

Issues from Other Meetings

FF Systems Approach

Near East: Participants questioned whether FFF-POP and FFF-PS (43) should be listed as components of an FF-SA because these measures are adequate to achieve appropriate level of protection (ALP) without additional measures. Participants were referred to 61 which indicates that FFF-POP and FFF-PS should be used in conjunction with other independent measures. The glossary definition of SA was considered. It was decided to include a substantive comment to delete these terms because it was felt they are adequate by themselves to achieve ALP. Section 2.1.1.2 regarding FF-POP and FFF-PS was deleted in its entirety to be consistent with changes made in 43. There was discussion indicating that these measures may stand alone or may be used as elements of an FFSA, but the group decided to make a substantive change and delete the entire section to be consistent with previous changes made in 43. There was discussion of whether it would be reasonable to expect farmers to harvest at a less susceptible stage, because they need to sell their product and don't have access to cold storage facilities.

Africa: Substantive comments were effective on references paragraph number 10 and 20; background 30 and section 1.2 paragraph no 46, 60 and 93.

Russia: Some overarching questions regarding why a systems approach was necessary for the Tephritidae and whether it was valid to lump all Tephritidae together. It was noted that it was important to distinguish between uninfested fruits and that infestation can only be detected after second or third treatment. It was observed that cold treatment can be useful in light of this issue, and that cold treatment is particular during transportation. Two proposals were put forward: 1.) standards be drafted for each species; 2.) cold treatments be used during transportation. In response to the second proposal, it was noted that some fruit originate from pest free areas, thus cold treatment during transportation would not be required. One participant felt that it was the responsibility of the importing country to implement the systems approach to ensure the appropriate level of protection. A question was raised why it was necessary to use a combination of measures. It was noted that often a single measure taken alone would not be sufficient to ensure the appropriate level of protection. There were some issues with respect to the terminology used in the draft. It was suggested to replace "relationship between host, target fruit fly species and specified area" with "phytosanitary condition" as Russian speaking countries are more familiar with the term "phytosanitary condition". Since "phytosanitary condition" is not a term that is included in the Glossary of Phytosanitary Terms, it was proposed to add the term "Phytosanitary condition" and its definition to the glossary. There was a question as to whether "systems approach" should be plural throughout. The group encountered some difficulty in identifying an equivalent term for "host commodity" in Russian. The discussion centered on what is covered by the terms "hosts" and what is covered by "trade". After some discussion, it was decided that "host commodity" should be replaced with "fruits and vegetable cultures" throughout the text. Overall, the participants felt that the draft as written was too general and not sufficiently focused on fruit flies. Likewise, it repeated the text of the Convention and other standards unnecessarily. The group recommended replacing the word "mitigation" with "management" and "appropriate" to "acceptable" throughout the text. Also, it was noted that "host sequence" was not generally understood. It was felt that "changes in host plant" would be more easily understood by a wider audience. Having discussed these general issues, the group proceeded to examine each section of the draft. With respect to the scope, there was an objection to the reference to facilitation of trade, as this is not the primary objective of the draft standard. With respect to paragraph 25, it was proposed to change "appropriate level", which implies some general level, to "acceptable level", which implies rightly that each country establishes own acceptable level of protection. In the second sentence of paragraph 26, the group felt that the term "phytosanitary security" should be further specified. In paragraph 27, it was proposed to simplify the first sentence by replacing "the appropriate level of phytosanitary protection" with "phytosanitary requirements". It was noted that "protection" refers to the phytosanitary status of the importing country. There was a suggestion to delete paragraph 28 in its entirety, as it was found to be unclear. Others felt that the second sentence added to the standard and that the second sentence merely referred to the delegation of tasks as described in the Convention. The majority of participants wanted to preserve the first sentence with some rearrangements – namely to move the first sentence into paragraph

