

2018 FIRST CONSULTATION

1 July – 30 September 2018

Compiled comments for Draft ISPM on Authorization of entities to perform phytosanitary actions (2014-002)

Summary of comments

| Name | Summary |
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| Benin | Accepté |
| Chad | Les observations sont faites d'une manière générales sur la forme |
| Croatia | After the consultation with relevant subject matter experts we agree agree with the comments made during regional workshop |
| Cuba | No hay comentarios al documento |
| European Union | Completed on 27 September 2018 by the European Commission on behalf of the European Union and its 28 Member States. |
| Korea, Republic of | Republic of Korea agrees with the comments made during APPPC Regional workshop. |
| Lao People's Democratic Republic | Lao PDR has agreed with APPPC as Regional comments. |
| Latvia | For internal LV discussions in progress only |
| OIRSA | Norma revisada e incorporado los comentarios. |
| Oman | No comment. |
| Peru | Completada |
| Singapore | Singapore also support the APPPC's submitted comments. |
| Trinidad and Tobago | Trinidad and Tobago is in agreement with the comments made during the 2018 IPPC Regional Workshop in the Caribbean. |

T (Type) - B = Bullet, C = Comment, P = Proposed Change, R = Rating

| FAO sequential number | Para | Text | T | Comment |
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| 1 | G | (General Comment) | C | Benin Pas de commentaire <i>Category : TECHNICAL</i> |
| 2 | G | (General Comment) | C | Guyana Guyana has reviewed the draft standard and accepts its adoption. However, the alignment of national legislation to facilitate this standard is a potential significant implementation issue. <i>Category : SUBSTANTIVE</i> |
| 3 | G | (General Comment) | C | Sri Lanka Sri Lanka Accepts all comments made by APPPC on this standard <i>Category : SUBSTANTIVE</i> |

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| 4 | G | (General Comment) | C | Canada Canada supports the draft ISPM - Authorization of entities to perform phytosanitary actions. Substantive, technical and editorial comments are provided for consideration. <i>Category : SUBSTANTIVE</i> |
| 5 | G | (General Comment) | C | Antigua and Barbuda Antigua and Barbuda endorses the comments made by CAHFSA. <i>Category : SUBSTANTIVE</i> |
| 6 | G | (General Comment) | C | Peru Peru shares with the final comments of COSAVE <i>Category : SUBSTANTIVE</i> |
| 7 | G | (General Comment) | C | Trinidad and Tobago Trinidad and Tobago is in agreement with the comments made during the 2018 IPPC Regional Workshop in the Caribbean. <i>Category : SUBSTANTIVE</i> |
| 8 | G | (General Comment) | C | Panama Difference between auditing and supervision should be clarified throughout the standard, because both terms are used indistinctly and they are different actions. In addition it should be clarified if these actions should be included as examples of phytosanitary actions and therefore within the scope of this ISPM. Some countries questioned if these are phytosanitary actions. The Glossary definition of phytosanitary actions does not specifically mention supervision and auditing, but the definition of the term mentions only some examples of phytosanitary actions. Other countries understood that auditing and supervision would be covered under "actions undertaken to implement phytosanitary measures" and therefore within the scope of the standard. <i>Category : SUBSTANTIVE</i> |
| 9 | G | (General Comment) | C | Russian Federation The Russian Federation does not support this ISPM draft in general Comments: The system of quarantine phytosanitary control is a system providing not only phytosanitary safety of the territory of the country, but the safety phytosanitary trade between the countries. However, none of the private organizations that are knowingly focused to gain economic profit will not consider the issue of phytosanitary security of the country. Plant quarantine, which has become a part of business will not be able to provide an impartial judgement and often competent decision when considering the issue of import, transfer or export of products. Attempts to use the elements of the system proposed by this Standard have been made by the Dutch side. The study of this |

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| | | | <p>system proved its insolvency and bias. Removal of the state body from the system of phytosanitary control will serve as a basis for the import and distribution of quarantine, invasive and underinvestigated species and would invariably entail the abolition of the concept of "Plant Quarantine " because the meaning of the term itself is lost within this "new system ". The Russian Federation was not only opposed to considering the provisions of the Standard, but also considered it necessary to cease work on its provisions.</p> <p>Российская Федерация не поддерживает данный проект Стандарта МСФМ в целом. Комментарий: Система карантинного фитосанитарного контроля — это система, обеспечивающая не только фитосанитарную безопасность территории страны, но безопасный в фитосанитарном отношении товарооборот между странами. Вместе с тем ни одна из частных организаций, которая заведомо настроена получить экономическую прибыль не будет рассматривать вопрос о фитосанитарной безопасности страны. Карантин растений, ставший частью бизнеса, не сможет обеспечить беспристрастное, а зачастую и квалифицированное решение при рассмотрении вопроса о ввозе, перемещении или вывозе продукции. Попытки использования элементов, предлагаемой стандартом системы были предприняты голландской стороной. Изучение этой системы доказали ее несостоятельность и предвзятость. Отстранение государственного органа от системы фитосанитарного контроля будет служить основанием для ввоза и распространения карантинных, инвазивных и малоизученных видов и неизменно повлечет за собой ликвидацию самого понятия "карантин растений" ввиду потери смысла самого термина в рамках этой "новой системы". Российская Федерация выступает не только категорически против рассмотрения положений стандарта, но и считает необходимым прекратить работу над его положениями.</p> <p><i>Category : SUBSTANTIVE</i></p> |
| 10 | G | (General Comment) | <p>C Armenia Armenia is against this standard as: 1.such standard is a signal for private entities to ask governments and finally overtake NPPOs functions; 2.Standard is not written in accordance with specification; 3.We do not see the reasoning of such standard as there is nothing phytosanitary specific in this standard; 4.inspections and control surveys cannot be authorized; 5.it is not acceptable to authorize phytosanitary certification related activities to private sector such as inspections or checks for issuance of phytosanitary certificate, so we could accept</p> |

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| | | | | certificates with confidence as dependable document (as we agreed in Convention). Otherwise confidence about reliable certification system is lost if so important tasks authorized away to private sector. Convention encompass this aspect of reliability; 6.It contradicts with some related aspects in other approved standards. <i>Category : SUBSTANTIVE</i> |
| 11 | G | (General Comment) | C | Belarus The draft standard is not supported by the Republic of Belarus. The Standard can not be relevant for the Republic of Belarus, since the legislative framework does not provide for the possibility of empowerment an entities, other than the NPPO of Belarus, to perform phytosanitary activities listed in the draft Standard. <i>Category : SUBSTANTIVE</i> |
| 12 | G | (General Comment) | C | Philippines We agree with the comments made during the APPPC Regional Workshop. <i>Category : SUBSTANTIVE</i> |
| 13 | G | (General Comment) | C | Australia An Authorized entity may be an individual who is trained and assessed by the NPPO before being approved. These individuals would not create their own instructional material or management system. Nor would they have 'personnel' themselves. We propose a separate section relevant to individuals as an authorised entity. <i>Category : TECHNICAL</i> |
| 14 | G | (General Comment) | C | Sri Lanka There may be implementation issues in some countries. These standards may be a ground for the external parties (to NPPO) to urge NPPO to implement such standards in their countries (opportunistic stakeholders/ political influences). If the country's NPPO does not have a capacity to implement such systems, existence of these type of blanket recommendations will harm to integrity of the phytosanitary system in those countries <i>Category : SUBSTANTIVE</i> |
| 15 | G | (General Comment) | C | Viet Nam 1. The Implementation and guidance material to supplement the ISPM will be critical for the development of systems with integrity. Such material should underscore the need for culture change, the challenges of dealing with conflicts of interest. It should also include a number of case studies to demonstrate how a delegated system and its elements can be established. 2. It should be mentioned that NPPO is accountable for phytosanitary actions conducted by authorized entities. 3. Suggest to include a recognised transition phase for the establishment of any new entity which specifies how non conformities will be managed. 4. Suggest a Performance Based Verification (PBV) system which is performance and outcome based. In terms of managing non-conformity, suggest to also include a |

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| | | | | <p>requirement for increased audits as an option.</p> <p>5. Potential implementation issue: Define and manage conflict of interest. In implementing a system it will be important to articulate potential conflicts of interest and how they are managed. Conflicts of interest may include conflicts with other Government Agencies in the samPotential implementation issue:</p> <p>6. Section 2 "Criteria for Eligibility of Entities" is key to the integrity of any systems developed according to this ISPM. The text is reasonable and flexible but how countries choose to operate and implement the system is where concern of whether the system delivers the desired outcome potentially lies.e country.</p> <p>7. Development of an authorisation process/programme is required - this can be done at NPPO level to ensure fit for purpose within its own regulatory system.</p> <p>8. Clarification is needed for NPPO delegation of responsibility, how far it can delegate? how many levels - if NPPO delegate to one organisation & the organisation delegates to another agency - how far does this goes?</p> <p>9. It is important that the standard is robust, all entities taking phytosanitary actions can deliver the same outcome, and all countries can meet the same level of integrity for their exported commodities. Therefore the standard should be the same any entities (private or public).</p> <p>10. The overall objective of the ISPM should be to deliver a high standard of plant health and results in phytosanitary systems which consistently approve safe compliant plant products. This standard should be met by achieving outcomes. The integrity of any systems established under this ISPM must be based on all parties demonstrating compliance (i.e. meeting the requirements) and which are transparently demonstrated to the confidence of the regulatory body.</p> <p>11. The Implementation and guidance material to supplement the ISPM will be critical for the development of systems with integrity. Such material should underscore the need for culture change, the challenges of dealing with conflicts of interest. It should also include a number of case studies to demonstrate how a delegated system and its elements can be established</p> <p>12. Add Destination of entities in ISPM 5 to clarify</p> <p>13. Clarification is needed for NPPO delegation of responsibility <i>Category : SUBSTANTIVE</i></p> |
| 16 | G | (General Comment) | C | <p>Korea, Republic of Republic of Korea agrees with the comments made during APPPC Regional workshop. <i>Category : SUBSTANTIVE</i></p> |
| 17 | G | (General Comment) | C | <p>PPPO We agree with the comments made during the regional workshop <i>Category : SUBSTANTIVE</i></p> |

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| 18 | G | (General Comment) | C | <p>Saint Kitts And Nevis St.Kitts and Nevis is in agreement that entities providing phyto sanitary services for the NPPO should be authorized. This activity is important for efficacy and harmonization of phyto sanitary measures. There is need to consider the extent of implementation (capacity) and the available resources.</p> <p>Authorized bodies should be allowed to decide on and advise NPPO on pest status of an area i.e. declare an area pest free, outbreak, etc, or in conjunction with the NPPO. The information should be the property of the NPPO, (not the Contracted Party)and cannot be used by anyone else without permission of the NPPO</p> <p><i>Category : SUBSTANTIVE</i></p> |
| 19 | G | (General Comment) | C | <p>Bahrain Paragraph no. 99 "Roles and responsibilities of entities authorized to audit or supervise"</p> <p>The standard stated that NPPO shall audit the authorized entities, the standard also stated that the NPPO can mandate another entity to carry out the audit on the authorized entities on behalf of the NPPO. Comment: The standard does not include any criteria for eligibility of AUDITING entities The criteria should also include responsibilities of the NPPO towards the auditing entity. Including how the NPPO will audit the auditing entity. If the NPPO can authorized an entity to audit another authorized entity, the NPPO should also has clear program on how it will audit the auditing entity. The NPPO should audit the auditing entity which is authorized by the NPPO to audit the authorized entity to carry out the phytosanitary actions and it will be a series of auditing. It will not ease the work of the NPPO. Because the NPPO should audit the auditing entity by the end</p> <p><i>Category : TECHNICAL</i></p> |
| 20 | G | (General Comment) | C | <p>Bahrain Paragraph no. 27 "Scope"</p> <p>The scope of this standard stated that it provides a framework that enables NPPOs to authorize private entities to perform specific phytosanitary actions associated with import, domestic</p> |

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| | | | | <p>and export systems on behalf of the NPPO. Elements of this standard may also apply when authorizing public entities. This standard does not cover the issuance of phytosanitary certificates; these are issued by authorized public officers only.</p> <p>Comment:</p> <p>Issuance of phytosanitary certificates is the last step of any export system in the addition to the phytosanitary security. It depends on all previous steps like sampling, inspection and testing which may be carried out by authorized entity.</p> <p>There is a need for addressing the integrating the first steps of export system that been carried out by the authorized entity with the last step that been carried out by the public authorized officers (issuing the certificate) in one system.</p> <p>It should also clarify when the public authorized officer have the authority not to complete the process depending on doubts in the actions carried out by the authorized entity.</p> <p>The phytosanitary security also should be addressed. If sampling, inspection and testing will be carried out by the entity, and the phytosanitary certificate will be issued by the public authorized officer. Who will be responsible for the phytosanitary security of a consignment after issuing the certificate? The authorized entity or the NPPO?</p> <p><i>Category : TECHNICAL</i></p> |
| 21 | G | (General Comment) | C | <p>Botswana</p> <p>no comment</p> <p><i>Category : TECHNICAL</i></p> |
| 22 | G | (General Comment) | C | <p>EPPO</p> <p>The Standard needs to cover small companies for single actions (e.g. tree felling and disposal in an outbreak situation) and individual persons. It is currently too elaborate for these purposes in relation to especially the "Development of an authorization program", "Eligibility of Entities" or "responsibilities of the NPPOs", these sections are too strictly predetermined and restrict, in part, a fast ability to act.</p> <p>The Standard needs separate sections on the requirements for private and public entities, and the Standard also needs to cover individuals.</p> <p><i>Category : SUBSTANTIVE</i></p> |
| 23 | G | (General Comment) | C | <p>EPPO</p> <p>Legal advice should be sought during development of this Standard on what actions may be delegated to authorized entities, within the terms of Article V of the IPPC and in particular the expression "under the authority of".</p> <p><i>Category : SUBSTANTIVE</i></p> |
| 24 | G | (General Comment) | C | <p>EPPO</p> <p>This is a complex and difficult question and there is a need for international discussion of the risks, costs and benefits of</p> |

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| | | | | authorization of entities for different actions and exchange of experiences (positive and negative), in parallel with the development of this Standard. <i>Category : SUBSTANTIVE</i> |
| 25 | G | (General Comment) | C | New Zealand New Zealand agrees with the comments made at the APPPC regional workshop. <i>Category : SUBSTANTIVE</i> |
| 26 | G | (General Comment) | C | Sierra Leone Sierra Leone agrees to the comment made during the Africa regional workshop <i>Category : SUBSTANTIVE</i> |
| 27 | G | (General Comment) | C | European Union Legal advice should be sought during the SPG 2018 discussion on the nature of the phytosanitary actions which may be delegated to authorised entities and which entities may be authorized to perform phytosanitary actions. The outcome should be taken into account in the development of the standard. <i>Category : SUBSTANTIVE</i> |
| 28 | G | (General Comment) | C | European Union Authorization is a complex and challenging concept and there is a lack of common understanding globally on what it means and how it can be addressed in an ISPM. We believe there would be value in having a discussion between contracting parties with the aim to reach a common understanding which will then aid the development of the standard. The SPG (9 – 11 October 2018) meeting would provide a good forum for such discussion and we believe that key points to cover should include: a) exchange of views regarding the risks and benefits of authorisation of entities, b) positive and negative experiences of authorisation, c) the roles of private and public entities (both governmental and non-governmental). Legal advice is also needed on what NPPO tasks/responsibilities can be delegated to authorised entities. The Standard needs separate sections on the requirements of authorization for the public, private and non-governmental sectors. (please take a look at the standard specification points 4 and 5). There are very strong links between this draft standard and the draft standard on 'Audits in the phytosanitary context' and therefore there may be benefits in developing the draft standard |

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| | | | | on 'audit in the phytosanitary context' as soon as possible. <i>Category : SUBSTANTIVE</i> |
| 29 | G | (General Comment) | C | PPPO No amendment on this draft <i>Category : EDITORIAL</i> |
| 30 | G | (General Comment) | C | NEPPO I agree with the comments made during NEPPO regional workshop <i>Category : SUBSTANTIVE</i> |
| 31 | G | (General Comment) | C | Libya Not acceptable but we need to strengthen and raise abilities NPPO <i>Category : TECHNICAL</i> |
| 32 | G | (General Comment) | C | Iraq Iraq reviewed the drafts and has no comments <i>Category : TECHNICAL</i> |
| 33 | G | (General Comment) | C | South Africa The National Plant Protection Organisation of South Africa (NPPOZA) endorse the comments from the regional workshop <i>Category : SUBSTANTIVE</i> |
| 34 | G | (General Comment) | C | Caribbean Agricultural Health and Food Safety Agency This draft ISPM is an important guide for NPPOs that may find some of their operational activities being handled by private sector entities. <i>Category : SUBSTANTIVE</i> |
| 35 | G | (General Comment) | C | Mozambique Lack of legal framework in Africa may affect the implementation of this Standard <i>Category : TECHNICAL</i> |
| 36 | G | (General Comment) | C | Algeria No comment <i>Category : SUBSTANTIVE</i> |
| 37 | G | (General Comment) | C | Zambia Apart from Paragraph 125 under Chapter 6, the rest of the Draft ISPM is fine. <i>Category : SUBSTANTIVE</i> |
| 38 | G | (General Comment) | C | Zambia 1. Paragraph 125 under Chapter 6; a suspended authorized entity should never carry out any phytosanitary actions pending findings of investigations that led to the suspension and only resume if such a suspension is lifted. Allowing a suspended authorized entity to carry out phytosanitary actions would erroneous. <i>Category : TECHNICAL</i> |
| 39 | G | (General Comment) | C | Lao People's Democratic Republic Lao PDR has agreed with APPPC as Regional comments. <i>Category : TECHNICAL</i> |

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| 40 | G | (General Comment) | C | Argentina We request the Steward to clarify differences between the concepts of supervision and audit throughout the text. <i>Category : TECHNICAL</i> |
| 41 | G | (General Comment) | C | United States of America The United States of America support development of this ISPM. <i>Category : SUBSTANTIVE</i> |
| 42 | G | (General Comment) | C | New Zealand 1. Verification and audit. Suggest to consider recognition of systems already in place to verify technical areas and the requirement for appropriate accreditation of key entities in the accreditation process e.g. Jasanz and ISTA. 2. Audit vs supervision. Supervision is used throughout the text. Worth defining the term and differentiate it from audit and verification. <i>Category : SUBSTANTIVE</i> |
| 43 | G | (General Comment) | C | New Zealand 1. The Implementation and guidance material to supplement the ISPM will be critical for the development of systems with integrity. Such material should underscore the need for culture change, the challenges of dealing with conflicts of interest. It should also include a number of case studies to demonstrate how a delegated system and its elements can be established. 2. It should be mentioned that NPPO is accountable for phytosanitary actions conducted by authorized entities. 3. Suggest to include a recognised transition phase for the establishment of any new entity which specifies how non conformities will be managed. 4. Suggest a Performance Based Verification (PBV) system which is performance and outcome based. In terms of managing non-conformity, suggest to also include a requirement for increased audits as an option. 5. Potential implementation issue: Define and manage conflict of interest. In implementing a system it will be important to articulate potential conflicts of interest and how they are managed. Conflicts of interest may include conflicts with other Government Agencies in the same potential implementation issue: 6. Section 2 "Criteria for Eligibility of Entities" is key to the integrity of any systems developed according to this ISPM. The text is reasonable and flexible but how countries choose to operate and implement the system is where concern of whether the system delivers the desired outcome potentially lies.e country. 7. Development of an authorisation process/programme is required - this can be done at NPPO level to ensure fit for purpose within its own regulatory system. 8. Clarification is needed for NPPO delegation of responsibility, how far it can delegate? how many levels - if NPPO delegate to |

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| | | | <p>one organisation & the organisation delegates to another agency - how far does this goes?</p> <p>9. It is important that the standard is robust, all entities taking phytosanitary actions can deliver the same outcome, and all countries can meet the same level of integrity for their exported commodities. Therefore the standard should be the same any entities (private or public).</p> <p>10. The overall objective of the ISPM should be to deliver a high standard of plant health and results in phytosanitary systems which consistently approve safe compliant plant products. This standard should be met by achieving outcomes. The integrity of any systems established under this ISPM must be based on all parties demonstrating compliance (i.e. meeting the requirements) and which are transparently demonstrated to the confidence of the regulatory body.</p> <p><i>Category : SUBSTANTIVE</i></p> |
| 44 | G | (General Comment) | <p>C APPPC (99) New Zealand (7 Sep 2018 3:04 AM) Suggest to include a recognised transition phase for the establishment of any new entity which specifies how non conformities will be managed. Suggest a Performance Based Verification (PBV) system which is performance and outcome based. In terms of managing non-conformity, suggest to also include a requirement for increased audits as an option. (94) New Zealand (7 Sep 2018 1:45 AM) Clarification is needed for NPPO delegation of responsibility, how far it can delegate? how many levels?</p> <p><i>Category : TECHNICAL</i></p> |
| 45 | G | (General Comment) | <p>C APPPC Category : SUBSTANTIVE (147) APPPC (11 Sep 2018 5:41 AM) 1. The Implementation and guidance material to supplement the ISPM will be critical for the development of systems with integrity. Such material should underscore the need for culture change, the challenges of dealing with conflicts of interest. It should also include a number of case studies to demonstrate how a delegated system and its elements can be established. 2. It should be mentioned that NPPO is accountable for phytosanitary actions conducted by authorized entities. 3. Suggest to include a recognised transition phase for the establishment of any new entity which specifies how non conformities will be managed. 4. Suggest a Performance Based Verification (PBV) system which is performance and outcome based. In terms of managing non-conformity, suggest to also include a</p> |

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| | | | <p>requirement for increased audits as an option.</p> <p>5. Potential implementation issue: Define and manage conflict of interest. In implementing a system it will be important to articulate potential conflicts of interest and how they are managed. Conflicts of interest may include conflicts with other Government Agencies in the samPotential implementation issue:</p> <p>6. Section 2 "Criteria for Eligibility of Entities" is key to the integrity of any systems developed according to this ISPM. The text is reasonable and flexible but how countries choose to operate and implement the system is where concern of whether the system delivers the desired outcome potentially lies.e country.</p> <p>7. Development of an authorisation process/programme is required - this can be done at NPPO level to ensure fit for purpose within its own regulatory system.</p> <p>8. Clarification is needed for NPPO delegation of responsibility, how far it can delegate? how many levels - if NPPO delegate to one organisation & the organisation delegates to another agency - how far does this goes?</p> <p>9. It is important that the standard is robust, all entities taking phytosanitary actions can deliver the same outcome, and all countries can meet the same level of integrity for their exported commodities. Therefore the standard should be the same any entities (private or public).</p> <p>10. The overall objective of the ISPM should be to deliver a high standard of plant health and results in phytosanitary systems which consistently approve safe compliant plant products. This standard should be met by achieving outcomes. The integrity of any systems established under this ISPM must be based on all parties demonstrating compliance (i.e. meeting the requirements) and which are transparently demonstrated to the confidence of the regulatory body.</p> <p>(100) New Zealand (7 Sep 2018 5:35 AM) The Implementation and guidance material to supplement the ISPM will be critical for the development of systems with integrity. Such material should underscore the need for culture change, the challenges of dealing with conflicts of interest. It should also include a number of case studies to demonstrate how a delegated system and its elements can be established.</p> <p>(142) Korea, Republic of (10 Sep 2018 9:41 AM) It should be mentioned that NPPO is responsible for phytosanitary actions conducted by authorized entities.</p> <p>(98) New Zealand (7 Sep 2018 2:58 AM) Verification and audit. Suggest to consider recognition of systems already in place to verify technical areas (– e.g. ISO accreditation) and the requirement for appropriate accreditation of key entities in the accreditation process e.g. Jasanz and ISTA.</p> <p>Audit vs supervision. Supervision is used throughout the text.</p> |
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| | | | <p>Worth defining the term and differentiate it from audit and verification.</p> <p>(97) New Zealand (7 Sep 2018 2:53 AM)</p> <p>Potential implementation issue:</p> <p>Define and manage conflict of interest. In implementing a system it will be important to articulate potential conflicts of interest and how they are managed. Conflicts of interest may include conflicts with other Government Agencies in the same country.</p> <p>(96) New Zealand (7 Sep 2018 2:47 AM)</p> <p>Potential implementation issue:</p> <p>Section 2 "Criteria for Eligibility of Entities" is key to the integrity of any systems developed according to this ISPM. The text is reasonable and flexible but how countries choose to operate and implement the system is where concern of whether the system delivers the desired outcome potentially lies.</p> <p>(95) New Zealand (7 Sep 2018 1:48 AM)</p> <p>Development of an authorisation process/programme is required - this can be done at NPPO level to ensure fit for purpose within its own regulatory system.</p> <p>(93) New Zealand (7 Sep 2018 1:42 AM)</p> <p>It is important that the standard is robust, all entities taking phytosanitary actions can deliver the same outcome, and all countries can meet the same level of integrity for their exported commodities. Therefore the standard should be the same any entities (private or public).</p> <p>(92) New Zealand (6 Sep 2018 7:09 AM)</p> <p>The overall objective of the ISPM should be to deliver a high standard of plant health and results in phytosanitary systems which consistently approve safe compliant plant products. This standard should be met by achieving outcomes. The integrity of any systems established under this ISPM must be based on all parties demonstrating compliance (i.e. meeting the requirements) and which are transparently demonstrated to the confidence of the regulatory body.</p> <p>Category : SUBSTANTIVE</p> <p>(22) Malaysia (21 Aug 2018 4:57 AM)</p> <p>Malaysia has reviewed and accepted the draft. Malaysia will evaluate the implementation of this draft ISPM as it progress with time.</p> |
| 46 | G | (General Comment) | <p><i>Category : SUBSTANTIVE</i></p> <p>C Jamaica</p> <p>Jamaica (16 Sep 2018 6:01 PM)</p> <p>Standard is needed and gives good guidance and control to NPPO's in authorizing entities to perform phytosanitary actions.</p> |

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| | | | | There is need to consider the extent of implementation capacity and the availability of resources in developing countries. The alignment of National legislation to facilitate this standard will be a significant implementation issue. <i>Category : SUBSTANTIVE</i> |
| 47 | G | (General Comment) | C | NEPPO The authorization should be allowed by the national phytosanitary law. <i>Category : SUBSTANTIVE</i> |
| 48 | G | (General Comment) | C | Egypt there are too many editorial comments need to be considered like spaces between to words <i>Category : EDITORIAL</i> |
| 49 | G | (General Comment) | C | Namibia we agree with the comments <i>Category : SUBSTANTIVE</i> |
| 50 | G | (General Comment) | C | Malawi We agree with Comments <i>Category : SUBSTANTIVE</i> |
| 51 | G | (General Comment) | C | IPPC Regional Workshop Africa Would like to request for examples for other nonconformity <i>Category : SUBSTANTIVE</i> |
| 52 | G | (General Comment) | C | IPPC Regional Workshop Africa Another examples of nonconformity should be given <i>Category : SUBSTANTIVE</i> |
| 53 | G | (General Comment) | C | IPPC Regional Workshop Africa Critical Non conformity examples to be given <i>Category : SUBSTANTIVE</i> |
| 54 | G | (General Comment) | C | IPPC Regional Workshop Africa Need to give examples of other non-conformity for clarity <i>Category : TECHNICAL</i> |
| 55 | G | (General Comment) | C | IPPC Regional Workshop Africa Need to give examples of critical non conformity for clarity <i>Category : TECHNICAL</i> |
| 56 | G | (General Comment) | C | Malawi We accept the draft ISPM <i>Category : SUBSTANTIVE</i> |
| 57 | G | (General Comment) | C | COSAVE We request the Steward to clarify differences between the concepts of supervision and audit throughout the text. <i>Category : TECHNICAL</i> |
| 58 | G | (General Comment) | C | Uruguay We request the steward to clarify differences between the concepts of supervision and audit throughout the text. <i>Category : TECHNICAL</i> |

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| 59 | G | (General Comment) | C | Philippines Please provide a clearer definition of "entity"; we propose to use the term Quarantine Treatment Providers (QTP) to mean individuals, agencies, etc. authorized by the NPPO to carry out phytosanitary actions on its behalf. <i>Category : SUBSTANTIVE</i> |
| 60 | G | (General Comment) | C | Costa Rica Difference between auditing and supervision should be clarified throughout the standard, because both terms are used indistinctly and they are different actions. In addition it should be clarified if these actions should be included as examples of phytosanitary actions and therefore within the scope of this ISPM. Some counties questioned if these are phytosanitary actions. The Glossary definition of phytosanitary actions does not specifically mention supervision and auditing, but the definition of the term mentions only some examples of phytosanitary actions. Other countries understood that auditing and supervision would be covered under "actions undertaken to implement phytosanitary measures" and therefore within the scope of the standard. <i>Category : SUBSTANTIVE</i> |
| 61 | G | (General Comment) | C | Kenya Potential Implementation issues: Fixing of costs-whereas NPPO may charge minimal fee as per the relevant regulations, private entities may push for higher profits leading to high costs of authorized services. There is need for the government to regulate the charges so that the industry is not forced to evade the authorized service providers. Moreover, the government may need to subsidize the initiate investments needed by the authorized private entities for purposes of price stabilization <i>Category : TECHNICAL</i> |
| 62 | G | (General Comment) | C | Kenya Section 5.2 Need to give examples of other non-conformity for clarity <i>Category : TECHNICAL</i> |
| 63 | G | (General Comment) | C | Kenya Section 5.1 <i>Category : TECHNICAL</i> |
| 64 | G | (General Comment) | C | Kenya Need to give examples of critical non-conformity for clarity <i>Category : TECHNICAL</i> |
| 65 | G | (General Comment) | C | South Africa NPPOZA suggest that the roles and responsibility of auditing should remain with the NPPO. <i>Category : SUBSTANTIVE</i> |
| 66 | G | (General Comment) | C | Chile Chile support and agrees with comments of COSAVE <i>Category : TECHNICAL</i> |

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| 67 | G | (General Comment) | C | Brazil Brazil supports COSAVE's comments. <i>Category : SUBSTANTIVE</i> |
| 68 | G | (General Comment) | C | Venezuela Una Vez realizada la revisión técnica, Venezuela no tiene ninguna objeción, por tanto manifestamos nuestro acuerdo con la propuesta <i>Category : TECHNICAL</i> |
| 69 | G | (General Comment) | C | Malawi No comment <i>Category : SUBSTANTIVE</i> |
| 70 | G | (General Comment) | C | Lao People's Democratic Republic So far no comments for Lao PDR. <i>Category : TECHNICAL</i> |
| 71 | G | (General Comment) | C | Argentina Equipment should be translated into Spanish as "equipamiento" (paragraph 45 and 65). <i>Category : TRANSLATION</i> |
| 72 | G | (General Comment) | C | Uruguay "Equipment" should be translated into Spanish as "Equipamiento" (paragraphs 45 and 65) <i>Category : TRANSLATION</i> |
| 73 | G | (General Comment) | C | Malaysia Malaysia has reviewed and accepted the draft. Malaysia will evaluate the implementation of this draft ISPM as it progress with time. <i>Category : SUBSTANTIVE</i> |
| 74 | G | (General Comment) | C | Peru Peru shares the comments made by COSAVE <i>Category : SUBSTANTIVE</i> |
| 75 | G | (General Comment) | C | Burkina Faso Les préoccupations sont celles relatives au suivi de ces organismes à se maintenir dans le respect strict-du niveau requis pour réaliser cette mission <i>Category : TECHNICAL</i> |
| 76 | G | (General Comment) | C | Indonesia Indonesia propose to make little change on the title i.e. "Authorization of entities to perform phytosanitary action" become "Authorization of entities to perform phytosanitary measures" <i>Category : EDITORIAL</i> |
| 77 | G | (General Comment) | C | Indonesia Indonesia would like to add: -List of equipment and material including vehicles owned by authorized entity under section 3.2 Roles and responsibility of the authorized entity <i>Category : TECHNICAL</i> |

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| 78 | G | (General Comment) | C | <p>COSAVE Equipment should be translated into Spanish as "equipamiento" (paragraph 45 and 65). <i>Category : TRANSLATION</i></p> |
| 79 | G | (General Comment) | C | <p>OIRSA Cambiar en toda la norma: el término "emprender" por "ejecutar" emprender acciones fitosanitarias por ejecutar acciones fitosanitarias. Cambiar "procedimiento normaliza de actuación por procedimiento de operación normado" Se considera que es el término más adecuadas. <i>Category : EDITORIAL</i></p> |
| 80 | G | (General Comment) | C | <p>OIRSA El borrador está dirigido a ofrecer un marco para la autorización de entidades para emprender acciones fitosanitarias, pero ¿cómo se garantizaría el cumplimiento de las funciones y responsabilidades inherentes de la ONPF, si el borrador plantea la posibilidad de externalizar la auditoría y supervisión a una "Entidad Distinta a la ONPF"; pero no establece la manera en que la ONPF le daría seguimiento y evaluaría a esas "Entidades autorizadas para auditar o supervisar"?</p> <ul style="list-style-type: none"> • El párrafo 76 (llevar a cabo auditorías periódicas de la entidad autorizada para verificar que cumple los requisitos del programa de autorizaciones de la ONPF), establece esta como una de las funciones y responsabilidades de la ONPF, pero no indica que la ONPF podrá externalizar esta su responsabilidad a una Entidad Distinta a la ONPF. En tal caso, debería ser indicado aquí. • Es en el párrafo 98 ubicado dentro de las funciones y responsabilidades de la entidad autorizada donde se plantea que una "Entidad Distinta a la ONPF" (pero autorizada por esta) podría asumir la responsabilidad de la ONPF de auditar a las entidades autorizadas y de supervisar las acciones fitosanitarias. • Entre los párrafos 99 y 103 se describen funciones y responsabilidades de este tipo de entidad, pero en ningún párrafo del borrador de norma se indica cuáles serían los criterios que habrían de cumplir. • El procedimiento para las auditorías (párrafos 104 a 112) está enfocado a aquellas entidades que implementan acciones fitosanitarias: tanto auditorías previas a obtener la autorización como auditorías para mantenerla. Pero en el borrador de norma no se propone como la ONPF evaluara, auditara o supervisara a esa "Entidad Distinta a la ONPF". • El párrafo 101 indica que esta "Entidad Distinta a la ONPF" tendrá como responsabilidad el formular y ejecutar un plan de acción de acción o procedimiento para gestionar las no |

