

2017 SECOND CONSULTATION

1 July – 30 September 2017

Compiled comments for Draft revision to Annex 1 (Approved treatments associated with wood packaging material) and Annex 2 (The mark and its application) to ISPM 15 (Regulation of wood packaging material in international trade): inclusion of the phytosanitary treatment Sulphuryl fluoride fumigation and revision of the dielectric heating section (2006-010A&B)

Summary comments

Name	Summary
EPPO [Central Asia and Eastern Europe] Σ	Finalised by the EPPO Secretariat on behalf of its 51 Member Countries.
European Union [European Union]	Comments finalised by the European Commission on behalf of the EU and its 28 Member States on 29/09/2017.
Jamaica [Caribbean]	The inclusion of a second chemical treatment for solid wood packaging material is timely in light of the phasing out of methyl bromide by many countries.
Malaysia [Asia]	Malaysia agreed with APPPC
Samoa [South West Pacific]	no further comments
South Africa [Africa]	No comments from the National Plant Protection Organisation of South Africa.

#	Para	Text	Comment
1	G	(General Comment)	Barbados Barbados has no objection to the addition of Sulphuryl fluoride to Annex 1 of ISPM 15. <i>Category : SUBSTANTIVE</i>
2	G	(General Comment)	Congo, DR nous n'avons pas d'autres commentaires si cen 'est que demander la traduction en francais pour tous lse projets postés seulement en anglais <i>Category : TRANSLATION</i>
3	G	(General Comment)	Tajikistan We support all comments done by EPPO via OCS <i>Category : SUBSTANTIVE</i>
4	G	(General Comment)	Costa Rica We agree with the document as it as <i>Category : TECHNICAL</i>
5	G	(General Comment)	Canada Canada supports the proposed Draft revision of Annex 1 (Approved treatments associated with wood packaging material) and Annex 2 (The mark and its application) to ISPM 15 (Regulation of wood packaging material in international trade): inclusion of the phytosanitary treatment Sulphuryl fluoride

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			fumigation and revision of the dielectric heating section (2006-010A&B). <i>Category : SUBSTANTIVE</i>
6	G	(General Comment)	COSAVE No comments <i>Category : TECHNICAL</i>
7	G	(General Comment)	Peru No comments <i>Category : TECHNICAL</i>
8	G	(General Comment)	Azerbaijan Azerbaijan would like to formally endorse the EPPO coments submitted via the IPPC Online Comment System <i>Category : SUBSTANTIVE</i>
9	G	(General Comment)	Cuba No hay comentarios a los anexos de la NIMF <i>Category : TECHNICAL</i>
10	G	(General Comment)	Swaziland amendment is acceptable <i>Category : SUBSTANTIVE</i>
11	G	(General Comment)	Brazil No comments <i>Category : TECHNICAL</i>
12	G	(General Comment)	Argentina No comments <i>Category : TECHNICAL</i>
13	G	(General Comment)	Guyana Guyana has no objection to the inclusion of the annex on Sulphuryl fluoride as a fumigant and the revision of the dielectric heating section. <i>Category : SUBSTANTIVE</i>
14	G	(General Comment)	European Union For a future revision of the standard, for consistency between the different approved treatments please consider the possibility: 1) To replace "over 24 hours" with "within a single 24 hours period" (paragraph 90); 2) To replace "dose" with "dosage" or "dose rate" (paragraphs 106, 140 and 206), because according to paragraphs 138 and 139 of this standard and paragraph 134 of the draft standard on fumigation, "dosage" and "dose rate" seem to be the correct terms to use. <i>Category : TECHNICAL</i>
15	G	(General Comment)	Jamaica Jamaica has no objection to the inclusion of the annex on Sulphuryl fluoride as a fumigant <i>Category : SUBSTANTIVE</i>
16	G	(General Comment)	Mongolia Mongolia agree with Nepal's comments

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			<i>Category : SUBSTANTIVE</i>
17	G	(General Comment)	<p>EPPO For a future revision of the standard, for consistency between the different approved treatments please consider the possibility:</p> <p>1) To replace "over 24 hours" with "within a single 24 hours period" (paragraph 90)</p> <p>2) To replace "dose" with "dosage" or "dose rate" (paragraphs 106, 140 and 206), because according to paragraphs 138 and 139 of this standard and paragraph 134 of the draft standard on fumigation, "dosage" and "dose rate" seem to be the correct terms to use.</p> <p><i>Category : TECHNICAL</i></p>
18	G	(General Comment)	<p>Bahamas The Bahamas has a high volume of trade but the ISPM 15, approved treatments associated with wood packaging material and the inclusion of phytosanitary treatments such as Sulphuryl fluoride fumigation and dielectric heating are currently not standards that we impose. In fact ISPM 15 is still under review and requires further consultation at the administrative level. <i>Category : SUBSTANTIVE</i></p>
19	G	(General Comment)	<p>Panama En la región no se tiene experiencia en la aplicabilidad de estos tratamientos. <i>Category : TECHNICAL</i></p>
20	G	(General Comment)	<p>Uruguay Sin comentarios <i>Category : TECHNICAL</i></p>
21	G	(General Comment)	<p>Nepal The per unit cost of electricity is usually high and initial establishment cost is also high so CP from developing countries cannot afford it lets keep it as reference material only. Similarly, their maintenance cost would also be high .</p> <p>Potential issues:</p> <ul style="list-style-type: none"> To strengthen the Sulphuryl fluoride fumigation and the dielectric heating (2006-010A&B) for CP from Developing countries need to supported with technical financial support for establishing the required physical facilities otherwise, the developing countries export potentiality may be hampered. Thus there must be some provision for technical and financial support to strengthen the SPS capacity of Developing countries. Further, to the above all these three fumigation/ disinfectant methods are technically sound and based on this CP may agree to adopt it but some of them may not have the capacity to implement it, on the other side importing countries may show desire to have the packaging material treated with one of these methods in such situation it may not facilitate trade especially for