27. Paragraph 29, there was a question as to what is meant by “association”. With reference to paragraph 32, it was suggested that the genera be re-ordered in terms of importance, with *Ceratitis* listed first. It was also observed that the importance of the genera varies geographically. With respect to paragraph 43, it was noted that it is out of context where it is currently placed as it unrelated to the heading under which it is currently placed (i.e. “pest risk analysis”). In section 1.3, there was a question regarding what supervision entails – is it inspection or some other activities? It was decided to replace the “Supervision” heading with “Audit”. Also, an addition was made to the last sentence to clarify that audits are carried out by the importing party in conjunction with the exporting country. In section 2.1, paragraph 52, observed repetition from ISPM 24 in sentence 1. Found “affected groups” to be repetitious. Meanwhile, it was noted that some countries may not refer to all standards when preparing regulations, so the repetitions can be valuable. As a whole, it was noted that much of section 2.1 (paras 52 – 54) dealt with bilateral arrangements, and consequently it was felt that this section should not be included in the draft standard. The standard should present guidelines for the general application of the systems approach and not for bilateral agreements. It is the responsibility of the importing country to define requirements and the responsibility of the exporting country to meet these requirements. It was proposed to delete first sentence of paragraph 52 and the last sentence of paragraph 53 (repetitious). The group reviewed the document over the course of a day and a half. In addition to the issues listed above, the group raised several points in particular: why this standard addressed the systems approach for Tephritidae only; noted considerable repetitions (e.g. from other standards and the Convention itself); took issue with the introduction of discussion of bilateral arrangements; found a lack of clarity regarding roles; and overly conceptual and deficient in technical guidance. After considerable discussion, the group decided that there were sufficient issues with the document that it would have to be re-drafted.

Pacific: It was suggested that “contracting parties” be changed to “countries” and that ISPM 6 be added to the list of references. There was some concern about PRA in the outline. In para 27 “options” was changed to “measures” and “appropriate level of protection” to “phytosanitary import requirements”. It was recommended that “hosts” in para 23 be changed to “fruits” as per the scope. In para 29 “association” changed to “consultation”. The group thought that para 37 could be deleted as it was superfluous. It was noted in para 46 that the duties encompassed those of both importing and exporting countries and the distinction was not clear. Para 47 and 49 “supervision” was amended to “verification” or “auditing”. Some text reorganization was recommended for sections 2.1.2.1 and 2.1.2.2 (paras 69-72)

ISPM 15

Near East: The technical and statistical complexity of this ISPM and its overall relevance to the region was discussed. There was discussion on the difficulty of finding alternatives to methyl bromide that can achieve Probit 9 efficacy for all species and the possibility that it might not be feasible for some countries in the region to implement new, expensive, sophisticated treatments. A general comment was added suggesting that systems approaches for wood packaging materials be considered as alternatives to methyl bromide because they might be more feasible for some countries in the region to implement. Some participants found the standard (particularly the description of the stages) difficult to understand and suggested it be revised for clarity and ease of understanding. Several questions were posed about the selection of species for testing and the use of substitute species. A question was raised about the meaning of the term “moribund” in 33 and an editorial change was suggested that it be replaced by the more easy to understand phrase “appear dead”.

Africa: Substantive comments were done on introduction paragraph no 6 and 7; section 2 paragraphs no 22 and 23. Editorial comments were done on paragraph 7, 22 and 33.

Russia: A presentation of the draft ISPM was given by Mr. Andrei Orlinski, EPPO, and then the group began the discussion of the draft standard by expressing their doubts with respect to the requirement of an efficacy level of Probit 9 for all species. It was suggested that the level of effectiveness should vary according to the type of pest under consideration. It was observed that while the requirements are very well scientifically justified, they are unfortunately almost not feasible. Likewise, it was noted that the adopted treatments that are currently available do not achieve

Probit 9. Consequently, new treatments may be even more effective but strict Probit 9 requirements would prevent their adoption. A question was raised why new proposed treatments should be evaluated differently from the already adopted treatments. The group then proceeded to examine the draft on a paragraph-by-paragraph basis. In paragraph 3, the addition of a reference to ISPM 23 was suggested. With respect to table 1, the group felt that the scientific names of the most resistant quarantine pests should be given; carpenter ants and termites should be separated; and indication should be given regarding the geographical region in which the pests are of quarantine significance (e.g. wood flies are of particular importance to the tropics but not as important in the temperate zone). In paragraph 22, a clause to exclude vectors was added. In paragraph 23, there were questions regarding what was meant by “quality,” and it was determined that the “same characteristics as they would have in their natural conditions” would be more appropriate as it is fully inclusive description. The group felt that the requirement for 10 replicates given in paragraph 28 was too high. With respect to step 4 (the determination of efficacy against the target test species), it was suggested that another option for determining efficacy be included – comparison of the proposed treatment to the efficacy of the already adopted treatments. This would replace the listed requirement for Probit 9. This could result in a review of the already adopted treatments.