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| | | | | <p>conformidades. Sin embargo, cuando se detecta una no conformidad, es el auditado quien propone y ejecuta el plan de acción, no el auditor. Y para la formulación del plan de acción, ese auditado debería considerar el procedimiento para abordar la no conformidad que establezca la ONPF en su programa de autorizaciones (ver párrafo 57).</p> <ul style="list-style-type: none"> El párrafo 117 indica que: "Cualquier no conformidad detectada debería dar lugar a una acción correctiva que han de acordar la ONPF (o la entidad autorizada para auditar o supervisar) y la entidad autorizada que está siendo auditada". En el caso de que ocurra la segunda situación, ¿cómo la ONPF tendría certeza de que el plan de acción implementado logro subsanar la causa de la no conformidad, si no se ha establecido el mecanismo para evaluar el desempeño de esa "Entidad Distinta a la ONPF"? <p><i>Category : SUBSTANTIVE</i></p> |
| 81 | G | (General Comment) | C | <p>Costa Rica Cambiar en toda la norma: el término "emprender" por "ejecutar" Cambiar "procedimiento normalizado de actuación" por "procedimiento de operación normado" Se considera que es el término más adecuadas.</p> <p><i>Category : TECHNICAL</i></p> |
| DRAFT ISPM: Authorization of entities to perform phytosanitary actions (2014-002) | | | | |
| 82 | 1 | DRAFT ISPM: Authorization of entities to perform <u>phytosanitary</u> <u>Phytosanitary</u> actions (2014-002) | P | <p>Ghana</p> <p><i>Category : EDITORIAL</i></p> |
| 83 | 1 | DRAFT ISPM: Authorization of entities to perform phytosanitary actions (2014-002) | C | <p>China It should be mentioned that NPPO is accountable for phytosanitary actions conducted by authorized entities.</p> <p><i>Category : SUBSTANTIVE</i></p> |
| 84 | 1 | DRAFT ISPM: Authorization of entities to perform phytosanitary actions (2014-002) | C | <p>New Zealand Entity/entities should be defined. There is no definition of entity in ISPM 5.</p> <p><i>Category : SUBSTANTIVE</i></p> |
| 85 | 1 | DRAFT ISPM: Authorization of entities to perform phytosanitary actions (2014-002) | C | <p>APPPC (117) New Zealand (7 Sep 2018 7:21 AM) Entity/entities should be defined. There is no definition of entity in ISPM 5.</p> <p><i>Category : TECHNICAL</i></p> |
| 86 | 1 | DRAFT ISPM: Authorization of entities to perform phytosanitary actions (2014-002) | C | <p>APPPC (150) APPPC (11 Sep 2018 7:07 AM) Entity/entities should be defined. There is no definition of entity in ISPM 5. (23) Japan (2 Sep 2018 9:42 AM)</p> |

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| | | | <p>This draft ISPM should provide a guidance for authorization of entities in conformity with "Purpose" of a specification of this standard.</p> <p><i>Category : SUBSTANTIVE</i></p> |
| 87 | 1 | DRAFT ISPM: Authorization of entities to perform phytosanitary actions (2014-002) | <p>C Ukraine</p> <p>Ukraine does not support the draft standard in this version. The phytosanitary control is a function of the state that has the task to maintain the phytosanitary safety of the country. The phytosanitary control is not a matter of commerce or business. The standard does not have clear distinction of functions that may be delegated. It should define clearly the responsibility at the governmental and non-governmental level; which of functions may be performed at the governmental level and which ones at the non-governmental level. We understand that according to the standard, an NPPO has ultimate responsibility and actions may be delegated to private entities. Thus, if an entity having delegation performs phytosanitary actions for import that does not meet requirements, the freight infected with quarantine organisms will come to the country. Then, an NPPO will be entitled to cancel or suspend the issued authorization. But this response would not compensate or stabilize the phytosanitary state of the country affected by introduction of a quarantine organism.</p> <p>The standard defines the roles and responsibilities of an NPPO including to train and control entities, maintain documentation and describe procedures of such actions meaning that an NPPO becomes a state agency performing a bureaucratic function working "for an entity" not a phytosanitary control function. Thus, the NPPO performance in terms of its main functions and responsibilities as foreseen by IPPC is brought to nought. The standard does not cover the issue of remuneration by an entity to an NPPO for the implemented audit, training system, granting of authorizations, etc.</p> <p>Having said that, we are convinced that the standard should also set the remuneration for delegated phytosanitary actions performed by an authorized entity.</p> <p>Authorizing entities to sampling and testing will make complying with the IPPC in the part of NPPO responsibilities, development of phytosanitary diagnosis and science, complicated and in some cases impossible.</p> <p>Private business is not always interested in developments and improvements in controls and protection of the country against harmful organisms.</p> <p>Moreover, this draft, if implemented, will:</p> <ul style="list-style-type: none"> - increase the number of notifications received; - make it impossible, in some cases, for partner countries to fulfill their international trade obligations; - increase the risks of temporary plant import bans; |

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| | | | | <ul style="list-style-type: none"> - suspend technical development of national phytosanitary laboratories; - significantly decrease the financial incomes of NPPO as well as capacities of timely payment of mandatory membership contributions to international organisations. <p><i>Category : SUBSTANTIVE</i></p> |
| 88 | 11 | 2013-11 Standards Committee (SC) recommended topic <i>Authorization of non-NPPO entities to perform phytosanitary Phytosanitary actions</i> to be added to the work programme. | P | <p>Ghana</p> <p><i>Category : EDITORIAL</i></p> |
| 89 | 12 | 2014-04 CPM-9 added the topic <i>Authorization of non-NPPO entities to perform phytosanitary Phytosanitary actions</i> (2014-002) to the work programme with priority 3 (subsequently changed to priority 2 by CPM-10). | P | <p>Ghana</p> <p><i>Category : EDITORIAL</i></p> |
| 90 | 15 | 2016-05 2018-05: El CN revisó el proyecto y lo aprobó para la primera consulta. | P | <p>Colombia</p> <p>En la versión de español se debe cambiar 2016 – 05 por 2018 – 05. En la En la versión del idioma inglés se indica que es 2018 – 05, lo cual es lo correcto.</p> <p><i>Category : TRANSLATION</i></p> |
| Scope | | | | |
| 91 | 27 | Scope | C | <p>United States of America</p> <p>How accredited entities within third parties themselves are related to this process of being authorized by the NPPO?</p> <p><i>Category : SUBSTANTIVE</i></p> |
| 92 | 28 | This standard provides a framework that enables national plant protection organizations (NPPOs) to authorize private entities to <u>private entities to</u> perform specific phytosanitary actions associated with import, domestic and export systemson <u>systems on</u> behalf of the NPPO. Elements of this standard may also apply when authorizing public entities. | P | <p>Canada</p> <p><i>Category : EDITORIAL</i></p> |
| 93 | 28 | This standard provides a framework that enables national plant protection organizations (NPPOs) to authorize private entities to perform specific phytosanitary actions associated with import, domestic and export systemson behalf of the NPPO. Elements of this standard may also apply when authorizing public entities. This standard provides guidance to <u>national plant protection organizations (NPPOs) to authorize entities to perform specific phytosanitary actions associated with import and export systems on behalf of the NPPO.</u> | P | <p>Panama</p> <p>There is no reason to differentiate between private and public entities because phytosanitary actions to be performed are the same. Domestic issues should not be part of an international standard.</p> <p><i>Category : SUBSTANTIVE</i></p> |
| 94 | 28 | This standard provides a framework guidance <u>framework guidance</u> that enables national plant protection organizations (NPPOs) to <u>(NPPOs) to</u> authorize private entities to perform specific phytosanitary actions associated with import, domestic and export systemson <u>systems on</u> behalf of the NPPO. Elements of this standard may also apply when authorizing | P | <p>Viet Nam</p> <p><i>Category : EDITORIAL</i></p> |

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| | | public entities. <u>In principle, phytosanitary actions should be implemented by NPPO</u> | | |
| 95 | 28 | This standard provides a framework requirements for NPPOs that enables national plant protection organizations (NPPOs) to have decided to authorize private entities to entities to perform specific phytosanitary actions associated with import, domestic and export systemson behalf of the NPPO. Elements of this standard may also apply when authorizing public entities. | P | EPPO NPPOs are already allowed to authorize entities to perform phytosanitary actions and many NPPOs do already so. Thus this ISPM is not a prerequisite to delegate tasks, therefore the word 'enable' is not correct, this ISPM gives guidance to NPPOs. As stated in the general comments, legal advice should be sought during development of this Standard and international discussion is needed about the nature of the tasks which may be delegated to authorised entities, within the terms of Article V of the IPPC and in particular the expression "under the authority of". In line with task 5 of the specification, the different types of entities (individuals, private, public) need to be addressed in the Standard. Separate sections are needed on the requirements for private and public entities. <i>Category : SUBSTANTIVE</i> |
| 96 | 28 | This standard provides a framework requirements for NPPOs that enables national plant protection organizations (NPPOs) to have decided to authorize private entities to entities to perform specific phytosanitary actions associated with import, domestic and export systemson behalf of the NPPO on their behalf. Elements of this standard may also apply when authorizing public entities. | P | European Union NPPOs are already allowed to authorize entities to perform phytosanitary actions and many NPPOs do already so. Thus this ISPM is not a prerequisite to delegate tasks, therefore the word 'enable' is not correct, this ISPM gives guidance to NPPOs. As stated in the general comments, legal advice should be sought during development of this Standard and international discussion is needed about the nature of the tasks which may be delegated to authorised entities, within the terms of Article V of the IPPC and in particular the expression "under the authority of". In line with task 5 of the specification, the different types of entities (individuals, private, public) need to be addressed in the Standard. Separate sections are needed on the requirements for private and public entities. <i>Category : SUBSTANTIVE</i> |
| 97 | 28 | This standard provides a framework that enables national plant protection organizations National Plant Protection Organizations (NPPOs) to authorize private entities to perform specific phytosanitary Phytosanitary actions associated with import, domestic and export systemson behalf of the NPPO. Elements of this standard may also apply when authorizing public entities. | P | Ghana <i>Category : EDITORIAL</i> |
| 98 | 28 | This standard provides a framework guidance that enables national plant protection organizations (NPPOs) to (NPPOs) to authorize private entities to private entities to perform specific phytosanitary actions associated with import, domestic and export systemson behalf systems under the responsibilities of the NPPO. Elements of this standard may also apply when authorizing public entities. | P | Japan This standard should provide a guidance for NPPOs in conformity with a specification of this standard because not all NPPOs authorize entities to perform phytosanitary actions. To modify in compliance with the IPPC(Article.2). |

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| | | | | Generally, Authorization of entities is conducted by the NPPO in the country. <i>Category : SUBSTANTIVE</i> |
| 99 | 28 | This standard provides a framework that enables national plant protection organizations (NPPOs) to (NPPOs) to authorize private entities to private entities to perform specific phytosanitary actions associated with import, domestic import and export systemson systems on behalf of the NPPO. Elements of this standard may also apply when authorizing public entities. | P | Caribbean Agricultural Health and Food Safety Agency Domestic actions not within the scope of International phytosanitary standards <i>Category : EDITORIAL</i> |
| 100 | 28 | This standard provides a framework that enables national plant protection organizations (NPPOs) to authorize private entities to perform specific phytosanitary actions associated with import, domestic and export systemson behalf of the NPPO. Elements of this standard may also apply when authorizing public entities. ; <u>In principle, phytosanitary actions should be implemented by NPPO.</u> | P | China To avoid the NPPO misuse this standard. <i>Category : SUBSTANTIVE</i> |
| 101 | 28 | This standard provides a framework that enables national plant protection organizations (NPPOs) to authorize private entities to perform specific phytosanitary actions associated with import, domestic and export systemson behalf of the NPPO. Elements of this standard may also apply when authorizing public entities. | P | China Its internal events of a country, if or not authorize the entities to perform import and domestic phytosanitary actions. This international standard only needs to regulate the authorized entities' phytosanitary actions of export products. <i>Category : SUBSTANTIVE</i> |
| 102 | 28 | This standard provides a framework that enables national plant protection organizations (NPPOs) to authorize private entities to individuals, organizations, businesses entities to perform specific phytosanitary actions associated with import, domestic and export systemson behalf of the NPPO. Elements of this standard may also apply when authorizing public entities.; | P | China Consistent with the scope of entity described at paragraph 45, which include individuals, organizations, businesses. <i>Category : SUBSTANTIVE</i> |
| 103 | 28 | This standard provides a framework that enables national plant protection organizations (NPPOs) to authorize private entities to perform specific phytosanitary actions associated with import, domestic and export systemson behalf of the NPPO. Elements of this standard may also apply when authorizing public entities. | C | Jamaica Remove domestic from the scope of the ISPM as NPPOs do not regulate domestic trade. <i>Category : SUBSTANTIVE</i> |
| 104 | 28 | This standard provides a framework that enables national plant protection organizations (NPPOs) to authorize private entities to private entities to perform specific phytosanitary actions associated with import, domestic and export systemson systems on behalf of the NPPO. Elements of this standard may also apply when authorizing public entities. | P | APPPC (1) Nepal (9 Aug 2018 4:58 PM) <i>Category : EDITORIAL</i> |
| 105 | 28 | This standard provides a framework that enables national plant protection organizations (NPPOs) to authorize private entities to individuals, organizations, business entities to perform specific phytosanitary actions associated with import, domestic and export systemson behalf of the NPPO. Elements of this standard may also apply when authorizing public entities.; | P | APPPC (27) China (3 Sep 2018 9:13 AM) Consistent with the scope of entity described at paragraph 45, which include individuals, organizations, businesses. <i>Category : SUBSTANTIVE</i> |

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| 106 | 28 | This standard provides a framework that enables national plant protection organizations (NPPOs)to (NPPOs) to authorize privateentitiesto-private entities to perform specific phytosanitary actions associated with import, domestic and with export systemson-systems on behalf of the NPPO. Elements of this standard may also apply when authorizing public entities. | P | APPPC (28) China (3 Sep 2018 9:28 AM) Its internal events of a sovereignty, if or not authorize the entity to perform import and domestic phytosanitary actions. <i>Category : SUBSTANTIVE</i> |
| 107 | 28 | This standard provides a framework that enables national plant protection organizations (NPPOs)to authorize privateentitiesto perform specific phytosanitary actions associated with import, domestic and export systemson behalf of the NPPO. Elements of this standard may also apply when authorizing public entities. <u>In principle, phytosanitary actions should be implemented by NPPO.</u> | P | APPPC (30) China (3 Sep 2018 9:38 AM) To prevent the exporting country misuse this standard and authorize entities to perform phytosanitary actions, and lead to NPPO can not fulfill the treaty very well. <i>Category : SUBSTANTIVE</i> |
| 108 | 28 | This standard provides a framework that enables national plant protection organizations (NPPOs)to (NPPOs) to authorize privateentitiesto-private entities to perform specific phytosanitary actions associated with import, domestic and export systemson-systems on behalf of the NPPO. Elements of this standard may also apply when authorizing public entities. | P | APPPC (81) Singapore (5 Sep 2018 12:43 PM) spacing. <i>Category : EDITORIAL</i> |
| 109 | 28 | This standard provides a <u>framework-guidance</u> that enables national plant protection organizations (NPPOs)to (NPPOs) to authorize privateentitiesto-private entities to perform specific phytosanitary actions associated with import, domestic and export systemson-system son behalf of the NPPO. Elements of this standard may also apply when authorizing public entities. | P | APPPC (11) Japan (19 Aug 2018 8:47 AM) This standard should provide a guidance for NPPOs in conformity with a specification of this standard because not all NPPOs authorize entities to perform phytosanitary actions. To modify in compliance with the IPPC(ArticleIV.2) Generally, Authorization of entities is conducted by the NPPO in the country. <i>Category : SUBSTANTIVE</i> |
| 110 | 28 | This standard provides a framework that enables national plant protection organizations (NPPOs)to authorize privateentitiesto perform specific phytosanitary actions associated with import, domestic and export systemson behalf of the NPPO. Elements of this standard may also apply when authorizing public entities. | P | APPPC (149) Myanmar (11 Sep 2018 5:47 AM) add <i>Category : SUBSTANTIVE</i> |
| 111 | 28 | This standard provides a framework that enables national plant protection organizations (NPPOs)to (NPPOs) to authorize privateentitiesto-private entities to perform specific phytosanitary actions associated with import, domestic and export systemson-systems on behalf of the NPPO. Elements of this standard may also apply when authorizing public entities. | P | APPPC (89) New Zealand (6 Sep 2018 7:01 AM) <i>Category : EDITORIAL</i> |
| 112 | 28 | This standard provides a framework that enables national plant protection organizations (NPPOs)to authorize privateentitiesto-private entities to perform specific phytosanitary actions associated with import, domestic and export systemson-systems on behalf of the NPPO. Elements of this standard may also apply when authorizing public entities. | P | Egypt <i>Category : EDITORIAL</i> |

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| 113 | 28 | This standard provides a framework that enables national plant protection organizations (NPPOs) to authorize private entities to perform specific phytosanitary actions associated with import, domestic and export systems on behalf of the NPPO. Elements of this standard may also apply when authorizing public entities. | C | Mexico This draft standard provides a framework to the NPPO to authorize private entities to perform specific phytosanitary actions but does not provide any requirement when the entity is public. The authorization procedure for public entities is not specified within the body of the project, therefore, it must be specified if it will be the same as those in the authorized entities or must cover only certain criteria. <i>Category : SUBSTANTIVE</i> |
| 114 | 28 | This standard provides a framework that enables national plant protection organizations (NPPOs) to authorize private entities to perform specific phytosanitary actions associated with import, domestic and export systemson <u>systems on</u> behalf of the NPPO. Elements of this standard may also apply when authorizing public entities. | P | Philippines <i>Category : EDITORIAL</i> |
| 115 | 28 | This standard provides a framework that enables national plant protection organizations (NPPOs) to authorize private entities to <u>private entities to</u> perform specific phytosanitary actions associated with import, domestic and export systemson behalf of the NPPO. Elements of this standard may also apply when authorizing public entities. | P | Philippines <i>Category : EDITORIAL</i> |
| 116 | 28 | This standard provides a framework that enables national plant protection organizations (NPPOs) to authorize private entities to <u>private entities to</u> perform specific phytosanitary actions associated with import, domestic and export systemson behalf of the NPPO. Elements of this standard may also apply when authorizing public entities. | P | Philippines <i>Category : EDITORIAL</i> |
| 117 | 28 | This standard provides a framework that enables guidance to national plant protection organizations (NPPOs) to <u>(NPPOs) to</u> authorize private entities to <u>entities to</u> perform specific phytosanitary actions associated with import, domestic and export systemson <u>systems on</u> behalf of the NPPO. Elements of this standard may also apply when authorizing public entities. | P | Costa Rica There is no reason to differentiate between private and public entities because phytosanitary actions to be performed are the same. Domestic issues should not be part of an international standard <i>Category : SUBSTANTIVE</i> |
| 118 | 28 | This standard provides a framework that enables national plant protection organizations (NPPOs) to <u>(NPPOs) to</u> authorize private entities to <u>private entities to</u> perform specific phytosanitary actions associated with import, domestic and export systemson <u>systems on</u> behalf of the NPPO. Elements of this standard may also apply when authorizing public entities. | P | NEPPO <i>Category : EDITORIAL</i> |
| 119 | 28 | This standard provides a framework that enables national plant protection organizations (NPPOs) to authorize private entities to <u>private entities to</u> perform specific phytosanitary actions associated with import, domestic and export systemson <u>systems on</u> behalf of the NPPO. Elements of this standard may also apply when authorizing public entities. | P | Iran <i>Category : EDITORIAL</i> |

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| 120 | 28 | This standard provides a framework that enables national plant protection organizations (NPPOs) to authorize private entities to perform specific phytosanitary actions associated with import, domestic and export system on behalf of the NPPO. Elements of this standard may also apply when authorizing public entities. | C | South Africa Insertion of the word "legal", before the word: Private" reason being that the private entities must be legally established <i>Category : SUBSTANTIVE</i> |
| 121 | 28 | This standard provides a framework that enables national plant protection organizations (NPPOs) to authorize private entities to <u>private entities to</u> perform specific phytosanitary actions associated with import, domestic and export system on <u>on</u> behalf of the NPPO. Elements of this standard may also apply when authorizing public entities. | P | Montenegro <i>Category : TECHNICAL</i> |
| 122 | 28 | This standard provides a framework that enables national plant protection organizations (NPPOs) to <u>(NPPOs) to</u> authorize private entities to <u>private entities to</u> perform specific phytosanitary actions associated with import, domestic and export system on <u>systems on</u> behalf of the NPPO. Elements of this standard may also apply when authorizing public entities. | P | Singapore <i>Category : EDITORIAL</i> |
| 123 | 28 | This standard provides a framework that enables guidance to national plant protection organizations (NPPOs) to <u>(NPPOs) to</u> authorize private entities to <u>entities to</u> perform specific phytosanitary actions associated with import, domestic import and export system on behalf of the NPPO. Elements of this standard may also apply when authorizing public entities. | P | Argentina There is no reason to differentiate between private and public entities because phytosanitary actions to be performed are the same. Domestic issues should not be part of an international standard. <i>Category : SUBSTANTIVE</i> |
| 124 | 28 | This standard provides a framework that enables guidance to national plant protection organizations (NPPOs) to authorize private entities to <u>entities to</u> perform specific phytosanitary actions associated with import, domestic import and export system on <u>systems on</u> behalf of the NPPO. Elements of this standard may also apply when authorizing public entities. | P | Uruguay There is no reason to differentiate between private and public entities because phytosanitary actions to be performed are the same. Domestic issues should not be part of an international standard. <i>Category : SUBSTANTIVE</i> |
| 125 | 28 | This standard provides a framework that enables national plant protection organizations (NPPOs) to <u>(NPPOs) to</u> authorize private entities to perform specific phytosanitary actions associated with import, domestic and export system on behalf of the NPPO. Elements of this standard may also apply when authorizing public entities. | P | Ukraine <i>Category : EDITORIAL</i> |
| 126 | 28 | This standard provides a framework that enables national plant protection organizations (NPPOs) to authorize private entities to <u>private entities to</u> perform specific phytosanitary actions associated with import, domestic and export system on behalf of the NPPO. Elements of this standard may also apply when authorizing public entities. | P | New Zealand <i>Category : EDITORIAL</i> |
| 127 | 28 | This standard provides a framework that enables guidance to national plant protection organizations (NPPOs) to <u>(NPPOs) to</u> authorize private entities to <u>entities to</u> perform specific phytosanitary actions associated with import, domestic import | P | COSAVE There is no reason to differentiate between private and public entities because phytosanitary actions to be performed are the |

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| | | and export systemson-systems on behalf of the NPPO. Elements of this standard may also apply when authorizing public entities. | | same. Domestic issues should not be part of an international standard. <i>Category : SUBSTANTIVE</i> |
| 128 | 28 | La presente norma ofrece un marco que permite a las organizaciones nacionales de protección fitosanitaria (ONPF) autorizar a entidades privadas-privadas, publicas u organismos internacionales a emprender, en nombre de la ONPF, acciones fitosanitarias específicas relacionadas con sistemas de importación, nacionales y de exportación. Los elementos de esta norma podrán aplicarse también cuando la autorización se confiera a entidades públicas. | P | OIRSA Se incluye organismos internacionales dado que estos también podría ejecutar las acciones fitosanitarias y estos por su condición especial en el país no pueden ser considerados como entidades privadas. Simplificar el párrafo, más conciso <i>Category : EDITORIAL</i> |
| 129 | 28 | La presente norma ofrece un marco que permite a las organizaciones nacionales de protección fitosanitaria (ONPF) autorizar a entidades privadas a emprender, en nombre de la ONPF, acciones fitosanitarias específicas relacionadas con sistemas de importación, nacionales-importación y de exportación. Los elementos de esta norma podrán aplicarse también cuando la autorización se confiera a entidades públicas. | P | OIRSA Los aspectos domésticos no encajan en el ámbito fitosanitario de la convención p.e. manejo de plagas establecidas si es que a esto se refiere doméstico. El termino domestico se puede malinterpretar. <i>Category : TECHNICAL</i> |
| 130 | 29 | This standard does not cover the issuance of phytosanitary certificates; these are issued by authorized public officers-the NPPO only (Article V.2(a) of the IPPC). | P | Viet Nam <i>Category : EDITORIAL</i> |
| 131 | 29 | This standard does not cover the issuance of phytosanitary certificates; these are issued by authorized public officers-the NPPO only (Article V.2(a) of the IPPC). | P | Korea, Republic of To provide clarity that only the NPPO can provide the issuance of PCs and not other authorised public officers. <i>Category : TECHNICAL</i> |
| 132 | 29 | This standard does not cover the issuance of phytosanitary certificates; these are <u>they shall be issued only</u> by authorized public officers only-authorized by the NPPO (Article V.2(a) of the IPPC). | P | EPPO This is a clear requirement based on the IPPC and its ISPMs and this should be better reflected in this sentence using the wording of the Convention. To improve clarity <i>Category : EDITORIAL</i> |
| 133 | 29 | This standard does not cover the issuance of phytosanitary certificates;certificates <u>as these are-can only be</u> issued by authorized public officers only -(Article V.2(a) of the IPPC). | P | European Union This is a clear requirement based on the IPPC and its ISPMs and this should be better reflected in this sentence using the wording of the Convention. <i>Category : SUBSTANTIVE</i> |
| 134 | 29 | This standard does not cover the issuance of phytosanitary certificates; these are issued by authorized public officers-the NPPO only (Article V.2(a) of the IPPC). | P | Japan To provide clarity that only the NPPO can provide the issuance of PCs and not other authorised public officers. This proposed change is supported by APPPC as well as by Japan. <i>Category : SUBSTANTIVE</i> |
| 135 | 29 | This standard does not cover the issuance of phytosanitary certificates; these are issued by authorized public officers-the NPPO only (Article V.2(a) of the IPPC). | P | China Only the NPPO can provide the issuance of PCs and be recognized. <i>Category : SUBSTANTIVE</i> |

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| 136 | 29 | This standard does not cover the issuance of phytosanitary certificates; these are issued by authorized public officers-the NPPO only (Article V.2(a) of the IPPC). | P | New Zealand To provide clarity that only the NPPO can provide the issuance of PCs and not other authorised public officers. <i>Category : TECHNICAL</i> |
| 137 | 29 | This standard does not cover the issuance of phytosanitary certificates; these are issued by authorized public officers only (Article V.2(a) of the IPPC). <u>If an authorized entity participate in an export phytosanitary action refer to one shipment, NPPO should indicate the name or special registration number of the authorized entity in corresponding phytosanitary certificate for export.</u> | P | APPPC (31) China (3 Sep 2018 9:47 AM) To be easy to trace to the source, while NPPO of import and export countries found noncompliance. <i>Category : SUBSTANTIVE</i> |
| 138 | 29 | This standard does not cover the issuance of phytosanitary certificates; these are issued by authorized public officers-the NPPO only (Article V.2(a) of the IPPC). | P | APPPC (153) APPPC (11 Sep 2018 7:31 AM) To provide clarity that only the NPPO can provide the issuance of PCs and not other authorised public officers. <i>Category : TECHNICAL</i> |
| 139 | 29 | This standard does not cover the issuance of phytosanitary certificates; these are issued by authorized public officers-the NPPO only (Article V.2(a) of the IPPC). | P | APPPC (88) New Zealand (6 Sep 2018 7:00 AM) <i>Category : TECHNICAL</i> |
| 140 | 29 | This standard does not cover the issuance of phytosanitary certificates; these are issued by authorized public officers only (Article V.2(a) of the IPPC). | C | South Africa Addition of the words: "or import authorisation certificates", to provide a broader understanding of the entire statement. Deletion of the pronoun: "these" in order to make the sentence clearer. The punctuation is confusing: is it a comma, as in the explanation column or a semicolon as in the text? It is my understanding that either of these would be incorrect if the phrase/ description/ wording is intended to read as follows: 'import authorization certificates'. <i>Category : EDITORIAL</i> |
| 141 | 29 | This standard does not cover the issuance of phytosanitary certificates; these are issued by authorized public officers only (Article V.2(a) of the IPPC). | C | Ukraine Our suggestion: This standard provides a framework that enables national plant protection organizations (NPPOs) to authorize private entities to perform specific phytosanitary actions only in cases when an NPPO is unable whatever the reason to perform such functions. This standard does not cover the issuance of phytosanitary certificates or directly related actions leading to the issuance of phytosanitary certificates as well as control functions at regulated objects import. Phytosanitary certificates and related actions are issued by authorized public officers only (Article V.2(a) of the IPPC), as only this way the countries may accept a phytosanitary certificate as a reliable document. |

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| | | | | Except as may be agreed in bilateral contracts between governments authorizing entities to perform phytosanitary actions (sampling for phytosanitary expertise or phytosanitary expertise). <i>Category : SUBSTANTIVE</i> |
| References | | | | |
| 142 | 32 | IPPC. 1997. International Plant Protection Convention. Rome, IPPC, FAO. | P | Argentina Consistency with other adopted ISPM. <i>Category : EDITORIAL</i> |
| 143 | 32 | IPPC. 1997. International Plant Protection Convention. Rome, IPPC, FAO. | P | Uruguay For consistency with other adopted ISPMs <i>Category : EDITORIAL</i> |
| 144 | 32 | IPPC. 1997. International Plant Protection Convention. Rome, IPPC, FAO. | P | COSAVE Consistency with other adopted ISPM. <i>Category : EDITORIAL</i> |
| Definitions | | | | |
| 145 | 34 | Definitions of phytosanitary <u>Phytosanitary</u> terms used in this standard can be found in ISPM 5 (<i>Glossary of phytosanitary <u>Phytosanitary</u> terms</i>). | P | Ghana <i>Category : EDITORIAL</i> |
| 146 | 34 | Definitions of phytosanitary terms used in this standard can be found in ISPM 5 (<i>Glossary of phytosanitary terms</i>). <u>Definition of Entity/entities</u> | P | China There is no definition of entity/entities in ISPM 5. <i>Category : SUBSTANTIVE</i> |
| 147 | 34 | Las definiciones de los términos fitosanitarios utilizados en la presente norma figuran en la NIMF 5 (<i>Glosario de términos fitosanitarios</i>). <u>En la presente norma, se consideran “entidades” los ejecutores de la acción fitosanitaria (ya sean individuos, organizaciones o empresas) y cuando proceda, su infraestructura (como el equipo, los laboratorios o los recintos de tratamiento).</u> | P | OIRSA Se traslada del párrafo 45 a este punto. Incluyéndose como un segundo párrafo en esta sección. Se considera más pertinente en este punto de definiciones y aclarar desde su inicio que se entiende por “entidad”. El vocablo “Particulares” se cambió por individuos para ser consistente con la versión en inglés <i>Category : TECHNICAL</i> |
| Outline of Requirements | | | | |
| 148 | 36 | This standard outlines the key requirements for the development of an authorization programme and the eligibility criteria for of entities to become authorized perform phytosanitary actions . The standard identifies the roles and responsibilities of the parties involved in NPPO and the implementation of an authorization programme authorized entity. It also describes processes for audits, types of nonconformities, and types of authorization status that may apply to entities. | P | EPPO The term "authorization programme" is not clear. Eligibility criteria are part of the key requirements . More precise wording. <i>Category : TECHNICAL</i> |
| 149 | 36 | This standard outlines the key requirements for the development of an authorization programme and the eligibility criteria for entities to become | P | Japan <i>Category : EDITORIAL</i> |

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| | | authorized. The standard identifies the roles and responsibilities of the parties involved in the implementation of an authorization programme. It also describes processes for audits, types of noneconformities <u>non-conformities</u> , and types of authorization status that may apply to entities. | | |
| 150 | 36 | This standard outlines the key requirements for the development of an authorization programme and the eligibility criteria for entities to become authorized <u>perform phytosanitary actions</u> . The standard identifies the roles and responsibilities of the parties involved in NPPO and the implementation of an authorization programme <u>authorized entity</u> . It also describes processes for audits, types of nonconformities, and types of authorization status that may apply to entities. | P | European Union The term "authorization programme" is not clear. Eligibility criteria are part of the key requirements . More precise wording. <i>Category : TECHNICAL</i> |
| 151 | 36 | This standard outlines the key requirements for the development of an authorization programme and the eligibility criteria for entities to become authorized. The standard identifies the roles and responsibilities of the parties involved in the implementation of an authorization programme. It also describes processes for audits, types of nonconformities, <u>actions by NPPO for nonconformities</u> , and types of authorization status that may apply to entities. | P | IPPC Regional Workshop Africa 'Include this phrase' actions by NPPO for nonconformities'. The reason is, these actions are included in body of the draft ISPM. <i>Category : SUBSTANTIVE</i> |
| 152 | 36 | This standard outlines the key requirements for the development of an authorization programme and the eligibility criteria for entities to become authorized <u>authorized by an NPPO to perform phytosanitary actions on its behalf</u> . The standard identifies the roles and responsibilities of the parties involved in the implementation of an authorization programme. It also describes processes for audits, types of nonconformities, and types of authorization status that may apply to entities. | P | Argentina To better outline the requirements. <i>Category : TECHNICAL</i> |
| 153 | 36 | This standard outlines the key requirements for the development of an authorization programme and the eligibility criteria for entities to become authorized <u>authorized by an NPPO to perform phytosanitary actions on its behalf</u> . The standard identifies the roles and responsibilities of the parties involved in the implementation of an authorization programme. It also describes processes for audits, types of nonconformities, and types of authorization status that may apply to entities. | P | Uruguay To better outline the requirements <i>Category : TECHNICAL</i> |
| 154 | 36 | This standard outlines the key requirements for the development of an authorization programme and the eligibility criteria for entities to become authorized <u>authorized by an NPPO to perform phytosanitary actions on its behalf</u> . The standard identifies the roles and responsibilities of the parties involved in the implementation of an authorization programme. It also describes processes for audits, types of nonconformities, and types of authorization status that may apply to entities. | P | COSAVE To better outline the requirements. <i>Category : TECHNICAL</i> |