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			<p>developing countries; it then become a barrier. Though these are alternative but it is better to specifically mention that the material should be treated with either one of the method.</p> <p>Nepal Support to country comments <i>Category : SUBSTANTIVE</i></p>
22	G	(General Comment)	<p>Honduras HONDURAS NO TIENE COMENTARIOS <i>Category : TECHNICAL</i></p>
23	G	(General Comment)	<p>China Change Footnote 3, Footnote 4, Footnote 5 to Footnote 1, Footnote 2 and Footnote 3. The original text : Footnote 1 and 2 was deleted. <i>Category : EDITORIAL</i></p>
24	G	(General Comment)	<p>PPPO Have no other comments. Agree with the new insertion of comments <i>Category : SUBSTANTIVE</i></p>
25	G	(General Comment)	<p>Algeria Pas d'observation particulière de notre part. <i>Category : SUBSTANTIVE</i></p>
26	1	Draft revision of Annex 1 (Approved treatments associated with wood packaging material) and Annex 2 (The mark and its application) to ISPM 15 (Regulation of wood packaging material in international trade): inclusion of the phytosanitary treatment Sulphuryl fluoride fumigation and revision of the dielectric heating section (2006-010A&B)	<p>Cameroon Le Cameroun est dans l'attente urgente d'un substitut au Bromure de Méthyle qui a été récemment interdit. Nous sommes toutefois préoccupés par les propriétés de ce gaz qui pour le moment est indexé comme un gaz à effet de serre et qui va probablement accélérer son interdiction par les Conventions Internationales pertinentes (http://publications.gc.ca/collections/collection_2016/sc-hc/H113-9-2016-30-fra.pdf). La mise en oeuvre de ce traitement va nécessiter des équipements additionnels qui n'étaient pas nécessaires en conditions tropicales pour d'autres gaz tels que le MB. L'incidence de ces équipements additionnels pourrait se ressentir dans le coût des traitements et donc la compétitivité des produits traités avec ce produit <i>Category : TECHNICAL</i></p>
27	56	For methyl bromide <u>and sulphuryl fluoride</u> treatments, the removal of bark must be carried out before treatment as the presence of bark on the wood may affect treatment efficacy. For heat treatment, the removal of bark may be carried out before or after treatment. When a dimension limitation is specified for a certain type of heat treatment (e.g. dielectric heating), any bark must be included in the dimension measurement.	<p>Nicaragua De acuerdo con la adición de las palabras tratamientos aprobados y la adición de tratamiento de fluoruro de sulfurilo <i>Category : TECHNICAL</i></p>
28	56	For methyl bromide <u>and sulphuryl fluoride</u> treatments, the removal of bark must be carried out before treatment as the presence of bark on the wood may affect treatment efficacy. For	<p>Nepal If "Irrespective of the type of treatment applied, wood packaging</p>

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		heat treatment, the removal of bark may be carried out before or after treatment. When a dimension limitation is specified for a certain type of heat treatment (e.g. dielectric heating), any bark must be included in the dimension measurement.	material must be made of debarked wood then no need to have less than 3 cm in width or greater than 3 cm in width. <i>Category : EDITORIAL</i>
29	78	Where dielectric heating is used (microwaves or radio waves) is used , wood packaging material composed of wood not exceeding 20 cm³ when measured across the smallest dimension of the piece or the stack must should be heated to achieve a minimum temperature of 60 °C for 1 continuous minute throughout the entire profile of the wood (including its surface). The prescribed temperature must be reached within 30 minutes from the start of the treatment². Treatment providers using dielectric heating must should verify that their schedules achieve specified treatment parameters (taking into account moisture content of wood, its size and density, and the frequency of microwave or radio waves).	United States of America Before last sentence, to replace proposed deleted sentence: "Timeframe for increasing temperatures of wood to the 60C minimum needs to be ascertained through experimental data collection". This is based on experimental data collection. <i>Category : TECHNICAL</i>
30	78	Where dielectric heating is used (microwaves or radio waves) is used , wood packaging material composed of wood not exceeding 20 cm³ when measured across the smallest dimension of the piece or the stack must should be heated to achieve a minimum temperature of 60 °C for 1 continuous minute throughout the entire profile of the wood (including its surface). The prescribed temperature must be reached within 30 minutes from the start of the treatment². Treatment providers using dielectric heating must should verify that their schedules achieve specified treatment parameters (taking into account moisture content of wood, its size and density, and the frequency of microwave microwaves or radio waves).	European Union Plural (please see first line of this paragraph). <i>Category : EDITORIAL</i>
31	78	Where dielectric heating is used (microwaves or radio waves) is used , wood packaging material composed of wood not exceeding 20 cm³ when measured across the smallest dimension of the piece or the stack must should must be heated to achieve a minimum temperature of 60 °C for 1 continuous minute throughout the entire profile of the wood (including its surface). The prescribed temperature must be reached within 30 minutes from the start of the treatment². Treatment providers using dielectric heating must must should verify that their schedules achieve specified treatment parameters (taking into account moisture content of wood, its size and density, and the frequency of microwave or radio waves).	European Union This is an obligation of a technical nature that is unavoidable (as part of a method description) and thus "must" is the right term to use according to the IPPC Style guide for standards and meeting documents. <i>Category : SUBSTANTIVE</i>
32	78	Where dielectric heating is used (microwaves or radio waves) is used , wood packaging material composed of wood not exceeding 20 cm³ when measured across the smallest dimension of the piece or the stack must should must be heated to achieve a minimum temperature of 60 °C for 1 continuous minute throughout the entire profile of the wood (including its surface). The prescribed temperature must be reached within 30 minutes from the start of the treatment². Treatment providers using dielectric heating must should must verify that their schedules achieve specified treatment parameters (taking into account moisture content of wood, its size and density, and the frequency of microwave microwaves or radio waves).	EPPO This is an obligation of a technical nature that is unavoidable (as part of a method description) and thus "must" is the right term to use according to the IPPC Style guide for standards and meeting documents. Plural (please see first line of this paragraph). <i>Category : EDITORIAL</i>
33	78	Where dielectric heating is used (microwaves or radio waves) is used , wood packaging material composed of wood not exceeding 20 cm³ when measured across the smallest dimension of the piece or the stack must should be heated to achieve a minimum	Nicaragua De acuerdo con la adición de las palabras ondas de radio, los proveedores de tratamientos dieléctricos deben cumplir los