Pacific: It was suggested that the title be changed to reflect the idea that it was a procedure for evaluation for new treatments submitted for inclusion in ISPM 15. The group discussed the level of efficacy demanded by treatment testing procedure. There were some comments on the use of “logs” in para 6 – this was amended to “logs for dunnage”. It was noted that there was already an Appendix 1 in ISPM 15. But there was the suggestion that this should be Annex 3, rather than an appendix. Some members of the group supported the use of the example boxes in the text. The group supported the use of probit 9 for the testing. This was particularly the case with the provisions provided in the text of the draft which included the ability to extrapolate results where insufficient pests are available or, also, to use substitute species.

Plants for Planting

Near East: It was suggested that the title was not descriptive of the standard and should possibly be changed. This suggestion was not accepted by the group. It was suggested to clarify the first indent of 22 by adding the phrase at the end and at certain life stages. In addition an editorial change was made so that subject and verb agree in number. There was discussion of whether morphology of the plant (34) would affect risk and discussion of whether rhizomes and tubers should be added to the list. There was a discussion about whether tubers should be considered seed and whether they would come under the scope of this standard. There was discussion regarding the difference between critical and non-critical non-compliance incidents (84-88) and it was suggested that examples would help to clarify the difference between the two concepts. It was discovered that in Table 1 of Appendix 1, group 10 is missing. It was later clarified that during the SC meeting group 10 became group 9. This means that Table 2 of Appendix one will need to be revised to remove any references to group 10, since it no longer exists in Table 1.

Africa: However substantive comments were done on paragraphs no 18,31,44,57,61,63,74,78,98,92,95,108,114,119 and 121. Editorial comments were effective on paragraphs no 3,17,18,32,41,52,81,82,85,87,98,100,106 and 110.

Russia: A power point presentation of the draft ISPM was given by Ms Natalia Sherokolava, Deputy Director of the All-Russian Plant Quarantine Center. She noted that the expert working groups that drafted the standard and subsequent intervening stages resulted in considerable discussion which improved the draft in many respects, e.g. the terminology has been harmonized. She noted that it was important that the responsibilities of the exporting country should be well clarified and that internal audits be conducted to prevent infestations. There was a reluctance to use the term “integrated approach” as this could lead to confusion with “integrated pest management”, and thus imply that biological control measures are necessarily part of the management plan. The group proposed to delete the word “integrated” from the text. Likewise, it was suggested to replace the word “mitigation” with “management” and to change “crop protection specialist” to “plant protection specialist” throughout the text. The group reviewed each section of the draft, beginning with the title which many felt could lead to confusion with the systems approach. It was suggested that the

title be changed to “Managing pest risk associated with international trade of plants for planting”. In paragraph 17, the group suggested that the last clause be removed and replaced by “and other interested parties”. Examples of the roles taken by the NPPO of the exporting country were given – one where the whole production chain was monitored and another where the NPPO only supervised transportation. The group felt that the role of the exporting country needed to be clarified. In paragraph 21, it was felt that the comparison of plants for planting to “plant products” could cause confusion, so it was recommended to state that “they are generally considered to pose a higher risk than other regulated articles”.

Pacific: It was suggested that the Scope be shortened as it was not intended to be a list of contents. The outline was noted as unhelpful and lacking in facts that might usefully summarize the sections. It was noted that much of the draft referred to the measures in detail used for the measure of a POP, but did not refer to other measures to make up integrated measures (as were listed in Table 1). In para 31, “transmission” was amended to “mode of transmission”. A further bullet point was added “– likely economic and environmental impact”. It was suggested that tubers and pollen be added to the list of factors considered for risk. It was suggested that the title of para 45 be changed to “application of pest risk management measures”. It was noted that there did not seem to be a mention of buffer zones in the text whereas they were mentioned in Table 1. It was suggested that the pest management plan be incorporated into the previous section with both being in a section numbered 3.2.2. Pest management would be a subsection within this section. With para 61 dot-point 6, the addition of the certification of subcontractors was suggested. There was discussion about the nature of the employment of the crop protection specialist – part-time for fulltime, or a government official. An amendment was proposed. The use of critical and non-critical non-compliance was questioned. The use of the corrective action plans as described in other standards was noted. The numbers in the third column of table 2 that are referring to table 1 need to be amended.