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| 155 | 36 | Cette NIMP décrit les principales exigences relatives à l'élaboration d'un programme d'autorisation ainsi que les critères à respecter pour agréer-permettre à un organisme <u>organisme agréé à mener les actions phytosanitaires</u> . Elle établit les rôles et les responsabilités des parties qui participent à la mise en œuvre d'un programme d'autorisation. La norme décrit en outre les processus de vérification, les types de cas de non-conformité et les différents statuts d'autorisation dont peuvent relever les organismes concernés. | P | Chad correction de la première phrase du paragraphe 35 pour la compréhension <i>Category : EDITORIAL</i> |
| Background | | | | |
| 156 | 37 | BACKGROUND | C | APPPC (162) Philippines (12 Sep 2018 3:26 AM) please clarify what quality management systems are. It is important for the NPPOs, especially developing countries, to have a solid understanding in order to establish their own systems, if not yet present. <i>Category : SUBSTANTIVE</i> |
| 157 | 38 | It is becoming common in various countries throughout the world for national plant protection organizations to authorize entities to perform specific phytosanitary actions such as inspection <u>monitoring, sampling</u> , testing, surveillance and treatment. Concepts of quality management systems applied in the manufacturing sector are increasingly being applied to the delivery of a wide range of phytosanitary actions, including those undertaken by such authorized entities. However, there is a need to ensure the credibility of such authorizations and that the practice aligns with the principles of the IPPC <u>IPPC in that the NPPO remains accountable for phytosanitary actions</u> | P | Viet Nam <i>Category : EDITORIAL</i> |
| 158 | 38 | It is becoming common in various countries throughout the world for national plant protection organizations to authorize entities to perform specific phytosanitary actions such as inspection, testing, surveillance and treatment. Concepts of quality management systems applied in the manufacturing sector are increasingly being applied to the delivery of a wide range of phytosanitary actions, including those undertaken by such authorized entities. However, there is a need to ensure the credibility of such authorizations and that the practice aligns with the principles of the IPPC <u>IPPC in that the NPPO remains accountable for phytosanitary actions</u> . | P | Korea, Republic of <i>Category : SUBSTANTIVE</i> |
| 159 | 38 | It is becoming common in various countries throughout the world for national plant protection organizations <u>NPPOs</u> to authorize entities to perform specific phytosanitary actions such as inspection, testing, surveillance and treatment. Concepts of quality management systems applied in the manufacturing sector are increasingly being applied to the delivery of a wide range of phytosanitary actions, including those undertaken by such authorized entities. However, there is a need to | P | EPPO This abbreviation is already used in paragraph 28. Quality management system should be deleted as it might create confusion. Moreover, the word 'manufacturing' is not clear and this applies both to the public and private sector. As stated in the general comments, legal advice should be sought during development of this Standard and international discussion |

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| | | ensure the credibility of such authorizations and that the practice aligns with the principles of the IPPC. | | is needed about the nature of the tasks which may be delegated to authorised entities, within the terms of Article V of the IPPC and in particular the expression "under the authority of". <i>Category : SUBSTANTIVE</i> |
| 160 | 38 | It is becoming common in various countries throughout the world for national plant protection organizations to authorize entities to perform specific phytosanitary actions such as inspection, testing, surveillance and treatment. Concepts of quality management systems applied in the manufacturing sector are increasingly being applied to the delivery of a wide range of phytosanitary actions, including those undertaken by such authorized entities. However, there is a need to ensure the credibility of such authorizations and that the practice aligns with the principles of the IPPC. <u>Individuals assisting personnel of the NPPO in the presence and direct oversight of the NPPO personnel need not be authorized.</u> | P | European Union Quality management system should be deleted as it might create confusion. Moreover, the word 'manufacturing' is not clear and this applies both to the public and private sector. As stated in the general comments, legal advice should be sought during development of this Standard and international discussion is needed about the nature of the tasks which may be delegated to authorised entities, within the terms of Article V of the IPPC and in particular the expression "under the authority of". An important clarification is added in the end of the paragraph. <i>Category : SUBSTANTIVE</i> |
| 161 | 38 | <u>Article IV of the IPPC lays down the roles and responsibilities for NPPOs.</u> It is becoming common in various countries throughout the world for national plant protection organizations <u>NPPOs</u> to authorize entities to perform specific phytosanitary actions such as inspection, testing, surveillance and treatment. Concepts of quality management systems applied in the manufacturing sector are increasingly being applied to the delivery of a wide range of phytosanitary actions, including those undertaken by such authorized entities. However, there is a need to ensure the credibility of such authorizations and that the practice aligns with the principles of the IPPC. | P | European Union Clarifying opening sentence is added. This abbreviation is already used in paragraph 28. <i>Category : EDITORIAL</i> |
| 162 | 38 | It is becoming common in various countries throughout the world for national plant protection organizations to authorize entities to perform specific phytosanitary <u>Phytosanitary</u> actions such as inspection, testing, surveillance and treatment. Concepts of quality management systems applied in the manufacturing sector are increasingly being applied to the delivery of a wide range of phytosanitary actions, including those undertaken by such authorized entities. However, there is a need to ensure the credibility of such authorizations and that the practice aligns with the principles of the IPPC. | P | Ghana <i>Category : EDITORIAL</i> |
| 163 | 38 | It is becoming common in various countries throughout the world for national plant protection organizations <u>National Plant Protection Organizations</u> to authorize entities to perform specific phytosanitary actions such as inspection, testing, surveillance and treatment. Concepts of quality management systems applied in the manufacturing sector are increasingly being applied to the delivery of a wide range of phytosanitary actions, including those undertaken by such authorized entities. | P | Ghana <i>Category : EDITORIAL</i> |

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| | | However, there is a need to ensure the credibility of such authorizations and that the practice aligns with the principles of the IPPC. | | |
| 164 | 38 | It is becoming common in various countries throughout the world for national plant protection organizations to authorize entities to perform specific phytosanitary actions such as inspection, testing, surveillance and treatment. Concepts of quality management systems applied in the manufacturing sector are increasingly being applied to the delivery of a wide range of phytosanitary actions, including those undertaken by such authorized entities. However, there is a need to ensure the credibility of such authorizations and that the practice aligns with the principles of the IPPC <u>IPPC in that the NPPO remains accountable for phytosanitary actions.</u> | P | Japan To clarify that NPPO remains accountable for phytosanitary actions. This proposed change is supported by APPPC as well as by Japan. <i>Category : SUBSTANTIVE</i> |
| 165 | 38 | It is becoming common in various countries throughout the world for national plant protection organizations <u>NPPOs</u> to authorize entities to perform specific phytosanitary actions such as inspection, testing, surveillance and treatment. Concepts of quality management systems applied in the manufacturing sector are increasingly being applied to the delivery of a wide range of phytosanitary actions, including those undertaken by such authorized entities. However, there is a need to ensure the credibility of such authorizations and that the practice aligns with the principles of the IPPC. | P | United States of America For consistency with the rest of the document - the abbreviation was already used above.. <i>Category : EDITORIAL</i> |
| 166 | 38 | It is becoming common in various countries throughout the world for national plant protection organizations to authorize entities to perform specific phytosanitary actions such as inspection, testing, surveillance and treatment <u>treatment (as listed in paragraph 2 in Requirements)</u> . Concepts of quality management systems applied in the manufacturing sector are increasingly being applied to the delivery of a wide range of phytosanitary actions, including those undertaken by such authorized entities. However, there is a need to ensure the credibility of such authorizations and that the practice aligns with the principles of the IPPC. | P | New Zealand Para 2 in Requirements lists the following: monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervision and auditing. Also "phytosanitary security" seems to be missing. <i>Category : TECHNICAL</i> |
| 167 | 38 | It is becoming common in various countries throughout the world for national plant protection organizations <u>National Plant Protection Organizations</u> to authorize entities to perform specific phytosanitary actions such as inspection, testing, surveillance <u>surveillance, pest risk analysis</u> and treatment. Concepts of quality management systems applied in the manufacturing sector are increasingly being applied to the delivery of a wide range of phytosanitary actions, including those undertaken by such authorized entities. However, there is a need to ensure the credibility of such authorizations and that the practice aligns with the principles of the IPPC. | P | APPPC (2) Nepal (9 Aug 2018 5:02 PM) <i>Category : EDITORIAL</i> |
| 168 | 38 | It is becoming common in various countries throughout the world for national plant protection organizations to authorize entities to perform specific phytosanitary actions such as inspection, testing, surveillance and treatment <u>treatment (as listed in</u> | P | APPPC (118) New Zealand (7 Sep 2018 7:26 AM) Para 2 in Requirements lists the following: monitoring, sampling, |

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| | | paragraph 2 in Requirements). Concepts of quality management systems applied in the manufacturing sector are increasingly being applied to the delivery of a wide range of phytosanitary actions, including those undertaken by such authorized entities. However, there is a need to ensure the credibility of such authorizations and that the practice aligns with the principles of the IPPC. | | inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervision and auditing. Also “phytosanitary security” seems to be missing. <i>Category : TECHNICAL</i> |
| 169 | 38 | It is becoming common in various countries throughout the world for national plant protection organizations to authorize entities to perform specific phytosanitary actions such as inspection, testing, surveillance and treatment. Concepts of quality management systems applied in the manufacturing sector are increasingly being applied to the delivery of a wide range of phytosanitary actions, including those undertaken by such authorized entities. However, there is a need to ensure the credibility of such authorizations and that the practice aligns with the principles of the IPPCIPPC in that the NPPO remains accountable for phytosanitary actions. | P | APPPC (152) APPPC (11 Sep 2018 7:26 AM) <i>Category : SUBSTANTIVE</i> |
| 170 | 38 | It is becoming common in various countries throughout the world for national plant protection organizations NPPOs to authorize entities to perform specific phytosanitary actions such as inspection, testing, surveillance and treatment. Concepts of quality management systems applied in the manufacturing sector are increasingly being applied to the delivery of a wide range of phytosanitary actions, including those undertaken by such authorized entities. However, there is a need to ensure the credibility of such authorizations and that the practice aligns with the principles of the IPPC. | P | IPPC Regional Workshop Africa <i>Category : EDITORIAL</i> |
| 171 | 38 | It is becoming common in various countries throughout the world for national plant protection organizations to authorize entities to perform specific phytosanitary actions such as inspection, testing, surveillance and treatment treatment or other specific task determinate by NPPO. Concepts of quality management systems applied in the manufacturing sector are increasingly being applied to the delivery of a wide range of phytosanitary actions, including those undertaken by such authorized entities. However, there is a need to ensure the credibility of such authorizations and that the practice aligns with the principles of the IPPC. | P | Montenegro <i>Category : TECHNICAL</i> |
| 172 | 38 | It is becoming common in various countries throughout the world for national plant protection organizations to authorize entities to perform specific phytosanitary actions such as inspection, testing, surveillance and treatment. Concepts of quality management systems applied in the manufacturing sector are increasingly being applied to the delivery of a wide range of phytosanitary actions, including those undertaken by such authorized entities. However, there is a need to harmonize the credibility of such authorizations and that the practice aligns with the principles of the IPPC. | P | Argentina Deleted sentence because the meaning is unclear. Harmonize is more appropriate term to describe the purpose for an ISPM. <i>Category : TECHNICAL</i> |

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| 173 | 38 | It is becoming common in various countries throughout the world for national plant protection organizations to authorize entities to perform specific phytosanitary actions such as inspection, testing, surveillance and treatment. Concepts of quality management systems applied in the manufacturing sector are increasingly being applied to the delivery of a wide range of phytosanitary actions, including those undertaken by such authorized entities. However, there is a need to ensure harmonize the credibility of such authorizations and that the practice aligns with the principles of the IPPC. | P | Uruguay Deleted sentence because the meaning is unclear. "Harmonize" is more appropriate term to describe the purpose for an ISPM. <i>Category : TECHNICAL</i> |
| 174 | 38 | It is becoming common in is various countries throughout the world for national plant protection organizations to authorize entities to perform specific phytosanitary actions such as inspection, testing, surveillance and treatment. Concepts of quality testing management systems applied in the manufacturing sector are increasingly being applied to the delivery of a wide range of phytosanitary actions, including those undertaken by such authorized entities. However, there is a need to ensure the credibility of such authorizations and that the practice aligns with the principles of the IPPC. | P | OIRSA <i>Category : EDITORIAL</i> |
| 175 | 38 | It is becoming common in various countries throughout the world for national plant protection organizations to authorize entities to perform specific phytosanitary actions such as inspection, testing, surveillance and treatment. Concepts of quality management systems applied in the manufacturing sector are increasingly being applied to the delivery of a wide range of phytosanitary actions, including those undertaken by such authorized entities. However, there is a need to ensure harmonize the credibility of such authorizations and that the practice aligns with the principles of the IPPC. | P | COSAVE Deleted sentence because the meaning is unclear. Harmonize is more appropriate term to describe the purpose for an ISPM. <i>Category : TECHNICAL</i> |
| 176 | 39 | The need for harmonization when considering, developing and implementing the authorization programmes of entities to perform phytosanitary actions has led to the development of this standard. | P | EPPO The term "authorization programme" is not clear. More precise wording. <i>Category : TECHNICAL</i> |
| 177 | 39 | The need for harmonization when considering, developing and implementing the authorization programmes of entities to perform phytosanitary actions has led to the development of this standard. | P | European Union The term "authorization programme" is not clear. More precise wording. <i>Category : TECHNICAL</i> |
| 178 | 39 | The need for harmonization This standard seeks an harmonized process when considering, developing and implementing authorization programmes has led to the development of this standard programmes. | P | Caribbean Agricultural Health and Food Safety Agency <i>Category : EDITORIAL</i> |
| 179 | 39 | The need for harmonization when considering, developing and implementing authorization programmes has led to the development of this standard. | C | Jamaica This standard seeks an harmonized process when considering, developing and implementing authorization programmes. <i>Category : EDITORIAL</i> |

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| 180 | 39 | The need for harmonization This standard seeks to harmonize the process when considering, developing and implementing authorization programmes has led to the development of this standard. | P | Antigua and Barbuda <i>Category : EDITORIAL</i> |
| 181 | 39 | The need for harmonization when considering, developing and implementing authorization programmes has led to the development of this standard. | P | Costa Rica This indication is not necessary, one of the principles established in ISPM 1 is harmonization and countries are urged to take into account, as appropriate, international standards when drafting their own regulations. <i>Category : TECHNICAL</i> |
| 182 | 39 | The need for harmonization when considering, developing and implementing authorization programmes has led to the development of this standard. | C | Ukraine The Background refers to situations that are often exceptional rather than regular. As authorizing entities to perform specific phytosanitary actions such as inspection, testing, surveillance that are often inspector functions. The Background would better mention cases when an NPPO was unable to perform these or those procedures undertaken when entering the IPPC. Following such practices when entities not subordinated to an NPPO perform inspector functions, eventually an NPPO will be reorganized and terminated. The practice of authorization of certain inspector functions in some situations contradicts to paragraph 2 article IV IPPC. <i>Category : SUBSTANTIVE</i> |
| 183 | 39 | The need for harmonization when considering, developing and implementing authorization programmes has led to the development of this standard. | P | Argentina Text deleted as a consequence of change in paragraph 38. <i>Category : TECHNICAL</i> |
| 184 | 39 | The need for harmonization when considering, developing and implementing authorization programmes has led to the development of this standard. | P | Uruguay Text deleted as a consequence of change in paragraph 38. <i>Category : TECHNICAL</i> |
| 185 | 39 | The need for harmonization when considering, developing and implementing authorization programmes has led to the development of this standard. | P | COSAVE Text deleted as a consequence of change in paragraph 38. <i>Category : TECHNICAL</i> |
| 186 | 39 | La necesidad de armonización a la hora de considerar, elaborar y aplicar programas de autorizaciones ha conducido a la elaboración de esta norma. | P | OIRSA Termino ambiguo. Es difícil ver como la armonización haya dado raíz a la necesidad de esta norma. <i>Category : SUBSTANTIVE</i> |
| IMPACTS ON BIODIVERSITY AND THE ENVIRONMENT | | | | |
| 187 | 41 | Standardized requirements for the authorization programmes of entities may have a positive impact on biodiversity and the environment because if they may result in more effective and consistent delivery of phytosanitary actions, helping to enhance the integrity (i.e. Better preventing the overall effectiveness introduction and reliability) spread of regulated pests is beneficial to biodiversity through the | P | EPPO The term "authorization programme" is not clear. More precise wording. To better explain the link with biodiversity and environment. <i>Category : TECHNICAL</i> |

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| | | NPPO's phytosanitary system- protection of plant health and the decrease in the use of treatments having a negative environmental impact. | | |
| 188 | 41 | Standardized authorization programmes may have a positive impact on biodiversity and the environment because they may result in more effective and consistent delivery of phytosanitary actions, helping to enhance the integrity (i.e. the overall effectiveness and reliability) of the NPPO's phytosanitary system. <u>Better prevention of the introduction and spread of regulated pests is beneficial to biodiversity through the protection of plant health and the decrease in the use of treatments having a negative environmental impact.</u> | P | European Union To better explain the link with biodiversity and environment. <i>Category : TECHNICAL</i> |
| 189 | 41 | Standardized <u>requirements for the authorization programmes of entities</u> may have a positive impact on biodiversity and the environment because if they may result in more effective and consistent delivery of phytosanitary actions, helping to enhance the integrity (i.e. the overall effectiveness and reliability) of the NPPO's phytosanitary system. | P | European Union The term "authorization programme" is not clear. More precise wording. <i>Category : TECHNICAL</i> |
| 190 | 41 | Standardized authorization programmes may have a positive impact on biodiversity and the environment because they may result in more effective and consistent delivery of phytosanitary <u>Phytosanitary</u> actions, helping to enhance the integrity (i.e. the overall effectiveness and reliability) of the NPPO's phytosanitary <u>Phytosanitary</u> system. | P | Ghana <i>Category : EDITORIAL</i> |
| 191 | 41 | Standardized authorization programmes may have a positive impact on biodiversity and the environment because they may result in more effective and consistent delivery of phytosanitary actions, helping to enhance the integrity (i.e. the overall effectiveness and reliability) of the NPPO's phytosanitary system- phytosanitary system. What does phytosanitary system constitute?? | P | IPPC Regional Workshop Africa <i>Category : TECHNICAL</i> |
| 192 | 41 | Standardized authorization programmes may have a positive impact on biodiversity and the environment because they may result in more effective and consistent delivery of phytosanitary actions, helping to enhance the integrity (i.e. the overall effectiveness and reliability) of the NPPO's phytosanitary system. | C | Ukraine We believe standardized authorization programmes may have a positive as well as NEGATIVE impact on biodiversity and the environment. Implementation of the standard will in no way have a positive impact on the environment especially on the biodiversity of plants. As performance of functions by authorized entities cannot guarantee the phytosanitary safety. The phytosanitary system will be weakened due to imperfect performance of phytosanitary controls by an NPPO. <i>Category : SUBSTANTIVE</i> |
| Requirements | | | | |
| 193 | 42 | REQUIREMENTS | P | APPPC (46) Thailand (5 Sep 2018 12:02 PM) A new heading should be added to clarify detail of these |

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| | | 1. BASIC UNDERSTANDING OF AUTHORIZATION | | paragraphs. <i>Category : SUBSTANTIVE</i> |
| 194 | 42 | REQUIREMENTS | P | Jamaica Legal framework needed to guide this ISPM. Concerned about trade facilitation to the detriment of plant health. <i>Category : SUBSTANTIVE</i> |
| 195 | 43 | Authorization is a process that may be used by NPPOsto formally recognize entities to undertake specific NPPO-specific phytosanitary actions <u>actions that have been historically performed by NPPOs</u> . An NPPO's authorization programme operates within its phytosanitary system. | P | Canada To provide clarity. <i>Category : EDITORIAL</i> |
| 196 | 43 | Authorization is a process that may be used by NPPOsto <u>NPPOs to</u> formally recognize entities to undertake specific NPPO phytosanitary actions. An NPPO's authorization programme operates within its phytosanitary system. | P | Canada <i>Category : EDITORIAL</i> |
| 197 | 43 | Authorization is a process that may be used by NPPOsto <u>NPPOs to</u> formally recognize entities to undertake specific NPPO phytosanitary actions. An NPPO's authorization programme operates within its phytosanitary system. | P | Saint Kitts And Nevis <i>Category : EDITORIAL</i> |
| 198 | 43 | Authorization is a process that may be used by NPPOsto formally recognize entities to undertake specific NPPO phytosanitary actions . An NPPO's authorization programme operates within its phytosanitary system. <u>actions associated with NPPO's import, domestic or export systems. The process for authorization should operate within the NPPO's phytosanitary system.</u> | P | EPPO Superfuous words are deleted. The term "authorization programme" is not clear. According to ISPM 5, "phytosanitary actions" are "official" operations, so they are "established, authorized or performed by a NPPO". Precisions coming from the last sentence of paragraph 44 (and from paragraph 28). More appropriate wording for an ISPM. <i>Category : TECHNICAL</i> |
| 199 | 43 | Authorization is a process that may be used by NPPOsto formally recognize entities <u>Authorization: transfer of tasks to undertake specific NPPO phytosanitary actions</u> an entity that will perform the task under the responsibility and oversight of the NPPO. An NPPO's <u>The process for authorization programme operates should operate within its the NPPO's</u> phytosanitary system. ; | P | European Union The term "authorization programme" is not clear. According to ISPM 5, "phytosanitary actions" are "official" operations, so they are "established, authorized or performed by a NPPO". Precisions coming from the last sentence of paragraph 44 (and from paragraph 28). More appropriate wording for an ISPM ('should' as it is a requirement and therefore it is better to word it also as such). <i>Category : TECHNICAL</i> |
| 200 | 43 | Authorization is a process that may be used by NPPOsto <u>NPPO's to</u> formally recognize entities to undertake specific NPPO phytosanitary <u>Phytosanitary</u> actions. An NPPO's authorization programme operates within its phytosanitary <u>Phytosanitary</u> system. | P | Ghana <i>Category : EDITORIAL</i> |
| 201 | 43 | Authorization is a process that may be used by NPPOsto <u>NPPOs to</u> formally recognize entities to undertake specific NPPO phytosanitary actions. An NPPO's authorization programme operates within its phytosanitary system. | P | Caribbean Agricultural Health and Food Safety Agency <i>Category : EDITORIAL</i> |

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| 202 | 43 | Authorization is a process that may be used by NPPOsto <u>NPPOs to</u> formally recognize entities to undertake specific NPPO phytosanitary actions. An NPPO's authorization programme operates within its phytosanitary system. | P | Japan <i>Category : EDITORIAL</i> |
| 203 | 43 | Authorization is a process that may be used by NPPOsto <u>NPPOs to</u> formally recognize entities to undertake specific NPPO phytosanitary actions. An NPPO's authorization programme operates within its phytosanitary system. | P | APPPC (163) Philippines (12 Sep 2018 3:26 AM) (90) New Zealand (6 Sep 2018 7:02 AM) (3) Nepal (9 Aug 2018 5:03 PM) <i>Category : EDITORIAL</i> |
| 204 | 43 | Authorization is a process that may be used by NPPOsto formally recognize entities to undertake specific NPPO phytosanitary actions. An NPPO's authorization programme operates within its phytosanitary system. | P | NEPPO <i>Category : EDITORIAL</i> |
| 205 | 43 | Authorization is a process that may be used by NPPOsto <u>NPPOs to</u> formally recognize entities to undertake specific NPPO phytosanitary actions. An NPPO's authorization programme operates within its phytosanitary system. | P | NEPPO <i>Category : EDITORIAL</i> |
| 206 | 43 | Authorization is a process that may be used by NPPOsto <u>NPPOs to</u> formally recognize entities to undertake specific NPPO phytosanitary actions. An NPPO's authorization programme operates within its phytosanitary system. | P | Egypt <i>Category : EDITORIAL</i> |
| 207 | 43 | Authorization is a process that may be used by NPPOsto <u>NPPOs to</u> formally recognize entities to undertake specific NPPO phytosanitary actions. An NPPO's authorization programme operates within its phytosanitary system. | P | Egypt <i>Category : EDITORIAL</i> |
| 208 | 43 | Authorization is a process that may be used by NPPOsto formally recognize entities to undertake specific NPPO phytosanitary actions. <u>document assessment and pest identification activities</u> . An NPPO's authorization programme operates within its phytosanitary system. | P | Australia The original text did not include assessment fit activities. <i>Category : TECHNICAL</i> |
| 209 | 43 | 1. Basic Understanding of Authorization Authorization is a process that may be used by NPPOsto formally recognize entities to undertake specific NPPO phytosanitary actions. An NPPO's authorization programme operates within its phytosanitary system. | P | Thailand A new heading should be added to clarify detail of these paragraphs. <i>Category : SUBSTANTIVE</i> |
| 210 | 43 | Authorization is a process that may be used by NPPOsto formally recognize entities to undertake specific NPPO phytosanitary actions. An NPPO's authorization programme operates within its phytosanitary system. | P | Malawi No comment <i>Category : SUBSTANTIVE</i> |
| 211 | 43 | Authorization is a process that may be used by NPPOsto formally recognize entities to undertake specific NPPO phytosanitary actions. An NPPO's authorization programme operates within its phytosanitary system. <u>La autorización es un procedimiento que podrán utilizar las ONPF para reconocer formalmente a entidades que cumplan los requisitos a fin de que emprendan acciones fitosanitarias específicas de las ONPF. El programa de autorizaciones de una ONPF opera dentro de su sistema fitosanitario.</u> | P | Nicaragua La autorización es un procedimiento que podrán utilizar las ONPF para reconocer formalmente a ciertas entidades a fin de que emprendan acciones fitosanitarias específicas de las ONPF. El programa de autorizaciones de una ONPF opera dentro de su sistema fitosanitario. <i>Category : SUBSTANTIVE</i> |

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| | | <u>"A ciertas" es un término discrecional</u> | | |
| 212 | 43 | Authorization is a process that may be used by NPPOsto formally recognize entities to undertake specific NPPO -phytosanitary actions. An NPPO's authorization programme operates within its phytosanitary system. | P | Argentina Redundant. Phytosanitary action by definition is an official operation. <i>Category : TECHNICAL</i> |
| 213 | 43 | Authorization is a process that may be used by NPPOsto <u>NPPOs to</u> formally recognize entities to undertake specific NPPO -phytosanitary actions. An NPPO's authorization programme operates within its phytosanitary system. | P | Uruguay NPPO deleted to avoid redundancy. Phytosanitary action by definition is an official operation, therefore being official they are performed or authorized by NPPO. <i>Category : TECHNICAL</i> |
| 214 | 43 | Authorization is a process that may be used by NPPOsto <u>NPPOs to</u> formally recognize entities to undertake specific NPPO -phytosanitary actions. An NPPO's authorization programme operates within its phytosanitary system. | P | COSAVE Redundant. Phytosanitary action by definition is an official operation. <i>Category : TECHNICAL</i> |
| 215 | 43 | La autorización es un procedimiento que podrán utilizar las ONPF para reconocer formalmente a ciertas -entidades <u>que cumplen los requisitos</u> a fin de que emprendan acciones fitosanitarias específicas de las ONPF. El programa de autorizaciones de una ONPF opera dentro de su sistema fitosanitario. | P | OIRSA "A ciertas" es un término discrecional <i>Category : SUBSTANTIVE</i> |
| 216 | 43 | La autorización es un procedimiento que podrán utilizar las ONPF para reconocer formalmente a ciertas -entidades a fin de que emprendan acciones fitosanitarias específicas de las ONPF. El programa de autorizaciones de una ONPF opera dentro de su sistema fitosanitario. | P | Costa Rica "A ciertas" es un término discrecional <i>Category : TECHNICAL</i> |
| 217 | 43 | La autorización es un procedimiento que podrán utilizar las ONPF para reconocer formalmente a ciertas entidades a fin de que emprendan-ejecuten acciones fitosanitarias específicas de las ONPF. El programa de autorizaciones de una ONPF opera dentro de su sistema fitosanitario. | P | Costa Rica <i>Category : EDITORIAL</i> |
| 218 | 43 | La autorización es un procedimiento que podrán utilizar las ONPF para reconocer formalmente a-ciertas-a entidades <u>que cumplan requisitos</u> , a fin de que emprendan acciones fitosanitarias específicas de las ONPF. El programa de autorizaciones de una ONPF opera dentro de su sistema fitosanitario. | P | Nicaragua La autorización es un procedimiento que podrán utilizar las ONPF para reconocer formalmente a ciertas entidades que cumplan los requisitos a fin de que emprendan acciones fitosanitarias específicas de las ONPF. El programa de autorizaciones de una ONPF opera dentro de su sistema fitosanitario. "A ciertas" es un término discrecional <i>Category : SUBSTANTIVE</i> |
| 219 | 44 | An NPPO should determine whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervision and auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export). It is up to each contracting party or NPPO to decide whether or not to authorize entities to perform | P | IPPC Regional Workshop Central Asia & Central Europe The Regional Workshop proposed to improve this section (Para 44) as indicated. This section reads in Russian as follows: Каждая Договаривающаяся сторона или НОКЗР решают, уполномочивать или нет юридических лиц на осуществление конкретных фитосанитарных действий. Если они принимают |

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| | | <p><u>specific phytosanitary actions. If they decide to do so, it is also their decision to determine which entity is authorized and for which specific phytosanitary actions. With the authorization the task is performed by the entity but the responsibility remains with the NPPO. The quality of the tasks performed by authorized entities should be at least of the same level of the quality when these tasks are performed by the NPPO.</u></p> <p><u>Such authorization may be given only to carry out official operations to implement phytosanitary measures that are decided by the NPPO. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine and destruction. . Authorization for phytosanitary actions does not include NPPO tasks that affect core activities in the NPPOs such as issuance of phytosanitary certificates or setting phytosanitary measures because these are not phytosanitary actions. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export).</u></p> <p><u>When authorizing entities to perform phytosanitary actions, the NPPO should keep sufficient staff and expertise to manage their phytosanitary system, carry out the functions described in Article IV of the IPPC, and carry out oversight over the tasks performed by authorized entities.</u></p> | <p>данное решение на осуществление данных действий, то они также согласно своему решению определяют, какой орган уполномочен и для каких конкретных фитосанитарных действий. При уполномочивании данная задача выполняется юридическим лицом, но ответственность за выполнение данных задач по-прежнему возлагается на НОКЗР. Качество задач, выполняемых уполномоченными юридическими лицами, должно быть по крайней мере того же уровня качества, когда эти задачи выполняются НОКЗР.</p> <p>Такое уполномочивание может быть предоставлено только для проведения официальных функций по осуществлению фитосанитарных действий, которые решаются НОКЗР. Примерами фитосанитарных действий, на выполнение которых от своего имени НОКЗР может уполномочить юридическое лицо, являются мониторинг, отбор образцов, досмотр, анализ, надзор, обработки, карантин после ввоза, и уничтожение, наблюдение и аудит. Уполномочивание на осуществление фитосанитарных действий не включает задачи НОКЗР, которые затрагивают основные виды деятельности в странах НОКЗР, такие как выдача фитосанитарных сертификатов или установление фитосанитарных мер, поскольку они не являются фитосанитарными действиями. В рамках программы по передаче полномочий, юридические лица могут выполнять фитосанитарные действия в рамках фитосанитарной регламентирующей системы (импортной, внутринациональной или экспортной).</p> <p>При уполномочивании юридических лиц на осуществление фитосанитарных действий НОКЗР должен обладать достаточным штатом и опытом для управления своей фитосанитарной системой, выполнять функции, описанные в Статье IV, и осуществлять надзор за выполнением задач, выполняемых уполномоченными юридическими лицами.</p> <p><i>Category : SUBSTANTIVE</i></p> |
| 220 | 44 | <p><u>The NPPO has responsibilities to decide which phytosanitary action can be conducted as an authorization programme and which elements need to include in the programme depend on its country's situation.</u> An NPPO should determine whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary- <u>Phytosanitary</u> actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervision and auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export).</p> | <p>P Viet Nam</p> <p><i>Category : SUBSTANTIVE</i></p> |
| 221 | 44 | <p><u>An NPPO has responsibilities to decide which phytosanitary action can be conducted as an authorization programme and which elements need to be included in the programme depend on its country's situation. An NPPO should determine</u></p> | <p>P Korea, Republic of</p> <p>To clearly specifies that NPPO has responsibilities to decide which phytosanitary action can be conducted as an authorization</p> |

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| | | whether to authorize entities to perform phytosanitary actions.Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervisionand <u>supervision and</u> auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export) <u>export) for a defined period of time.</u> | | programme and which elements need to include in the programme depend on its country's situation. <i>Category : SUBSTANTIVE</i> |
| 222 | 44 | An NPPO should determine whether to authorize entities to perform phytosanitary actions.Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervisionand auditing. Under an authorization programme, Authorized entities may perform <u>specific</u> phytosanitary actions within a the NPPO's phytosanitary regulatory system (import, domestic or export)-system. | P | EPPO In case replacement of paragraph 44 is not accepted. The term "authorization program" is not clear. It is suggested to move "import, domestic or import" in paragraph 43 which introduces the section. In case replacement of paragraph 44 is not accepted. According to ISPM 5, monitoring is a kind of surveillance. <i>Category : TECHNICAL</i> |
| 223 | 44 | An NPPO should determine whether to authorize entities to perform phytosanitary actions.Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervisionand auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export). | C | EPPO This section has been improved by the Regional Workshop in Bykovo and endorsed by the EPPO Panel to make clear that it is a sovereign decision of CPs whether to authorize entities and if so for what sort of actions and under what conditions. To avoid unclarity on the wording 'on its behalf' and possible responsibilities transferred. In addition, these paragraphs are needed to clarify that the responsibility always stays with the NPPO, that the entity should perform well, that the NPPO should keep sufficient critical mass to perform its NPPO tasks, that the decisions on phytosanitary measures stay with the NPPO and that certain NPPO tasks cannot be delegated to entities. EPPO therefore suggests the following text for this section: It is up to each contracting party or NPPO to decide whether or not to authorize entities to perform specific phytosanitary actions. If they decide to do so, it is also their decision to determine which entity is authorized and for which specific phytosanitary actions. With the authorization the action is performed by the entity but the responsibility remains with the NPPO. The authorized entities should fulfil the performance criteria set by the NPPOs . Such authorization may be given only to carry out actions to implement phytosanitary measures that are decided by the NPPO. Examples of phytosanitary actions that an NPPO may authorize an entity to perform include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine and destruction. Authorization for phytosanitary actions does not include NPPO tasks that affect core activities of the NPPO such as |

