



2014-002: Draft specification - Authorization of entities other than national plant protection organizations to perform phytosanitary actions - EN

| Comm no. | Para no. | Comment type | Comment | Explanation | Country |
|----------|----------|--------------|---|---|-------------------------------|
| 1. | G | Substantive | I support the document as it is and I have no comments | | Singapore, Guyana, Ghana |
| 1. | G | Substantive | I support the document as it is and I have no comments | | Congo |
| 3. | G | Substantive | <u>To add in the text /specific:/, where it is needed about specific tasks, not all of them.</u> | All standard is about specific phytosanitary actions, not all of them, there this also should be clearly stated. | Latvia |
| 4. | G | Substantive | <u>To add the word "specific" in the text where needed in relation to "specific" task s. as when not *all* tasks are actually being referred to.</u> | Since the entire Standard is about specific phytosanitary actions, and not all of them, then this also should be clearly stated. This suggestion is not applied to the title, to avoid unnecessary modification. | EPPO, European Union, Georgia |
| 5. | G | Substantive | <u>Acknowledgement that outcomes defined in this ISPM may require changes to export legislation</u> | This is an important consideration with regards to challenges to implementation. | Australia |
| 6. | G | Substantive | <u>Suggest the draft specification for ISPM written in several extensively used language including Chinese.</u> | In convenience of review by contracting parties. | China |
| 7. | G | Substantive | <u>The expression: "other than" should not be used either in the specification nor in the ISPM</u> | The IPPC specifies "shall be carried out only by or under the authority of the official national plant protection organization", this implies that the entity responsible for the authorization must be the same NPPO and no other entity of the contracting party. | OIRSA |
| 8. | 1 | Editorial | Draft specification for ISPM: <u>Authorization of entities other than national plant protection organizations to perform phytosanitary actions</u> Authorization of entities other than national plant protection organizations to perform phytosanitary actions | For consistency with other specifications. | EPPO, European Union, Georgia |
| 9. | 1 | Editorial | Projet de spécification pour une NIMP: Autorisation d'instances autres que les organisations nationales de la protection des végétaux à <u>moner effectuer</u> des actions phytosanitaires | plus approprié | Algeria |
| 10. | 1 | Substantive | Draft specification for ISPM: Authorization of entities <u>other than national plant protection organizations</u> to perform phytosanitary actions | Delete "other than national plant protection organizations" from the title to simplify. The scope, paragraphs [12- 14], provides the limitations of who can be authorized. | Canada |

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| 11. | 1 | Substantive | Draft specification for ISPM: Authorization of entities by other than national plant protection organizations to perform phytosanitary actions | As explained in general comments | OIRSA |
| 12. | 1 | Translation | Draft specification for ISPM: Authorization of entities other than national plant protection organizations to perform phytosanitary actions | The proposed text in Spanish is: " Proyecto de especificación para la NIMF: Autorización de entidades por las organizaciones nacionales de protección fitosanitaria para realizar acciones fitosanitarias (2014-002)" | OIRSA |
| 13. | 4 | Editorial | <i>Authorization of entities other than national plant protection organizations to perform phytosanitary actions (2014-002).</i> | It is assumed that this text is not part of the title | OIRSA |
| 14. | 4 | Substantive | <i>Authorization of entities other than by national plant protection organizations to perform phytosanitary actions (2014-002).</i> | As explained in general comments | OIRSA |
| 15. | 4 | Substantive | <i>Autorisation d'instances autres que les organisations nationales de la protection des végétaux à mener des actions phytosanitaires <u>spécifiques</u> (2014-002).</i> | la précision est de taille | Algeria |
| 16. | 4 | Translation | <i>Authorization of entities other than national plant protection organizations to perform phytosanitary actions (2014-002).</i> | The proposed text for the title in Spanish is: "Autorización de entidades por las organizaciones nacionales de protección fitosanitaria para realizar acciones fitosanitarias" | OIRSA |
| 17. | 5 | Translation | Reason for the standard | In Spanish: "Justificación de la norma" | OIRSA |
| 18. | 6 | Editorial | Authorization of entities other than national plant protection organizations (NPPOs) to perform phytosanitary actions is becoming increasingly common in various countries throughout the world. Authorization is referred to in the IPPC (Article V.2(a)) <u>related to phytosanitary certification</u> , as well as in several ISPMs, such as ISPM 3:2005 (<i>Guidelines for the export, shipment, import and release of biological control agents and other beneficial organisms</i>), ISPM 7:2011 (<i>Phytosanitary certification system</i>), ISPM 12:2011 (<i>Phytosanitary certificates</i>), ISPM 20:2004 (<i>Guidelines for a phytosanitary import regulatory system</i>) and ISPM 23:2005 (<i>Guidelines for inspection</i>). However, these ISPMs do not refer specifically to authorization for entities other than NPPOs. | For better understanding. | OIRSA |
| 19. | 6 | Substantive | Authorization of entities other than national plant protection organizations (NPPOs) to perform phytosanitary actions <u>such as inspection, testing, surveillance, and treatment</u> , is becoming increasingly common in various countries throughout the world. Authorization is referred to in the IPPC (Article V.2(a)) as well as | Add examples "such as inspection, testing, surveillance, and treatment" for clarity. | Canada |