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		temperature of 60 °C for 1 continuous minute throughout the entire profile of the wood (including its surface). The prescribed temperature must be reached within 30 minutes from the start of the treatment ² . Treatment providers using dielectric heating must <u>should</u> verify that their schedules achieve specified treatment parameters (taking into account moisture content of wood, its size and density, and the frequency of microwave or radio waves).	parámetros de tratamientos <i>Category : EDITORIAL</i>
34	89	The fumigation of wood packaging material with methyl bromide must <u>must</u> should be in accordance with a schedule specified or approved by the NPPO that achieves the minimum concentration-time product ⁴ (CT) over 24 hours at the temperature and final residual concentration specified in Table 1. This CT must <u>should</u> must be achieved throughout the profile of the wood, including its core, although the concentrations would be <u>is</u> measured in the ambient atmosphere. The minimum temperature of the wood and its surrounding atmosphere must <u>should</u> must not be less than 10 °C and the minimum exposure time must <u>should</u> must not be less than 24 hours. Monitoring of gas concentrations must <u>should</u> must be carried out at a minimum at 2, 4 and 24 hours from the beginning of the treatment. In the case of longer exposure times and weaker concentrations, additional measurement of the gas concentrations should be recorded at the end of fumigation.	European Union These are obligations of a technical nature that are unavoidable (as part of a method description) and thus "must" is the right term to use according to the "IPPC Style guide for standards and meeting documents". Please see paragraph 88 where "must" was kept and it is correct. <i>Category : SUBSTANTIVE</i>
35	89	The fumigation of wood packaging material with methyl bromide must <u>should</u> must be in accordance with a schedule specified or approved by the NPPO that achieves the minimum concentration-time product ⁴ (CT) over 24 hours at the temperature and final residual concentration specified in Table 1. This CT must <u>must</u> should be achieved throughout the profile of the wood, including its core, although the concentrations would be <u>is</u> measured in the ambient atmosphere. The minimum temperature of the wood and its surrounding atmosphere must <u>should</u> must not be less than 10 °C and the minimum exposure time must <u>should</u> must not be less than 24 hours. Monitoring of gas concentrations must <u>should</u> must be carried out at a minimum at 2, 4 and 24 hours from the beginning of the treatment. In the case of longer exposure times and weaker concentrations, additional measurement of the gas concentrations should be recorded at the end of fumigation.	EPP0 These are obligations of a technical nature that are unavoidable (as part of a method description) and thus "must" is the right term to use according to the "IPPC Style guide for standards and meeting documents". Please see paragraph 88 where "must" was kept which is correct. <i>Category : SUBSTANTIVE</i>
36	89	The fumigation of wood packaging material with methyl bromide must <u>should</u> be in accordance with a schedule specified or approved by the NPPO that achieves the minimum concentration-time product ⁴ (CT) over 24 hours at the temperature and final residual concentration specified in Table 1. This CT must <u>should</u> be achieved throughout the profile of the wood, including its core, although the concentrations would be <u>is</u> measured in the ambient atmosphere. The minimum temperature of the wood and its surrounding atmosphere must <u>should</u> not be less than 10 °C and the minimum exposure time must <u>should</u> not be less than 24 hours. Monitoring of gas concentrations must <u>should</u> be carried out at a minimum at 2, 4 and 24 hours from the beginning of the treatment. In the case of longer exposure times and weaker concentrations, additional measurement of the gas concentrations should be recorded at the end of fumigation.	Nicaragua Cambió de la palabra debe por debería y agregar la palabra concentración <i>Category : EDITORIAL</i>
37	91	Table 1: Minimum <u>required</u> CT over 24 hours for wood packaging material fumigated with methyl bromide	Nicaragua De acuerdo en adicionar la palabra requerido <i>Category : EDITORIAL</i>
38	93	<u>Minimum required</u> CT (g-h/m3) over 24 h	Nicaragua De acuerdo en adicionar las palabras "Mínimo requerido" <i>Category : EDITORIAL</i>
39	144	<u>Sulphuryl fluoride treatment (treatment code for the mark: SF)</u>	United States of America Note that some IPPC standards and documents spell it "sulfuryl"

