phytosanitary terms.	Paraguay
82.	35	Substantive	RSPM 13. 2009. Guidelines to Establish, Maintain and Verify Karnal Bunt Pest Free Areas in North America. Ottawa, NAPPO.	It is preferable not to quote Standards all coming the same region of the world.	EPPO, European Union, Azerbaijan
83.	35	Substantive	RSPM 13. 2009. Guidelines to Establish, Maintain and Verify Karnal Bunt Pest Free Areas in North America. Ottawa, NAPPO.	See comment in para. 32	COSAVE, Brazil, Uruguay, Paraguay, Peru, Argentina, Chile
84.	36	Substantive	RSPM 16. 2013. Guidelines for the Importation of Citrus Propagative Material into a NAPPO Member Country. Ottawa, NAPPO.	It is preferable not to quote Standards all coming the same region of the world.	EPPO, European Union, Azerbaijan
85.	36	Substantive	RSPM 16. 2013. Guidelines for the Importation of Citrus Propagative Material into a NAPPO Member Country. Ottawa, NAPPO.	See comment in para. 32	COSAVE, Brazil, Uruguay, Paraguay, Peru, Argentina, Chile
86.	37	Substantive	RSPM 20. 2003. Guidelines for the Establishment, Maintenance and Verification of Areas of Low Pest Prevalence for Insects. Ottawa, NAPPO.	It is preferable not to quote Standards all coming the same region of the world.	EPPO, European

Comm no.	Para no.	Comment type	Comment	Explanation	Country
					Union, Azerbaijan
87.	37	Substantive	RSPM 20. 2003. Guidelines for the Establishment, Maintenance and Verification of Areas of Low Pest Prevalence for Insects. Ottawa, NAPPO.	See comment in para. 32	COSAVE, Brazil, Uruguay, Paraguay, Peru, Argentina, Chile
88.	38	Substantive	RSPM 24. 2005. Integrated Pest Risk Management Measures for the Importation of Plants for Planting into NAPPO Member Countries. Ottawa, NAPPO.	It is preferable not to quote Standards all coming the same region of the world.	EPPO, European Union, Azerbaijan
89.	38	Substantive	RSPM 24. 2005. Integrated Pest Risk Management Measures for the Importation of Plants for Planting into NAPPO Member Countries. Ottawa, NAPPO.	See comment in para. 32	COSAVE, Brazil, Uruguay, Paraguay, Peru, Argentina, Chile
90.	39	Substantive	RSPM 33. 2009. Guidelines for Regulating the Movement of Ships and Cargo from Areas Infested with the Asian Gypsy Moth. Ottawa, NAPPO.	It is preferable not to quote Standards all coming the same region of the world.	EPPO, European Union, Azerbaijan
91.	39	Substantive	<p>RSPM 33. 2009. Guidelines for Regulating the Movement of Ships and Cargo from Areas Infested with the Asian Gypsy Moth. Ottawa, NAPPO.</p> <p>ISPM 1: 2006. Phytosanitary principles for the protection of plants and the application of phytosanitary measures in international trade.</p> <p>ISPM 2: 2007. Framework for pest risk analysis</p> <p>ISPM 11: 2014. Pest risk analysis for quarantine pests</p> <p>ISPM 14: 2002. The use of integrated measures in a systems approach for pest risk management.</p> <p>ISPM 21: 2004. Pest risk analysis for regulated non quarantine pests</p> <p>ISPM 26: 2006 Establishment of pest free areas for fruit flies (Tephritidae)</p> <p>ISPM 32: 2009 Categorization of commodities according to their pest risk</p>	See comment in para. 32. References to ISPMs 1, 2, 11,14, 21, 26 added because they are relevant to pest risk management. ISPM 32 was added as a reference because the categorization of commodities according to the pest risk should be taken into account when drafting this standard.	COSAVE, Brazil, Uruguay, Peru, Argentina, Chile
92.	39	Substantive	RSPM 33. 2009. Guidelines for Regulating the Movement of Ships and	See comment in para. 32. References to ISPMs 1, 2, 11,14, 21, 26 added because they are relevant to	Paraguay

Comm no.	Para no.	Comment type	Comment	Explanation	Country
			<p>Cargo from Areas Infested with the Asian Gypsy Moth. Ottawa, NAPPO.</p> <p>ISPM 1: 2006. Phytosanitary principles for the protection of plants and the application of phytosanitary measures in international trade.</p> <p>ISPM 2: 2007. Framework for pest risk analysis</p> <p>ISPM 11: 2014. Pest risk analysis for quarantine pests</p> <p>ISPM 14: 2002. The use of integrated measures in a systems approach for pest risk management</p> <p>ISPM 21: 2004. Pest risk analysis for regulated non quarantine pests</p> <p>ISPM 26: 2006. Establishment of pest free areas for fruit flies (Tephritidae)</p> <p>ISPM 32: 2009. Categorization of commodities according to their pest risk</p>	pest risk management. ISPM 32 was added as a reference because the categorization of commodities according to the pest risk should be taken into account when drafting this standard.	
93.	40	Editorial	RSPM 40: Draft . Pest risk management for the import entry of commodities. Ottawa, NAPPO.	This standard was adopted by the NAPPO Executive Committee in July 2014	United States of America
94.	40	Technical	RSPM 40: Draft. Pest risk management for the entry of commodities. Ottawa, NAPPO.	It is preferable not to quote Standards all coming the same region of the world, and many ISPMs and RSPMs are also relevant, such as the EPPO decision support scheme for phytosanitary measures.	EPPO, European Union, Azerbaijan