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| | | | in several ISPMs, such as ISPM 3:2005 (<i>Guidelines for the export, shipment, import and release of biological control agents and other beneficial organisms</i>), ISPM 7:2011 (<i>Phytosanitary certification system</i>), ISPM 12:2011 (<i>Phytosanitary certificates</i>), ISPM 20:2004 (<i>Guidelines for a phytosanitary import regulatory system</i>) and ISPM 23:2005 (<i>Guidelines for inspection</i>). However, these ISPMs do not refer specifically to authorization for entities other than NPPOs. | | |
| 20. | 6 | Substantive | Authorization of entities other than <u>by</u> national plant protection organizations (NPPOs) to perform phytosanitary actions is becoming increasingly common in various countries throughout the world. Authorization is referred to in the IPPC (Article V.2(a)) as well as in several ISPMs, such as ISPM 3:2005 (<i>Guidelines for the export, shipment, import and release of biological control agents and other beneficial organisms</i>), ISPM 7:2011 (<i>Phytosanitary certification system</i>), ISPM 12:2011 (<i>Phytosanitary certificates</i>), ISPM 20:2004 (<i>Guidelines for a phytosanitary import regulatory system</i>) and ISPM 23:2005 (<i>Guidelines for inspection</i>). However, these ISPMs do not refer specifically to authorization for entities other than NPPOs. | As explained in general comments. By the suggested changes, the last sentence has no meaning. | OIRSA |
| 21. | 6 | Substantive | L'autorisation d'instances autres que les organisations nationales de la protection des végétaux (ONPV) à mener des actions phytosanitaires <u>spécifiques</u> est de plus en plus fréquente dans divers pays, dans toutes les régions du monde. Il est fait mention de l'autorisation dans la CIPV (article V.2.a) ainsi que dans plusieurs NIMP, notamment la NIMP 3:2005 (<i>Directives pour l'exportation, l'expédition, l'importation et le lâcher d'agents de lutte biologique et autres organismes utiles</i>), la NIMP 7:2011 (<i>Système de certification phytosanitaire</i>), la NIMP 12:2011 (<i>Certificats phytosanitaires</i>), la NIMP 20:2004 (<i>Directives pour un système phytosanitaire de réglementation des importations</i>) et la NIMP 23:2005 (<i>Directives pour l'inspection</i>). Cependant, ces NIMP ne font pas expressément état d'une autorisation d'instances autres que les ONPV. | pour être en conformité avec ce qui a été proposé au paragraphe 4 | Algeria |
| 22. | 6 | Technical | Authorization of entities other than national plant protection organizations (NPPOs) to perform <u>specific</u> phytosanitary actions is becoming increasingly common in various countries throughout the world. Authorization is referred to in the IPPC (Article V.2(a)) as well as in several ISPMs, such as ISPM 3:2005 (<i>Guidelines for the export, shipment, import and release of biological control agents and other beneficial organisms</i>), ISPM 7:2011 (<i>Phytosanitary certification system</i>), ISPM 12:2011 (<i>Phytosanitary certificates</i>), ISPM 20:2004 (<i>Guidelines</i> | Consistency with the General comment. | EPPO, European Union, Georgia |

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| | | | <i>for a phytosanitary import regulatory system</i>) and ISPM 23:2005 (<i>Guidelines for inspection</i>). However, these ISPMs do not refer specifically to authorization for entities other than NPPOs. | | |
| 23. | 6 | Translation | Authorization of entities other than national plant protection organizations (NPPOs) to perform phytosanitary actions is becoming increasingly common in various countries throughout the world. Authorization is referred to in the IPPC (Article V.2(a)) as well as in several ISPMs, such as ISPM 3:2005 (<i>Guidelines for the export, shipment, import and release of biological control agents and other beneficial organisms</i>), ISPM 7:2011 (<i>Phytosanitary certification system</i>), ISPM 12:2011 (<i>Phytosanitary certificates</i>), ISPM 20:2004 (<i>Guidelines for a phytosanitary import regulatory system</i>) and ISPM 23:2005 (<i>Guidelines for inspection</i>). However, these ISPMs do not refer specifically to authorization for entities other than NPPOs. | In Spanish the text "Authorization of entities", should be translated to "La autorización de entidades" | OIRSA |
| 24. | 7 | Editorial | An ISPM specifically on the authorization of entities other than NPPOs to perform phytosanitary actions on behalf of NPPOs should provide the necessary guidance to NPPOs for <u>granting, managing and revoking/removing</u> such authorization. The ISPM will also foster trust among NPPOs that when phytosanitary actions are performed by other entities, proper authorization has been given <u>and appropriate oversight by the authorizing NPPO</u> . | For clarity | United States of America |
| 25. | 7 | Editorial | An ISPM specifically on the authorization of entities other than NPPOs to perform phytosanitary actions on <u>their</u> behalf of NPPOs should provide the necessary guidance to NPPOs for <u>granting</u> such authorization. The ISPM will also foster trust among NPPOs that when phytosanitary actions are performed by other entities, proper authorization has been given. | For better understanding. | OIRSA |
| 26. | 7 | Substantive | An ISPM specifically on the authorization of entities other than NPPOs to perform <u>specific</u> phytosanitary actions on behalf of NPPOs should provide the necessary guidance to NPPOs for such authorization <u>and for what kind of tasks could be authorised</u> . The ISPM will also foster trust among NPPOs that when <u>specific</u> phytosanitary actions are performed by other entities, proper authorization has been given. | See general comment. This standard should be about specific phytosanitary actions and specific tasks to remain reliability and trust to phytosanitary actions from other countries. | Latvia |
| 27. | 7 | Substantive | An ISPM specifically on the authorization of entities other than NPPOs to perform <u>specific</u> phytosanitary actions on behalf of NPPOs should provide the necessary guidance to NPPOs for such authorization. The ISPM will also foster trust among NPPOs that when <u>specific</u> phytosanitary actions are performed by other entities, proper | See general comment. This standard should be about specific phytosanitary actions and specific tasks, in order to maintain reliability and international trust in phytosanitary actions. | EPPO, European Union, Georgia |