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			and others "sulphuryl". It should be consistent throughout all documents. <i>Category : EDITORIAL</i>
40	144	<u>Sulphuryl fluoride treatment (treatment code for the mark: SF)</u>	Nicaragua Agregar la marca SF (sulfuro de sufurilo) <i>Category : EDITORIAL</i>
41	145	<u>Wood packaging material containing a piece of wood exceeding 20 cm in cross-section at its smallest dimension should not be treated with sulphuryl fluoride. Wood packaging material with a moisture content higher than 60%-60% or 75% at the time of treatment should not be treated with sulphuryl fluoride.</u>	APPPC In this standard, the requirement about moisture content of wood is different with which is 75% in ISPM 28 PT 23. Please explain the reasons and provides the basis for 60%. Best to ensure consistency between ISPMs. Nepal Support APPPC comments Singapore Singapore support APPPC comment - best to ensure consistency by reviewing whether it is 75% or 60%. China China support to this APPPC comment. Thailand Thailand support this APPPC comment. Bangladesh Bangladesh agree with APPPC comment. Viet Nam Vietnam support this APPPC comment. Malaysia Malaysia agreed with APPPC <i>Category : SUBSTANTIVE</i>
42	145	<u>Wood packaging material containing a piece of wood exceeding 20 cm in cross-section at its smallest dimension should-must not be treated with sulphuryl fluoride. Wood packaging material with a moisture content higher than 60% at the time of treatment should-must not be treated with sulphuryl fluoride.</u>	European Union These are obligations of a technical nature that are unavoidable (as part of a method description) and thus "must" is the right term to use according to the "IPPC Style guide for standards and meeting documents". Please see paragraph 88 where "must" was kept which is correct. <i>Category : SUBSTANTIVE</i>
43	145	<u>Wood packaging material containing a piece of wood exceeding 20 cm in cross-section at its smallest dimension should not be treated with sulphuryl fluoride. Wood packaging material with a moisture content higher than 60%-75% (dry basis) at the time of treatment should not be treated with sulphuryl fluoride.</u>	European Union For consistency with ISPM 28 SF treatments adopted at CPM 12 (for the justification of this change, please see paragraph 36 of 2016 September TPPT Meeting report): "Determination of moisture content. The TPPT discussed the measurement of the moisture content because it seemed, from a consultation comment, that there was confusion as to the basis on which moisture was measured. The TPPT felt that, overall, the method of measuring moisture was an operational issue and did not pertain to the schedule, but agreed that it could be clarified in the PT on what basis (dry or wet) the moisture was measured. The TPPT noted that normally industry uses dry basis, but that the data underlying the treatment used wet basis and that if the basis was not specified, it could be misunderstood. Therefore, the TPPT

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			<p>decided, for clarity and to facilitate implementation of the treatment, to add "dry basis" and modified the percentage to 75%, which was the dry basis equivalent of the wet basis measurement provided in the supporting paper (Barak et al., 2006)."</p> <p><i>Category : TECHNICAL</i></p>
44	145	<u>Wood packaging material containing a piece of wood exceeding 20 cm in cross-section at its smallest dimension should not be treated with sulphuryl fluoride. Wood packaging material with a moisture content higher than 60% at the time of treatment should not be treated with sulphuryl fluoride.</u>	<p>European Union</p> <p>"At the time of treatment" is useless because it is obvious, and the sentence works better without it.</p> <p><i>Category : EDITORIAL</i></p>
45	145	<u>Wood packaging material containing a piece of wood exceeding 20 cm in cross-section at its smallest dimension should not be treated with sulphuryl fluoride. Wood packaging material with a moisture content higher than 60%-60%(wet basis) or 75%(dry basis) at the time of treatment should not be treated with sulphuryl fluoride.</u>	<p>Japan</p> <p>For consistency with ISPM28 Annexes based on 2016 TPPT Report(para 36 and 55).</p> <p><i>Category : TECHNICAL</i></p>
46	145	<u>Wood packaging material containing a piece of wood exceeding 20 cm in cross-section at its smallest dimension should-must not be treated with sulphuryl fluoride. Wood packaging material with a moisture content higher than 60% at the time of treatment should-75% (dry basis) must not be treated with sulphuryl fluoride.</u>	<p>EPPO</p> <p>For consistency with ISPM 28 SF treatments adopted at CPM 12 (for the justification of this change, please see paragraph 36 of 2016 September TPPT Meeting report):</p> <p>"Determination of moisture content. The TPPT discussed the measurement of the moisture content because it seemed, from a consultation comment, that there was confusion as to the basis on which moisture was measured. The TPPT felt that, overall, the method of measuring moisture was an operational issue and did not pertain to the schedule, but agreed that it could be clarified in the PT on what basis (dry or wet) the moisture was measured. The TPPT noted that normally industry uses dry basis, but that the data underlying the treatment used wet basis and that if the basis was not specified, it could be misunderstood. Therefore, the TPPT decided, for clarity and to facilitate implementation of the treatment, to add "dry basis" and modified the percentage to 75%, which was the dry basis equivalent of the wet basis measurement provided in the supporting paper (Barak et al., 2006)."</p> <p>"At the time of treatment" is useless because it is obvious, and the sentence works better without it.</p> <p>These are obligations of a technical nature that are unavoidable (as part of a method description) and thus "must" is the right term to use according to the "IPPC Style guide for standards and meeting documents". Please see paragraph 88 where "must" was kept which is correct.</p> <p><i>Category : SUBSTANTIVE</i></p>
47	145	<u>Wood packaging material containing a piece of wood exceeding 20 cm in cross-section at its smallest dimension should not be treated with sulphuryl fluoride. Wood packaging material with a moisture content higher than 60% (dry basis) at the time of treatment should not be treated with sulphuryl fluoride.</u>	<p>Australia</p> <p>Dry basis relative humidity is specified in the ISPM 28 Annexes 22 and 23 and so for consistency should be included here too.</p> <p><i>Category : TECHNICAL</i></p>