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| | | | <p>issuance of phytosanitary certificates or setting phytosanitary measures because these are not phytosanitary actions. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export).</p> <p>When authorizing entities to perform phytosanitary actions, the NPPO should keep sufficient staff and expertise to manage their phytosanitary system, carry out the functions described in Article IV of the IPPC, and carry out oversight over the actions performed by authorized entities.</p> <p><i>Category : SUBSTANTIVE</i></p> |
| 224 | 44 | <p>An It is up to each contracting party or NPPO should determine to decide whether or not to authorize entities to perform <u>specific</u> phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity. If they decide to perform on its behalf include monitoring <u>do so, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervision and auditing</u> it is also their decision to determine which entity is authorized and for which specific phytosanitary actions. Under an <u>With the</u> authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export) <u>the action is performed by the entity but the responsibility remains with the NPPO. The authorized entities should fulfil the performance criteria set by the NPPOs.</u></p> <p><u>Such authorization may be given only to carry out actions to implement phytosanitary measures that are decided by the NPPO. Examples of phytosanitary actions that an NPPO may authorize an entity to perform include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine and destruction. Authorised entities may perform specific phytosanitary actions within the NPPO's phytosanitary regulatory system.</u></p> <p><u>When authorizing entities to perform phytosanitary actions, the NPPO should keep sufficient staff and expertise to manage their phytosanitary system, fulfil their responsibilities described in Article IV of the IPPC, and carry out oversight over the actions performed by authorized entities.</u></p> | <p>P European Union</p> <p>This section has been improved to make it clear that it is a sovereign decision of CPs whether to authorize entities and if so for what sort of actions and under what conditions.</p> <p>To avoid unclarity on the wording 'on its behalf' and possible responsibilities transferred.</p> <p>In addition, these paragraphs are needed to clarify that the responsibility always stays with the NPPO, that the entity should perform well, that the NPPO should keep sufficient critical mass to fulfil the NPPO's responsibilities, that the decisions on phytosanitary measures stay with the NPPO and that certain NPPO tasks cannot be delegated to entities.</p> <p><i>Category : SUBSTANTIVE</i></p> |

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| 225 | 44 | An NPPO should determine whether to authorize entities to perform phytosanitary <u>Phytosanitary</u> actions. Examples of phytosanitary <u>Phytosanitary</u> actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervision and <u>supervision and</u> auditing. Under an authorization programme, entities may perform phytosanitary <u>Phytosanitary</u> actions within a phytosanitary <u>Phytosanitary</u> regulatory system (import, domestic or export). | P | Ghana <i>Category : EDITORIAL</i> |
| 226 | 44 | <u>NPPO has responsibilities to decide which phytosanitary action can be conducted as an authorization programme and which elements need to include in the programme depend on its country's situation.</u> An NPPO should determine whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervision and <u>supervision and</u> auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export). | P | Japan It clearly specifies that NPPO has responsibilities to decide which phytosanitary action can be conducted as an authorization programme and which elements need to include in the programme depend on its country's situation. <i>Category : SUBSTANTIVE</i> |
| 227 | 44 | An NPPO should determine whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervision and auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export). | C | Jamaica Revision to paragraph. An NPPO should determine whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, quarantine and destruction. In addition, supervision and auditing entities may be authorized to perform supervision and auditing in the phytosanitary context. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import or export). Remove the word domestic from the sentence as NPPOs do not usually regulate domestic activities. <i>Category : SUBSTANTIVE</i> |
| 228 | 44 | An NPPO should determine whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may shall authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, quarantine and destruction. <u>In addition, supervision and auditing entities may be authorized to perform supervision and auditing in the phytosanitary context.</u> Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export). | P | Caribbean Agricultural Health and Food Safety Agency As these entities would be obliged to perform phytosanitary actions within a phytosanitary regulatory system. Supervision and auditing are not phytosanitary action but quality control actions <i>Category : SUBSTANTIVE</i> |
| 229 | 44 | An NPPO should determine whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to | P | China To clarify the period of authorization can be flexible. <i>Category : SUBSTANTIVE</i> |

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| | | perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervision and auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export)- <u>2</u> . <u>Authorization may be periodical or long-term</u> | | |
| 230 | 44 | An NPPO should determine whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervision and auditing. Under an authorization programme, entities may perform phytosanitary actions within <u>a-an export</u> phytosanitary regulatory system (import, domestic or export). | P | China Its internal events of a country, if or not authorize the entities to perform import and domestic phytosanitary actions. <i>Category : SUBSTANTIVE</i> |
| 231 | 44 | An NPPO <u>has responsibilities to decide which phytosanitary action can be conducted as an authorization programme and which elements need to be included in the programme depend on its country's situation.</u> An NPPO should determine whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervision and <u>supervision and</u> auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export). | P | China To clearly specifies that NPPO has responsibilities to decide which phytosanitary action can be conducted as an authorization programme and which elements need to include in the programme depend on its country's situation. <i>Category : SUBSTANTIVE</i> |
| 232 | 44 | An NPPO should determine whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervision and auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic-domestic, export, or export) <u>re-export</u>). | P | United States of America Consider adding it through the text where appropriate. <i>Category : TECHNICAL</i> |
| 233 | 44 | An NPPO should determine whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, <u>phytosanitary security</u> , testing, surveillance, treatment, post-entry quarantine, destruction, supervision and auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export). | P | New Zealand Phytosanitary security is an important part of maintaining the integrity of the assurance system. <i>Category : TECHNICAL</i> |
| 234 | 44 | An NPPO should determine whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, | P | APPPC (4) Nepal (9 Aug 2018 5:04 PM) <i>Category : EDITORIAL</i> |

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| | | surveillance, <u>pest risk analysis</u> , treatment, post-entry quarantine, destruction, supervisionand auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export). | | |
| 235 | 44 | An NPPO should determine whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary <u>Phytosanitary</u> actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, <u>supervisionand auditing</u> . Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export). | P | APPPC (32) China (3 Sep 2018 9:49 AM) Definition of the specific phytosanitary actions which may be authorized to perform by entities, contribute to prevent the authorization be misused. The supervision and auditing to entities should be performed by NPPO itself, to insure the authorized entities perform phytosanitary actions according to the requirement of NPPO. <i>Category : SUBSTANTIVE</i> |
| 236 | 44 | An NPPO should determine whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervisionand auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export) <u>system</u> . | P | APPPC (33) China (3 Sep 2018 9:52 AM) Its internal events of a sovereignty, if or not authorize the entity to perform import and domestic phytosanitary actions <i>Category : SUBSTANTIVE</i> |
| 237 | 44 | An NPPO should determine whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervisionand auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export) 7 . <u>Authorization may be periodical or long-term</u> | P | APPPC (34) China (3 Sep 2018 9:53 AM) To definite the period of authorization may be flexible. <i>Category : SUBSTANTIVE</i> |
| 238 | 44 | An NPPO should determine whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervisionand <u>supervision and</u> auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export). | P | APPPC (91) New Zealand (6 Sep 2018 7:03 AM) <i>Category : EDITORIAL</i> |
| 239 | 44 | An NPPO should determine whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, <u>phytosanitary security</u> , testing, surveillance, treatment, post-entry quarantine, destruction, | P | APPPC (119) New Zealand (7 Sep 2018 7:27 AM) <i>Category : TECHNICAL</i> |

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| | | supervisionand auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export)-. | | |
| 240 | 44 | <u>NPPO has responsibilities to decide which phytosanitary action can be conducted as an authorization programme and which elements need to include in the programme depend on its country's situation.</u> An NPPO should determine whether to authorize entities to perform phytosanitary actions.Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervisionand auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export). | P | APPPC (143) Japan (10 Sep 2018 2:16 PM) It clearly specifies that NPPO has responsibilities to decide which phytosanitary action can be conducted as an authorization programme and which elements need to include in the programme depend on its country's situation. <i>Category : SUBSTANTIVE</i> |
| 241 | 44 | An NPPO <u>has responsibilities to decide which phytosanitary action can be conducted as an authorization programme and which elements need to be included in the programme depend on its country's situation.</u> An NPPO should determine whether to authorize entities to perform phytosanitary actions.Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, <u>supervisionand supervision and</u> auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export) <u>export) for a defined period of time.</u> | P | APPPC (154) APPPC (11 Sep 2018 7:43 AM) To clearly specifies that NPPO has responsibilities to decide which phytosanitary action can be conducted as an authorization programme and which elements need to include in the programme depend on its country's situation. <i>Category : SUBSTANTIVE</i> |
| 242 | 44 | An NPPO should determine whether to authorize entities to perform phytosanitary actions. <u>Examples of phytosanitary . These</u> actions <u>that an NPPO may authorize an entity to perform on its behalf</u> include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervisionand auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export). | P | Antigua and Barbuda The second sentence is unnecessarily wordy. <i>Category : EDITORIAL</i> |
| 243 | 44 | An NPPO should determine whether to authorize entities to perform phytosanitary actions.Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, <u>supervisionand supervision and</u> auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export). | P | Egypt <i>Category : EDITORIAL</i> |
| 244 | 44 | An NPPO <u>should may</u> determine whether to authorize entities to perform phytosanitary actions-. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, | P | IPPC Regional Workshop Africa Created by merging other changes together <i>Category : SUBSTANTIVE</i> |

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| | | inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervisionand-supervision and auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic-domestic, goods on transit or export). | | |
| 245 | 44 | An NPPO should determine whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervisionand <u>supervision and</u> auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export). | P | Philippines <i>Category : EDITORIAL</i> |
| 246 | 44 | An NPPO should determine whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervisionand auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export). | P | Philippines <i>Category : EDITORIAL</i> |
| 247 | 44 | An NPPO should determine whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervisionand auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export). | P | Montenegro <i>Category : SUBSTANTIVE</i> |
| 248 | 44 | An NPPO should-may determine whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervisionand auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export). | P | Eritrea <i>Category : EDITORIAL</i> |
| 249 | 44 | An NPPO should determine whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervisionand auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic-(import or export). | P | Mexico The domestic issues is not relevant here. Domestic issues should not be part of an ISPM <i>Category : SUBSTANTIVE</i> |

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| 250 | 44 | An NPPO should determine whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervision and auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic or export). Una ONPF debería determinar si autoriza a ciertas entidades a emprender acciones fitosanitarias. Como ejemplos de acciones fitosanitarias que podrá emprender una entidad con autorización y supervisión de una ONPF y estará facultado para las siguientes actividades el monitoreo, el muestreo, la inspección, la realización de pruebas, la vigilancia, el tratamiento, la cuarentena pos entrada, la destrucción, la supervisión y la auditoría. En el marco de un programa de autorizaciones, las entidades podrán emprender acciones fitosanitarias dentro de un sistema de reglamentación fitosanitaria (de importación, nacional o de exportación). | P | Nicaragua Una ONPF debería determinar si autoriza a ciertas entidades a emprender acciones fitosanitarias. Como ejemplos de acciones fitosanitarias que podrá emprender una entidad con autorización de una ONPF y en su nombre cabe citar el monitoreo, el muestreo, la inspección, la realización de pruebas, la vigilancia, el tratamiento, la cuarentena pos entrada, la destrucción, la supervisión y la auditoría. En el marco de un programa de autorizaciones, las entidades podrán emprender acciones fitosanitarias dentro de un sistema de reglamentación fitosanitaria (de importación, nacional o de exportación). <i>Category : TECHNICAL</i> |
| 251 | 44 | An NPPO should determine <u>decide</u> whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervision and auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic <u>(import</u> or export). | P | Argentina Domestic issues should not be part of an ISPM. To emphasize that the authorization of entities is an NPPO decision. <i>Category : TECHNICAL</i> |
| 252 | 44 | An NPPO should determine <u>decide</u> whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervision and auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic <u>(import</u> or export). | P | Uruguay To emphasize that the authorization of entities is an NPPO decision. Domestic issues should not be part of an ISPM <i>Category : TECHNICAL</i> |
| 253 | 44 | An NPPO should determine <u>decide</u> whether to authorize entities to perform phytosanitary actions. Examples of phytosanitary actions that an NPPO may authorize an entity to perform on its behalf include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine, destruction, supervision and auditing. Under an authorization programme, entities may perform phytosanitary actions within a phytosanitary regulatory system (import, domestic <u>(import</u> or export). | P | COSAVE Domestic issues should not be part of an ISPM. To emphasize that the authorization of entities is an NPPO decision. <i>Category : TECHNICAL</i> |

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| 254 | 44 | Une ONPV devrait déterminer si elle autorise des organismes à mener des actions phytosanitaires. Parmi les actions phytosanitaires qu'une ONPV peut autoriser un organisme à mener pour son compte figurent le suivi, l'échantillonnage, l'inspection, l'analyse, la surveillance, le traitement, la quarantaine post-entrée, la destruction, la supervision et les vérifications et audits. En vertu d'un programme d'autorisation, les organismes peuvent mener des actions phytosanitaires dans le cadre d'un système de réglementation phytosanitaire (des importations, des échanges nationaux ou des exportations). | C | Haiti Je crains que de telles mesures n'augmentent pas le risque d'introduction d'organismes nuisibles dans les pays moins avancés qui font déjà face à un déficit d'autorités sur les entreprises d'importations et d'exportations. En gros, c'est la barrière libre. <i>Category : TECHNICAL</i> |
| 255 | 44 | Une ONPV devrait déterminer si elle autorise des organismes à mener des actions phytosanitaires. Parmi les actions phytosanitaires qu'une ONPV peut autoriser un organisme à mener pour son compte figurent le suivi, l'échantillonnage, l'inspection, l'analyse, la surveillance, le traitement, la quarantaine post-entrée, la destruction, la supervision et supervision , les vérifications de conformité et des audits. En vertu d'un programme d'autorisation, les organismes peuvent mener des actions phytosanitaires dans le cadre d'un système de réglementation phytosanitaire (des importations, des échanges nationaux ou des exportations). | P | Chad un apport pour compléter la deuxième phase <i>Category : EDITORIAL</i> |
| 256 | 44 | Una ONPF debería determinar si autoriza a ciertas entidades a emprender acciones fitosanitarias. Como ejemplos de acciones fitosanitarias que podrá emprender una entidad con autorización de una ONPF y en su nombre cabe citar el monitoreo, el muestreo, la inspección, la realización de pruebas, la vigilancia, el tratamiento, la cuarentena posentrada, la destrucción, la supervisión y la auditoría . En el marco de un programa de autorizaciones, las entidades podrán emprender acciones fitosanitarias dentro de un sistema de reglamentación fitosanitaria (de importación, nacional o de exportación). | P | OIRSA La supervisión y auditoría no son acciones fitosanitarias sino elementos de control de calidad. Se tendría que explicar a qué se refiere el término doméstico. <i>Category : TECHNICAL</i> |
| 257 | 44 | Una ONPF debería determinar si autoriza a ciertas entidades a emprender acciones fitosanitarias. Como ejemplos de acciones fitosanitarias que podrá emprender una entidad con autorización y supervisión de una ONPF y en su nombre cabe citar ONPF , el monitoreo, el muestreo, la inspección, la realización de pruebas, la vigilancia, el tratamiento, la cuarentena posentrada, la destrucción, la supervisión y la auditoría. En el marco de un programa de autorizaciones, las entidades podrán emprender acciones fitosanitarias dentro de un sistema de reglamentación fitosanitaria (de importación, nacional o de exportación). | P | OIRSA La ONPF es la responsable de autorizar y supervisar estas actividades concediendo facultades específicas para estas acciones. <i>Category : TECHNICAL</i> |
| 258 | 44 | Una ONPF debería determinar si autoriza a ciertas entidades a emprender acciones fitosanitarias. Como ejemplos de acciones fitosanitarias que podrá emprender una entidad con autorización de una ONPF y en su nombre cabe citar el monitoreo, el muestreo, la inspección, la realización de pruebas, la vigilancia, el tratamiento, la cuarentena posentrada, la destrucción, la supervisión y la auditoría. En el marco de un programa de autorizaciones, las entidades podrán emprender acciones | P | Colombia El término de monitoreo se debe eliminar, teniendo en cuenta que está implícito en el término de vigilancia. <i>Category : SUBSTANTIVE</i> |

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| | | fitosanitarias dentro de un sistema de reglamentación fitosanitaria (de importación, nacional o de exportación). | | |
| 259 | 44 | Una ONPF debería determinar si autoriza a ciertas <u>autoriza</u> entidades a emprender acciones fitosanitarias. Como ejemplos de acciones fitosanitarias que podrá emprender una entidad con autorización <u>y supervisión</u> de una ONPF y en su nombre cabe citar el monitoreo, el muestreo, la inspección, la realización de pruebas, la vigilancia, el tratamiento, la cuarentena posentrada, la destrucción, la supervisión y la auditoría . En el marco de un programa de autorizaciones, las entidades podrán emprender acciones fitosanitarias dentro de un sistema de reglamentación fitosanitaria (de importación, nacional o de exportación). | P | <p>Costa Rica Coherencia con el párrafo anterior La ONPF es la responsable de autorizar y supervisar estas actividades concediendo facultades específicas para estas acciones.</p> <p>La supervisión y auditoría no son acciones fitosanitarias sino elementos de control de calidad.</p> <p>Se tendría que explicar a qué se refiere el término doméstico.</p> <p><i>Category : TECHNICAL</i></p> |
| 260 | 44 | Una ONPF debería determinar si autoriza a ciertas entidades a emprender acciones fitosanitarias. Como ejemplos de acciones fitosanitarias que podrá emprender una entidad con autorización <u>y supervisión</u> de una ONPF y en su nombre cabe citar <u>estará facultado para las siguientes actividades</u> el monitoreo, el muestreo, la inspección, la realización de pruebas, la vigilancia, el tratamiento, la cuarentena posentrada, la destrucción, la supervisión y la auditoría. En el marco de un programa de autorizaciones, las entidades podrán emprender acciones fitosanitarias dentro de un sistema de reglamentación fitosanitaria (de importación, nacional o de exportación). | P | <p>Nicaragua Una ONPF debería determinar si autoriza a ciertas entidades a emprender acciones fitosanitarias. Como ejemplos de acciones fitosanitarias que podrá emprender una entidad con autorización y supervisión de una ONPF y en su nombre cabe estar facultado para las siguientes actividades citar el monitoreo, el muestreo, la inspección, la realización de pruebas, la vigilancia, el tratamiento, la cuarentena pos entrada, la destrucción, la supervisión y la auditoría. En el marco de un programa de autorizaciones, las entidades podrán emprender acciones fitosanitarias dentro de un sistema de reglamentación fitosanitaria (de importación, nacional o de exportación).</p> <p><i>Category : TECHNICAL</i></p> |
| 261 | 45 | In this standard “entities” include the providers of phytosanitary action (e.g. individuals, organizations, businesses) and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization of entities may require an NPPO to approve individuals within the entity (such as those responsible for specific phytosanitary actions), relevant documentation, their facilities, or any combination of these. NPPOs should apply this standard when authorizing private entities. NPPOs may also decide to apply <u>some or all</u> elements of this standard when authorizing public entities, such as other government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement. | P | <p>Canada Provides greater clarity. <i>Category : SUBSTANTIVE</i></p> |
| 262 | 45 | In this standard “entities” include the providers of phytosanitary action (e.g. individuals, organizations, businesses) and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization of entities may require an NPPO to approve individuals within the entity (such as those responsible for specific phytosanitary actions), relevant documentation, their facilities, or any combination of these. NPPOs should apply this standard when | P | <p>Panama See comment in paragraph 28. In addition the NPPO will determine the nature of the authorization arrangement with all entities.</p> <p><i>Category : TECHNICAL</i></p> |

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| | | authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing public entities, such as other government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement. | | |
| 263 | 45 | In this standard standard , “entities” include the providers of phytosanitary action (e.g. can be individuals, organizations, businesses) enterprises and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization <u>Authorization</u> of entities may require an NPPO to approve authorize individuals within the entity (such as those responsible for specific phytosanitary actions), relevant documentation <u>approve facilities or quality management system documents</u> , their facilities , or any combination of these. NPPOs should apply this standard when authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing public entities, such as other government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement. | P | <p>EPPO</p> <p>The cases are not specified in the standard therefore better delete these words, it is in any case a 'may'.</p> <p>Comma added.</p> <p>According to Appendix 4 (General recommendations on the use of terms in ISPMs) of the "IPPC style guide for standards and meeting documents", in ISPMs and other IPPC documents it is recommended the term "authorize" to be used "to give authority to a person or a body to do something".</p> <p>"Quality management systems documents" are the type of documents which may be approved (see paragraphs 66, 85 and 97).</p> <p>More appropriate wording for a standard. If the NPPO decides to apply elements of these standards, then it should determine the nature of the authorization arrangement.</p> <p>It should be clearly explained what entities include. The Standard needs separate sections on the requirements for private and public entities, and the Standard also needs to cover individuals.</p> <p>This is a more clear term Category : <i>EDITORIAL</i></p> |
| 264 | 45 | In this standard “entities” include the providers of phytosanitary action (e.g. individuals, organizations, businesses) enterprises and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization of entities may require an NPPO to approve individuals within the entity (such as those responsible for specific phytosanitary actions), relevant documentation, their facilities, or any combination of these. NPPOs should apply this standard when authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing public entities, such as other government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement. | P | <p>European Union</p> <p>This is a more clearer term. Category : <i>EDITORIAL</i></p> |
| 265 | 45 | In this standard “entities” include the providers of phytosanitary action (e.g. individuals, organizations, businesses) and, where appropriate, their facilities (such | P | <p>European Union</p> <p>The cases are not specified in the standard therefore better delete these words, it is in any case a 'may'.</p> |

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| | | as equipment, laboratories, treatment enclosures). In some cases, authorization <u>Authorization</u> of entities may require an NPPO to approve individuals within the entity (such as those responsible for specific phytosanitary actions), relevant documentation, their facilities, or any combination of these. NPPOs should apply this standard when authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing public entities, such as other government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement. | | <i>Category : TECHNICAL</i> |
| 266 | 45 | In this standard “entities” include the providers of phytosanitary action (e.g. can be individuals, organizations, businesses) <u>businesses</u> and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization of entities may require an NPPO to approve individuals within the entity (such as those responsible for specific phytosanitary actions), relevant documentation, their facilities, or any combination of these. NPPOs should apply this standard when authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing public entities, such as other government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement. | P | European Union It should be clearly explained what entities include. The Standard needs separate sections on the requirements for private and public entities, and the Standard also needs to cover individuals (see also our general comment). <i>Category : SUBSTANTIVE</i> |
| 267 | 45 | In this standard standard , “entities” include the providers of phytosanitary action (e.g. individuals, organizations, businesses) and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization of entities may require an NPPO to approve individuals within the entity (such as those responsible for specific phytosanitary actions), relevant documentation, their facilities, or any combination of these. NPPOs should apply this standard when authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing public entities, such as other government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement. | P | European Union Comma added. <i>Category : EDITORIAL</i> |
| 268 | 45 | In this standard “entities” include the providers of phytosanitary action (e.g. individuals, organizations, businesses) and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization of entities may require an NPPO to approve individuals within the entity (such as those responsible for specific phytosanitary actions), relevant documentation, their facilities, or any combination of these. NPPOs should apply this standard when authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing public entities, such as other government departments. In such cases, the NPPO and the public entity will should determine the nature of the authorization arrangement. | P | European Union More appropriate wording for a standard. If the NPPO decides to apply elements of these standards, then it should determine the nature of the authorization arrangement. <i>Category : TECHNICAL</i> |

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| 269 | 45 | In this standard “entities” include the providers of phytosanitary action (e.g. individuals, organizations, businesses) and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization of entities may require an NPPO to approve-authorize individuals within the entity (such as those responsible for specific phytosanitary actions), <u>approve facilities of quality management system documents, other</u> relevant documentation, their facilities, or any combination of these. NPPOs should apply this standard when authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing public entities, such as other government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement. | P | European Union According to Appendix 4 (General recommendations on the use of terms in ISPMs) of the "IPPC style guide for standards and meeting documents", in ISPMs and other IPPC documents it is recommended the term "authorize" to be used "to give authority to a person or a body to do something". "Quality management systems documents" are the type of documents which may be approved (see paragraphs 66, 85 and 97). <i>Category : TECHNICAL</i> |
| 270 | 45 | In this standard “entities” include the providers of phytosanitary action (e.g. individuals, organizations, businesses) and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization of entities may require an NPPO to approve individuals within the entity (such as those responsible for specific phytosanitary actions), relevant documentation, their facilities, or any combination of these. NPPOs-NPPO's should apply this standard when authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing public entities, such as other government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement. | P | Ghana <i>Category : EDITORIAL</i> |
| 271 | 45 | In this standard “entities” include the providers of phytosanitary action (e.g. individuals, organizations, businesses) and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization of entities may require an NPPO to approve individuals within the entity (such as those responsible for specific phytosanitary-Phytosanitary actions), relevant documentation, their facilities, or any combination of these. NPPOs should apply this standard when authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing public entities, such as other government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement. | P | Ghana <i>Category : EDITORIAL</i> |
| 272 | 45 | In this standard “entities” include the providers of phytosanitary action (e.g. individuals, organizations, businesses) and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization of entities may require an NPPO to approve individuals within the entity (such as those responsible for specific phytosanitary actions), relevant documentation, their facilities, or any combination of these. <u>Conditions for entities to be authorized to perform phytosanitary actions(authorized definite phytosanitary action and its</u> | P | China To allow this standard be more feasible. <i>Category : SUBSTANTIVE</i> |

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| | | <u>corresponding specific requirements for personnel, documents, equipment, facilities etc</u>). NPPOs should apply this standard when authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing public entities, such as other government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement. | | |
| 273 | 45 | In this standard “entities” include the providers of phytosanitary action (e.g. individuals, organizations, businesses) and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization of entities may require an NPPO to approve individuals within the entity (such as those responsible for specific phytosanitary actions), relevant documentation, their facilities, or any combination of these. NPPOs should apply this standard when authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing <u>public entities, such as any entity carrying out phytosanitary actions. This may include private entities or</u> other government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement. | P | New Zealand The same standard should apply irrespective of who is carrying out the phytosanitary activity, to avoid resulting in a different level of delivery. Also see general comments. <i>Category : SUBSTANTIVE</i> |
| 274 | 45 | In this standard “entities” include the providers of phytosanitary action (e.g. individuals, organizations, businesses) and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization of entities may require an NPPO to approve individuals within the entity (such as those responsible for specific phytosanitary actions), relevant documentation, their facilities, or any combination of these. NPPOs should apply this standard when authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing <u>public entities, such as any entity carrying out phytosanitary actions. This may include private entities or</u> other government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement. | P | APPPC (102) New Zealand (7 Sep 2018 6:35 AM) The same standard should apply irrespective of who is carrying out the phytosanitary activity, to avoid resulting in a different level of delivery. Also see general comments. <i>Category : SUBSTANTIVE</i> |
| 275 | 45 | In this standard “entities” include the providers of phytosanitary action (e.g. individuals, organizations, businesses) and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization of entities may require an NPPO to approve individuals within the entity (such as those responsible for specific phytosanitary actions), relevant documentation, their facilities, or any combination of these. NPPOs should apply this standard when authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing public entities, such as other government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement. | P | Antigua and Barbuda <i>Category : EDITORIAL</i> |

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| 276 | 45 | In this standard “entities” include the providers of phytosanitary action (e.g. individuals, organizations, businesses) and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization of <u>private</u> entities may require an NPPO to approve individuals within the entity (such as those responsible for specific phytosanitary actions), relevant documentation, their facilities, or any combination of these. NPPOs should apply this standard when authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing public entities, such as other government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement. | P | Antigua and Barbuda The proposed amendment is to remove an extraneous, redundant sentence and to improve clarity. <i>Category : EDITORIAL</i> |
| 277 | 45 | In this standard “entities” include the providers of phytosanitary action (e.g. individuals, organizations, businesses) and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization of entities may require an NPPO to approve individuals within the entity (such as those responsible for specific phytosanitary actions), relevant documentation, their facilities, or any combination of these. NPPOs should apply this standard when authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing public entities, such as other government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement. | P | Costa Rica See comment in paragraph 28. In addition the NPPO will determine the nature of the authorization arrangement with all entities. <i>Category : TECHNICAL</i> |
| 278 | 45 | In this standard “entities” include the providers of phytosanitary action (e.g. individuals, organizations, businesses) and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization of entities may require an NPPO to approve individuals within the entity (such as those responsible for specific phytosanitary actions), relevant documentation, their facilities, or any combination of these. NPPOs should apply this standard when authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing public entities, such as other government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement. | C | South Africa Insertion of the word “legal” to align it with point 28 above. <i>Category : SUBSTANTIVE</i> |
| 279 | 45 | In this standard “entities” include the providers of phytosanitary action (e.g. individuals, organizations, businesses) and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures <u>equipment</u>). In some cases, authorization of entities may require an NPPO to approve individuals within the entity (such as those responsible for specific phytosanitary actions <u>actions</u>), relevant documentation, their facilities, or any combination of these. NPPOs should apply this standard when authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing public entities, such as other | P | Montenegro <i>Category : TECHNICAL</i> |

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| | | government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement. | | |
| 280 | 45 | In this standard “entities” include the providers of phytosanitary action (e.g. individuals, organizations, businesses) and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization of entities may require an NPPO to approve individuals within the entity (such as those responsible for specific phytosanitary actions), relevant documentation, their facilities, or any combination of these. NPPOs should apply this standard when authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing public entities, such as other government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement. | C | <p>Ukraine</p> <p>According to Article IV IPPC, an NPPO shall to the best of its ability ensure the establishment of an official national quarantine and plant protection organization performing main obligations as set in the mentioned article. Performing of phytosanitary controls is a function of the state that has the task to maintain the phytosanitary safety of the country. The phytosanitary control is not a matter of commerce or business.</p> <p>Functions of NPPO may be delegated only when an NPPO cannot perform this or that function due to circumstances.</p> <p>NPPO control functions for exports and imports shall not be delegated to entities (business) as the business pursues financial benefits. Performance of business may not be always objective.</p> <p>If a decision to delegate NPPO’s functions is taken, an NPPO shall notify partner countries and ensure maximum control of performance of functions delegated to business. NPPO has to develop and improve in its country the phytosanitary systems, meet commitments undertaken when signing the IPPC.</p> <p>The draft standard has no clear definition of functions that may be delegated. There should be clear definition what responsibility and functions shall be with the state and which ones with entities.</p> <p>Suggested version:</p> <p>An NPPO shall to the best of its ability perform phytosanitary actions. If necessary, an NPPO may authorize an entity to perform monitoring, treatment, destruction, localization and liquidation.</p> <p><i>Category : SUBSTANTIVE</i></p> |
| 281 | 45 | In this standard “entities” include the providers of phytosanitary action (e.g. individuals, organizations, businesses) and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization of entities may require an NPPO to approve individuals within the entity (such as those responsible for specific phytosanitary actions), relevant documentation, their facilities, or any combination of these. NPPOs should apply this standard when authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing public entities, such as other government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement. | P | <p>Argentina</p> <p>See comment in paragraph 28.</p> <p>In addition the NPPO will determine the nature of the authorization arrangement with all entities.</p> <p><i>Category : TECHNICAL</i></p> |
| 282 | 45 | In this standard “entities” include the providers of phytosanitary action (e.g. individuals, organizations, businesses) and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization of entities may require an NPPO to approve individuals within the entity (such as | P | <p>Uruguay</p> <p>See comment in paragraph 28. In addition the NPPO will determine the nature of the authorization arrangement with all entities.</p> |

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| | | those responsible for specific phytosanitary actions), relevant documentation, their facilities, or any combination of these. NPPOs should apply this standard when authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing public entities, such as other government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement. | | <i>Category : SUBSTANTIVE</i> |
| 283 | 45 | In this standard “entities” include the providers of phytosanitary action (e.g. individuals, organizations, businesses) and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization of entities may require an NPPO to approve individuals within the entity (such as those responsible for specific phytosanitary actions), relevant documentation, their facilities, or any combination of these. NPPOs should apply this standard when authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing public entities, such as other government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement. | C | Mexico It must be specified what elements the public entities and private entities that the NPPO authorizes must comply, since the perception of revenues and resources is different. <i>Category : SUBSTANTIVE</i> |
| 284 | 45 | In this standard “entities” include the providers of phytosanitary action (e.g. individuals, organizations, businesses) and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization of entities may require an NPPO to approve individuals within the entity (such as those responsible for specific phytosanitary actions), relevant documentation, their facilities, or any combination of these. NPPOs should apply this standard when authorizing private entities. NPPOs may also decide to apply elements of this standard when authorizing public entities, such as other government departments. In such cases, the NPPO and the public entity will determine the nature of the authorization arrangement. | P | COSAVE See comment in paragraph 28. In addition the NPPO will determine the nature of the authorization arrangement with all entities. <i>Category : TECHNICAL</i> |
| 285 | 45 | En la presente norma, se consideran “entidades” los proveedores de la acción fitosanitaria (ya sean particulares, organizaciones o empresas) y, en caso pertinente, sus instalaciones (como el equipo, los laboratorios o los recintos de tratamiento). En algunos casos, la autorización de entidades podrá requerir que una ONPF dé su aprobación a personas concretas dentro de la entidad (por ejemplo, las responsables de acciones fitosanitarias específicas), a la documentación pertinente, a sus instalaciones o a cualquier combinación de estas. Las ONPF deberían aplicar la presente norma cuando autoricen a entidades privadas. Las ONPF también podrán decidir aplicar elementos de la presente norma cuando autoricen privadas o a entidades públicas, por ejemplo otros departamentos gubernamentales. En tales casos, la ONPF y la entidad pública determinarán la naturaleza del acuerdo de autorización. | P | OIRSA Simplifica el párrafo, no se ve la necesidad de separar entre una entidad privada o pública <i>Category : TECHNICAL</i> |