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| | | | authorization has been given. | | |
| 28. | 7 | Substantive | An ISPM specifically on the authorization of entities other than NPPOs to perform phytosanitary actions on behalf of NPPOs should provide the necessary guidance to NPPOs for such authorization. The ISPM will also foster trust among NPPOs that when phytosanitary actions are performed by other entities, proper authorization has been given granted. | Change 'given' to 'granted' to be consistent with paragraph [9] | Canada |
| 29. | 7 | Substantive | An ISPM specifically on the authorization of entities by other than NPPOs to perform phytosanitary actions on behalf of NPPOs should provide the necessary guidance to NPPOs for such authorization. The ISPM will also foster trust among NPPOs that when phytosanitary actions are performed by other entities, proper authorization has been given. | As explained y general comments. | OIRSA |
| 30. | 7 | Substantive | Une NIMP expressément consacrée à l'autorisation d'instances autres que les ONPV à mener des actions phytosanitaires spécifiques pour le compte d'ONPV devrait donner aux ONPV les indications nécessaires pour ladite autorisation. La NIMP donnera en outre aux diverses ONPV davantage d'assurances que lorsque des actions phytosanitaires sont menées par d'autres instances, elles ont été dûment autorisées. | pour être en conformité avec ce qui a été proposé au paragraphe 4 | Algeria |
| 31. | 7 | Technical | An ISPM specifically on the authorization of entities other than NPPOs to perform phytosanitary actions on behalf of NPPOs should provide the necessary guidance to NPPOs for such authorization. The ISPM will also foster trust among NPPOs that when phytosanitary actions are performed by other entities, proper authorization has been given. | Trust is not a proper word for standards. Better to delete. | COSAVE, Brazil, Uruguay, Peru, Argentina, Chile |
| 32. | 7 | Technical | An ISPM specifically on the authorization of entities other than NPPOs to perform phytosanitary actions on behalf of NPPOs should provide the necessary guidance to NPPOs for such authorization. The ISPM will also foster trust among NPPOs that when phytosanitary actions are performed by other entities, proper authorization has been given. | Trust is not a proper word for standards. Better to delete. | Paraguay |
| 33. | 7 | Translation | An ISPM specifically on the authorization of entities other than NPPOs to perform phytosanitary actions on behalf of NPPOs should provide the necessary guidance to NPPOs for such authorization. The ISPM will also foster trust among NPPOs that when phytosanitary actions are performed by other entities, proper authorization has been given. | In Spanish (not taking into account the changes supra) the proposed text is: "Una NIMF dedicada específicamente a la autorización de entidades distintas de las ONPF para realizar acciones fitosanitarias en nombre de las ONPF debería brindar a las ONPF la orientación necesaria para dicha autorización. La NIMF también fomentará la confianza entre las ONPF cuando otras entidades realicen acciones fitosanitarias, pues se ha otorgado la debida autorización." | OIRSA |

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| 34. | 9 | Editorial | This ISPM should provide guidance to NPPOs on their responsibilities in developing criteria for: authorization of <u>other</u> entities to perform phytosanitary actions on their behalf; assessing compliance with the minimum responsibilities laid out in the authorization; and granting, removing and reinstating authorization. | For clarity. Also, should define all responsibilities, not just the minimum. | United States of America |
| 35. | 9 | Editorial | This ISPM should provide guidance to NPPOs on their responsibilities in developing criteria for: authorization of entities to perform phytosanitary actions on their behalf; assessing compliance with the minimum responsibilities laid out in the authorization; and granting, withdrawal <u>removing</u> and reinstating authorization. | More appropriate term in English. | OIRSA |
| 36. | 9 | Substantive | This ISPM should provide guidance to NPPOs on their responsibilities in <u>the application of the criteria identified in this ISPM for the developing criteria</u> for: authorization of entities to perform phytosanitary actions on their behalf; assessing compliance with the minimum responsibilities laid out in the authorization; and granting, removing and reinstating authorization. | It is the NPPOs that should follow the ISPM. | New Zealand |
| 37. | 9 | Substantive | Cette NIMP devrait donner des indications aux ONPV sur les responsabilités qui sont les leurs en matière d'élaboration de critères pour: l'autorisation d'instances à mener des actions phytosanitaires <u>spécifiques</u> pour leur compte; l'évaluation de la conformité aux responsabilités minimales énoncées dans l'autorisation; enfin, l'octroi, le retrait et le rétablissement de l'autorisation. | pour être en conformité avec ce qui a été proposé au paragraphe 4 | Algeria |
| 38. | 9 | Technical | This ISPM should provide guidance to NPPOs on their responsibilities in developing criteria for : authorization of entities to perform <u>specific</u> phytosanitary actions on their behalf; <u>developing criteria</u> , assessing compliance with the conditions <u>minimum responsibilities</u> laid out in the authorization; and granting, removing and reinstating authorization. | For consistency with the general comment, and simplification of the text. | EPPO, European Union, Georgia |
| 39. | 9 | Translation | This ISPM should provide guidance to NPPOs on their responsibilities in developing criteria for: authorization of entities to perform phytosanitary actions on their behalf; assessing compliance with the minimum responsibilities laid out in the authorization; and granting, removing and reinstating authorization. | Translation to Spanish: "Esta NIMF debería orientar a las ONPF sobre sus responsabilidades en cuanto al desarrollo de criterios para: autorizar a entidades para realizar acciones fitosanitarias en su nombre; evaluar el cumplimiento de las responsabilidades mínimas establecidas en la autorización, y conceder, retirar y restablecer la autorización." | OIRSA |
| 40. | 10 | Editorial | The ISPM will also define the minimum responsibilities of the entity to be authorized. | See US comment on paragraph 9 | United States of America |