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48	145	Wood packaging material containing a piece of wood exceeding 20 cm in cross-section at its smallest dimension should not be treated with sulphuryl fluoride. Wood packaging material with a moisture content higher than 60% at the time of treatment should not be treated with sulphuryl fluoride. <i>In this standard, the requirement about moisture content of wood is different with which is 75% in ISPM 28 PT 23. Please explain the reasons and provides the basis.</i>	China For the same parameter requirements, different indicators are likely to cause confusion. <i>Category : SUBSTANTIVE</i>
49	145	Wood packaging material containing a piece of wood exceeding 20 cm in cross-section at its smallest dimension should not be treated with sulphuryl fluoride. Wood packaging material with a moisture content higher than 60% at the time of treatment should not be treated with sulphuryl fluoride.	Nicaragua Aprobado <i>Category : TECHNICAL</i>
50	145	Wood packaging material containing a piece of wood exceeding 20 cm in cross-section at its smallest dimension should not be treated and with sulphuryl fluoride. Wood packaging material with a moisture content higher than 60% at the time of treatment should not be treated with sulphuryl fluoride.	Philippines <i>Category : EDITORIAL</i>
51	146	The fumigation of wood packaging material with sulphuryl fluoride should be in accordance with a schedule specified or approved by the NPPO that achieves the minimum CT ²⁴ over 24 or 48 hours at the target temperature and final concentration specified in Table 3. This CT should be achieved throughout the profile of the wood, including its core, although the concentration is measured in the ambient atmosphere. Small increases in the treatment time (not more than 2 hours) may be permitted to achieve the required CT if the minimum final concentration is not reached. The minimum temperature of the wood should not be lower than 20 °C and the minimum exposure time should not be less than the time stated for each temperature in Table 3.	European Union Currently it is footnote 4 and not 2 (but as footnotes 1 and 2 are proposed to be deleted, it will become footnote 2). <i>Category : EDITORIAL</i>
52	146	The fumigation of wood packaging material with sulphuryl fluoride should-must be in accordance with a schedule specified or approved by the NPPO that achieves the minimum CT ² over 24 or 48 hours at the target temperature and final concentration specified in Table 3. This CT should-must be achieved throughout the profile of the wood, including its core, although the concentration is measured in the ambient atmosphere. Small increases in the treatment time (not more than 2 hours) may be permitted to achieve the required CT if the minimum final concentration is not reached. The minimum temperature of the wood should-must not be lower than 20 °C and the minimum exposure time should-must not be less than the time stated for each temperature in Table 3.	European Union These are obligations of a technical nature that are unavoidable (as part of a method description) and thus "must" is the right term to use according to the "IPPC Style guide for standards and meeting documents". <i>Category : SUBSTANTIVE</i>
53	146	The fumigation of wood packaging material with sulphuryl fluoride should be in accordance with a schedule specified or approved by the NPPO that achieves the minimum CT ² over 24 or 48 hours at the target temperature and final concentration specified in Table 3. This CT should be achieved throughout the profile of the wood, including its core, although the concentration is measured in the ambient atmosphere. Small increases in the treatment time (not more than 2 hours) may be permitted to achieve the required CT if the minimum final concentration is not reached. The minimum temperature of the wood should not be lower than 20 °C and the minimum exposure time should not be less than the time stated for each temperature in Table 3.	European Union This sentence should be deleted because it is redundant with paragraph 147 which was added following comments made during first consultation. <i>Category : EDITORIAL</i>
54	146	The fumigation of wood packaging material with sulphuryl fluoride should be in accordance with a schedule specified or approved by the NPPO that achieves the minimum CT ² over 24 or 48 hours at the target temperature and final residual concentration specified in Table 3. This CT should be achieved throughout the profile of the wood, including its core, although the concentration is measured in the ambient atmosphere. Small increases in the treatment	European Union Precision given ("final residual concentration" is the expression used in paragraph 89 (MB treatment) and in PT 23). <i>Category : EDITORIAL</i>