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| 286 | 45 | En la presente norma, se consideran “entidades” los proveedores de la acción fitosanitaria (ya sean particulares, organizaciones o empresas) y, en caso pertinente, sus instalaciones (como el equipo, los laboratorios o los recintos de tratamiento). En algunos casos, la autorización de entidades podrá requerir que una ONPF dé su aprobación a personas concretas dentro de la entidad (por ejemplo, las responsables de acciones fitosanitarias específicas), a la documentación pertinente, a sus instalaciones o a cualquier combinación de estas. Las ONPF deberían aplicar la presente norma cuando autoricen a entidades privadas. Las ONPF también podrán decidir aplicar elementos de la presente norma cuando autoricen a entidades públicas, por ejemplo otros departamentos gubernamentales. En tales casos, la ONPF y la entidad pública determinarán la naturaleza del acuerdo de autorización. | P | OIRSA Lo elimina de traslada al apartado de definiciones, ya que se considera más pertinente. <i>Category : EDITORIAL</i> |
| 287 | 45 | En la presente norma, se consideran “entidades” los proveedores de la acción fitosanitaria (ya sean particulares, organizaciones o empresas) y, en caso pertinente, sus instalaciones (como el equipo, los laboratorios o los recintos de tratamiento). En algunos casos, la autorización de entidades podrá requerir que una ONPF dé su aprobación a personas concretas dentro de la entidad (por ejemplo, las responsables de acciones fitosanitarias específicas), a la documentación pertinente, a sus instalaciones o a cualquier combinación de estas. Las ONPF deberían aplicar la presente norma cuando autoricen a entidades privadas. Las ONPF también podrán decidir aplicar elementos de la presente norma cuando autoricen a entidades públicas, por ejemplo otros departamentos gubernamentales. En tales casos, la ONPF y la entidad pública determinarán la naturaleza del acuerdo de autorización. | C | OIRSA Habria que considerar la aplicabilidad de esta propuesta ya que podriamos asumir que la razon para que una ONPF autorice a terceros es porque no cuenta con los recursos públicos para ejecutar ciertas actividades. Si otra entidad pública cuenta con los recursos entonces se puede concluir que existen problemas de priorización dentro de una parte contratante. Este comentario más bien es en relación a la futura aplicación e implementación de la norma. <i>Category : SUBSTANTIVE</i> |
| 288 | 46 | NPPOs should ensure that their legal framework enables them to authorize entities to perform phytosanitary actions on their behalf. The NPPO’s legal framework should allow itto-it to suspend, revoke and reinstate authorizations, and should also enable an authorized entity to withdraw from the authorization programme. | P | Canada <i>Category : EDITORIAL</i> |
| 289 | 46 | NPPOs should ensure that their legal framework enables them to authorize entities to perform phytosanitary actions on their behalf. The NPPO’s legal framework should allow itto-it to suspend, revoke and reinstate authorizations, and should also enable an authorized entity to withdraw from the authorization programme. | P | Viet Nam <i>Category : SUBSTANTIVE</i> |
| 290 | 46 | NPPOs If authorizing entities, CPs should ensure that their legal framework enables them to authorize entities to perform phytosanitary actions on their behalf actions . The NPPO’s country’s legal framework should allow itto-the NPPO to suspend, revoke and reinstate authorizations, and should also enable an authorized entity to withdraw from the authorization programme. | P | EPPO This should not be part of the legal framework but of the agreement. To stress that it is up to the NPPO whether tasks are delegated to authorized entities. <i>Category : SUBSTANTIVE</i> |
| 291 | 46 | NPPOs should ensure CPs that their legal framework enables them have decided to authorize entities to perform phytosanitary actions on should ensure that their | P | European Union To stress that it is up to the NPPO whether tasks are delegated to authorized entities. |

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| | | behalf legal framework enables them to do so. The NPPO's country's legal framework should allow itto-the NPPO to suspend, revoke and reinstate authorizations, and should also enable an authorized entity to withdraw from the authorization programme. | | Category : SUBSTANTIVE |
| 292 | 46 | NPPOs should ensure that their legal framework enables them to authorize entities to perform phytosanitary actions on their behalf. The NPPO's legal framework should allow itto-it to suspend, revoke and reinstate authorizations, and should also enable an authorized entity to withdraw from the authorization programme. | P | European Union This may not be part of the legal framework. Category : SUBSTANTIVE |
| 293 | 46 | NPPOs should ensure that their legal framework enables them to authorize entities to perform phytosanitary <u>Phytosanitary</u> actions on their behalf. The NPPO's legal framework should allow itto suspend, revoke and reinstate authorizations, and should also enable an authorized entity to withdraw from the authorization programme. | P | Ghana Category : EDITORIAL |
| 294 | 46 | NPPOs should ensure that their legal framework enables them to authorize entities to perform phytosanitary actions on their behalf. <u>In the process of establishing a legal framework, the NPPO may establish a temporary contract or memorandum of understanding with the entity to be authorized.</u> The NPPO's legal framework should allow itto-it to suspend, revoke and reinstate authorizations, and should also enable an authorized entity to withdraw from the authorization programme. | P | Caribbean Agricultural Health and Food Safety Agency This is a possibility that some countries may have. Category : SUBSTANTIVE |
| 295 | 46 | <u>NPPOs If authorizing entities, CPs</u> should ensure that their legal framework enables them to authorize entities to perform phytosanitary actions on their behalf <u>behalf of the the NPPOs.</u> The NPPO's Countries' legal framework should allow itto suspend, revoke and reinstate authorizations, and should also enable an authorized entity to withdraw from the authorization programme. | P | IPPC Regional Workshop Central Asia & Central Europe With the amendments proposed the section reads as follows, in Russian: При уполномочивании юридических лиц, Договаривающиеся стороны должны обеспечить, чтобы их правовая база позволяла передавать полномочия юридическим лицам на осуществление фитосанитарных действий от мени стран НОКЗР. Правовая база Стран должна позволять ей приостанавливать, отзывать и возвращать полномочия, а также позволять уполномоченному юридическому лицу аннулировать программу передачи полномочий. Category : SUBSTANTIVE |
| 296 | 46 | NPPOs should ensure that their legal framework enables them to authorize entities to perform phytosanitary actions on their behalf <u>behalf when authorizing entities. In such cases.</u> The NPPO's legal framework should allow itto-it to suspend, revoke and reinstate authorizations, and should also enable an authorized entity to withdraw from the authorization programme. | P | Japan Legal framework should be considered when authorizing entities. Category : SUBSTANTIVE |
| 297 | 46 | NPPOs should ensure that their legal framework enables them to authorize entities to perform phytosanitary actions on their behalf. The NPPO's legal framework | C | Jamaica Updating legislation to cover international agreements can be lengthy and time consuming activity. In the process of establishing a legal framework, the NPPO may consider the establishment of a temporary MoU with the entity to be |

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| | | should allow itto suspend, revoke and reinstate authorizations, and should also enable an authorized entity to withdraw from the authorization programme. | | authorized. <i>Category : SUBSTANTIVE</i> |
| 298 | 46 | NPPOs should ensure that their legal framework enables them to authorize entities to perform phytosanitary actions on their behalf. The <i>behalf when authorizing entities.</i> In such cases, the NPPO's legal framework should allow itto <i>it to</i> suspend, revoke and reinstate authorizations, and should also enable an authorized entity to withdraw from the authorization programme. | P | APPPC (25) Japan (2 Sep 2018 10:15 AM) Legal framework should be considered when authorizing entities. <i>Category : SUBSTANTIVE</i> |
| 299 | 46 | NPPOs should ensure that their legal framework enables them to authorize entities to perform phytosanitary actions on their behalf. The NPPO's legal framework should allow itto <i>it to</i> suspend, revoke and reinstate authorizations, and should also enable an authorized entity to withdraw from the authorization programme. | P | APPPC (104) New Zealand (7 Sep 2018 6:41 AM) (82) Singapore (5 Sep 2018 12:44 PM) Missing space <i>Category : EDITORIAL</i> |
| 300 | 46 | NPPOs should ensure that their legal framework enables them to authorize entities to perform phytosanitary actions on their behalf. The NPPO's legal framework should allow itto suspend, revoke and reinstate authorizations, and should also enable an authorized entity to withdraw from the authorization programme. | C | IPPC Regional Workshop Africa NPPOs of developing countries may have potential implementation issues namely:: 1. It is difficult to easily enact laws to undertake certain phytosanitary measures. 2. It may store implementation of this ISPM in developing countries. 3. In this case NPPOs may use existing powers according to IPPS guardlines to authorize entities <i>Category : SUBSTANTIVE</i> |
| 301 | 46 | NPPOs should ensure that their legal framework enables them to authorize entities to perform phytosanitary actions on their behalf. The NPPO's legal framework should allow itto <i>it to</i> suspend, revoke and reinstate authorizations, and should also enable an authorized entity to withdraw from the authorization programme. | P | Philippines <i>Category : EDITORIAL</i> |
| 302 | 46 | NPPOs should ensure that their legal framework enables them to authorize entities to perform phytosanitary actions on their behalf. The NPPO's legal framework should allow itto suspend, revoke and reinstate authorizations, and should also enable an authorized entity to withdraw from the authorization programme. | C | Ukraine We do not support this part in whole An NPPO is authorized by the government to perform phytosanitary control. Delegating functions to other government departments is inexpedient as every government agency has to perform its own functions to fulfil certain tasks. Moreover, other government departments – to perform certain functions – will need special qualification as required by ISPM No. 7. <i>Category : SUBSTANTIVE</i> |
| 303 | 46 | NPPOs should ensure that their legal framework enables them to authorize entities to perform phytosanitary actions on their behalf. The NPPO's legal framework should allow itto <i>it to</i> suspend, revoke and reinstate authorizations, and should also enable an authorized entity to withdraw from the authorization programme. | P | Singapore <i>Category : EDITORIAL</i> |

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| 304 | 46 | <p>Las ONPF deberían asegurarse de que su marco jurídico les permita autorizar a entidades a emprender acciones fitosanitarias en su nombre. El marco jurídico de la ONPF debería permitir a esta suspender, revocar y restablecer las autorizaciones, y también debería permitir que una entidad autorizada se retire del programa de autorizaciones. Las ONPF deberían asegurar que su marco jurídico les permita autorizar a entidades a emprender acciones fitosanitarias en su nombre. El marco jurídico de la ONPF debería permitir a esta inhabilitar, suspender, revocar y restablecer las entidades autorizadas, y también debería permitir que una entidad autorizada se retire del programa de autorizaciones.</p> <p><u>El marco jurídico de la ONPF debería permitir a esta tomar las medidas necesarias para garantizar el cumplimiento de las entidades autorizadas.</u></p> | P | <p>Colombia</p> <p>Incluir que el marco jurídico de las ONPF debe permitir tomar las medidas necesarias para garantizar el cumplimiento de las entidades autorizadas.</p> <p>De igual manera se requiere cambiar "autorizaciones" por "entidades autorizadas"</p> <p><i>Category : SUBSTANTIVE</i></p> |
| 305 | 46 | <p>Las ONPF deberían asegurarse de que su marco jurídico les permita autorizar a entidades a emprender-ejecutar acciones fitosanitarias en su nombre. El marco jurídico de la ONPF debería permitir a esta suspender, revocar y restablecer las autorizaciones, y también debería permitir que una entidad autorizada se retire del programa de autorizaciones.</p> | P | <p>Costa Rica</p> <p><i>Category : EDITORIAL</i></p> |
| 1. Development of Authorization Programme | | | | |
| 306 | 47 | 1. Development of Authorization Programme Process | P | <p>EPPO</p> <p>The term "authorization programme" is not clear. More precise wording suggested in consistency with title of section 4 (Process for Audits). The term "process" is already used in the standard, e.g. in paragraph 43 and in some of the indents following paragraph 48.</p> <p><i>Category : TECHNICAL</i></p> |
| 307 | 47 | 1. Development of Authorization Programme Process | P | <p>European Union</p> <p>The term "authorization programme" is not clear. More precise wording suggested in consistency with the title of section 4 (Process for Audits). The term "process" is already used in the standard, e.g. in paragraph 43 and in some of the indents following paragraph 48.</p> <p><i>Category : TECHNICAL</i></p> |
| 308 | 47 | 1-2. Authorization Programme Development of Authorization Programme | P | <p>APPPC</p> <p>(47) Thailand (5 Sep 2018 12:03 PM)</p> <ul style="list-style-type: none"> - re-numbering - The term "Development" should be deleted due to its redundancy. <p><i>Category : EDITORIAL</i></p> |

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| 309 | 47 | 1. Development of Authorization Programme | C | IPPC Regional Workshop Africa NPPOs should ensure that their Legal framework caters for implementation of the standard <i>Category : SUBSTANTIVE</i> |
| 310 | 47 | 12. Development of Authorization Programme | P | Thailand The term "Development" should be deleted due to its redundancy. <i>Category : EDITORIAL</i> |
| 311 | 48 | The NPPO should define its objectives for, and develop <u>requirements for developing</u> , an authorization programme that is appropriate for its purposes. When developing an authorization programme, the NPPO should: | P | Panama The NPPO should define also the requirements <i>Category : TECHNICAL</i> |
| 312 | 48 | The If authorizing entities, the NPPO should define <u>its the scope and the</u> objectives for, and develop, develop an authorization <u>programme-process</u> that is appropriate for its purposes. When developing an authorization <u>programme-process</u> , the NPPO should: | P | EPPO Easier to read. To stress that it is up to the NPPO whether tasks are delegated to authorized entities. The scope is also an important element. The term "authorization programme" is not clear. The term "process" is suggested (it is already used in the standard, e.g. in paragraph 43 and in some of the indents following paragraph 48). <i>Category : TECHNICAL</i> |
| 313 | 48 | The If authorizing entities, the NPPO should define <u>its the scope and the</u> objectives for, and develop, an authorization programme that is appropriate for its purposes. When developing an authorization programme, the NPPO should: | P | European Union To stress that it is up to the NPPO whether tasks are delegated to authorized entities. The scope is also an important element. <i>Category : TECHNICAL</i> |
| 314 | 48 | The NPPO should define its objectives for, and develop, develop an authorization programme that is appropriate for its purposes. When developing an authorization programme, the NPPO should: | P | European Union Easier to read. <i>Category : EDITORIAL</i> |
| 315 | 48 | The NPPO should define its objectives for, and develop, an authorization <u>programme-process</u> that is appropriate for its purposes. When developing an authorization <u>programme-process</u> , the NPPO should: | P | European Union The term "authorization programme" is not clear. The term "process" is suggested (it is already used in the standard, e.g. in paragraph 43 and in some of the indents following paragraph 48). <i>Category : TECHNICAL</i> |
| 316 | 48 | The NPPO should define its objectives for requirements for developing, and develop , an authorization programme that is appropriate for its purposes. When developing an authorization programme, the NPPO should: | P | Costa Rica The NPPO should define also the requirements <i>Category : TECHNICAL</i> |
| 317 | 48 | The If the national law allows it, the NPPO should define its objectives for, and develop, an authorization programme that is appropriate for its purposes. When developing an authorization programme, the NPPO should: | P | NEPPO <i>Category : SUBSTANTIVE</i> |
| 318 | 48 | The NPPO should define its objectives for, and develop, an authorization programme that is appropriate for its purposes. When developing an authorization programme, the NPPO should: | P | Montenegro <i>Category : TECHNICAL</i> |

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| 319 | 49 | develop and establish the requirements that must be met in order for an entity to be authorized to carry out specific phytosanitary actions on behalf of the NPPO <u>49 bis: - identify the risks which may arise from authorization and which need to be managed through the authorization process</u> | P | European Union New indent added. Risks need to be identified so that they can be managed effectively including through the development of contingency plans. See para 59. <i>Category : SUBSTANTIVE</i> |
| 320 | 49 | develop and establish the requirements that must be met in order for an entity to be authorized to carry out specific phytosanitary actions on behalf of the NPPO <u>actions</u> | P | European Union These words are not needed and may create confusion, see also remark on paragraph 44. <i>Category : SUBSTANTIVE</i> |
| 321 | 49 | develop and establish set the requirements that must be met in order for by an entity to be authorized to carry out specific phytosanitary actions on behalf of the NPPO | P | European Union Better wording. <i>Category : EDITORIAL</i> |
| 322 | 49 | develop and establish set the requirements that must be met in order for by an entity to be authorized to carry out specific phytosanitary actions on behalf of <u>actions</u> <u>49 bis: identify the NPPO risks which may arise from authorization and which need to be managed through the authorization process</u> | P | EPPO These words are not needed and may create confusion, see also remark on paragraph 44. Better wording New indent added. Risks need to be identified so that they can be managed effectively including through the development of contingency plans. See para 59. <i>Category : SUBSTANTIVE</i> |
| 323 | 49 | develop and establish the requirements that must be met in order for an entity to be authorized to carry out specific phytosanitary <u>Phytosanitary</u> actions on behalf of the NPPO | P | Ghana <i>Category : EDITORIAL</i> |
| 324 | 49 | develop and establish the requirements that must be met in order for an entity to be authorized to carry out specific phytosanitary actions on its behalf of the NPPO | P | Caribbean Agricultural Health and Food Safety Agency <i>Category : EDITORIAL</i> |
| 325 | 49 | develop and establish the requirements that must be met in order for an entity to be authorized to carry out specific phytosanitary actions on behalf of the NPPO | C | Ukraine The standard should define criteria with requirements that must be met in order for an entity to be authorized to carry out specific phytosanitary actions <i>Category : SUBSTANTIVE</i> |
| 326 | 49 | develop and establish the requirements that must be met in order for an entity to be authorized to carry out specific phytosanitary actions on behalf of the NPPO | P | Argentina To avoid repetition. <i>Category : EDITORIAL</i> |
| 327 | 49 | develop and establish the requirements that must be met in order for an entity to be authorized to carry out specific phytosanitary actions on behalf of the NPPO <u>authorized</u> | P | Uruguay To avoid repetition <i>Category : EDITORIAL</i> |
| 328 | 49 | develop and establish the requirements that must be met in order for an entity to be authorized to carry out specific phytosanitary actions on behalf of the NPPO <u>authorized.</u> | P | COSAVE To avoid repetition. <i>Category : EDITORIAL</i> |

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| 329 | 49 | formular y establecer los requisitos que deben cumplirse para que una entidad sea autorizada a emprender acciones fitosanitarias específicas en nombre de la ONPF; <u>- Contar con procedimientos y herramientas que permita realizar seguimiento en tiempo real de las actividades asignadas a la empresa autorizada.</u> | P | Colombia Incluir que la ONPF cuente con mecanismo de seguimiento que permita llevar control en tiempo real, permitirá verificar el estado de cumplimiento de cada actividad. <i>Category : SUBSTANTIVE</i> |
| 330 | 49 | formular y establecer los requisitos que deben cumplirse para que una entidad sea autorizada a emprender acciones fitosanitarias específicas en nombre de la ONPF; <u>- Elaborar procedimientos de manejo y entrega de la información, así como de la confidencialidad de esta.</u> | P | Colombia Incluir procedimientos de manejo y entrega de la información, así como la confidencialidad de ésta. La información levantada por las entidades autorizadas a realizar acciones fitosanitarias, solo debe ser entregada a la ONPF contratante. <i>Category : SUBSTANTIVE</i> |
| 331 | 49 | formular y establecer los requisitos que deben cumplirse para que una entidad sea autorizada a emprender-ejecutar acciones fitosanitarias específicas en nombre de la ONPF; | P | Costa Rica <i>Category : EDITORIAL</i> |
| 332 | 50 | develop an initiation and approval process for authorizing entities <u>50 bis: - determine a validity period for authorization, and arrangements for review and prolongation if appropriate</u> | P | European Union A new indent has been added as it is essential to set duration for authorization. <i>Category : TECHNICAL</i> |
| 333 | 50 | develop an initiation and approval process for authorizing entities | P | European Union Not clear what the initiation process is. <i>Category : SUBSTANTIVE</i> |
| 334 | 50 | develop an initiation and approval process for authorizing entities <u>50 bis: determine a validity period for authorization, and arrangements for review and prolongation if appropriate</u> | P | EPPO Not clear what the initiation process is. New indent added. Risks need to be identified so that they can be managed effectively including through the development of contingency plans. See para 59. <i>Category : SUBSTANTIVE</i> |
| 335 | 50 | develop an initiation and approval process for authorizing entities | C | Ukraine define conditions or criteria that must be met in order for an entity to be authorized. <i>Category : SUBSTANTIVE</i> |
| 336 | 50 | develop an initiation-application and approval process for authorizing entities | P | Argentina The NPPO should develop a process describing how entities should apply for authorization. <i>Category : TECHNICAL</i> |
| 337 | 50 | develop an initiation-application and approval process for authorizing entities | P | Uruguay The NPPO should develop a process describing how entities should apply for authorization <i>Category : TECHNICAL</i> |
| 338 | 50 | develop an initiation-application and approval process for authorizing entities | P | COSAVE The NPPO should develop a process describing how entities should apply for authorization. |

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| | | | | <i>Category : TECHNICAL</i> |
| 339 | 50 | elaborar un procedimiento de inicio - <u>aplicación</u> y aprobación para la autorización de entidades; | P | Costa Rica <i>Category : EDITORIAL</i> |
| 340 | 51 | develop a training plan to ensure that NPPO personnel are trained and obtain <u>have</u> the expertise to manage the authorization programme | P | European Union Better English. <i>Category : EDITORIAL</i> |
| 341 | 51 | develop a training plan to ensure that NPPO personnel are trained and obtain the expertise to manage the authorization programme <u>process</u> | P | European Union The term "authorization programme" is not clear. The term "process" is suggested (it is already used in the standard, e.g. in paragraph 43 and in some of the indents following paragraph 48). <i>Category : TECHNICAL</i> |
| 342 | 51 | develop a training plan to ensure that NPPO personnel are trained and obtain <u>have</u> the expertise to manage the authorization programme <u>process</u> | P | EPPO The term "authorization programme" is not clear. The term "process" is suggested (it is already used in the standard, e.g. in paragraph 43 and in some of the indents following paragraph 48). Better English <i>Category : EDITORIAL</i> |
| 343 | 51 | develop a training plan to ensure that NPPO personnel <u>responsible for managing the authorization programme</u> are trained and obtain the expertise to manage the authorization programme | P | APPPC (120) New Zealand (7 Sep 2018 7:30 AM) <i>Category : EDITORIAL</i> |
| 344 | 52 | identify minimum training, skills and competency requirements for entities to perform phytosanitary actions, these requirements being at least should be equivalent to those required for NPPO personnel to undertake the same phytosanitary actions | P | Panama For consistency with the ISPM 7. <i>Category : TECHNICAL</i> |
| 345 | 52 | identify minimum training, skills and competency requirements for entities to perform phytosanitary actions, these requirements being at least equivalent to those required for NPPO personnel to undertake the same phytosanitary actions <u>- Develop a system to provide training for the authorized entities</u> | P | Sri Lanka The entities should be aware on the new standards, new phytosanitary requirements of other importing contracting parties, and any changes in procedures /technologies etc. <i>Category : TECHNICAL</i> |
| 346 | 52 | identify minimum training, skills - <u>equipment</u> and competency - <u>skills</u> requirements for entities to perform phytosanitary actions, these requirements being at least equivalent to those required for NPPO personnel - <u>resources if they were</u> to undertake the same phytosanitary actions | P | European Union To avoid use of competency which has two different meanings and include equipment which is important for some actions. The NPPO staff only has to fulfil the requirements if they do perform these actions. <i>Category : TECHNICAL</i> |
| 347 | 52 | identify minimum training, skills - <u>equipment</u> , and competency - <u>skills</u> requirements for entities to perform phytosanitary actions, these requirements being at least equivalent to those required for NPPO personnel - <u>resources if they were</u> to undertake the same phytosanitary actions | P | EPPO To avoid use of competency which has two different meanings and include equipment which is important for some actions. The NPPO staff only has to fulfil the requirements if they do |

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| | | | | perform these actions. <i>Category : TECHNICAL</i> |
| 348 | 52 | identify minimum training, skills and competency requirements for entities to perform phytosanitary <u>Phytosanitary</u> actions, these requirements being at least equivalent to those required for NPPO personnel to undertake the same phytosanitary <u>Phytosanitary</u> actions | P | Ghana <i>Category : EDITORIAL</i> |
| 349 | 52 | identify minimum training, <u>equipment</u> , skills and competency requirements for entities to perform phytosanitary actions, these requirements being at least equivalent to those required for NPPO personnel <u>resources</u> to undertake the same phytosanitary actions | P | IPPC Regional Workshop Central Asia & Central Europe With the improvement suggested the paragraph reads as follows in Russian: определить минимальные требования к уровню подготовки, оборудования, навыков и компетенции, необходимые для юридических лиц, чтобы осуществлять фитосанитарные действия. Эти требования должны быть по меньшей мере эквивалентны тем, что предъявляются к человеческим ресурсам НОКЗР для осуществления тех же фитосанитарных действий; <i>Category : TECHNICAL</i> |
| 350 | 52 | identify minimum training, skills and competency requirements for entities to perform phytosanitary actions, these requirements being at least should be equivalent to those required for NPPO personnel to undertake the same phytosanitary actions | P | Costa Rica For consistency with the ISPM 7 <i>Category : TECHNICAL</i> |
| 351 | 52 | identify minimum training, skills and competency requirements for entities to perform phytosanitary actions, these requirements being at least should be equivalent to those required for NPPO personnel to undertake the same phytosanitary actions | P | Argentina For consistency with the ISPM 7. <i>Category : TECHNICAL</i> |
| 352 | 52 | identify minimum training, skills and competency requirements for entities to perform phytosanitary actions, these requirements being at least should be equivalent to those required for NPPO personnel to undertake the same phytosanitary actions | P | Uruguay For consistency with ISPM 7 <i>Category : TECHNICAL</i> |
| 353 | 52 | identify minimum training, skills and competency requirements for entities to perform phytosanitary actions, these requirements being at least should be equivalent to those required for NPPO personnel to undertake the same phytosanitary actions | P | COSAVE For consistency with the ISPM 7. <i>Category : TECHNICAL</i> |
| 354 | 53 | develop a template arrangement, such as a contract or a memorandum of understanding, that can be used to formalize the authorization of entities | P | Panama The formalization of authorization not necessarily implies an arrangement. It is better to keep wording more general. <i>Category : TECHNICAL</i> |
| 355 | 53 | develop a template legally binding arrangement, such as a contract or a memorandum of understanding, that can be used to formalize the authorization of entities | P | European Union To avoid restricting terms which can be used for such an arrangement and make clear that it is legally binding. For example the arrangement could be set out in legislation. |

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| 356 | 53 | develop a template arrangement, such as a contract or a memorandum of understanding, legally binding arrangement that can be used to formalize the authorization of entities | P | EPPO To avoid restricting terms which can be used for such an arrangement and make clear that it is legally binding. For example the arrangement could be set out in legislation. <i>Category : TECHNICAL</i> |
| 357 | 53 | develop a template arrangement, such as a contract or a memorandum of understanding, that can be used <u>an agreement</u> to formalize the authorization of entities | P | IPPC Regional Workshop Central Asia & Central Europe With the changes made the paragraph reads as follows, in Russian: разработать для придания официального статуса передач полномочий юридическим лицам; <i>Category : SUBSTANTIVE</i> |
| 358 | 53 | develop a template arrangement, such as a contract or a memorandum of understanding, that can be used to formalize the authorization of entities | P | Costa Rica The formalization of authorization not necessarily implies an arrangement. It is better to keep wording more general. <i>Category : TECHNICAL</i> |
| 359 | 53 | develop a template arrangement, such as a contract or a memorandum of understanding, that can be used to formalize the authorization of entities | C | Mauritius develop standard operating practices (SOP) for the specific activities (proposed to add this additional requirement to the list) <i>Category : TECHNICAL</i> |
| 360 | 53 | develop a template arrangement, such as a contract or a memorandum of understanding, that can be used to formalize the authorization of entities | C | Ukraine This should be a contract as it the most suitable legal form for that. Suggested version: develop a contract authorizing an entity to perform certain phytosanitary actions, as well as review and update it as and when necessary. <i>Category : SUBSTANTIVE</i> |
| 361 | 53 | develop a template arrangement, such as a contract or a memorandum of understanding, that can be used to formalize the authorization of entities | P | Argentina The formalization of authorization not necessarily implies an arrangement. It is better to keep wording more general. <i>Category : TECHNICAL</i> |
| 362 | 53 | develop a template arrangement, such as a contract or a memorandum of understanding, that can be used to formalize the authorization of entities | P | Uruguay The formalization of authorization not necessarily implies an arrangement. It is better to keep wording more general. <i>Category : TECHNICAL</i> |
| 363 | 53 | develop a template arrangement, such as a contract or a memorandum of understanding, that can be used to formalize the authorization of entities | P | COSAVE The formalization of authorization not necessarily implies an arrangement. It is better to keep wording more general. <i>Category : TECHNICAL</i> |
| 364 | 53 | mettre au point un document type, par exemple un contrat ou un protocole d'accord, pouvant servir à formaliser l'autorisation d'organismes <u>aux organismes</u> ; | P | Chad correction du paragraphe 53 pour compréhension <i>Category : EDITORIAL</i> |
| 365 | 54 | develop performance criteria <u>criteria and guidelines for the actions performed by the entities</u> | P | European Union It would be useful to have examples of appropriate performance criteria from the phytosanitary perspective in an appendix. <i>Category : TECHNICAL</i> |

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| 366 | 54 | develop performance criteria <u>criteria and guidelines for the actions performed by the entities</u> | P | EPPO It would be useful to have examples of appropriate performance criteria from the phytosanitary perspective in an appendix. <i>Category : TECHNICAL</i> |
| 367 | 54 | develop performance criteria <u>criteria and guidelines for the tasks performed by the entities</u> | P | IPPC Regional Workshop Central Asia & Central Europe With the addition the paragraph reads as follows in Russian: разработать критерии результативности и руководства по задачам, выполняемым юридическими лицами <i>Category : TECHNICAL</i> |
| 368 | 54 | develop performance criteria | C | Ukraine It is necessary to define specific performance criteria taking into account the nature of functions authorized to be performed Suggested version: define specific performance criteria taking into account the nature of functions authorized to be performed <i>Category : SUBSTANTIVE</i> |
| 369 | 55 | develop an audit process and supporting tools, including audit checklists and corrective action reports <u>- Develop a monitoring (or supervision) program to ensure continues compliance and delivery of quality service</u> | P | Panama The concept for audit and monitoring is diferent. Audits are more structure and periodic meanwhile monitoring is more continues and less structure. <i>Category : TECHNICAL</i> |
| 370 | 55 | develop an audit process and supporting tools, including audit checklists and <u>audit report template comprising of form for</u> corrective <u>and preventive</u> action reports | P | Viet Nam <i>Category : SUBSTANTIVE</i> |
| 371 | 55 | develop an audit process and supporting tools, including audit checklists-checklists, <u>audit report template</u> and <u>forms for</u> corrective action reports <u>actions and preventive actions.</u> | P | Korea, Republic of <i>Category : SUBSTANTIVE</i> |
| 372 | 55 | develop an audit process and supporting tools, including audit checklists and corrective action reports | C | United States of America Ensure consistency with the upcoming ISPM on audit. <i>Category : TECHNICAL</i> |
| 373 | 55 | develop an audit process and supporting tools, including audit checklists-checklists, <u>audit report template</u> and <u>forms for</u> corrective <u>and preventive</u> action reports <u>request for nonconformities.</u> | P | APPPC (48) Thailand (5 Sep 2018 12:07 PM) Thailand would like to revise the detail of audit supporting tools to be in line with the common terms used in a certification system. In addition, corrective action report is a document that must be submitted by an auditee after receiving a corrective action request (CAR) from an auditor (NPPO). <i>Category : SUBSTANTIVE</i> |
| 374 | 55 | develop an audit process and supporting tools, including audit checklists and corrective action reports <u>reports</u> <u>- Develop and monitoring (or supervision) program to ensure continues compliance and delivery quality service</u> | P | Costa Rica The concept for audit and monitoring is diferent. Audits are more structure and periodic meanwhile monitoring is more continues and less structure. <i>Category : TECHNICAL</i> |

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| 375 | 55 | develop an audit process and supporting tools, including audit checklists and <u>audit report template comprising of forms for</u> corrective <u>and preventive</u> action reports <u>request for nonconformity.</u> | P | Thailand Thailand would like to revise the detail of audit supporting tools to be in line with the common terms used in a certification system. In addition, corrective action report is a document that must be submitted by an auditee after receiving a corrective action request (CAR) from an auditor (NPPO). <i>Category : SUBSTANTIVE</i> |
| 376 | 55 | elaborar un procedimiento de auditoría y herramientas de apoyo, en particular listas de control e informes sobre las acciones correctivas; <u>[56] Develop a monitoring (or supervision) program to ensure continuous compliance and delivery of quality service</u> | P | OIRSA El concepto de auditoría y monitoreo son diferentes. Auditorías son más estructuradas y periódicas mientras que monitoreo es más continuo y menos estructurado. En nuestro contexto se requieren de los dos elementos. <i>Category : SUBSTANTIVE</i> |
| 377 | 55 | elaborar un procedimiento de auditoría y herramientas de apoyo, en particular listas de control e informes sobre las acciones correctivas; <u>- elaborar un programa de monitoreo (o supervisión) para asegura el cumplimiento continuo y entrega de servicio de calidad.</u> | P | Costa Rica El concepto de auditoría y monitoreo son diferentes. Auditorías son más estructuradas y periódicas mientras que monitoreo es más continuo y menos estructurado. En nuestro contexto se requieren de los dos elementos. <i>Category : SUBSTANTIVE</i> |
| 378 | 56 | develop criteria to determine noneonformities <u>non-conformities</u> | P | Japan <i>Category : EDITORIAL</i> |
| 379 | 57 | develop a process to address noneonformity <u>non-conformity</u> , this including, where appropriate, suspending or revoking authorization | P | Japan <i>Category : EDITORIAL</i> |
| 380 | 58 | develop a process for the entity to voluntarily withdraw from the authorization programme <u>- develop a process for the NPPO to remove/ blacklist the entity from the authorization programme</u> | P | Sri Lanka If the NPPO has identified that the authorized entity has failed performing authorized duties, there should be a way to remove the authorization of the company <i>Category : TECHNICAL</i> |
| 381 | 58 | develop a process for the entity to voluntarily withdraw from the authorization programme <u>arrangement</u> | P | European Union The term "authorization programme" is not clear. The term "arrangement" is suggested (it is used e.g. in paragraphs 45, 53 and 64). <i>Category : TECHNICAL</i> |
| 382 | 58 | develop a process for the <u>authorized</u> entity to voluntarily withdraw from the authorization programme | P | European Union We believe it helps to specify this. <i>Category : EDITORIAL</i> |
| 383 | 58 | develop a process for the <u>authorized</u> entity to voluntarily withdraw from the authorization programme <u>arrangement</u> | P | EPPO The term "authorization programme" is not clear. The term "arrangement" is suggested (it is used e.g. in paragraphs 45, 53 and 64). it helps to specify this aspect <i>Category : EDITORIAL</i> |