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| 41. | 10 | Substantive | The ISPM will also define the minimum responsibilities of the entity to be authorized <u>on specific tasks or responsibilities</u> . | Minimum requirements can not be defined to all tasks or actions as they might differ (F.e., for laboratories tests or for pest risk management on the border or field). | Latvia |
| 42. | 10 | Substantive | The ISPM will also define the minimum responsibilities of the entity to be authorized <u>on specific tasks or responsibilities</u> . | Minimum requirements can not be defined for all tasks or actions, as they might differ (F.e., for laboratories tests or for pest risk management on the border or in the field). | EPPO, Georgia |
| 43. | 10 | Substantive | The ISPM will also define the minimum responsibilities of the entity to be authorized <u>for specific tasks or responsibilities</u> . | Minimum requirements can not be defined for all tasks or actions, as they might differ (F.e., for laboratories tests or for pest risk management on the border or in the field). | European Union |
| 44. | 10 | Substantive | La NIMP définira également les responsabilités minimales de l'instance pour laquelle l'autorisation doit être établie <u>pour des tâches ou actions spécifiques</u> . | la précision est de taille | Algeria |
| 45. | 10 | Translation | The ISPM will also define the minimum responsibilities of the entity to be authorized. | Translate to Spanish: "La NIMF también definirá las responsabilidades mínimas de la entidad a ser autorizada." | OIRSA |
| 46. | 11 | Translation | Scope | Translate to Spanish: "Ámbito" only | OIRSA |
| 47. | 12 | Substantive | The ISPM <u>for specific tasks</u> should describe the essential elements required for the authorization of entities to perform specific phytosanitary actions on behalf of and under the supervision of an NPPO. | All tasks can not be given to everybody. | Latvia |
| 48. | 12 | Substantive | The ISPM should describe the essential elements required for the authorization of entities to perform specific phytosanitary actions on behalf of and under the supervision of an NPPO. | The use of the word "and" implies that the NPPO would be present to supervise the authorised entity every time during the entity performs the specific phytosanitary actions on behalf of the NPPO. Delete these words if this is not the intention. | Australia |
| 49. | 12 | Substantive | The ISPM should describe the essential elements required for the authorization of entities to perform specific phytosanitary actions on behalf of and under the <u>formal audit and</u> supervision of an NPPO. | Clarity | New Zealand |
| 50. | 12 | Substantive | The ISPM should describe the essential elements required for the authorization of entities to perform specific phytosanitary actions on behalf of of and under the supervision of an NPPO. | Supervision and authorization are two separate alternatives for the performance of phytosanitary actions e.g. ISPM 12 "Phytosanitary Certificates" indicates that treatments can be performed under supervision OR authority of the NPPO of the exporting country. Delete "of and under the | Canada |

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| | | | | supervision" because guidance on how an NPPO should supervise an entity is not in scope of the proposed standard. | |
| 51. | 12 | Substantive | La NIMP devrait décrire les éléments essentiels qui doivent être présents pour que des instances soient autorisées à mener des actions phytosanitaires déterminées <u>spécifiques</u> pour le compte et sous la supervision d'une ONPV. | pour être en conformité avec ce qui a été proposé au paragraphe 4 | Algeria |
| 52. | 12 | Translation | The ISPM should describe the essential elements required for the authorization of entities to perform specific phytosanitary actions on behalf of and under the supervision of an NPPO. | Translate to Spanish: "La NIMF debería describir los elementos esenciales necesarios para la autorización a entidades para realizar acciones fitosanitarias específicas en nombre de una ONPF y bajo su supervisión." | OIRSA |
| 53. | 13 | Editorial | The ISPM may be applied to private or <u>Entities covered by this ISPM include</u> government <u>and private</u> entities, including individuals, facilities, laboratories, businesses and other organizations. | For clarity | United States of America |
| 54. | 13 | Substantive | The ISPM may be applied to private or government entities, including individuals, facilities , laboratories, businesses and other organizations. | Facilities not apply. | OIRSA |
| 55. | 14 | Editorial | The ISPM does not cover the issuance of phytosanitary certificates because they <u>phytosanitary certificates</u> are issued by authorized public officers only (CPM-4, 2009). | For clarity | United States of America |
| 56. | 14 | Substantive | The ISPM does not cover the issuance of phytosanitary certificates because phytosanitary certificates are issued by authorized public officers only (CPM-4, 2009) <u>as well a import authorisation or other specific tasks that does not provide relieability from importing countries if done by other than NPPO.</u> | Import authorisation also encloses to import-export regulation system and can not be authorised to non NPPO. Otherwise it makes it unreliable and is in contradiction with IPPC Convention. | Latvia |
| 57. | 14 | Substantive | The ISPM does not cover the issuance of phytosanitary certificates because phytosanitary certificates are issued by authorized public officers only (CPM-4, 2009). <u>The ISPM does not cover the issuance of phytosanitary import requirements because phytosanitary import requirements are issued by authorized public offices only.</u> | Propose the inclusion of the indicated statement in order to emphasise that issuance of phytosanitary import requirements should be performed by the relevant NPPO, not by any delegated entities. It is also important to emphasise that issuance of phytosanitary import requirements are done by public officers or the NPPO. | South Africa |
| 58. | 14 | Substantive | The ISPM does not cover the issuance of phytosanitary certificates because phytosanitary certificates are issued by authorized public | Change reference from CPM-4 to the IPPC. Although CPM 4 discussed Interpretation of the | Canada |