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		time (not more than 2 hours) may be permitted to achieve the required CT if the minimum final concentration is not reached. The minimum temperature of the wood should not be lower than 20 °C and the minimum exposure time should not be less than the time stated for each temperature in Table 3.	
55	146	The fumigation of wood packaging material with sulphuryl fluoride should-must be in accordance with a schedule specified or approved by the NPPO that achieves the minimum CT ²⁴ over 24 or 48 hours at the target temperature and final residual concentration specified in Table 3. This CT should-must be achieved throughout the profile of the wood, including its core, although the concentration is measured in the ambient atmosphere. Small increases in the treatment time (not more than 2 hours) may be permitted to achieve the required CT if the minimum final concentration is not reached. The minimum temperature of the wood should-must not be lower than 20 °C and the minimum exposure time should-must not be less than the time stated for each temperature in Table 3.	<p>EPPO Precision given ("final residual concentration" is the expression used in paragraph 89 (MB treatment) and in PT 23.</p> <p>This sentence should be deleted because it is redundant with paragraph 147 which was added following comments made during first consultation.</p> <p>Currently it is footnote 4 and not 2 (but as footnotes 1 and 2 are proposed to be deleted, it will become footnote 2).</p> <p>These are obligations of a technical nature that are unavoidable (as part of a method description) and thus "must" is the right term to use according to the "IPPC Style guide for standards and meeting documents". <i>Category : SUBSTANTIVE</i></p>
56	146	The fumigation of wood packaging material with sulphuryl fluoride should be in accordance with a schedule specified or approved by the NPPO that achieves the minimum CT ² over 24 or 48 hours at the target temperature and final concentration specified in Table 3. This CT should be achieved throughout the profile of the wood, including its core, although the concentration is measured in the ambient atmosphere. Small increases in the treatment time (not more than 2 hours) may be permitted to achieve the required CT if the minimum final concentration is not reached. The minimum temperature of the wood should not be lower than 20 °C and the minimum exposure time should not be less than the time stated for each temperature in Table 3. Monitoring of gas concentration should be carried out at a minimum of 2, 4, and 24 hours (in the case of longer exposure times and weaker concentrations, additional measurement should be recorded at the end of the fumigation).	<p>United States of America This sentence proposed to be consistent with the language of ISPM 15 <i>Category : SUBSTANTIVE</i></p>
57	146	The fumigation of wood packaging material with sulphuryl fluoride should be in accordance with a schedule specified or approved by the NPPO that achieves the minimum required CT ² over 24 or 48 hours at the target temperature and the minimum final concentration specified in Table 3. This CT should be achieved throughout the profile of the wood, including its core, although the concentration is measured in the ambient atmosphere. Small increases in the treatment time (not more than 2 hours) may be permitted to achieve the required CT if the minimum final concentration is not reached. The minimum temperature of the wood should not be lower than 20 °C and the minimum exposure time should not be less than the time stated for each temperature in Table 3.	<p>Thailand for better clarification. <i>Category : EDITORIAL</i></p>
58	146	The fumigation of wood packaging material with sulphuryl fluoride should be in accordance with a schedule specified or approved by the NPPO that achieves the minimum CT ² over 24 or 48 hours at the target temperature and final concentration specified in Table 3. This CT should be achieved throughout the profile of the wood, including its core, although the concentration is measured in the ambient atmosphere. Small increases in the treatment time (not more than 2 hours) may be permitted to achieve the required CT if the minimum final concentration is not reached. The minimum temperature of the wood should not be lower	<p>Nicaragua Aprobado <i>Category : TECHNICAL</i></p>

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		than 20 °C and the minimum exposure time should not be less than the time stated for each <u>temperature in Table 3.</u>	
59	147	If the CT is not achieved within a single 24 or 48 hour period (even if the minimum concentration is achieved), corrective action <u>will need to should</u> be taken. The treatment may be extended for a maximum of two hours without adding more sulphuryl fluoride, or it may be restarted.	European Union Expressing the level of obligation. <i>Category : TECHNICAL</i>
60	147	If the CT is not achieved within a single 24 or 48 hour period (even if the minimum concentration is achieved), corrective action will need to be <u>takentaken to ensure the CT is reached</u> . The treatment may be extended for a maximum of two hours without adding more sulphuryl fluoride <u>fluoride to achieve the required CT (see the footnote to Table 3), or it may be restarted.</u>	European Union More explicit and more precise, and consistent with paragraph 90 (MB treatment). <i>Category : TECHNICAL</i>
61	147	If the CT is not achieved within a single 24 or 48 hour period (even if the minimum concentration is achieved), corrective action <u>will need to should</u> be <u>takentaken to ensure the CT is reached</u> . The treatment may be extended for a maximum of two hours without adding more sulphuryl fluoride <u>fluoride to achieve the required CT (see the footnote to Table 3), or it may be restarted.</u>	EPPO Expressing the level of obligation More explicit and more precise, and consistent with paragraph 90 (MB treatment). <i>Category : TECHNICAL</i>
62	147	If the CT is not achieved within a single 24 or 48 hour period (even if the minimum concentration is achieved), corrective action will need to be taken. The treatment <u>time may</u> be extended for a maximum of two hours without adding more sulphuryl fluoride, or it may be restarted.	China The statement is clearer. <i>Category : EDITORIAL</i>
63	147	If the CT is not achieved within a single 24 or 48 hour period (even if the minimum <u>final</u> concentration is achieved), corrective action will need to be taken. The treatment may be extended for a maximum of two hours without adding more sulphuryl fluoride, or it may be restarted.	Thailand for better clarification. <i>Category : EDITORIAL</i>
64	147	If the CT is not achieved within a single 24 or 48 hour period (even if the minimum concentration is achieved), corrective action will need to be taken. The treatment may be extended for a maximum of two hours without adding more sulphuryl fluoride, or it may be restarted.	Nicaragua Aprobado la propuesta de adición <i>Category : EDITORIAL</i>
65	149	Temperature (°C)	Nicaragua De acuerdo en que se agregue la palabra temperatura <i>Category : TECHNICAL</i>
66	150	Minimum required CT (g·h/m3)	Nicaragua Sin comentarios <i>Category : EDITORIAL</i>
67	159	[†] if If the minimum final concentration is not achieved after 24 or 48 hours by the end of the treatment, a deviation in the concentration of ~5% is permitted, provided additional treatment time is added at the end of the treatment to achieve the prescribed CT.	European Union Capital letter. <i>Category : EDITORIAL</i>
68	159	[†] if the minimum final concentration is not achieved after 24 or 48 hours by the end of the treatment, a deviation in the concentration of ~5% is permitted, provided additional treatment time is added at the end of the treatment to achieve the prescribed CT-. <u>(Is it still possible to reach the minimum final concentration, by just extending exposure period? and not topping up or adding additional SF?)</u>	Philippines <i>Category : SUBSTANTIVE</i>
69	159	[†] if If the minimum final concentration is not achieved after 24 or 48 hours by the end of the treatment, a deviation in the concentration of ~5% is permitted, provided additional treatment time is added at the end of the treatment to achieve the prescribed CT.	EPPO Capital letter. <i>Category : EDITORIAL</i>
70	159	[†] if the minimum final concentration is not achieved after 24 or 48 hours by the end of the treatment, a deviation in the concentration of ~5% is permitted, provided additional treatment time is added at the end of the treatment to	Philippines Is it still possible to reach the minimum final concentration, by