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| 384 | 59 | develop <u>and maintain</u> a contingency plan for business continuity <u>of action</u> in the event that an authorized entity <u>had its authorization suspended, revoked or</u> has withdrawn from the authorization programme or had its authorization suspended or <u>revokedprogramme</u> | P | European Union Section improved to put in order of importance the reasons why an entity may lose its authorization. <i>Category : TECHNICAL</i> |
| 385 | 59 | develop a contingency plan for business continuity in the event that an authorized entity has withdrawn from the authorization programme <u>arrangement</u> or had its authorization suspended or revoked | P | European Union The term "authorization programme" is not clear. The term "arrangement" is suggested (it is used e.g. in paragraphs 45, 53 and 64). <i>Category : TECHNICAL</i> |
| 386 | 59 | develop <u>and maintain</u> a contingency plan for business continuity <u>of action</u> in the event that an authorized entity <u>had its authorization suspended, revoked or</u> has withdrawn from the authorization programme or had its authorization suspended or <u>revokedarrangement</u> | P | EPPO The term "authorization programme" is not clear. The term "arrangement" is suggested (it is used e.g. in paragraphs 45, 53 and 64). Section improved to put in order of importance the reasons why an entity may lose its authorization. <i>Category : TECHNICAL</i> |
| 387 | 59 | develop a contingency plan for business continuity in the event that an authorized entity has withdrawn from the authorization programme or had its authorization suspended or revoked | C | United States of America Please clarify the meaning (possibly with examples). Such requirement can put an unnecessary burden on the NPPO. Usually these are part of a national policy or a specific agreement with third parties. How in practical terms should the NPPO be providing business continuity? Usually the program would stop. <i>Category : TECHNICAL</i> |
| 388 | 59 | develop a contingency plan for business continuity in the event that an authorized entity has withdrawn <u>entity withdraws</u> from the authorization programme or had <u>has</u> its authorization suspended or revoked | P | APPPC (122) New Zealand (7 Sep 2018 7:32 AM) <i>Category : EDITORIAL</i> |
| 389 | 60 | develop a process to ensure efficient and effective communication between the NPPO and the authorized entity. <u>- Develop a process for management of information and also its confidentiality</u> | P | Panama The NPPO should be responsible for the management of the confidentiality of the information <i>Category : TECHNICAL</i> |
| 390 | 60 | develop a process to ensure efficient and effective communication between the NPPO and the authorized entity. <u>- develop a process the list of authorized entities and update the records.</u> | P | Viet Nam to add a new bullet relating to the records and updating the list of authorization entities as a part of the authorization program <i>Category : SUBSTANTIVE</i> |
| 391 | 60 | develop a process to ensure efficient and effective communication between the NPPO and the authorized entity- <u>60 bis: - develop a clear statement of liability for damages if these result from actions performed by an authorized entity.</u> | P | European Union It is suggested to add a new indent to cover the aspect of liability. This includes reference to the development of a clear statement of liability for damages if these result from actions performed by an authorized entity. <i>Category : SUBSTANTIVE</i> |
| 392 | 60 | develop a process to ensure efficient and effective communication between the NPPO and the authorized entity <u>entity including reporting by the entity to the NPPO.</u> | P | European Union To make clear that it includes reporting by the entity to the NPPO. <i>Category : TECHNICAL</i> |

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| 393 | 60 | develop a process to ensure efficient and effective communication between the NPPO and the authorized entity <u>entity including reporting by the entity to the NPPO.</u> <u>60 bis: develop a clear statement of liability for damages if these result from actions performed by an authorized entity</u> | P | EPPO To make clear that it includes reporting by the entity to the NPPO. It is suggested to add a new indent to cover the aspect of liability. This includes reference to the development of a clear statement of liability for damages if these result from actions performed by an authorized entity. <i>Category : TECHNICAL</i> |
| 394 | 60 | develop a process to ensure efficient and effective communication between the NPPO and the authorized entity. <u>- develop a process to publicize and update the list of authorized entities.</u> | P | APPPC (49) Thailand (5 Sep 2018 12:09 PM) Thailand would like to add a new bullet relating to the publication and updating the list of authorization entities as a part of the authorization program. <i>Category : SUBSTANTIVE</i> |
| 395 | 60 | develop a process to ensure efficient and effective communication between the NPPO and the authorized entity. <u>- define a deadline for the authorisation</u> | P | NEPPO <i>Category : SUBSTANTIVE</i> |
| 396 | 60 | develop a process to ensure efficient and effective communication between the NPPO and the authorized entity. <u>- develop a process for collecting public opinion about entities on their efficient discharge pf phytosanitary action</u> <u>- develop a process to ensure efficient and effective resolution of conflicts between the entity and it's client</u> <u>- develop a process to ensure efficient and effective resolution of damages that may occur for non performance of the entity at any court of competent jurisdiction</u> | P | IPPC Regional Workshop Africa Created by merging other changes together <i>Category : SUBSTANTIVE</i> |
| 397 | 60 | develop a process to ensure efficient and effective communication between the NPPO and the authorized entity- <u>- develop a process for managment and delivery of information and also its confidentiality</u> | P | Costa Rica The NPPO should be responsible for the managment of the confidentiality of the information <i>Category : TECHNICAL</i> |
| 398 | 60 | develop a process to ensure efficient and effective communication between the NPPO and the authorized entity. <u>- develop a process to publicize and update the list of authorized entities.</u> | P | Thailand Thailand would like to add a new bullet relating to the publication and updating the list of authorization entities as a part of the authorization program. <i>Category : SUBSTANTIVE</i> |
| 399 | 60 | develop a process to ensure efficient and effective communication between the NPPO and the authorized entity. <u>- develop a process for collecting public opinion about entities on their efficient discharge of phytosanitary action.</u> | P | Eritrea <i>Category : SUBSTANTIVE</i> |

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| 2. Criteria for Eligibility of Entities | | | | |
| 400 | 61 | 23. Criteria for Eligibility of Entities | P | Thailand re-numbering <i>Category : EDITORIAL</i> |
| 401 | 61 | 2. Criterios que han de cumplir las entidades | C | OIRSA Se debe de contar con un sistema de aprobación: evaluación legal de documentos y de la resolución de aprobación <i>Category : TECHNICAL</i> |
| 402 | 62 | The If authorizing entities, the NPPO should ensure that the entity meets the following criteria: | P | IPPC Regional Workshop Central Asia & Central Europe To be coherent with comment above (para 44) <i>Category : EDITORIAL</i> |
| 403 | 62 | The NPPO should ensure that the entity meets the following criteria: | P | Montenegro <i>Category : TECHNICAL</i> |
| 404 | 63 | it has legal status to operate in the country of authorization | C | PPPO further clarification needed <i>Category : SUBSTANTIVE</i> |
| 405 | 63 | l'organisme dispose du statut juridique lui permettant de travailler dans le pays d'autorisation qui lui donne l'autorisation; | P | Chad correction du paragraphe 63 pour la compréhension <i>Category : EDITORIAL</i> |
| 406 | 64 | it has the ability to enter into a formal <u>an official</u> arrangement with the NPPO | P | European Union Arrangement should be official, not only formal on the paper. <i>Category : SUBSTANTIVE</i> |
| 407 | 64 | it has the ability to enter into a formal <u>official</u> arrangement with the NPPO | P | EPPO Arrangement should be official, not only formal on the paper. <i>Category : SUBSTANTIVE</i> |
| 408 | 64 | it has the ability <u>capability</u> to enter into a formal arrangement with the NPPO | P | PPPO replace ability with capability <i>Category : EDITORIAL</i> |
| 409 | 64 | it has the ability to enter into a formal <u>an</u> arrangement with the NPPO | P | Ukraine <i>Category : TECHNICAL</i> |
| 410 | 64 | it has the ability to enter into a formal arrangement with the NPPO | P | Argentina Bullet deleted because is covered by first bullet and for consistency with the changes in paragraph 53. <i>Category : TECHNICAL</i> |
| 411 | 64 | it has the ability to enter into a formal arrangement with the NPPO | P | Uruguay Bullet deleted because is covered by THE first bullet and for consistency with changes proposed in paragraph 53. <i>Category : TECHNICAL</i> |
| 412 | 64 | it has the ability to enter into a formal arrangement with the NPPO | P | COSAVE Bullet deleted because is covered by first bullet and for consistency with the changes in paragraph 53. <i>Category : TECHNICAL</i> |

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| 413 | 64 | tener capacidad <u>poder legal</u> para establecer <u>suscribir</u> un acuerdo formal con la ONPF; | P | OIRSA Mejora la comprensión, la persona que representa la entidad debe tener las calidades legales necesarias para poder firma un acuerdo por lo que se considera que es pertinente aclarar dicha condición <i>Category : TECHNICAL</i> |
| 414 | 64 | tener capacidad <u>poder legal</u> para establecer <u>suscribir</u> un acuerdo formal con la ONPF; | P | Costa Rica Quien suscriba un acuerdo debe ser el representante legal de la entidad que se va a autorizar de lo contrario no tendría validez <i>Category : TECHNICAL</i> |
| 415 | 65 | it has sufficient resources (financial and human), including the expertise, equipment and infrastructure required, to undertake the specific phytosanitary actions and to ensure continuity of service <u>continuity of service</u> | P | United States of America See U.S. comment on paragraph 59 <i>Category : TECHNICAL</i> |
| 416 | 65 | it has sufficient resources (financial and human), including the expertise <u>expertise (well qualified staff)</u> , equipment and infrastructure required, to undertake the specific phytosanitary actions and to ensure continuity of service | P | NEPPO <i>Category : SUBSTANTIVE</i> |
| 417 | 66 | it agrees to conform with the requirements set by the NPPO, including submitting to the NPPO its documented quality management system, this including a documented quality manual and standard operating procedures (an NPPO may determine that a quality manual is not required, and that other documentation may be sufficient <u>satisfactory</u> , hereafter referred to as “documentation in lieu of a quality manual”; standard operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and how)) | P | Canada More appropriate term. <i>Category : EDITORIAL</i> |
| 418 | 66 | it agrees to conform with the requirements set by the NPPO, including submitting to the NPPO its documented quality management system, this including a documented quality manual and standard operating procedures (an NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”; standard operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and how)) | C | Panama Spanish version require review to be aligned with the english version <i>Category : TRANSLATION</i> |
| 419 | 66 | it agrees to conform with the requirements set by the NPPO, including submitting to the NPPO its documented quality management system, this including a documented quality manual and standard operating procedures (an NPPO may determine that a quality manual is not required, and that other documentation may be sufficient,) hereafter referred to as “documentation in lieu of a quality manual”; standard operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and how)) | P | Sri Lanka A quality manual should be available as a mandatory requirement <i>Category : SUBSTANTIVE</i> |
| 420 | 66 | it agrees to conform with the requirements set by the NPPO, including submitting to the NPPO its documented quality management system, this including. This <u>system should include</u> a documented quality manual and standard operating | P | European Union Improvement. <i>Category : EDITORIAL</i> |

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| | | procedures (an-procedures. An NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”; standard. Standard operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and how))how). | | |
| 421 | 66 | it agrees to conform with the requirements set by the NPPO, including submitting to the NPPO its documented quality management system, this including. This system should include a documented quality manual and standard operating procedures (an-procedures. An NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”; standard. Standard operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and how))how). | P | EPPO <i>Category : EDITORIAL</i> |
| 422 | 66 | it agrees to conform with the requirements set by the NPPO, including submitting to the NPPO its documented quality management system, this including a documented quality manual and standard operating procedures (an NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”; standard operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and how)) | C | PPPO the understanding that the standard operating procedures should have a mechanism for conflict management <i>Category : TECHNICAL</i> |
| 423 | 66 | it agrees to conform with the requirements set by the NPPO, including submitting to the NPPO its documented quality management system <u>system (where applicable)</u> , this including a documented quality manual and standard operating procedures (an NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”; standard operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and how)) | P | Australia There are programs where an officer is authorised and the NPPO writes the instructional material <i>Category : TECHNICAL</i> |
| 424 | 66 | it agrees to conform with the requirements set by the NPPO, including submitting to the NPPO its documented quality management system, this including a documented quality manual and standard operating procedures (an NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”; standard operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and how)) | C | New Zealand Suggest only having requirements that apply to the quality management system (QMS) rather than mixing requirements of the QMS with requirements of the quality manual, which forms part of the QMS along with the standard operating procedure (SOP). It is confusing to state that other documents can be used in lieu of only the quality manual. Surely the NPPO could also determine that other documents can be used in lieu of entity developed SOPs also. <i>Category : SUBSTANTIVE</i> |

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| 425 | 66 | it agrees to conform with the requirements set by the NPPO, including submitting to the NPPO its documented quality management system, this including a documented quality manual and standard operating procedures (an NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”; standard operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, <u>whom</u> , where and how)) | P | APPPC (6) Nepal (9 Aug 2018 5:09 PM) <i>Category : EDITORIAL</i> |
| 426 | 66 | it agrees to conform with the requirements set by the NPPO, including submitting to the NPPO its documented <u>quality management system information</u> , this including a <u>documented</u> quality manual and standard operating procedures (an NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”; standard operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and how)) | P | APPPC (51) Thailand (5 Sep 2018 12:10 PM) The term "documented information" may be more appropriate in this context as it is more perceivable and has already been used in ISO9001:2015. <i>Category : SUBSTANTIVE</i> |
| 427 | 66 | it agrees to conform with the requirements set by the NPPO, including submitting to the NPPO its documented quality management system, this including a documented quality manual and standard operating <u>procedures (an procedures. An</u> NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”; standard operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and how)) | P | APPPC (123) New Zealand (7 Sep 2018 7:36 AM) Suggest only having requirements that apply to the quality management system (QMS) rather than mixing requirements of the QMS with requirements of the quality manual, which forms part of the QMS along with the standard operating procedure (SOP). It is confusing to state that other documents can be used in lieu of only the quality manual. Surely the NPPO could also determine that other documents can be used in lieu of entity developed SOPs also. <i>Category : TECHNICAL</i> |
| 428 | 66 | it agrees to conform with the requirements set by the NPPO, including submitting to the NPPO its documented quality management <u>system or an equivalent documented system, this including. The documented quality management system includes</u> a documented quality manual and standard operating procedures <u>(an NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”; standard (standard</u> operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and how)) | P | APPPC (133) Japan (7 Sep 2018 6:44 PM) The concept of quality management system is developed based on the ISO9001 but equivalent documented system is enough to authorize entities. <i>Category : SUBSTANTIVE</i> |
| 429 | 66 | it agrees to conform with the requirements set by the NPPO, including submitting to the NPPO its documented quality management system, this <u>including include</u> a documented quality manual and standard operating procedures (an NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”; | P | Egypt <i>Category : EDITORIAL</i> |

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| | | standard operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and how)) | | |
| 430 | 66 | it agrees to conform with the requirements set by the NPPO, including submitting to the NPPO its documented quality management system, this including a documented quality manual and standard operating procedures (an NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”; standard operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and how)) | P | Mexico It is necessary to describe in detail how it will be carried out, since the NPPO must guarantee that the phytosanitary actions are performed in accordance with the regulations, procedures and protocols in which the authorization will be granted. For that a quality manual is required. <i>Category : TECHNICAL</i> |
| 431 | 66 | it agrees to conform with the requirements set by the NPPO, including submitting to the NPPO its documented quality management system, this including a documented quality manual and standard operating procedures (an NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”; standard operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and how)) | C | Philippines Make the terminology for documentation simpler or define clearly what a quality manual is. This applies to the rest of the document which makes use of "quality manual". <i>Category : SUBSTANTIVE</i> |
| 432 | 66 | it agrees to conform with the requirements set by the NPPO, including submitting to the NPPO its documented quality management system <u>documentation, this including a documented such as</u> quality manual and or standard operating procedures (an NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual ”; standard operating procedures need manual) to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and how) <u>how</u>). | P | Philippines <i>Category : EDITORIAL</i> |
| 433 | 66 | it agrees to conform with the requirements set by the NPPO, including submitting to the NPPO its documented quality management system, this including a documented quality manual and standard operating procedures (an NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”; standard operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and how)) | C | Costa Rica Spanish version require review to be aligned with the english version <i>Category : TRANSLATION</i> |
| 434 | 66 | it agrees to conform with the requirements set by the NPPO, including submitting to the NPPO its documented quality management system <u>information</u> , this including a documented quality manual and standard operating procedures (an NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”; standard operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and how)) | P | Thailand The term "documented information" may be more appropriate in this context as it is more perceivable and has already been used in ISO9001:2015. <i>Category : EDITORIAL</i> |

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| 435 | 66 | it agrees to conform with the requirements set by the NPPO, including submitting - it submits to the NPPO its documented a quality management system, this including system that includes a documented quality manual and standard operating procedures (an describing how they will consistently meet the requirements established by the NPPO). An NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”; standard . <u>Standard</u> operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and how))how) | P | Argentina Paragraph splitted in two bullets to clarify the two criteria of eligibility, conformity with NPPO requirements and having a quality management system. <i>Category : TECHNICAL</i> |
| 436 | 66 | it agrees to conform with the requirements set by the NPPO, including submitting to the NPPO its documented quality management system, this including a documented quality manual and standard operating procedures (an NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”; standard operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and how)) | C | Argentina The end part of paragraph 66 is wrong translated into Spanish. English version provides that standard operating procedures need to describe how specific phytosanitary actions are undertaken, while Spanish version provides that these procedures "NO" need to describe how phytosanitary actions are undertaken. <i>Category : TRANSLATION</i> |
| 437 | 66 | it agrees-must to conform with the requirements set by the NPPO, including submitting to the NPPO its documented quality management system, this including a documented quality manual and standard operating procedures (an NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”; standard operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and how)) | P | Ukraine <i>Category : EDITORIAL</i> |
| 438 | 66 | it agrees to conform with the requirements set by the NPPO, including submitting to the NPPO its documented quality management system, this including a documented quality manual and standard operating procedures (an NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”; standard operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and how)) | C | Uruguay The end part of paragraph 66 is wrong translated into Spanish. English version provides that standard operating procedures need to describe how specific phytosanitary actions are undertaken, while Spanish version provides that these procedures "NO" need to describe how phytosanitary actions are undertaken. <i>Category : TRANSLATION</i> |
| 439 | 66 | it agrees to conform with the requirements set by the NPPO, including submitting - it submits to the NPPO its documented a quality management system, this including system that includes a documented quality manual and standard operating procedures (an (describing how they will consistently meet the requirements established by the NPPO). An NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”; standard . <u>Standard</u> operating | P | Uruguay Paragraph splitted in two bullets to clarify the two criteria of eligibility, conformity with NPPO requirements and having a quality management system. <i>Category : TECHNICAL</i> |

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| | | procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and how)) <u>how</u>) | | |
| 440 | 66 | it agrees to conform with the requirements set by the NPPO, including submitting to the NPPO its documented quality management system, this including a documented quality manual and standard operating procedures (an NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”; standard operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and how)) | C | COSAVE The end part of paragraph 66 is wrong translated into Spanish. English version provides that standard operating procedures need to describe how specific phytosanitary actions are undertaken, while Spanish version provides that these procedures "NO" need to describe how phytosanitary actions are undertaken. <i>Category : TRANSLATION</i> |
| 441 | 66 | it agrees to conform with the requirements set by the NPPO, including submitting - it submits to the NPPO its documented a quality management system, this including system that includes a documented quality manual and standard operating procedures (an describing how they will consistently meet the requirements established by the NPPO. An NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as “documentation in lieu of a quality manual”; standard . <u>Standard</u> operating procedures need to describe how specific phytosanitary actions are undertaken (i.e. who does what, when, where and how)) <u>how</u>) | P | COSAVE Paragraph splitted in two bullets to clarify the two criteria of eligibility, conformity with NPPO requirements and having a quality management system. <i>Category : TECHNICAL</i> |
| 442 | 66 | aceptar ajustarse a los requisitos establecidos por la ONPF, incluida la presentación a la ONPF de su sistema de gestión de la calidad documentado, lo que incluye un manual de calidad y un procedimiento normalizado de actuación documentados <u>operación normalizado</u> (una ONPF podrá determinar que no se requiere un manual de calidad y que podrá ser suficiente otra documentación, denominada en adelante “documentación sustitutiva de un manual de calidad”; no es necesario que el procedimiento normalizado de actuación <u>operación normalizado</u> describa cómo se realizan las acciones fitosanitarias específicas, es decir, quién hace qué, cuándo, dónde y cómo); | P | OIRSA Para ser consistente con el comentario general <i>Category : TECHNICAL</i> |
| 443 | 66 | aceptar ajustarse a los requisitos establecidos por la ONPF, incluida la presentación a la ONPF de su sistema de gestión de la calidad documentado, lo que incluye un manual de calidad y un procedimiento normalizado de actuación documentados (una ONPF podrá determinar que no se requiere un manual de calidad y que podrá ser suficiente otra documentación, denominada en adelante “documentación sustitutiva de un manual de calidad”; no es necesario que el procedimiento normalizado de actuación describa cómo se realizan las acciones fitosanitarias específicas, es decir, quién hace qué, cuándo, dónde y cómo); | P | Colombia Eliminar la siguiente frase “(una ONPF podrá determinar que no se requiere un manual de calidad y que podrá ser suficiente otra documentación, denominada en adelante “documentación sustitutiva de un manual de calidad”; no es necesario que el procedimiento normalizado de actuación describa cómo se realizan las acciones fitosanitarias específicas, es decir, quién hace qué, cuándo, dónde y cómo);” No es clara la definición del termino “documentación sustitutiva de un manual de calidad”. Se considera que éste genera confusión, debido a que para la supervisión y auditoria es altamente |

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| | | | | relevante contar con documentos detallados sobre la forma en que se ejecuta cada actividad designada. <i>Category : SUBSTANTIVE</i> |
| 444 | 66 | aceptar ajustarse a los requisitos establecidos por la ONPF, incluida la presentación a la ONPF de su sistema de gestión de la calidad documentado, lo que incluye un manual de calidad y un procedimiento normalizado de actuación documentados <u>operación normalizado y documentado</u> (una ONPF podrá determinar que no se requiere un manual de calidad y que podrá ser suficiente otra documentación, denominada en adelante “documentación sustitutiva de un manual de calidad”; no es necesario que el procedimiento <u>de operación</u> normalizado de actuación describa cómo se realizan las acciones fitosanitarias específicas, es decir, quién hace qué, cuándo, dónde y cómo); | P | Costa Rica Consistencia con la versión en inglés <i>Category : TRANSLATION</i> |
| 445 | 67 | it declares any possible conflict of interest and identifies how this would be managed to ensure that it acts impartially as regards the specific phytosanitary actions <u>it actions it</u> undertakes. | P | Canada <i>Category : EDITORIAL</i> |
| 446 | 67 | it declares any possible conflict of interest and identifies interest how this would be managed to ensure that it acts impartially as regards the specific phytosanitary actions <u>it undertakes</u> . | P | Panama For consistency with ISPM 7. <i>Category : TECHNICAL</i> |
| 447 | 67 | it declares any possible conflict of interest and identifies how this would be managed to ensure that it acts impartially as regards the specific phytosanitary actions <u>it actions it</u> undertakes. | P | Sri Lanka <i>Category : EDITORIAL</i> |
| 448 | 67 | it declares any possible conflict of interest and identifies how this would be managed to ensure that it acts impartially as regards the specific phytosanitary actions <u>it actions it</u> undertakes. | P | Viet Nam <i>Category : EDITORIAL</i> |
| 449 | 67 | it declares is impartial and free from any possible conflict of interest and identifies how this would be managed to ensure that it acts impartially as regards the specific phytosanitary actions <u>it actions it</u> undertakes. | P | European Union This very important requirement is included in the EU Regulation 2017/625 on official controls and other official activities (articles 29 (iii) and 30 (iii)). <i>Category : SUBSTANTIVE</i> |
| 450 | 67 | it declares is impartial and free from any possible conflict of interest and identifies how this would be managed to ensure that it acts impartially as regards the specific phytosanitary actions <u>it undertakes</u> . | P | EPPO This very important requirement is included in the EU Regulation 2017/625 on official controls and other official activities (articles 29 (iii) and 30 (iii)). <i>Category : SUBSTANTIVE</i> |
| 451 | 67 | it declares any possible conflict of interest and identifies how this would be managed to ensure that it acts impartially as regards the specific phytosanitary actions <u>it actions it</u> undertakes. | P | Japan <i>Category : EDITORIAL</i> |
| 452 | 67 | it declares any possible conflict of interest <u>conflict of interest</u> and identifies how this would be managed to ensure that it acts impartially as regards the specific phytosanitary actions <u>it undertakes</u> . | P | United States of America perhaps include a statement that the agreement should identify specifically what could be a conflict of interest. <i>Category : TECHNICAL</i> |

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| 453 | 67 | it declares any possible conflict of interest and identifies how this would be managed to ensure that it acts impartially <u>and with integrity</u> as regards the specific phytosanitary actions <u>it undertakes</u> . | P | New Zealand It's possible to be influenced by conflict of interest – and still be impartial - i.e. everyone has ability to influence a decision <i>Category : TECHNICAL</i> |
| 454 | 67 | it declares any possible conflict of interest and identifies how this would be managed to ensure that it acts impartially as regards the specific phytosanitary actions <u>it undertakes</u> <u>actions it undertakes particularly for supervision and auditing</u> . | P | APPPC (52) Thailand (5 Sep 2018 12:12 PM) We would like to specifically identify the phytosanitary actions including supervision and auditing that must be undertaken against conflict of interest. <i>Category : SUBSTANTIVE</i> |
| 455 | 67 | it declares any possible conflict of interest and identifies how this would be managed to ensure that it acts impartially as regards the specific phytosanitary actions <u>it undertakes</u> . | P | Egypt <i>Category : EDITORIAL</i> |
| 456 | 67 | it declares any possible conflict of interest and identifies how this would be managed to ensure that it acts impartially as regards the specific phytosanitary actions <u>it undertakes</u> . | P | IPPC Regional Workshop Africa <i>Category : EDITORIAL</i> |
| 457 | 67 | it declares any possible conflict of interest and identifies how this would be managed to ensure that it acts impartially as regards the specific phytosanitary actions <u>it undertakes</u> . | P | Australia <i>Category : EDITORIAL</i> |
| 458 | 67 | it declares any possible conflict of interest and identifies how this would be managed to ensure that it acts impartially as regards the specific phytosanitary actions <u>it undertakes</u> . | P | Costa Rica For consistency with ISPM 7 <i>Category : TECHNICAL</i> |
| 459 | 67 | it declares any possible conflict of interest and identifies how this would be managed to ensure that it acts impartially as regards the specific phytosanitary actions <u>it undertakes</u> <u>, particularly for supervision and auditing</u> . | P | Thailand We would like to specifically identify the phytosanitary actions including supervision and auditing that must be undertaken against conflict of interest. <i>Category : SUBSTANTIVE</i> |
| 460 | 67 | it declares any possible conflict of interest and identifies how this would be managed to ensure that it acts impartially as regards the specific phytosanitary actions <u>it undertakes</u> . | P | Mexico To be consistent with ISPM 7 <i>Category : SUBSTANTIVE</i> |
| 461 | 67 | it declares any possible conflict of interest and identifies how this would be managed to ensure that it acts impartially as regards the specific phytosanitary actions <u>it undertakes</u> . | P | Argentina For consistency with ISPM 7. <i>Category : TECHNICAL</i> |
| 462 | 67 | it declares any possible conflict of interest and identifies <u>interest</u> how this would be managed to ensure that it acts impartially as regards the specific phytosanitary actions <u>it undertakes</u> . | P | Uruguay For consistency with ISPM 7 <i>Category : TECHNICAL</i> |
| 463 | 67 | it declares any possible conflict of interest and identifies <u>interest</u> how this would be managed to ensure that it acts impartially as regards the specific phytosanitary actions <u>it undertakes</u> . | P | COSAVE For consistency with ISPM 7. <i>Category : TECHNICAL</i> |

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| 464 | 67 | declarar todos los posibles que no tiene conflictos de intereses y especificar cómo se gestionarían tales conflictos para garantizar que actúa con imparcialidad en lo que respecta a las acciones fitosanitarias específicas que emprende. | P | OIRSA Las entidades que ejecutan las acciones fitosanitarias deben asegurar la imparcialidad en todo momento. Si existiera la posibilidad de tener algún conflicto, la imparcialidad podría verse afectada. <i>Category : TECHNICAL</i> |
| 3. Roles and Responsibilities for Implementing the Authorization Programme | | | | |
| 465 | 68 | 3. Roles and Responsibilities for Implementing the for <u>Implementing the</u> Authorization Programme | P | Sri Lanka <i>Category : EDITORIAL</i> |
| 466 | 68 | 3. Roles and Responsibilities for Implementing the Authorization Programme for <u>Implementing the Authorization</u> | P | European Union The term "authorization programme" is not clear. <i>Category : TECHNICAL</i> |
| 467 | 68 | 3. Roles and Responsibilities for Implementing the <u>Authorization Programme Authorization</u> | P | EPPO The term "authorization programme" is not clear. <i>Category : TECHNICAL</i> |
| 468 | 68 | 3. Roles and Responsibilities for Implementing the for <u>Implementing the</u> Authorization Programme | P | Ghana <i>Category : EDITORIAL</i> |
| 469 | 68 | 3. Roles and Responsibilities for Implementing the for <u>Implementing the</u> Authorization Programme | P | Caribbean Agricultural Health and Food Safety Agency <i>Category : EDITORIAL</i> |
| 470 | 68 | 3. Roles and Responsibilities for Implementing the for <u>Implementing the</u> Authorization Programme | P | Japan <i>Category : EDITORIAL</i> |
| 471 | 68 | <u>34.1</u> Roles and Responsibilities for Implementing the Authorization Programme | P | APPPC (53) Thailand (5 Sep 2018 12:13 PM) re-numbering <i>Category : EDITORIAL</i> |
| 472 | 68 | 3. Roles and Responsibilities for Implementing the for <u>Implementing the</u> Authorization Programme | P | APPPC (105) New Zealand (7 Sep 2018 6:43 AM) (164) Philippines (12 Sep 2018 3:28 AM) <i>Category : EDITORIAL</i> |
| 473 | 68 | 3. Roles and Responsibilities for Implementing the for <u>Implementing the</u> Authorization Programme | P | IPPC Regional Workshop Africa <i>Category : EDITORIAL</i> |
| 474 | 68 | 3. Roles and Responsibilities for Implementing the for <u>Implementing the</u> Authorization Programme | P | Philippines <i>Category : EDITORIAL</i> |
| 475 | 68 | 3. Roles and Responsibilities for Implementing the for <u>Implementing the</u> Authorization Programme | P | NEPPO <i>Category : SUBSTANTIVE</i> |
| 476 | 68 | <u>34.</u> Roles and Responsibilities for Implementing the Authorization Programme | P | Thailand re-numbering <i>Category : EDITORIAL</i> |
| 3.1 Roles and responsibilities of the NPPO | | | | |

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| 477 | 69 | 34.1 Roles and responsibilities of the NPPO | P | Thailand re-numbering <i>Category : EDITORIAL</i> |
| 478 | 69 | 3.1 Roles and responsibilities of the NPPO | C | Ukraine General comments to part 3.1: We think the standard should define in a clearer way the conditions and timeframe when an NPPO may suspend, revoke, reinstate or issue authorizations. We would like to suggest unbiased audits. <i>Category : SUBSTANTIVE</i> |
| 479 | 69 | 3.1 Funciones y responsabilidades de la ONPF | C | OIRSA Sistema de aprobación: evaluación legal de documentos. De las actividades, de los requisitos y procedimientos de autorización. De la supervisión. De la unidad de fiscalización: fiscalización regular. De la suspensión o revocación de la autorización. De los informes y manejo de información. <i>Category : TECHNICAL</i> |
| 480 | 70 | The roles and responsibilities of the NPPO should include the following: <u>70 bis: - to evaluate which actions can be authorized at governmental level, which for nongovernmental level and which for individual persons by taking into account specific section in this standard and legislation and situation in country</u> | P | European Union To make clear that the first step for the NPPO is deciding whether to authorize entities to carry out actions and if so, which ones. <i>Category : SUBSTANTIVE</i> |
| 481 | 70 | The roles and responsibilities of the NPPO should include the following: | C | European Union Proposal to seek legal advice on this question (see general comment). <i>Category : SUBSTANTIVE</i> |
| 482 | 70 | The roles and responsibilities of the NPPO should include the following: <u>70 bis: to evaluate which actions can be authorized at governmental level, which for nongovernmental level and which for individual persons by taking into account specific section in this standard and legislation and situation in country</u> | P | EPPO To make clear that the first step for the NPPO is deciding whether to authorize entities to carry out actions and if so, which ones. <i>Category : SUBSTANTIVE</i> |
| 483 | 70 | The roles and responsibilities of the NPPO should include the following: | C | EPPO As mentioned in one of the general comments, it is proposed to seek legal advice on this question. <i>Category : SUBSTANTIVE</i> |
| 484 | 70 | The roles and responsibilities of the NPPO should include the following: <u>-To ensure the legal framework exists to enable the authorization programme</u> | P | Caribbean Agricultural Health and Food Safety Agency For consistency with the the section in the draft on requirements <i>Category : SUBSTANTIVE</i> |
| 485 | 70 | The roles and responsibilities of the NPPO should include the following: | C | Jamaica Roles and responsibilities of the NPPO Add to establish the legal framework to support the authorization programme to the Roles and responsibility of the NPPO. |