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| | | | officers only (Article V.2(a) of the IPPC , CPM-4, 2009). | term “public officer”, it did not elaborate on the interpretation, as such it is more appropriate to reference the IPPC article itself. From the CPM-4 report: "The CPM: 1. Agreed that the term “public officer” is already sufficiently defined in the IPPC, ISPM No. 7 (Export certification system) and ISPM No. 12 (Guidelines for phytosanitary certificates) therefore no further interpretation is required and there should be no changes made to ISPM No. 12 in this regard. " | |
| 59. | 16 | Translation | The expert working group (EWG) should undertake the following tasks: | Suggested translation to Spanish is: "El Grupo de Trabajo de Expertos (GTE) debería realizar las siguientes tareas:" | OIRSA |
| 60. | 17 | Editorial | 1. consider existing standards and guidelines for authorization, for NPPO officials and for other entities , developed by NPPOs and regional plant protection organizations for employees of the NPPO and for external entities | For clarity | United States of America |
| 61. | 17 | Translation | 1. consider existing standards and guidelines for authorization developed by NPPOs and regional plant protection organizations for employees of the NPPO and for external entities | Suggested translation to Spanish is: "examinar las normas y las directrices existentes en materia de autorización elaboradas por las ONPF y las organizaciones regionales de protección fitosanitaria para los empleados de la ONPF y entidades externas;" | OIRSA |
| 62. | 18 | Substantive | 1. consider the use of “authorize” and similar terms (e.g. accredit, approve, certify) in adopted ISPMs and how these relate to procedures and requirements outlined in this ISPM, and provide recommendations to the Standards Committee (SC) on this issue, with proposals for new terms or modifications to existing terms in ISPM 5 (Glossary of phytosanitary terms) if relevant | Regarding the similar terms, the US suggests the EWG determine how these terms exist in the various ISPMs and glossary, and then make sure each term describes what they are doing for each term (criteria, authorization, assessing compliance, reinstating). The standard should note where the similarities and boundaries of these terms. Regarding the deletion, this is too confusing, especially for non-native English speakers. | United States of America |
| 63. | 19 | Editorial | 1. determine the phytosanitary actions that NPPOs may decide to may/should be performed by authorized entities and the phytosanitary actions that should not be authorized to be | Suggest replacing "to" with "may" or "should" | United States of America |

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| | | | performed by such other entities | | |
| 64. | 19 | Substantive | 1. propose determine the phytosanitary actions that NPPOs may decide to be performed by authorized entities and the phytosanitary actions that should not be authorized to be performed by other entities | It is suggested to use the verb "propose", since this type of phytosanitary actions should be proposed by the EWG to be discussed and determined by the contracting parties. | COSAVE, Brazil, Uruguay, Peru, Argentina, Chile |
| 65. | 19 | Substantive | 1. determine the phytosanitary actions activities that NPPOs may decide to be performed by authorized entities and the phytosanitary activities actions that should not be authorized to be performed by other entities | Clarity | New Zealand |
| 66. | 19 | Substantive | 1. propose determine the phytosanitary actions that NPPOs may decide to be performed by authorized entities and the phytosanitary actions that should not be authorized to be performed by other entities | It is suggested to use the verb "propose", since this type of phytosanitary actions should be proposed by the EWG to be discussed and determined by the contracting parties. | Paraguay |
| 67. | 19 | Substantive | 1. determine the phytosanitary actions that NPPOs may decide to be performed by authorized entities and the phytosanitary actions that should not be authorized to be performed by other entities | Delete task 3. Only issuance of phytosanitary certificates must be conducted by a public officer. All other phytosanitary activities can be conducted by an authorized entity on an NPPO's behalf. No additional guidance is required in this respect. | Canada |
| 68. | 19 | Substantive | 1. determine the phytosanitary actions that NPPOs may decide to be performed by authorized entities and the phytosanitary actions that should not be authorized to be performed by other entities | Unnecessary text. | OIRSA |
| 69. | 19 | Technical | 1. determine the phytosanitary actions that NPPOs may decide to be performed by authorized entities <u>and for which specific guidance is therefore needed</u> and the phytosanitary actions that should not be authorized to be performed by other entities | This is a positive list, and the wording suggested for deletion could have been misleading. The need for guidance should be underlined. | EPPO, European Union, Georgia |
| 70. | 19 | Translation | 3. determine the phytosanitary actions that NPPOs may decide to be performed by authorized entities and the phytosanitary actions that should not be authorized to be performed by other | Suggested translation to Spanish (not taking into account the above) is: "determinar qué acciones fitosanitarias las ONPF podrán decidir que realicen | OIRSA |