Ceratitis capitata

Near East: Two participants raised concerns about the effects of irradiation on animals, humans, and the environment, and one recommended that tests should be done on health and environmental effects before irradiation treatments are adopted. There was not agreement on this point and it was emphasized that countries may submit comments individually through their contact points. There was a suggestion that all commodities should be tested prior to adoption of irradiation standards; but it was suggested that this might be impracticable given the number of commodities and cultivars and their differential responses to irradiation treatment. There was clarification that modified atmospheres refers to modified constituents (carbon dioxide, nitrogen, hydrogen) of the atmosphere in which commodities are stored.

Africa: The power point presentation was clear and no substantive issue was raised during the review of the document.

Russia: A presentation of the draft ISPM was given by Mr. Jacob Mordkovich, Chief of Department for Desinfestation of the All-Russian Plant Quarantine Center. At the conclusion of the presentation, he provided some general remarks on the draft. A question was raised about whether it was possible to extrapolate the results obtained through studies on mango and papaya to all hosts of *Ceratitis capitata*. It was observed that flies infesting fruits of these two species are considered to be the most resistant to irradiation and it was for this reason it was possible to extrapolate these results to other host species. With respect to the treatment schedule, it was suggested to add an additional point indicating that the fruits should be calibrated by size. The group felt that the phrase “may not result in outright mortality” should be replaced with “results in a reliable level of sterilization”.

Pacific: There were no comments on this draft.

PPV

Near East: Mode of transmission of plum pox virus was discussed. Questions were raised about whether the virus could be transmitted by the seeds of the fruit or infected imported fruit, but it was asserted that aphids and grafting are the primary means for transmitting the virus and there is no scientific evidence to support transmission via seed or fruit.

There was a suggestion to add photographs to the diagnostic protocol. It was noted that this could aid understanding, and that the Secretariat is trying to develop a process for adding graphics to diagnostic protocols which will keep the files of a manageable size so they can be uploaded and downloaded easily by everyone. A general question was raised about the purpose of diagnostic protocols and it was indicated their purpose is to establish commonly accepted methods to identifying pests and pathogens. Technical and editorial comments made on the draft ISPMs are attached to the report (see Appendix 4). Participants were invited to take note of the comments collected at this workshop and utilize these comments as they felt appropriate in their preparation of national comments. National comments should be submitted through the NPPO contact point to the IPPC Secretariat no later than 30 September 2010. Guidelines for the submission of comments on draft international standards for phytosanitary measures (ISPMs) are provided (see Appendix 5).

Africa: Upon reading of the power point presentation the draft was so technical which required specialists. The general comment was reviewed. Substantive comments were done on paragraphs 6, 10 and 11. There was a need to insert into the text example of facultative hosts which may be found in Africa. Collaboration of NPPOs with agricultural research institutes and universities is necessary. There is also a need to enhance the capacity of African countries on this draft.

Russia: Mr. Yuriy Prikhodko, a specialist in virology, gave a presentation of the draft ISPM. He also made some general comments on the draft and made a general recommendation that identification to the level of strain be a requirement for the D and M strains of PPV. Following Mr. Prikhodko's remarks, the group proceeded to review each section of the draft. In paragraph 11, the group recommended the addition of text to the effect that "the most appropriate period for sampling should be specified taking into account the biology of each type of PPV and for each species of affected fruits and vegetables for appropriate level of confidence." It was noted that the information in paragraph 24 is available in the published literature, so the group recommended deletion of the paragraph in its entirety. Regarding paragraph 88, it was proposed to add the following clause "samples identified as infested should be maintained at least for one year".

Pacific: A comment on multiple plants for testing was suggested for insertion after para 11: "In some circumstances (e.g. during routine diagnosis of a pest widely established in a country) multiple plants may be tested simultaneously using a bulked sample derived from a number of plants. The decision to test individual or multiple plants will depend on the virus concentration in the plants and the level of confidence required by the NPPO."