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| | | | | <i>Category : SUBSTANTIVE</i> |
| 486 | 70 | The roles and responsibilities of the NPPO should include the following: <u>- to ensure the legal framework exists to support the authorization program</u> | P | Antigua and Barbuda The requirement for the NPPO to have legal support of its actions was mentioned earlier in the document but should also be included under this section that speaks to the specific roles and responsibilities of the NPPO. <i>Category : SUBSTANTIVE</i> |
| 487 | 70 | The roles and responsibilities of the NPPO should include the following: | P | Montenegro <i>Category : TECHNICAL</i> |
| 488 | 70 | The roles and responsibilities of the NPPO should include the following: | C | Ukraine The standard should set which of phytosanitary actions may be performed by an entity. <i>Category : SUBSTANTIVE</i> |
| 489 | 71 | to assess the entity against the criteria for eligibility <u>set in this standard and those</u> established by the NPPO | P | European Union More precise wording. <i>Category : SUBSTANTIVE</i> |
| 490 | 71 | to assess the entity against the criteria for eligibility <u>set in this standard and those</u> established by the NPPO | P | EPPO More precise wording <i>Category : TECHNICAL</i> |
| 491 | 71 | to assess the entity against <u>according</u> the criteria for eligibility established by the NPPO | P | Montenegro <i>Category : TECHNICAL</i> |
| 492 | 71 | to assess the entity against the criteria for eligibility established by the NPPO, <u>including any conflict of interest</u> | P | Mexico To highlight that the NPPO needs to consider everything including aspects of conflict of interest <i>Category : TECHNICAL</i> |
| 493 | 71 | to assess the entity against the criteria for eligibility established by the NPPO | C | Ukraine The standard should set the criteria for eligibility taking into account specific features of delegated functions <i>Category : SUBSTANTIVE</i> |
| 494 | 71 | evaluar-auditar si la entidad cumple los criterios establecidos por la ONPF <u>ONPF</u> para su autorización; | P | OIRSA <i>Category : TECHNICAL</i> |
| 495 | 71 | evaluar si la entidad cumple los criterios establecidos por la ONPF <u>ONPF</u> para su autorización; | P | Costa Rica Aclarar para que se va a evaluar la empresa <i>Category : TECHNICAL</i> |
| 496 | 72 | to define clearly the phytosanitary actions the entity is authorized to perform, the performance criteria and corrective actions; <u>performance criteria should be defined taking into account the nature of the authorized entity and the action delegated</u> | P | European Union In this standard, performance criteria must be defined, taking into account the specific nature of the delegated authorities. <i>Category : SUBSTANTIVE</i> |
| 497 | 72 | to define clearly <u>define</u> the phytosanitary actions the entity is authorized to perform, the performance criteria and corrective actions | P | European Union Better English. <i>Category : EDITORIAL</i> |
| 498 | 72 | to define clearly <u>define</u> the phytosanitary actions the entity is authorized to perform, the performance criteria and corrective actions; <u>performance criteria</u> | P | EPPO Better English |

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| | | <u>should be defined taking into account the nature of the authorized entity and the action delegated</u> | | In this standard, performance criteria must be defined, taking into account the specific nature of the delegated authorities. <i>Category : SUBSTANTIVE</i> |
| 499 | 72 | to define clearly the phytosanitary <u>Phytosanitary</u> actions the entity is authorized to perform, the performance criteria and corrective actions | P | Ghana <i>Category : EDITORIAL</i> |
| 500 | 72 | to define clearly the phytosanitary <u>Phytosanitary</u> actions the entity is authorized to perform, the performance criteria and corrective actions | P | Ghana <i>Category : EDITORIAL</i> |
| 501 | 72 | to define clearly the phytosanitary actions the entity is authorized to perform, the performance criteria and corrective actions | C | New Zealand Suggest corrective actions should be addressed separately as they would not typically be pre-defined, whereas the performance criteria and phytosanitary actions would be. Corrective actions should be "determined" by the NPPO, rather than "defined". <i>Category : SUBSTANTIVE</i> |
| 502 | 72 | to define clearly the phytosanitary actions the entity is authorized to perform, the performance criteria and corrective actions | C | APPPC (124) New Zealand (7 Sep 2018 7:40 AM) Suggest corrective actions should be addressed separately as they would not typically be pre-defined, whereas the performance criteria and phytosanitary actions would be. Corrective actions should be "determined" by the NPPO, rather than "defined". <i>Category : SUBSTANTIVE</i> |
| 503 | 72 | to define clearly the phytosanitary actions the entity is authorized to perform, the performance criteria and corrective actions | C | Ukraine The standard should set the performance criteria taking into account specific features of delegated functions <i>Category : SUBSTANTIVE</i> |
| 504 | 72 | <u>Définir</u> clairement définir les actions phytosanitaires que l'organisme est autorisé à mener ainsi que les critères d'évaluation et les actions correctives y afférents; | P | Chad correction du paragraphe 72 <i>Category : EDITORIAL</i> |
| 505 | 73 | to evaluate the entity against the requirements set by the NPPO regarding its documented quality manual (or documentation sufficient to address the specific phytosanitary actions) and management system and its implementation of standard operating procedures on-site, and propose suggestions for improvement as necessary | P | European Union The whole quality management system, i.e. not only the quality manual (or the documentation in lieu of a quality manual) but also the standard operating procedures should be documented according to paragraphs 66 and 85. <i>Category : TECHNICAL</i> |
| 506 | 73 | to evaluate the entity against the requirements set by the NPPO regarding its documented quality manual (or documentation sufficient to address the specific phytosanitary actions) and management system and its implementation of standard operating procedures on-site, and propose suggestions for improvement as necessary | P | EPPO The whole quality management system, i.e. not only the quality manual (or the documentation in lieu of a quality manual) but also the standard operating procedures should be documented according to paragraphs 66 and 85. <i>Category : TECHNICAL</i> |
| 507 | 73 | to evaluate the entity against the requirements set by the NPPO regarding its documented quality manual (or documentation sufficient to address the specific phytosanitary actions) and actions) and implementation of standard operating | P | Ghana <i>Category : EDITORIAL</i> |

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| | | procedures <u>Standard Operating Procedures (SOP)</u> on-site, and propose suggestions for improvement as necessary | | |
| 508 | 73 | to evaluate the entity against the requirements set by the NPPO regarding its documented quality manual (or documentation sufficient to address the specific phytosanitary actions) and-actions) and implementation of standard operating procedures on-site, and propose suggestions for improvement as necessary | P | Japan <i>Category : EDITORIAL</i> |
| 509 | 73 | to evaluate the entity against the requirements set by the NPPO regarding its documented quality manual (or documentation sufficient to address the specific phytosanitary actions) and-in lieu of a quality manual) and implementation of standard operating procedures on-site, and propose suggestions for improvement as necessary | P | APPPC (125) New Zealand (7 Sep 2018 7:43 AM) Suggested change relates to statement in section 2. NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as "documentation in lieu of a quality manual". <i>Category : TECHNICAL</i> |
| 510 | 73 | to evaluate the entity against the requirements set by the NPPO regarding its documented quality manual (or documentation sufficient to address the specific phytosanitary actions) and-in lieu of a quality manual) and implementation of standard operating procedures on-site, and propose suggestions for improvement as necessary | P | New Zealand Suggested change relates to statement in section 2. NPPO may determine that a quality manual is not required, and that other documentation may be sufficient, hereafter referred to as "documentation in lieu of a quality manual". <i>Category : TECHNICAL</i> |
| 511 | 73 | to evaluate the entity against the requirements set by the NPPO regarding its documented quality manual (or documentation sufficient to address the specific phytosanitary actions) and implementation of standard operating procedures on-site, and propose suggestions for improvement as necessary | C | Philippines NPPOs may have different forms of documentation. It may be wise to keep it as "documentation" or define what a "quality manual or standard operating procedures manual" is. <i>Category : EDITORIAL</i> |
| 512 | 73 | to evaluate the entity against the requirements set by the NPPO regarding its documented quality manual (or documentation sufficient to address the on specific phytosanitary actions) and-actions and implementation of standard operating procedures on-site, and propose suggestions for improvement as necessary | P | Philippines <i>Category : EDITORIAL</i> |
| 513 | 73 | to evaluate the entity against the requirements set by the NPPO regarding its documented quality manual (or documentation sufficient to address the specific phytosanitary actions) and-actions) and implementation of standard operating procedures on-site, and propose suggestions for improvement as necessary | P | NEPPO <i>Category : EDITORIAL</i> |
| 514 | 73 | to evaluate the entity against accordance with the requirements set by the NPPO regarding its documented quality manual (or documentation sufficient to address the specific phytosanitary actions) and implementation of standard operating procedures on-site, and propose suggestions for improvement as necessary | P | Montenegro <i>Category : TECHNICAL</i> |
| 515 | 73 | evaluar si la entidad cumple los requisitos-criterios establecidos por la ONPF en relación con su manual de calidad documentado (o documentación suficiente para abordar las acciones fitosanitarias específicas) y la aplicación in situ del | P | OIRSA Se agregó el término requisitos para establecer condición específica y no solo subjetiva. <i>Category : SUBSTANTIVE</i> |

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| | | procedimiento normalizado de actuación, y proponer sugerencias de mejora en caso necesario; | | |
| 516 | 73 | evaluar si la entidad cumple los requisitos establecidos por la ONPF en relación con su manual de calidad documentado (o documentación suficiente para abordar las acciones fitosanitarias específicas) y la aplicación in situ <i>in situ</i> del procedimiento normalizado de actuación, y proponer sugerencias de mejora en caso necesario; | P | Colombia Toda palabra en latín debe ir en cursiva Category : <i>EDITORIAL</i> |
| 517 | 74 | to enter into an arrangement which authorizes the entity to perform specific phytosanitary actions, and review and update the arrangement as necessary - Notify entities that did not meet the criteria for eligibility and provide the rationale for the decision | P | Canada It is equally important to notify entities that did not qualify to participate in the program and to provide them the rationale for the decision. Category : <i>SUBSTANTIVE</i> |
| 518 | 74 | to enter into an arrangement which authorizes the entity to perform specific phytosanitary <i>Phytosanitary</i> actions, and review and update the arrangement as necessary | P | Ghana Category : <i>EDITORIAL</i> |
| 519 | 74 | to enter into an arrangement which authorizes the entity to perform specific phytosanitary actions, and review and update the arrangement as necessary <i>necessary with a specified time frame</i> | P | IPPC Regional Workshop Africa Category : <i>SUBSTANTIVE</i> |
| 520 | 74 | to enter into an arrangement which authorizes the entity to perform specific phytosanitary actions, and review and update the arrangement as necessary | C | South Africa Insertion of the word "formal" before the word "arrangements" reason being that arrangements must be formalised. Category : <i>SUBSTANTIVE</i> |
| 521 | 74 | to enter into an arrangement which authorizes the entity to perform specific phytosanitary actions, and review and update the arrangement as necessary <i>necessary with a specified time frame</i> | P | Eritrea Category : <i>TECHNICAL</i> |
| 522 | 75 | to train NPPO personnel and ensure that their skills and competencies are maintained at an adequate level to consistently implement the authorization programme <i>process</i> | P | European Union The term "authorization programme" is not clear. The term "process" is suggested. Category : <i>TECHNICAL</i> |
| 523 | 75 | to train NPPO personnel and ensure that their skills and competencies are maintained at an adequate level to consistently implement the authorization programme <i>process</i> | P | EPPO The term "authorization programme" is not clear. The term "process" is suggested. Category : <i>TECHNICAL</i> |
| 524 | 75 | to train NPPO and authorized entities personnel and ensure that their skills and competencies are maintained at an adequate level to consistently implement the authorization programme | P | APPPC (166) Philippines (12 Sep 2018 3:29 AM) Category : <i>SUBSTANTIVE</i> |

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| 525 | 75 | to train NPPO personnel and ensure that their skills and competencies are maintained at an adequate level to consistently implement the authorization programme | C | Ukraine - a clear provision who is to train NPPO personnel is necessary here. <i>Category : SUBSTANTIVE</i> |
| 526 | 76 | to carry out regular audits <u>or supervisions</u> of the authorized entity to verify that it conforms with the requirements of the NPPO's authorization programme | P | Panama Two sections are considered. The audit is focus in a integral review of all procedures and the supervisions as frequently visits to ensure that the authorized actions are being undertaken. <i>Category : TECHNICAL</i> |
| 527 | 76 | to carry out regular audits of the authorized entity to verify that it conforms with the requirements of the NPPO's <u>authorization programme</u> <u>authorization</u> | P | European Union The term "authorization programme" is not clear. <i>Category : TECHNICAL</i> |
| 528 | 76 | to carry out regular audits of the authorized entity to verify that it conforms with the requirements of the NPPO's <u>authorization programme</u> <u>authorization</u> | P | EPPO The term "authorization programme" is not clear. <i>Category : TECHNICAL</i> |
| 529 | 76 | to carry out regular audits of the authorized entity to verify that it conforms with the requirements of the NPPO's authorization programme | C | PPPO more clarity on the word regular <i>Category : SUBSTANTIVE</i> |
| 530 | 76 | to carry out regular audits of the authorized <u>entity-entity, also via third-party contractors.</u> to verify that it conforms with the requirements of the NPPO's authorization programme | P | Caribbean Agricultural Health and Food Safety Agency For consistency with the following section of the draft standard referring to roles and responsibilities of authorized entities. <i>Category : SUBSTANTIVE</i> |
| 531 | 76 | to carry out regular audits of the authorized entity to verify that it conforms with the requirements of the NPPO's authorization programme | C | United States of America See the U.S> comment in para 55. <i>Category : TECHNICAL</i> |
| 532 | 76 | to carry out regular audits of the authorized entity to verify that it conforms with the requirements of the NPPO's authorization programme | C | Jamaica Reword sentence to capture activities of third parties. to carry out regular audits of the authorized entity, also via third party contractor, to verify that it conforms with the requirements of the NPPO's authorization programme <i>Category : SUBSTANTIVE</i> |
| 533 | 76 | to carry out regular audits <u>or supervisions</u> of the authorized entity to verify that it conforms with the requirements of the NPPO's authorization programme | P | Costa Rica Two sections are considered. The audit is focus in a integral review of all procedures and the supervisions as frequently visits to ensure that the authorized actions are being undertaken. <i>Category : TECHNICAL</i> |
| 534 | 76 | llevar a cabo auditorías <u>o supervisiones técnicas</u> periódicas de la entidad autorizada para verificar que cumple los requisitos del programa de autorizaciones de la ONPF; | P | OIRSA Se consideran dos acciones diferentes, la auditoria está más enfocada en una revisión integral de todos los procedimientos y las supervisiones como visitas más frecuentes para asegurar que se están realizando las acciones autorizadas. <i>Category : TECHNICAL</i> |

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| 535 | 76 | llevar a cabo auditorías <u>o supervisiones</u> periódicas de la entidad autorizada para verificar que cumple los requisitos del programa de autorizaciones de la ONPF; | P | Costa Rica Se consideran dos acciones diferentes, la auditoria está más enfocada en una revisión integral de todos los procedimientos y las supervisiones como visitas más frecuentes para asegurar que se están realizando las acciones autorizadas. <i>Category : TECHNICAL</i> |
| 536 | 77 | to carry out internal audits of its own procedures and processes to verify that the objectives of its authorization programme <u>the authorizations</u> continue to be met | P | European Union The term "authorization programme" is not clear. <i>Category : TECHNICAL</i> |
| 537 | 77 | to carry out internal audits of its own procedures and processes to verify that the objectives of its authorization programme <u>the authorizations</u> continue to be met | P | EPPO The term "authorization programme" is not clear. <i>Category : TECHNICAL</i> |
| 538 | 77 | to carry out internal audits <u>internal audits</u> of its own procedures and processes to verify that the objectives of its authorization programme continue to be met | P | United States of America Depends on practicality of the process and ability of the NPPO. <i>Category : TECHNICAL</i> |
| 539 | 77 | to carry out internal audits of its own procedures and processes to verify that the objectives of its authorization programme continue to be met | C | Ukraine The standard should define the frequency of audits of entities. <i>Category : SUBSTANTIVE</i> |
| 540 | 78 | to implement processes for addressing identified nonconformities, including, where appropriate, suspending or revoking authorization, which may include regulatory enforcement. <u>- to implement the processes for the entity to voluntarily withdraw from the authorization programme.</u> | P | Viet Nam Add more a bullet to be in accordance with bullet no.10 under section 1 authorization programme concerning voluntarily withdrawal of authorized entities <i>Category : SUBSTANTIVE</i> |
| 541 | 78 | to implement processes for addressing identified nonconformities, including, where appropriate, suspending or revoking authorization, which may include regulatory enforcement <u>- to implement the processes for the entity to voluntarily withdraw from the authorization programme</u> | P | Korea, Republic of to add this bullet to be in accordance with bullet no.10 under section 1 authorization programme concerning voluntarily withdrawal of authorized entities. <i>Category : SUBSTANTIVE</i> |
| 542 | 78 | to implement processes for addressing identified noneonformities <u>non-conformities</u> , including, where appropriate, suspending or revoking authorization, which may include regulatory enforcement | P | Japan <i>Category : EDITORIAL</i> |
| 543 | 78 | to implement processes for addressing identified nonconformities, including, where appropriate, suspending or revoking authorization, which may include regulatory enforcement <u>- to implement the processes for the entity to voluntarily withdraw from the authorization programme</u> | P | APPPC (157) APPPC (11 Sep 2018 8:58 AM) to add this bullet to be in accordance with bullet no.10 under section 1 authorization programme concerning voluntarily withdrawal of authorized entities. (55) Thailand (5 Sep 2018 12:15 PM) Thailand would like to add this bullet to be in accordance with bullet no.10 under section 1 authorization programme concerning voluntarily withdrawal of authorized entities. <i>Category : SUBSTANTIVE</i> |

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| 544 | 78 | to implement processes for addressing identified nonconformities, including, where appropriate, suspending or revoking authorization, which may include regulatory enforcement <u>- to implement the processes for the entity to voluntarily withdraw from the authorization programme</u> | P | Thailand Thailand would like to add this bullet to be in accordance with bullet no.10 under section 1 authorization programme concerning voluntarily withdrawal of authorized entities. <i>Category : SUBSTANTIVE</i> |
| 545 | 78 | mettre en œuvre des processus pour gérer les cas de non-conformité observés qui prévoient notamment sur les activités prévues, s'il y a lieu, la suspension ou le retrait d'une autorisation, et peuvent reposer sur l'exécution de <u>en tenant compte des dispositions réglementaires</u> réglementaires; | P | Chad Reformulation du paragraphe 78 pour une bonne compréhension <i>Category : EDITORIAL</i> |
| 546 | 79 | to maintain documentation, including records and lists of authorized entities <u>entities and update records and its corresponding authorized phytosanitary actions, period and registration code.</u> | P | Viet Nam To increase transparency <i>Category : SUBSTANTIVE</i> |
| 547 | 79 | to maintain documentation, including records and lists of authorized entities | C | PPPO include a sub point ...to communicate this information to trading partners <i>Category : SUBSTANTIVE</i> |
| 548 | 79 | to maintain documentation, including records and lists of authorized entities <u>-to publish lists of authorized entities and its corresponding authorized phytosanitary actions, period and registration number.</u> | P | APPPC (35) China (3 Sep 2018 10:16 AM) To increase transparency. <i>Category : SUBSTANTIVE</i> |
| 549 | 79 | to maintain documentation, including records and lists of authorized entities <u>- to make available (e.g. to publish) the lists of authorized entities and updating them</u> | P | Iran <i>Category : TECHNICAL</i> |
| 550 | 79 | to maintain documentation, including records and lists of authorized entities <u>- to publicize the updated list of authorized entities</u> | P | Thailand to be in line with the new bullet just added in section 1. <i>Category : SUBSTANTIVE</i> |
| 551 | 80 | to implement and maintain transparent, efficient and effective communication on the authorization programme, in particular between the NPPO and the authorized entities. <u>- To establish a complaint system as a feedback mechanism</u> | P | Panama Establish a complain system for service users as a mechanism of feedback to prevent irregularities of the service <i>Category : TECHNICAL</i> |
| 552 | 80 | to implement and maintain transparent, efficient and effective communication on the authorization programme, in particular between the NPPO and the authorized entities. <u>- to implement national phytosanitary regulation.</u> <u>- to ensure that the documented information of authorized entities is adequately protected from loss of confidentiality or improper use.</u> | P | Viet Nam to add bullets concerning confidentiality of the authorized entities as priority and to be in line with international standards (ISO) for the certification body <i>Category : SUBSTANTIVE</i> |

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| 553 | 80 | to implement and maintain transparent, efficient and effective communication on the authorization programme, in particular between the NPPO and the authorized entities. <u>- to ensure that the documented information of authorized entities is adequately protected from loss of confidentiality or improper use.</u> | P | Korea, Republic of To add a new bullet concerning confidentiality of the authorized entities as priority and to be in line with international standards (ISO) for the certification body. <i>Category : SUBSTANTIVE</i> |
| 554 | 80 | to implement and maintain transparent, efficient and effective communication on the authorization programme process, in particular between the NPPO and the authorized entities. | P | European Union The term "authorization programme" is not clear. The term "process" is suggested. <i>Category : TECHNICAL</i> |
| 555 | 80 | to implement and maintain transparent, efficient and effective communication on the authorization programme process, in particular between the NPPO and the authorized entities. | P | EPPO The term "authorization programme" is not clear. The term "process" is suggested. <i>Category : TECHNICAL</i> |
| 556 | 80 | to implement and maintain transparent, efficient and effective communication on the authorization programme, in particular between the NPPO and the authorized entities. | C | IPPC Regional Workshop Central Asia & Central Europe It was suggested to add the following indent: - To publish officially the list of authorized entities In Russian: - Официальная публикация перечня уполномоченных юридических лиц <i>Category : SUBSTANTIVE</i> |
| 557 | 80 | to implement and maintain transparent, efficient and effective communication on the authorization programme, in particular between the NPPO and the authorized entities. <u>to publish lists of authorized entities and its corresponding authorized phytosanitary actions, period and registration number.</u> | P | China To increase trades transparency. <i>Category : SUBSTANTIVE</i> |
| 558 | 80 | to implement and maintain transparent, efficient and effective communication on the authorization programme, in particular between the NPPO and the authorized entities. <u>- To implement national phytosanitary regulation.</u> | P | APPPC (7) Nepal (9 Aug 2018 5:13 PM) <i>Category : SUBSTANTIVE</i> |
| 559 | 80 | to implement and maintain transparent, efficient and effective communication on the authorization programme, in particular between the NPPO and the authorized entities. <u>- to ensure that the documented information of authorized entities is adequately protected from loss of confidentiality or improper use.</u> | P | APPPC (57) Thailand (5 Sep 2018 12:17 PM) Thailand would like to add a new bullet concerning confidentiality of the authorized entities as priority and to be in line with international standards (ISO) for the certification body. <i>Category : SUBSTANTIVE</i> |
| 560 | 80 | to implement and maintain transparent, efficient and effective communication on the authorization programme, in particular between the NPPO and the authorized entities. | P | NEPPO For transparency <i>Category : SUBSTANTIVE</i> |

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| | | <u>-publish authorized entities list .</u> | | |
| 561 | 80 | to implement and maintain transparent, efficient and effective communication on the authorization programme, in particular between the NPPO and the authorized entities. <u>- to establish a complaint system as a feedback mechanism</u> | P | Costa Rica Establish a complain system for service users as a mechanism of feedback to prevent irregularities of the service <i>Category : TECHNICAL</i> |
| 562 | 80 | to implement and maintain transparent, efficient and effective communication on the authorization programme, in particular between the NPPO and the authorized entities <u>- published list of authorized entities on NPPO web page.</u> | P | Montenegro <i>Category : TECHNICAL</i> |
| 563 | 80 | to implement and maintain transparent, efficient and effective communication on the authorization programme, in particular between the NPPO and the authorized entities. <u>- to ensure that the documented information of authorized entities is adequately protected from loss of confidentiality or improper use.</u> | P | Thailand Thailand would like to add a new bullet concerning confidentiality of the authorized entities as priority and to be in line with international standards (ISO) for the certification body. <i>Category : SUBSTANTIVE</i> |
| 564 | 80 | to implement and maintain transparent, efficient and effective communication on the authorization programme, in particular between the NPPO and the authorized entities. | C | Mexico Is necessary to include these responsibilities. <i>Category : TECHNICAL</i> |
| 565 | 80 | to implement and maintain transparent, efficient and effective communication on the authorization programme, in particular between the NPPO and the authorized entities. | C | Mexico To maintain transparency of the process <i>Category : TECHNICAL</i> |
| 566 | 80 | to implement and maintain transparent, efficient and effective communication on the authorization programme, in particular between the NPPO and the authorized entities. <u>- Validate the registration formats of the phytosanitary actions in which the entity is authorized, to guarantee that they are carried out with transparency and consistency;</u> <u>- determine the authorization matters, determining the type and quantity of entities required by the NPPO, as well as the phytosanitary actions that these will carry out.</u> <u>- establish the period of authorization of the entity; in addition to establishing the criteria for the suspension or revocation of the authorized entity in case of non-compliance with its functions and responsibilities.</u> <u>- integrate and publish the data of the authorized entities, indicating the specific phytosanitary actions that perform on behalf of the NPPO.</u> | P | Mexico <i>Category : TECHNICAL</i> |

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| 567 | 80 | mettre en œuvre et maintenir une communication transparente, efficace et efficiente sur le programme d'autorisation, en particulier entre l'ONPV et les organismes autorisés. | P | Chad correction du paragraphe 80 <i>Category : EDITORIAL</i> |
| 568 | 80 | establecer y mantener una comunicación transparente, eficiente y eficaz sobre el programa de autorizaciones, en particular entre la ONPF y las entidades autorizadas. <u>(81) Implement a complaint system for service users as a feedback mechanism to prevent irregularities in the system.</u> | P | OIRSA Se propone la adición de un párrafo ya que es un elemento importante de retroalimentación sobre la efectividad y calidad del servicio. <i>Category : SUBSTANTIVE</i> |
| 569 | 80 | establecer y mantener una comunicación transparente, eficiente y eficaz sobre el programa de autorizaciones, en particular entre la ONPF y las entidades autorizadas. <u>autorizar a la entidad que audita a otras entidades autorizadas o supervisa las acciones fitosanitarias</u> | P | OIRSA Incluye, la ONPF también debería tener control sobre las entidades que auditen a la entidad autorizada para evitar conflictos de interés. Ya que si esta son contratadas y pagadas por las entidades autorizadas podría perder objetividad, además esta entidad no tendría ninguna responsabilidad con la ONPF <i>Category : SUBSTANTIVE</i> |
| 3.2 Roles and responsibilities of the authorized entity | | | | |
| 570 | 81 | 3.2 Roles and responsibilities of the authorized entity | C | European Union We propose to add in this section: - comply with the requirements established in the phytosanitary procedures, standards, legislation and guidelines of the NPPO. <i>Category : SUBSTANTIVE</i> |
| 571 | 81 | 3.2 Roles and responsibilities of the authorized entity | P | European Union There are some tasks and responsibilities to entity to become authorized before it is authorized. <i>Category : TECHNICAL</i> |
| 572 | 81 | 3.2 Roles and responsibilities of the authorized entity | C | EPPO We propose to add in this section: - comply with the requirements established in the phytosanitary procedures, standards, legislation and guidelines of the NPPO. <i>Category : SUBSTANTIVE</i> |
| 573 | 81 | 3.2 Roles and responsibilities of the authorized entity | P | EPPO In the list there are some tasks and responsibilities for the entity before authorization. <i>Category : TECHNICAL</i> |
| 574 | 81 | 34.2 Roles and responsibilities of the authorized entity | P | APPPC (58) Thailand (5 Sep 2018 12:18 PM) re-numbering <i>Category : EDITORIAL</i> |
| 575 | 81 | 34.2 Roles and responsibilities of the authorized entity | P | Thailand |

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| 576 | 81 | 3.2 Roles and responsibilities of the authorized entity | C | Ukraine (Proposed modification to the title: Roles and responsibilities of an entity) General comments to part 3.2: In this case, the requirement of this section are to be met by entities seeking to be authorized by NPPO (candidates) <i>Category : TECHNICAL</i> |
| 577 | 81 | 3.2 Funciones y responsabilidades de la entidad autorizada | C | OIRSA Procedimiento para la autorización. De la resolución. La evaluación técnica y legal de los documentos. <i>Category : TECHNICAL</i> |
| 578 | 82 | The roles and responsibilities of the authorized entity should include the following: | P | European Union In the list there are some tasks and responsibilities for the entity before authorization. <i>Category : SUBSTANTIVE</i> |
| 579 | 82 | The roles and responsibilities of the authorized entity should include the following: | P | EPPO In the list there are some tasks and responsibilities for the entity before authorization. <i>Category : TECHNICAL</i> |
| 580 | 82 | The roles and responsibilities of the authorized entity should include the following: | P | Montenegro <i>Category : TECHNICAL</i> |
| 581 | 82 | Las funciones y responsabilidades de la entidad autorizada deberían incluir las siguientes:- <u>- Mantener la confidencialidad de la información obtenida mediante sus acciones fitosanitarias autorizadas.</u> <u>- Mantener la imparcialidad e independencia con los usuarios relacionados con las acciones fitosanitarias autorizadas, y estar libre de cualquier conflicto de intereses</u> | P | Colombia La información levantada por las entidades autorizadas a realizar acciones fitosanitarias, solo debe ser entregada a la ONPF contratante. Se debe incluir la responsabilidad de imparcialidad e independencia para generar transparencia en el accionar de la entidad autorizada. <i>Category : SUBSTANTIVE</i> |
| 582 | 83 | to provide necessary <u>the required</u> information to the NPPO when applying for authorization to perform specific phytosanitary actions on behalf of the NPPO | P | Canada More appropriate. The NPPO determines the required information that needs to be provided by the entity. <i>Category : SUBSTANTIVE</i> |
| 583 | 83 | to provide necessary <u>and accurate</u> information to the NPPO when applying for authorization to perform specific phytosanitary actions on behalf of the NPPO | P | Viet Nam to Ensure that the entity is held accountable for provision of accurate information to the NPPO <i>Category : SUBSTANTIVE</i> |
| 584 | 83 | to provide necessary information to the NPPO when applying <u>being considered</u> for authorization to perform specific phytosanitary actions on behalf of the NPPO | P | European Union Application may not always be applicable, therefore the more general wording 'being considered' is clearer and more correct. <i>Category : SUBSTANTIVE</i> |

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| 585 | 83 | to provide necessary information to the NPPO when applying for authorization to perform specific phytosanitary actions on behalf of the NPPO <u>actions</u> | P | European Union Performing certain tasks does not require legal enforcement to act on NPPO's behalf. <i>Category : SUBSTANTIVE</i> |
| 586 | 83 | to provide necessary information to the NPPO when applying-being considered for authorization to perform specific phytosanitary actions on behalf of the NPPO <u>o</u> | P | EPPO Application may not always be applicable, therefore the more general wording 'being considered' is clearer and more correct. Performing certain tasks does not require legal enforcement to act on NPPO's behalf. <i>Category : SUBSTANTIVE</i> |
| 587 | 83 | to provide necessary information to the NPPO when applying for authorization to perform specific phytosanitary actions on behalf of the NPPO, <u>including a declaration of potential conflict of interest.</u> | P | Caribbean Agricultural Health and Food Safety Agency to ensure that the NPPO is aware of any potential conflict of interest. <i>Category : SUBSTANTIVE</i> |
| 588 | 83 | to provide necessary-required information to the NPPO when applying for authorization to perform specific phytosanitary actions on behalf of the NPPO | P | United States of America As per specific requirements by the NPPO. <i>Category : TECHNICAL</i> |
| 589 | 83 | to provide necessary information to the NPPO when applying for authorization to perform specific phytosanitary actions on behalf of the NPPO <u>and accurate information to the NPPO when applying for authorization to perform specific phytosanitary actions on behalf of the NPPO</u> | P | APPPC (83) Singapore (5 Sep 2018 12:46 PM) To add the word - accurate to Ensure that the entity is held accountable for provision of accurate information to the NPPO. <i>Category : SUBSTANTIVE</i> |
| 590 | 83 | to provide necessary information to the NPPO when applying for authorization to perform specific phytosanitary actions on behalf of the NPPO | C | Jamaica to provide necessary information to the NPPO when applying for authorization to perform specific phytosanitary actions on behalf of the NPPO, including a declaration of potential conflict of interest. <i>Category : SUBSTANTIVE</i> |
| 591 | 83 | to provide <u>all</u> necessary information to-required by the NPPO when applying for authorization to perform specific phytosanitary actions on behalf of the NPPO | P | IPPC Regional Workshop Africa <i>Category : EDITORIAL</i> |
| 592 | 83 | to provide necessary-necessary <u>and accurate</u> information to the NPPO when applying for authorization to perform specific phytosanitary actions on behalf of the NPPO | P | Singapore To add the word " and accurate" yo ensure that the entity is held accountable for provision of accurate information to the NPPO. <i>Category : SUBSTANTIVE</i> |
| 593 | 83 | to provide necessary information to the NPPO when applying for authorization to perform specific phytosanitary actions on behalf of the NPPO | P | Nicaragua -proporcionar a la ONPF, al solicitar la autorización, la información necesaria para emprender acciones fitosanitarias específicas en nombre de la ONPF; <i>Category : SUBSTANTIVE</i> |
| 594 | 83 | proporcionar a la ONPF, al solicitar la autorización, la información necesaria para emprender acciones fitosanitarias específicas en nombre de autorizadas por la ONPF; | P | OIRSA Se agregó el termino autorizadas se tachó el termino en nombre de <i>Category : SUBSTANTIVE</i> |