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| | | | entities | las entidades autorizadas y qué acciones fitosanitarias no deberían autorizarse que se realicen por otras entidades;" | |
| 71. | 20 | Editorial | 1. define "entities" (excluding NPPO personnel), consider the different categories of entities (e.g. <u>other government departments</u> , individuals, facilities, businesses, organizations) that could be authorized by NPPOs, and consider the phytosanitary actions that they <u>each different category of entities</u> could perform on behalf of NPPOs | Otherwise redundant with second part of task 3 (paragraph [19]). | EPPO, Georgia |
| 72. | 20 | Editorial | 1. define "entities" (excluding NPPO personnel), consider the different categories of entities (e.g. <u>other government departments</u> , individuals, facilities, businesses, organizations) that could be authorized by NPPOs, and consider the phytosanitary actions that they <u>each different category of entities</u> could perform on behalf of NPPOs | Consistency with para [13]. Adds clarity and consistent with the EU comment (addition) on para [19]. Otherwise redundant with second part of task 3 (paragraph [19]). | European Union |
| 73. | 20 | Substantive | 4. define "entities" (excluding NPPO personnel), consider the different categories of entities (e.g. individuals, facilities, businesses, organizations) that could be authorized by NPPOs, and consider the phytosanitary actions that they could perform on behalf of NPPOs | The second part of this, beginning with "and consider the phytosanitary actions..." is already covered under bullet three? | United States of America |
| 74. | 20 | Substantive | 1. define "entities" (excluding NPPO personnel) , consider the different categories of entities (e.g. individuals, facilities, businesses, organizations, <u>other governments</u>) that could be authorized by NPPOs, and consider the phytosanitary actions that they could perform on behalf of NPPOs | Delete - define "entities" (excluding NPPO personnel" - since any individual or organization other than the NPPO can be an entity. No additional guidance is required in this respect. Add "other governments" to the examples as they may be another category of entities. | Canada |
| 75. | 20 | Substantive | 1. define "entities" (excluding NPPO personnel), consider the different categories of entities (e.g. individuals, facilities , businesses, organizations) that could be authorized by NPPOs, and consider the phytosanitary actions that they could perform on behalf of NPPOs | Facilities not apply. | OIRSA |

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| 76. | 20 | Substantive | 4. définir les «instances» (à l'exclusion du personnel des ONPV), examiner les différentes catégories d'instances (par exemple <u>autres organismes gouvernementaux</u> les individus, les structures, les entreprises commerciales, les organisations) qui pourraient être autorisées par les ONPV et réfléchir aux actions phytosanitaires <u>spécifiques</u> que ces instances pourraient mener pour le compte des ONPV; | plus de précision | Algeria |
| 77. | 20 | Translation | 4. define "entities" (excluding NPPO personnel), consider the different categories of entities (e.g. individuals, facilities, businesses, organizations) that could be authorized by NPPOs, and consider the phytosanitary actions that they could perform on behalf of NPPOs | Suggested translation to Spanish (not taking into account the above) is: "definir "entidades" (excluyendo al personal de las ONPF), analizar las distintas categorías de entidades (p. ej., particulares, instalaciones, empresas y organizaciones) que podrían ser autorizadas por las ONPF y estudiar las acciones fitosanitarias que podrían realizar en nombre de las ONPF;" | OIRSA |
| 78. | 21 | Editorial | 1. determine the criteria required for the authorization of entities and prepare guidance on the minimum requirements to be met by an NPPO when authorizing an entity to conduct specific actions on its behalf | See US comment on paragraph 9 | United States of America |
| 79. | 21 | Substantive | 1. specify determine the criteria required for the authorization of entities and prepare guidance on the minimum procedures requirements to be followed met by an NPPO when authorizing an entity to conduct specific actions on its behalf | Rather it is the minimum procedures to be followed, instead of requirements that must be met. | OIRSA |
| 80. | 21 | Technical | 1. determine the criteria required for the authorization of <u>different categories of</u> entities and prepare guidance on the minimum requirements to be <u>specified</u> met by an NPPO when authorizing an entity to conduct specific actions on its behalf | "different categories": this wording allows to introduce the notion that there could be different types of authorizations for different categories of entities. For the suggestion to modify the word "met" by the word "specified", the NPPO is specifying the requirements to be met by the entity. | EPPO |
| 81. | 21 | Technical | 1. determine the criteria required for the authorization of <u>different categories of</u> entities and prepare guidance on the minimum requirements to be <u>specified</u> met by an NPPO when authorizing an entity to conduct specific actions on its behalf | "different categories": this wording allows to introduce the notion that there could be different types of authorizations for different categories of entities. 'met' considered not appropriate, minimum requirements are needed for the authorized entity, therefore suggestion for 'specified' | European Union |