#	Para	Text	Comment
		achieve the prescribed CT.	just extending exposure period? and not topping up or adding additional SF? <i>Category : SUBSTANTIVE</i>
71	160	<u>Example-One example</u> of a schedule that may be used for achieving the specified requirements is shown in Table 4.	European Union More precise and consistent with paragraph 105 (MB treatment) and PT 23. <i>Category : EDITORIAL</i>
72	160	<u>Example-One example</u> of a schedule that may be used for achieving the specified requirements is shown in Table 4.	EPPC More precise and consistent with paragraph 105 (MB treatment) and PT 23. <i>Category : EDITORIAL</i>
73	161	Table 4: Example of a treatment schedule that achieves the minimum required CT for wood packaging material treated with sulphuryl fluoride (initial dosage may need to be higher under conditions of high <u>serption or leakage)sorption</u>).	APPPC To remove leakage. Nepal Support APPPC comments Singapore Singapore support APPPC comment as fumigation should not be carried out if there is leakage. Hence, proposed to delete leakage from this sentence. China China support to this APPPC comment. Thailand Thailand support this APPPC comment. Bangladesh Bangladesh agree with APPPC comment. Viet Nam Vietnam support this APPPC comment. Malaysia Malaysia agreed with APPPC <i>Category : SUBSTANTIVE</i>
74	161	Table 4: Example of a treatment schedule that achieves the minimum required CT for wood packaging material treated with sulphuryl fluoride (initial dosage may need to be higher <u>under-in</u> conditions of high sorption or leakage).	European Union For consistency with paragraph 106 (MB treatment) and PT 23. <i>Category : EDITORIAL</i>
75	161	Table 4: Example of a treatment schedule that achieves the minimum required CT for wood packaging material treated with sulphuryl fluoride (initial dosage may need to be higher <u>under-in</u> conditions of high sorption or leakage).	EPPC For consistency with paragraph 106 (MB treatment) and PT 23. <i>Category : EDITORIAL</i>
76	161	Table 4: Example of a treatment schedule that achieves the minimum required CT for wood packaging material treated with sulphuryl fluoride (initial dosage may need to be higher under conditions of high <u>serption or leakage)sorption</u>).	Philippines Is a prescribed additional dosage in anticipation for sorptive materials? delete leakage, because you are not supposed to fumigate if there is leak on the enclosure. <i>Category : SUBSTANTIVE</i>
77	164	Dosage (g/m³)-*	New Zealand As g/m3 is used twice in the table and the 0.5 hr number exceeds the initial dosage (ie 87>82), the new note will help explain why this occurs. Dosage and minimum concentration, although they

#	Para	Text	Comment
		<p>* footnote - <u>Dosage is the amount of sulphuryl fluoride required for the total volume of the fumigation enclosure.</u></p> <p><u>Minimum concentration (g/m3)**</u></p> <p>**footnote - <u>Minimum concentration is measuring the fumigant per m3 of free air space within the fumigation enclosure.</u></p>	<p>hve the same units, are different in what they are measuring.</p> <p>This explanation applies to the Minimum concentration suggested addition.</p> <p>Category : <i>TECHNICAL</i></p>
78	197	<p><u>Treatment providers should be approved by the NPPO. NPPOs should consider the following factors that may be required for sulphuryl fluoride fumigation to meet the treatment requirements.</u></p>	<p>APPPC The factors that may be required for SF and MB seem to be similar. These factor should be summarized as a general requirement for fumigation treatment.</p> <p>Nepal Support APPPC comments</p> <p>Singapore Singapore support APPPC comment to review the factors for SF & MB as these appeared to be similar. If so, then best to summarise under general requirements for fumigation treatment instead.</p> <p>China China support to this APPPC comment.</p> <p>Thailand Thailand support this APPPC comment.</p> <p>Viet Nam Vietnam support this APPPC comment.</p> <p>Malaysia Malaysia agreed with APPPC</p> <p>Category : <i>SUBSTANTIVE</i></p>
79	197	<p><u>Treatment providers should be approved by the NPPO. NPPOs should consider the following factors that may be required for sulphuryl fluoride fumigation to meet the treatment requirements.</u></p>	<p>Thailand The factors that may be required for SF and MB seem to be similar. These factor should be summarized as a general requirement for fumigation treatment.</p> <p>Category : <i>SUBSTANTIVE</i></p>
80	199	<p><u>The fumigation enclosure is not loaded beyond 80% of its volume.</u></p>	<p>United States of America What is research behind not loading beyond 80%? Usually listed as 50-60%. This should be based on the research that has been done.</p> <p>Category : <i>TECHNICAL</i></p>
81	200	<p><u>The fumigation enclosure is well sealed and as gas tight as possible. If fumigation is to be carried out under sheets, these must be made of gas-proof material and sealed appropriately at the seams and at floor level.</u></p>	<p>European Union NB: In the second sentence the use of "must" is correct because this is an obligation of a technical nature that is unavoidable (as part of a method description).</p> <p>Category : <i>EDITORIAL</i></p>
82	200	<p><u>The fumigation enclosure is well sealed and as gas tight as possible. If fumigation is to be carried out under sheets, these must be made of gas-proof material and sealed appropriately at the seams and at floor level.</u></p>	<p>EPPO NB: In the second sentence the use of "must" is correct because this is an obligation of a technical nature that is unavoidable (as</p>