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| 82. | 21 | Translation | 5. determine the criteria required for the authorization of entities and prepare guidance on the minimum requirements to be met by an NPPO when authorizing an entity to conduct specific actions on its behalf | Translaion to Spanish: "especificar los criterios requeridos para la autorización de entidades y elaborar directrices en relación con los requisitos mínimos que deben cumplir las ONPF al autorizar a una entidad para que realice acciones específicas en su nombre;" | OIRSA |
| 83. | 22 | Editorial | 1. prepare guidance on the responsibilities related to authorization by of the NPPO, the entity being authorized and auditors | Modification for clarity. | EPPO, European Union, Georgia |
| 84. | 22 | Editorial | 1. prepare guidance for the entity being authorized on the responsibilities related to authorization from of the NPPO, the entity being authorized and auditors | For better understanding. | OIRSA |
| 85. | 22 | Substantive | 6. prepare guidance on the responsibilities related to authorization of the NPPO, the entity being authorized and auditors | It may be difficult to develop a guidance because of the infinite number of examples. Consider having an appendix with an example of what would be included in an agreement to make it work, so they can see an example – compliance agreements, MoUs, generic with input from all countries, a "model document" | United States of America |
| 86. | 22 | Substantive | 1. prepare guidance on the responsibilities related to authorization by of the NPPO, the entity being authorized and assessors /auditors | Replace "authorization of the NPPO" with "authorization by the NPPO" as it seems that this is the intent of the standard. Add the term "assessor". The EWG should consider whether authorization can only be achieved through audit or whether other assessment mechanisms would be appropriate. | Canada |
| 87. | 22 | Translation | 6. prepare guidance on the responsibilities related to authorization of the NPPO, the entity being authorized and auditors | The translation to Spanish is: "elaborar directrices sobre las responsabilidades relacionadas con la autorización de la ONPF, la entidad autorizada y los auditores;" | OIRSA |
| 88. | 23 | Editorial | 1. describe the processes to be implemented for the authorization of entities, including granting authorization; assessing compliance with minimum responsibilities; and suspending, removing and reinstating authorization | See US comment on paragraph 9 | United States of America |

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| 89. | 23 | Editorial | 1. describe the processes to be implemented <u>by the NPPO</u> for the authorization of entities, including granting authorization; assessing compliance with minimum responsibilities; and suspending, removing and reinstating authorization | Clarity | New Zealand |
| 90. | 23 | Editorial | 1. describe the processes to be implemented for the authorization of entities, including granting authorization; assessing compliance with minimum responsibilities; and suspending, withdrawal removing and reinstating authorization | More appropriate term in English. | OIRSA |
| 91. | 23 | Substantive | 1. describe the processes to be implemented for the authorization of entities, including granting authorization; assessing compliance with minimum responsibilities; and suspending, removing and reinstating authorization 2. <u>Develop criteria for determining revocation, approval and suspension of entities regarding compliance upon auditing</u> | There is need for a standard criteria for revocation, approval and suspension of entities upon auditing. | Kenya |
| 92. | 23 | Substantive | describe the processes to be implemented for the authorization of entities, including granting authorization; assessing compliance with minimum responsibilities; and suspending, removing and reinstating authorization <u>(Add the following paragraph)</u> <u>8. prepare guidance to ensure authorization transparent, by making available to the NPPOs of importing countries, the list of authorized entities, process and criteria for authorization as well as through audit by the NPPOs of importing countries.</u> | Guidance to ensure transparency of authorization is necessary for the NPPOs of importing countries to consider their import requirements and secure the phytosanitary | Japan |
| 93. | 23 | Substantive | 1. describe the processes to be implemented for the authorization of entities, including granting authorization; assessing <u>conformity</u> compliance with minimum responsibilities; and suspending, removing and reinstating authorization | Replace "compliance" with "conformity" for consistency with recommendations of the IPPC style guide (pg. 18). | Canada |
| 94. | 23 | Technical | 1. describe the processes to be implemented for the authorization of entities, including granting authorization; assessing compliance with <u>all conditions of the authorization</u> minimum responsibilities ; and suspending, removing and reinstating | Modification suggested for additional precision. | EPPO, European Union, Georgia |

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| | | | authorization | | |
| 95. | 23 | Translation | 7. describe the processes to be implemented for the authorization of entities, including granting authorization; assessing compliance with minimum responsibilities; and suspending, removing and reinstating authorization | Translation to Spanish: "describir los procedimientos que deberán aplicarse para la autorización de entidades, entre ellos la concesión de autorizaciones; la evaluación del cumplimiento de las responsabilidades mínimas, y la suspensión, retiro y restablecimiento de autorizaciones;" | OIRSA |
| 96. | 24 | Editorial | 1. identify permissible <u>appropriate/qualified</u> auditors and describe the minimum requirements for auditors involved in the delivery of audits of authorized entities, <u>documents and processes for audits</u> | Suggest replacing "permissible" with "appropriate" or "qualified" See US comment on paragraph 9 For clarity | United States of America |
| 97. | 24 | Substantive | 1. identify permissible auditors and describe the minimum requirements for auditors involved in the delivery of audits of authorized entities | Each NPPO should be responsible for auditing authorized entities. The audit should not be delegated. | COSAVE, Brazil, Uruguay, Peru, Argentina, Chile |
| 98. | 24 | Substantive | 1. identify permissible auditors and describe the minimum requirements for auditors involved in the delivery of audits of authorized entities | Each NPPO should be responsible for auditing authorized entities. The audit should not be delegated. | Paraguay |
| 99. | 24 | Substantive | 1. identify permissible auditors and describe the minimum requirements for auditors involved in the delivery of audits of authorized entities | Delete "authorized" as auditors will also need to audit or assess entities, prior to authorization, as to whether they meet the pre-assessment criteria. | Canada |
| 100. | 24 | Technical | 1. determine <u>identify eligibility of</u> permissible auditors and describe the minimum requirements for auditors involved in the delivery of audits of authorized entities | Clarifying | OIRSA |
| 101. | 25 | Editorial | 1. describe the requirements (for <u>and other requirements</u>) that would enable entities to meet the criteria for authorization to perform phytosanitary actions | For clarity | United States of America |
| 102. | 25 | Substantive | 1. describe the requirements for training that would enable entities to meet the criteria for authorization to perform <u>specific</u> phytosanitary actions | 1. It is all about specific phytosanitary tasks, not everything. 2. There should be a section about control and what it should include for appropriately working | Latvia |