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			part of a method description). <i>Category : EDITORIAL</i>
83	202	<u>Wood stacks need separators at least every 20 cm to ensure adequate sulphuryl fluoride circulation and penetration.</u>	United States of America Clarify where spacing occurs, between the pallets or the stacks. <i>Category : TECHNICAL</i>
84	203	When calculating sulphuryl fluoride dosage, compensation is made for any gas mixtures (e.g. carbon dioxide) to ensure that the total amount of pure fumigant applied meets the requirements prescribed in the standard.	United States of America Propose deleting this bullet because it is confusing. <i>Category : TECHNICAL</i>
85	205	Initial dose rates and post-treatment product handling procedures take into account likely sulphuryl fluoride sorption by the treated wood packaging material or associated product (e.g. polystyrene boxes).	United States of America Delete the reference to polystyrene because it is unlikely to be used when treating wood packaging material. <i>Category : TECHNICAL</i>
86	206	<u>The measured temperature of the product or the ambient air (whichever is lower) is used to calculate the sulphuryl fluoride dose, and the temperature of the product must be at least 20 °C (including at the wood core) throughout the duration of the treatment.</u>	European Union NB: The use of "must" is correct because this is an obligation of a technical nature that is unavoidable (as part of a method description). <i>Category : EDITORIAL</i>
87	206	<u>The measured temperature of the product or the ambient air (whichever is lower) is used to calculate the sulphuryl fluoride dose, and the temperature of the product must be at least 20 °C (including at the wood core) throughout the duration of the treatment.</u>	EPPO NB: The use of "must" is correct because this is an obligation of a technical nature that is unavoidable (as part of a method description). <i>Category : EDITORIAL</i>
88	209	<u>For the purpose of auditing, the treatment provider or authorized entity keeps records of sulphuryl fluoride treatments and calibrations for a period of time specified by the NPPO.</u>	United States of America Added for accuracy, but verify whether they have the same meaning. <i>Category : TECHNICAL</i>
89	235	<u>SF</u>	Nicaragua Agregar la marca SF <i>Category : TECHNICAL</i>
90	251	Footnote 1: The 20 cm limit is based on the efficacy data currently available.	Nicaragua Sin comentarios <i>Category : TECHNICAL</i>
91	254	Footnote 4: The CT utilized for methyl bromide and sulphuryl fluoride treatments in this standard is the sum of the products of the concentration (g/m ³) and time (h) over the duration of the treatment.	Nicaragua Sin comentarios <i>Category : TECHNICAL</i>
92	256	Potential implementation issues	OIRSA In the OIRSA región, doesn't have experience in the applicability of these treatments. <i>Category : SUBSTANTIVE</i>
93	257	This section is not part of the standard. The Standards Committee in May 2016 requested the Secretariat to gather information on any potential implementation issues related to this draft. Please provide details and proposals on how to address these potential implementation issues.	United States of America Domestic regulations may need to be changed in order to comply with SF treatments for WPM per new annexes. <i>Category : SUBSTANTIVE</i>
94	257	This section is not part of the standard. The Standards Committee in May 2016 requested the Secretariat to gather information on any potential implementation issues related to	Cameroon Une des contraintes à la mise en oeuvre de cette annexe sera la problématique de l'effet de serre. En effet, le Bromure de methyl a

#	Para	Text	Comment
		this draft. Please provide details and proposals on how to address these potential implementation issues.	<p>été mis en marge pour son effet de serre. avant son adoption, il est déjà notoire que ce gaz présente un effet de serre, ce qui va conduire à une rapide élimination.</p> <p>L'autre contrainte à la mise en oeuvre de ce traitement est l'équipement nécessaire pour permettre ce gaz à forte densité de se diffuser dans l'enceinte de traitement. Ces dispositifs sont courants dans les pays développés et le sont moins dans les pays en développement. La nécessité d'acquérir des équipements pour optimiser ce traitement risquera de rendre le traitement plus coûteux à la tonne métrique et réduire par conséquent la compétitivité prix des biens traités avec ce moyen</p> <p><i>Category : TECHNICAL</i></p>
95	257	This section is not part of the standard. The Standards Committee in May 2016 requested the Secretariat to gather information on any potential implementation issues related to this draft. Please provide details and proposals on how to address these potential implementation issues.	<p>Colombia DIFICULTADES PARA LA IMPLEMENTACIÓN EN COLOMBIA</p> <p>1. Para la implementación del tratamiento de Fluoruro de Sulfurilo, Colombia requerirá de la formulación de normas nacionales que permitan el registro de empresas especializadas en la materia y deberá promover el registro del producto para el uso específico como tratamiento cuarentenario, lo cual puede tomar como mínimo 5 años.</p> <p>2. El tratamiento dieléctrico no se ha implementado en Colombia y por tanto aún no se ha adoptado la tecnología para el desarrollo del mismo, esto depende fundamentalmente de las condiciones del mercado interno. En este aspecto puede requerirse por parte de la ONPF conocer experiencias en otros países sobre este tratamiento.</p> <p><i>Category : TECHNICAL</i></p>