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| | | | 2. 10.To ddescribe control system for completely appropriately working authorisation system. | system. | |
| 103. | 25 | Substantive | 1. describe the requirements for training that would enable entities to meet the criteria for authorization to perform specific phytosanitary actions | Consistency with the general comment. | EPPO, European Union, Georgia |
| 104. | 25 | Substantive | 1. describe the requirements for training and development that would enable entities to meet the criteria for authorization to perform phytosanitary actions | Addition of the words “and development” adds substance and purpose to the sentence in order to ensure that the entities are capacitated to perform phytosanitary actions. | South Africa |
| 105. | 25 | Substantive | 9. décrire les exigences en matière de formation qui permettraient aux instances de satisfaire aux critères pour l'autorisation de mener des actions phytosanitaires spécifiques ; | pour être en conformité avec ce qui a été proposé au paragraphe 4 | Algeria |
| 106. | 25 | Technical | 1. describe the requirements (eg skills, competence) for training that would enable entities to meet the criteria for authorization to perform phytosanitary actions | Clarity | New Zealand |
| 107. | 25 | Technical | 1. describe the requirements for training that allows would enable prequalified entities to meet the criteria for authorization to perform phytosanitary actions | For better specification. | OIRSA |
| 108. | 27 | Substantive | 11. examiner la mise en œuvre de la NIMP par les parties contractantes, identifier les problèmes opérationnels et techniques potentiels de mise en œuvre et fournir également des informations et éventuellement des recommandations au CN sur ces problèmes. 12. déterminer l'impact de l'octroi d'autorisation sur les législations phytosanitaires en vigueur des Parties Contractantes | Ajout de cette tâche aux experts pour nous permettre de connaître les changements/modifications qui vont se répercuter sur nos législations en place: connaître les besoin en renforcement des capacités en ce sens | Burundi |
| 109. | 27 | Substantive | 1. consider implementation of the ISPM by contracting parties and identify potential operational and technical implementation issues, and also provide information and possible recommendations on these issues to the SC. 2. consider whether more detailed conditions for | Suggestion to add minimum criteria to define the actions considered. | EPPO, European Union, Georgia |

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| | | | certain phytosanitary actions could be annexed to the Standard | | |
| 110. | 27 | Translation | 11. consider implementation of the ISPM by contracting parties and identify potential operational and technical implementation issues, and also provide information and possible recommendations on these issues to the SC. | Translate "identify" like "identificar" | OIRSA |
| 111. | 29 | Editorial | Funding for the meetings 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 |
| 112. | 29 | Substantive | 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. | Could it be possible a virtual EWG to develop this draft?? | COSAVE, Brazil, Uruguay, Paraguay, Peru, Argentina, Chile |
| 113. | 35 | Substantive | Five to seven experts with a wide knowledge and experience in phytosanitary actions, including at least two to three one persons knowledgeable in authorization programmes and their elements and at least one person knowledgeable in auditing compliance with authorization programmes. | Suggest having more experts with experience in authorization programmes and their elements | United States of America |
| 114. | 35 | Substantive | Five to seven experts with a wide knowledge and experience in phytosanitary actions, including at least one person knowledgeable in authorization programmes and their elements and at least one person knowledgeable in auditing compliance with authorization programmes. | There is need to include training experts especially on phytosanitary aspects to join the team. | Kenya |
| 115. | 38 | Substantive | References Suggest add references to rganisations where official assurances are provided on he basis of inspection/testing undertaken by external entities of ISO, OECD seed schemes, ISTA. | These refs would be helpful in the considerations. | New Zealand |
| 116. | 40 | Editorial | NAPPO (North American Plant Protection Organization). 2009. The authorization of laboratories for phytosanitary testing. Regional | la même remarque s'applique au paragraphe 41 | Algeria |

| Comm no. | Para no. | Comment type | Comment | Explanation | Country |
|----------|----------|--------------|--|--|-------------------------------|
| 117. | 40 | Substantive | Standard for Phytosanitary Measures (RSPM) 9. Ottawa, NAPPO. NAPPO (North American Plant Protection Organization). 2009. The authorization of laboratories for phytosanitary testing. Regional Standard for Phytosanitary Measures (RSPM) 9. Ottawa, NAPPO. | It is preferable not to quote Standards all coming the same region of the world. | EPPO, European Union, Georgia |
| 118. | 41 | Editorial | NAPPO (North American Plant Protection Organization). 2014. <i>Guidelines for authorization of entities to perform phytosanitary services</i> . Regional Standard for Phytosanitary Measures (RSPM) 28. Ottawa, NAPPO. | The US notes that the reference styles in this specification differ from the other specifications out for member consultation (i.e. risk management specification) | United States of America |
| 119. | 41 | Substantive | NAPPO (North American Plant Protection Organization). 2014. Guidelines for authorization of entities to perform phytosanitary services. Regional Standard for Phytosanitary Measures (RSPM) 28. Ottawa, NAPPO. | It is preferable not to quote Standards all coming the same region of the world. | EPPO, European Union, Georgia |