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| 595 | 83 | proporcionar a la ONPF, al solicitar la autorización, la información necesaria para emprender acciones fitosanitarias específicas en nombre de <u>autorizadas por</u> la ONPF; | P | Nicaragua proporcionar a la ONPF, al solicitar la autorización, la información necesaria para emprender acciones fitosanitarias específicas en nombre autorizadas por de la ONPF; Se agregó el termino autorizadas se tachó el termino en nombre de <i>Category : SUBSTANTIVE</i> |
| 596 | 84 | to enter into an arrangement to perform the specific phytosanitary <u>Phytosanitary</u> actions on behalf of the NPPO | P | Ghana <i>Category : EDITORIAL</i> |
| 597 | 85 | to implement a documented quality management system to conform with the requirements set by the NPPO, which may cover: | C | New Zealand Re. "quality management system". See comment in section 2 relating to confusing requirements that sometimes relate to the QMS and other times relate to the quality manual. It is not clear if an NPPO could determine "documentation in lieu of a quality manual" would apply as an alternative to this requirement. <i>Category : SUBSTANTIVE</i> |
| 598 | 85 | to implement a documented quality management system to conform with the requirements set by the NPPO, which may cover: <u>a) quality manual</u> | P | APPPC (59) Thailand (5 Sep 2018 12:19 PM) Thailand would like to rearrange the list of document that should be prepared and implemented under quality management system as follow; a) quality manual b) standard operation procedure including - specific phytosanitary action process - development of personnel competency - document control - internal audit - management of nonconformity C) records, in particular <i>Category : SUBSTANTIVE</i> |
| 599 | 85 | to implement a documented <u>quality management system information</u> to conform with the requirements set by the NPPO, which may cover: | P | APPPC (68) Thailand (5 Sep 2018 12:26 PM) The term "documented information" may be more appropriate in this context as it is more perceivable and has already been used in ISO9001:2015. <i>Category : SUBSTANTIVE</i> |
| 600 | 85 | to implement a documented quality management system to conform with the requirements set by the NPPO, which may cover: | C | APPPC (126) New Zealand (7 Sep 2018 7:45 AM) Re. "quality management system". See comment in section 2 relating to confusing requirements that sometimes relate to the QMS and other times relate to the quality manual. It is not clear if an NPPO could determine |

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| | | | | "documentation in lieu of a quality manual" would apply as an alternative to this requirement. <i>Category : TECHNICAL</i> |
| 601 | 85 | to implement a documented quality management system to conform with the requirements set by the NPPO, which may cover: | C | Australia There are programs where an officer is authorised and the NPPO and the NPPO writes the instructional material. <i>Category : TECHNICAL</i> |
| 602 | 85 | to implement a documented quality management system to conform with the requirements set by the NPPO, which may cover: <u>a) Quality manual</u> | P | Thailand Thailand would like to rearrange the list of document that should be prepared and implemented under quality management system as follow; a) quality manual b) standard operation procedure including - specific phytosanitary action process - development of personnel competency - document control - internal audit - management of nonconformity C) records, in particular <i>Category : SUBSTANTIVE</i> |
| 603 | 85 | to implement a documented quality management system <u>informaion</u> to conform with the requirements set by the NPPO, which may cover: | P | Thailand The term "documented information" may be more appropriate in this context as it is more perceivable and has already been used in ISO9001:2015. <i>Category : EDITORIAL</i> |
| 604 | 86 | standard operating procedures <u>Standard Operating Procedures</u> | P | Ghana <i>Category : EDITORIAL</i> |
| 605 | 86 | standard operating procedures <u>procedures in including</u> | P | APPPC 60) Thailand (5 Sep 2018 12:21 PM) <i>Category : SUBSTANTIVE</i> |
| 606 | 86 | <u>b)</u> standard operating procedures | P | Thailand <i>Category : EDITORIAL</i> |
| 607 | 86 | un procedimiento normalizado de actuación <u>operación normado</u> | P | OIRSA Para ser consistente con el comentario general <i>Category : TECHNICAL</i> |
| 608 | 86 | un procedimiento normalizado de actuación <u>operación normalizado</u> | P | Costa Rica <i>Category : EDITORIAL</i> |
| 609 | 87 | competency of personnel <u>personnel specific phytosanitary action process</u> <u>- development of personnel competency</u> | P | APPPC (61) Thailand (5 Sep 2018 12:22 PM) <i>Category : SUBSTANTIVE</i> |
| 610 | 87 | competency <u>- specific phytosanitary actions process</u> <u>- development of personnel personnel competency</u> | P | Thailand <i>Category : SUBSTANTIVE</i> |

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| 611 | 88 | training of personnel | P | APPPC 62) Thailand (5 Sep 2018 12:23 PM) <i>Category : SUBSTANTIVE</i> |
| 612 | 88 | training of personnel | P | Thailand <i>Category : SUBSTANTIVE</i> |
| 613 | 88 | formación- Capacitación del personal | P | OIRSA Término mejor <i>Category : EDITORIAL</i> |
| 614 | 88 | formación- capacitación del personal | P | Costa Rica capacitación va mas dirigido al conocimiento que el personal adquiere para desempeñar una función determinada <i>Category : TECHNICAL</i> |
| 615 | 89 | document control | P | PPPO add another bullet point on issuance of lisencc <i>Category : SUBSTANTIVE</i> |
| 616 | 89 | document control, <u>which includes:</u> <u>- revision of documents</u> <u>- records, in particular of the activities undertaken in relation to the specific phytosanitary actions</u> | P | Japan "revision of documents" and "records, in particular of the activities undertaken in relation to the specific phytosanitary actions" are included "document control" <i>Category : SUBSTANTIVE</i> |
| 617 | 89 | document control <u>- internal audit</u> <u>- management of nonconformity</u> | P | APPPC (67) Thailand (5 Sep 2018 12:25 PM) <i>Category : EDITORIAL</i> |
| 618 | 89 | document control, <u>which includes:</u> | P | APPPC (140) Japan (9 Sep 2018 1:13 AM) "revision of documents" and "records, in particular of the activities undertaken in relation to the specific phytosanitary actions" are included "document control" <i>Category : SUBSTANTIVE</i> |
| 619 | 89 | document control <u>- internal audit</u> <u>- management of nonconformity</u> | P | Thailand <i>Category : EDITORIAL</i> |
| 620 | 90 | revision of documents | P | Japan "revision of documents" and "records, in particular of the activities undertaken in relation to the specific phytosanitary actions" are included "document control" <i>Category : SUBSTANTIVE</i> |
| 621 | 90 | revision of documents | P | APPPC (63) Thailand (5 Sep 2018 12:24 PM) |

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| | | | | <i>Category : EDITORIAL</i> |
| 622 | 90 | revision of documents | P | Thailand <i>Category : SUBSTANTIVE</i> |
| 623 | 91 | records, in particular of the activities undertaken in relation to the specific phytosanitary <u>Phytosanitary</u> actions | P | Ghana <i>Category : EDITORIAL</i> |
| 624 | 91 | records, in particular of the activities undertaken in relation to the specific phytosanitary actions | P | Japan "revision of documents" and "records, in particular of the activities undertaken in relation to the specific phytosanitary actions" are included "document control" <i>Category : SUBSTANTIVE</i> |
| 625 | 91 | records, in particular of the activities undertaken in relation to the specific phytosanitary actions <u>- list of equipment and their maintenance / calibration schedule to be used for the Phytosanitary actions that the entity is authorised to perform.</u> | P | APPPC 84) Singapore (5 Sep 2018 12:48 PM) To include the list of equipment used inside the overall quality management manual to ensure accountability of proper equipment used. <i>Category : SUBSTANTIVE</i> |
| 626 | 91 | <u>c)</u> records, in particular of the activities undertaken in relation to the specific phytosanitary actions | P | Thailand <i>Category : EDITORIAL</i> |
| 627 | 91 | records, in particular of the activities undertaken in relation to the specific phytosanitary actions <u>- list of equipment and their maintenance/calibration schedule to be used for the phytosanitary actions that the entity is authorised to perform.</u> | P | Singapore To include a list of equipment used in the phytosanitary actions inside the overall quality management manual to ensure accountability of the proper equipment used. <i>Category : SUBSTANTIVE</i> |
| 628 | 92 | internal audit | P | APPPC 65) Thailand (5 Sep 2018 12:24 PM) <i>Category : EDITORIAL</i> |
| 629 | 92 | internal audit | P | Thailand <i>Category : EDITORIAL</i> |
| 630 | 93 | management of nonconformity <u>-to provide notification (within an agreed time frame) to the NPPO upon a major change in management, site/location, non-conformity, or the outsourcing of phytosanitary activities to another third party entity</u> | P | Australia Clarification as these are also elements are also a responsibility of an authorised entity. <i>Category : TECHNICAL</i> |
| 631 | 93 | management of noneonformity <u>non-conformity</u> | P | Japan <i>Category : EDITORIAL</i> |
| 632 | 93 | management of nonconformity | P | APPPC 8) Nepal (9 Aug 2018 5:17 PM) <i>Category : SUBSTANTIVE</i> |

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| | | <u>□ To conduct PRA and surveillance management of noneconformity</u> | | |
| 633 | 93 | <u>management of noneconformity</u> | P | APPPC (66) Thailand (5 Sep 2018 12:24 PM) <i>Category : EDITORIAL</i> |
| 634 | 93 | <u>management of noneconformity</u> | P | Thailand <i>Category : EDITORIAL</i> |
| 635 | 94 | to maintain infrastructure, where applicable, infrastructure and resources to consistently carry out the actions necessary to conform with the requirements set by the NPPO | P | European Union Infrastructure is always applicable. <i>Category : SUBSTANTIVE</i> |
| 636 | 94 | to maintain infrastructure, where applicable, and resources to consistently carry out the <u>specific phytosanitary</u> actions necessary to conform in compliance with the requirements set by the NPPO | P | European Union Better wording. <i>Category : EDITORIAL</i> |
| 637 | 94 | to maintain infrastructure, where applicable, infrastructure and resources to consistently carry out the <u>specific phytosanitary</u> actions necessary to conform in compliance with the requirements set by the NPPO | P | EPPO Better wording Infrastructure is Always applicable. <i>Category : SUBSTANTIVE</i> |
| 638 | 94 | to maintain infrastructure <u>infrastructure and security</u> , where applicable, and resources to consistently carry out the actions necessary to conform with the requirements set by the NPPO | P | Australia Clarification <i>Category : TECHNICAL</i> |
| 639 | 95 | to ensure personnel have the relevant education and experience to perform the specific phytosanitary actions, <u>and to ensure that their skills and competencies are maintained at an adequate level to consistently carry out the actions necessary to conform with the requirements set by the NPPO</u> | P | Panama To simplify and clarify <i>Category : EDITORIAL</i> |
| 640 | 95 | to ensure personnel have the relevant education and experience <u>required by the NPPO</u> to perform the specific phytosanitary actions | P | Viet Nam The relevant education and experience for personnel should be required by the NPPO <i>Category : SUBSTANTIVE</i> |
| 641 | 95 | to ensure personnel have the relevant education and experience to perform the specific phytosanitary <u>Phytosanitary</u> actions | P | Ghana <i>Category : EDITORIAL</i> |
| 642 | 95 | to ensure personnel have the relevant education and experience <u>required by the NPPO</u> to perform the specific phytosanitary actions | P | Japan The relevant education and experience for personnel should be ones required by the NPPO. <i>Category : SUBSTANTIVE</i> |
| 643 | 95 | to ensure personnel have the relevant education and experience <u>required by the NPPO</u> to perform the specific phytosanitary actions | P | APPPC (139) Japan (9 Sep 2018 1:09 AM) The relevant education and experience for personnel should be ones required by the NPPO |

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| | | | | <i>Category : SUBSTANTIVE</i> |
| 644 | 95 | to ensure personnel have the relevant education and experience to perform the specific phytosanitary actions <u>actions on behalf of the NPPO</u> | P | APPPC (167) Philippines (12 Sep 2018 3:30 AM) <i>Category : SUBSTANTIVE</i> |
| 645 | 95 | to ensure personnel have the relevant education and experience <u>required by the NPPO</u> to perform the specific phytosanitary actions | P | IPPC Regional Workshop Africa <i>Category : EDITORIAL</i> |
| 646 | 95 | to ensure personnel have the relevant education and experience to perform the specific phytosanitary actions | C | Australia This may not always be applicable as individuals may be trained and assessed by the NPPO prior to being approved. <i>Category : TECHNICAL</i> |
| 647 | 95 | to ensure personnel have the relevant education <u>training</u> and experience to perform the specific phytosanitary actions | P | Australia Clarification <i>Category : TECHNICAL</i> |
| 648 | 95 | to ensure personnel have the relevant education and experience to perform the specific phytosanitary actions <u>actions and to ensure that their skills and competencies are maintained at an adequate level to consistently carry out the actions necessary to conform with the requirements set by the NPPO</u> | P | Costa Rica To simplify and clarity. join this sentence with the following <i>Category : EDITORIAL</i> |
| 649 | 95 | to ensure personnel have the relevant education and experience <u>required by the NPPO</u> to perform the specific phytosanitary actions | P | Eritrea <i>Category : EDITORIAL</i> |
| 650 | 95 | asegurarse <u>Asegurarse</u> de que el personal cuente con la formación <u>capacitación</u> y experiencia necesarias para emprender las acciones fitosanitarias específicas; <u>garantizando que sus conocimientos especializados y competencias se mantengan en un nivel suficiente para cumplir los requisitos establecidos por la ONPF.</u> | P | OIRSA Se recomienda unificar párrafos 95 y 96 ya que plantean similares funciones y responsabilidades de la entidad autorizada. <i>Category : SUBSTANTIVE</i> |
| 651 | 96 | to train personnel and ensure that their skills and competencies are maintained at an adequate level to consistently carry out the actions necessary to conform with the requirements set by the NPPO | P | Panama incorporated above <i>Category : EDITORIAL</i> |
| 652 | 96 | to train personnel and ensure that their skills and competencies are maintained at an adequate level to consistently carry out the <u>specific phytosanitary</u> actions necessary to conform in compliance with the requirements set by the NPPO | P | European Union Better wording. <i>Category : EDITORIAL</i> |
| 653 | 96 | to train personnel and ensure that their skills and competencies are maintained at an adequate level to consistently carry out the <u>specific phytosanitary</u> actions necessary to conform in compliance with the requirements set by the NPPO | P | EPPO Better wording <i>Category : EDITORIAL</i> |
| 654 | 96 | to train personnel and ensure that their skills and competencies are maintained at an adequate level to consistently carry out the actions necessary to conform with the requirements set by the NPPO | P | Costa Rica incorporated above <i>Category : EDITORIAL</i> |
| 655 | 96 | formar al <u>Asegurarse</u> de que el personal <u>cuente con la capacitación y garantizar experiencia necesarias para emprender las acciones fitosanitarias específicas.</u> <u>garantizando</u> que sus conocimientos especializados y competencias se mantengan | P | OIRSA Se recomienda unificar ambos párrafos 95 y 96 ya que plantean similares funciones y responsabilidades de la entidad autorizada. <i>Category : SUBSTANTIVE</i> |

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| | | en un nivel suficiente para llevar a cabo de forma sistemática las acciones necesarias a fin de cumplir los requisitos establecidos por la ONPF. | | |
| 656 | 97 | to maintain and provide quality management system documents (including records <u>records of its activities</u>) to the NPPO as required | P | European Union More precise wording. <i>Category : TECHNICAL</i> |
| 657 | 97 | to maintain and provide quality management system documents (including records <u>records of its activities</u>) to the NPPO as required | P | EPPO More precise wording <i>Category : TECHNICAL</i> |
| 658 | 97 | to maintain and provide quality management system documents documented <u>information</u> (including records) to the NPPO as required | P | APPPC (69) Thailand (5 Sep 2018 12:27 PM) The term "documented information" may be more appropriate in this context as it is more perceivable and has already been used in ISO9001:2015. <i>Category : SUBSTANTIVE</i> |
| 659 | 97 | to maintain and provide quality management system documents (including records) to the NPPO as required | C | APPPC (127) New Zealand (7 Sep 2018 7:46 AM) Re. "quality management system". See comment in section 2 relating to confusing requirements that sometimes relate to the QMS and other times relate to the quality manual. It is not clear if an NPPO could determine "documentation in lieu of a quality manual" would apply as an alternative to this requirement. <i>Category : TECHNICAL</i> |
| 660 | 97 | to maintain and provide quality management system documents (including records) <u>documented information</u> to the NPPO as required | P | Thailand The term "documented information" may be more appropriate in this context as it is more perceivable and has already been used in ISO9001:2015. <i>Category : EDITORIAL</i> |
| 661 | 98 | to undergo audits <u>and control</u> by the NPPO (or its authorized entity) as described in the requirements set by the NPPO. | P | European Union NPPO should have rights to carry out controls in any moment. <i>Category : SUBSTANTIVE</i> |
| 662 | 98 | to undergo audits <u>and control</u> by the NPPO (or its authorized entity) as described in the requirements set by the NPPO. | P | EPPO NPPO should have rights to make control in any moment. <i>Category : SUBSTANTIVE</i> |
| 663 | 98 | to undergo audits by the NPPO (or its authorized entity) as described in the requirements set by the NPPO. | C | Ukraine We would like to suggest adding a paragraph: to meet requirements set by phytosanitary procedures, standards, legislation and guidelines of NPPO <i>Category : SUBSTANTIVE</i> |
| 3.2.1 Roles and responsibilities of entities authorized to audit or supervise | | | | |
| 664 | 99 | 3.2.1 Roles and responsibilities of entities authorized to audit or supervise | P | European Union Deletion of the section is proposed. There is no clarity on whether audits and supervision can also be delegated to a legal entity or should always be performed by the NPPO itself. This clarity is needed before this can be included here. |

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| | | | | This issue could also be covered in the standard to be developed under the topic "audits in the phytosanitary context". <i>Category : SUBSTANTIVE</i> |
| 665 | 99 | 3.2.1 Roles and responsibilities of entities authorized to audit or supervise | P | EPPO Deletion of the section is proposed. There is no clarity on whether audits and supervision can also be delegated to a legal entity or should always be performed by the NPPO itself. This clarity is needed before this can be included here. This issue could also be covered in the standard to be developed under the topic "audits in the phytosanitary context". <i>Category : SUBSTANTIVE</i> |
| 666 | 99 | 3.2.1 Roles and responsibilities of entities authorized to audit or supervise | P | IPPC Regional Workshop Central Asia & Central Europe Delete as it was not in the specifications (to be covered in ISPM audits in phytosanitary context) Исключить, поскольку это не было указано в спецификациях (которые должны охватываться Стандартом МСФМ по аудиту в фитосанитарном контексте) <i>Category : SUBSTANTIVE</i> |
| 667 | 99 | 3.2.1 Roles and responsibilities of entities authorized to audit or supervise | P | China The supervision and auditing to entities should be performed by NPPO itself, to insure the authorized entities perform phytosanitary actions according to the requirement of NPPO. <i>Category : SUBSTANTIVE</i> |
| 668 | 99 | 3.2.1 Roles and responsibilities of entities authorized to audit or supervise | C | United States of America See our comment in the para 55. <i>Category : TECHNICAL</i> |
| 669 | 99 | 3.2.1 Roles and responsibilities of entities authorized to audit or supervise | P | APPPC 36) China (3 Sep 2018 10:18 AM) The supervision and auditing to entities should be performed by NPPO itself, to insure the authorized entities perform phytosanitary actions according to the requirement of NPPO. <i>Category : SUBSTANTIVE</i> |
| 670 | 99 | 34.2.1 Roles and responsibilities of entities authorized to audit or supervise | P | APPPC (70) Thailand (5 Sep 2018 12:28 PM) re-numbering <i>Category : EDITORIAL</i> |
| 671 | 99 | 3.2.1 Roles and responsibilities of entities authorized to in process for audit or supervise | P | Montenegro <i>Category : SUBSTANTIVE</i> |
| 672 | 99 | 34.2.1 Roles and responsibilities of entities authorized to audit or supervise | P | Thailand re-numbering <i>Category : EDITORIAL</i> |

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| 673 | 99 | 3.2.1 Roles and responsibilities of entities authorized to audit or supervise | C | Ukraine We do not support this subpart in general. The audit and supervision shall not be delegated to an entity. They shall be performed by an NPPO exclusively. <i>Category : SUBSTANTIVE</i> |
| 674 | 99 | 3.2.1 Funciones y responsabilidades de las entidades autorizadas para auditar o supervisar | P | OIRSA Este concepto no está contemplado en el ámbito de la norma. Conceptualmente adiciona un nivel más de complejidad ya que la ONPF autorizaría a otra entidad para la auditoria y supervisión que igualmente, en teoría, requeriría de auditoria y supervisión ya que es otra entidad autorizada, convirtiéndose en un círculo viciosos y alejando más a la ONPF de sus obligaciones primarias. La ONPF debe ser la autoridad que supervisa y audita. <i>Category : TECHNICAL</i> |
| 675 | 99 | 3.2.13 Funciones y responsabilidades de las entidades autorizadas para auditar o supervisar | P | Costa Rica si se considera que además de la entidades autorizadas también la ONPF puede autorizar a empresas que realicen la supervisión estas debería estar bajo el control de la ONPF y no bajo las entidades autorizadas, dado que podría existir conflictos de interés. <i>Category : SUBSTANTIVE</i> |
| 676 | 100 | An entity that audits other authorized entities or supervises phytosanitary actions should: | P | IPPC Regional Workshop Central Asia & Central Europe <i>Category : SUBSTANTIVE</i> |
| 677 | 100 | An entity that audits other authorized entities or supervises phytosanitary actions should: | P | European Union See our comment on para [99]. <i>Category : SUBSTANTIVE</i> |
| 678 | 100 | An entity that audits other authorized entities or supervises phytosanitary <u>Phytosanitary</u> actions should: | P | Ghana <i>Category : EDITORIAL</i> |
| 679 | 100 | An entity that audits other authorized entities or supervises phytosanitary actions should: | P | China The supervision and auditing to entities should be performed by NPPO itself, to insure the authorized entities perform phytosanitary actions according to the requirement of NPPO. <i>Category : SUBSTANTIVE</i> |
| 680 | 100 | An entity that audits other authorized entities or supervises phytosanitary actions should: | P | APPPC (37) China (3 Sep 2018 10:18 AM) The supervision and auditing to entities should be performed by NPPO itself, to insure the authorized entities perform phytosanitary actions according to the requirement of NPPO. <i>Category : SUBSTANTIVE</i> |
| 681 | 100 | An entity that <u>For</u> audits other authorized entities process or supervises <u>of</u> phytosanitary actions <u>NPPO</u> should: | P | Montenegro <i>Category : SUBSTANTIVE</i> |

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| 682 | 100 | An entity that audits other authorized entities or supervises phytosanitary actions should actions: | P | Montenegro <i>Category : TECHNICAL</i> |
| 683 | 100 | Una entidad que audita a otras entidades autorizadas o supervisa las acciones fitosanitarias debería: | P | OIRSA Este concepto no está contemplado en el ámbito de la norma. Conceptualmente adiciona un nivel más de complejidad ya que la ONPF autorizaría a otra entidad para la auditoria y supervisión que igualmente, en teoría, requeriría de auditoria y supervisión ya que es otra entidad autorizada, convirtiéndose en un círculo viciosos y alejando más a la ONPF de sus obligaciones primarias. La ONPF debe ser la autoridad que supervisa y audita. <i>Category : TECHNICAL</i> |
| 684 | 101 | develop and carry out an action plan or procedures for dealing with nonconformities that compromise the integrity of and trust in the programme, including notification of these to the authorizing NPPO | P | IPPC Regional Workshop Central Asia & Central Europe <i>Category : SUBSTANTIVE</i> |
| 685 | 101 | develop and carry out an action plan or procedures for dealing with nonconformities that compromise the integrity of and trust in the programme, including notification of these to the authorizing NPPO | P | European Union See our comment on para [99]. <i>Category : SUBSTANTIVE</i> |
| 686 | 101 | develop and carry out an action plan or procedures for dealing with nonconformities non-conformities that compromise the integrity of and trust in the programme, including notification of these to these to the authorizing NPPO | P | Japan <i>Category : EDITORIAL</i> |
| 687 | 101 | develop and carry out an action plan or procedures for dealing with nonconformities that compromise the integrity of and trust in the programme, including notification of these to the authorizing NPPO | P | China The supervision and auditing to entities should be performed by NPPO itself, to insure the authorized entities perform phytosanitary actions according to the requirement of NPPO. <i>Category : SUBSTANTIVE</i> |
| 688 | 101 | develop and carry out an action plan or procedures for dealing with nonconformities that compromise the integrity of and trust in the programme, including notification of these to the authorizing NPPO | P | APPPC (38) China (3 Sep 2018 10:19 AM) <i>Category : SUBSTANTIVE</i> |
| 689 | 101 | develop and carry out an action plan or procedures for dealing with nonconformities that compromise the integrity of and trust in the programme, including notification of these to these to the authorizing NPPO | P | APPPC (106) New Zealand (7 Sep 2018 6:44 AM) <i>Category : EDITORIAL</i> |
| 690 | 101 | develop and carry out an action plan or procedures for dealing with nonconformities that compromise the integrity of and trust in the programme, including notification of these to these to the authorizing NPPO | P | NEPPO <i>Category : EDITORIAL</i> |
| 691 | 101 | formular y ejecutar un plan de acción o procedimiento para gestionar las no conformidades que comprometan la confianza en el programa y su integridad, incluida la notificación de tales no conformidades a la ONPF responsable de la autorización; | P | OIRSA Este concepto no está contemplado en el ámbito de la norma. Conceptualmente adiciona un nivel más de complejidad ya que la ONPF autorizaría a otra entidad para la auditoria y supervisión que igualmente, en teoría, requeriría de auditoria y supervisión ya que es otra entidad autorizada, convirtiéndose en un círculo viciosos y alejando más a la ONPF de sus obligaciones primarias. La ONPF debe ser la autoridad que supervisa y audita. |

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| 692 | 102 | maintain confidentiality of information gained through its phytosanitary actions | P | IPPC Regional Workshop Central Asia & Central Europe <i>Category : SUBSTANTIVE</i> |
| 693 | 102 | maintain confidentiality of information gained through its phytosanitary actions | P | European Union See our comment on para [99]. <i>Category : SUBSTANTIVE</i> |
| 694 | 102 | maintain confidentiality of information gained through its phytosanitary <u>Phytosanitary</u> actions | P | Ghana <i>Category : EDITORIAL</i> |
| 695 | 102 | maintain confidentiality of information gained through its <u>audit or supervision of</u> phytosanitary actions | P | Caribbean Agricultural Health and Food Safety Agency For clarity and consistency <i>Category : SUBSTANTIVE</i> |
| 696 | 102 | maintain confidentiality of information gained through its phytosanitary actions | P | Japan Maintaining confidentiality is mentioned only in this paragraph in this draft ISPM. In addition, confidentiality is not specified in other ISPMs. <i>Category : SUBSTANTIVE</i> |
| 697 | 102 | maintain confidentiality of information gained through its phytosanitary actions | P | China The supervision and auditing to entities should be performed by NPPO itself, to insure the authorized entities perform phytosanitary actions according to the requirement of NPPO. <i>Category : SUBSTANTIVE</i> |
| 698 | 102 | maintain confidentiality of information gained through its phytosanitary actions | P | APPPC (146) Japan (10 Sep 2018 2:28 PM) Maintaining confidentiality is mentioned only in this paragraph in this draft ISPM. In addition, confidentiality is not specified in other ISPMs. (39) China (3 Sep 2018 10:20 AM) <i>Category : SUBSTANTIVE</i> |
| 699 | 102 | maintain confidentiality of information gained through its phytosanitary actions | C | Jamaica maintain confidentiality of information gained through its audit or supervision of phytosanitary actions <i>Category : SUBSTANTIVE</i> |
| 700 | 102 | maintain confidentiality of information gained through its <u>supervision of</u> phytosanitary actions | P | Antigua and Barbuda There is some confusion here as to which phytosanitary actions are being referred to. The auditor or supervisor is not executing the phytosanitary actions but merely auditing or supervising them. <i>Category : TECHNICAL</i> |
| 701 | 102 | mantener la confidencialidad de la información obtenida mediante sus acciones fitosanitarias; que se genera a partir de la auditoria o supervisión. | P | OIRSA El párrafo 100 indica que estas entidades son de tipo auditora o supervisora según el caso; por lo cual no estarían implementando acciones fitosanitarias propias. La información por la cual deberían mantener la confidencialidad serían aquellas generadas como resultado de esas dos actividades: auditoria o supervisión. |

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| 702 | 102 | mantener la confidencialidad de la información obtenida mediante sus acciones fitosanitarias; | P | OIRSA Este concepto no está contemplado en el ámbito de la norma. Conceptualmente adiciona un nivel más de complejidad ya que la ONPF autorizaría a otra entidad para la auditoria y supervisión que igualmente, en teoría, requeriría de auditoria y supervisión ya que es otra entidad autorizada, convirtiéndose en un círculo viciosos y alejando más a la ONPF de sus obligaciones primarias. La ONPF debe ser la autoridad que supervisa y audita. <i>Category : SUBSTANTIVE</i> |
| 703 | 102 | mantener la confidencialidad de la información obtenida mediante sus acciones fitosanitarias que se genera a partir de la auditoria o supervisión; | P | Costa Rica El párrafo 100 indica que estas entidades son de tipo auditora o supervisora según el caso; por lo cual no estarían implementando acciones fitosanitarias propias. La información por la cual deberían mantener la confidencialidad serían aquellas generadas como resultado de esas dos actividades: auditoria o supervisión. <i>Category : SUBSTANTIVE</i> |
| 704 | 103 | maintain impartiality and independence from the entities to be audited or supervised, and be free from any conflict of interest. | P | IPPC Regional Workshop Central Asia & Central Europe <i>Category : SUBSTANTIVE</i> |
| 705 | 103 | maintain impartiality and independence from the entities to be audited or supervised, and be free from any conflict of conflict of interest. <u>- to ensure personnel have the relevant training and experience to perform the specific audits being conducted</u> <u>- undertake internal audits to provide continuous feedback and identify system gaps (if applicable).</u> | P | Australia These are important components to ensure appropriate auditing. <i>Category : TECHNICAL</i> |
| 706 | 103 | maintain impartiality and independence from the entities to be audited or supervised, and be free from any conflict of conflict of interest. | P | Viet Nam <i>Category : EDITORIAL</i> |
| 707 | 103 | maintain impartiality and independence from the entities to be audited or supervised, and be free from any conflict of interest. | P | European Union See our comment on para [99]. <i>Category : SUBSTANTIVE</i> |
| 708 | 103 | maintain impartiality and independence from the entities to be audited or supervised, and be free from any conflict of conflict of interest. | P | Japan <i>Category : EDITORIAL</i> |
| 709 | 103 | maintain impartiality and independence from the entities to be audited or supervised, and be free from any conflict of interest. | P | China The supervision and auditing to entities should be performed by NPPO itself, to insure the authorized entities perform phytosanitary actions according to the requirement of NPPO. <i>Category : SUBSTANTIVE</i> |
| 710 | 103 | maintain impartiality and independence from the entities to be audited or supervised, and be free from any conflict of interest. | P | APPPC (40) China (3 Sep 2018 10:20 AM) <i>Category : SUBSTANTIVE</i> |

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| 711 | 103 | maintain impartiality and independence from the entities to be audited or supervised, and be free from any conflict of <u>conflict of</u> interest. | P | APPPC (107) New Zealand (7 Sep 2018 6:44 AM) <i>Category : EDITORIAL</i> |
| 712 | 103 | maintain impartiality and independence from the entities to be audited <u>it audits</u> or supervised <u>supervise</u> , and be free from any conflict of interest. | P | APPPC (128) New Zealand (7 Sep 2018 7:47 AM) Also see general comment re. supervision <i>Category : TECHNICAL</i> |
| 713 | 103 | maintain impartiality and independence from the entities to be audited or supervised, and be free from any conflict of interest. | C | Mauritius Publish the list of authorized entities for information of local stakeholder and NPPO of importing countries. (Proposed to add this additional requirement to the list) <i>Category : TECHNICAL</i> |
| 714 | 103 | mantener la imparcialidad e independencia de las entidades que vayan a ser auditadas o supervisadas, y estar libre de cualquier conflicto de intereses. | P | OIRSA Este concepto no está contemplado en el ámbito de la norma. Conceptualmente adiciona un nivel más de complejidad ya que la ONPF autorizaría a otra entidad para la auditoria y supervisión que igualmente, en teoría, requeriría de auditoria y supervisión ya que es otra entidad autorizada, convirtiéndose en un círculo viciosos y alejando más a la ONPF de sus obligaciones primarias. La ONPF debe ser la autoridad que supervisa y audita. <i>Category : SUBSTANTIVE</i> |
| 4. Process for Audits | | | | |
| 715 | 104 | 4. Process for Audits | C | United States of America See comment in para 55 <i>Category : TECHNICAL</i> |
| 716 | 104 | 4.5. _____ <u>Types of Process for Audits</u> | P | APPPC (71) Thailand (5 Sep 2018 12:29 PM) - re-numbering - The term "Types of Audits" is more appropriate than the term "process" as it is not a set of actions for auditing. <i>Category : SUBSTANTIVE</i> |
| 717 | 104 | 4.5. Process for Audits <u>Types of Audits</u> | P | Thailand The term "Types of Audits" is more appropriate than the term "process" as it is not a set of actions for auditing. <i>Category : SUBSTANTIVE</i> |
| 718 | 104 | 4. Process for Audits | C | Ukraine The audit and supervision shall not be delegated to an entity. They shall be performed by an NPPO exclusively. <i>Category : SUBSTANTIVE</i> |
| 4.1 Audits to authorize an entity | | | | |
| 719 | 105 | 4.5.1 <u>Audits to authorize an entity</u> | P | APPPC (72) Thailand (5 Sep 2018 12:29 PM) re-numbering <i>Category : EDITORIAL</i> |

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| 720 | 105 | 4.1 Audits to authorize <u>or not to authorize</u> an entity | P | IPPC Regional Workshop Africa <i>Category : EDITORIAL</i> |
| 721 | 105 | 4.1 Audits to authorize an entity | C | Australia It seems practical to make an additional section on the authorisation of individuals as well as entities. This would include some form of competency assessment to ensure the individual meets the requirements of the NPPO. <i>Category : TECHNICAL</i> |
| 722 | 105 | 4.5.1 Audits to authorize an entity | P | Thailand re-numbering <i>Category : EDITORIAL</i> |
| 723 | 105 | 4.1 Audits to authorize <u>or not to authorize</u> an entity | P | Eritrea <i>Category : EDITORIAL</i> |
| 724 | 105 | 4.1 Audits to authorize an entity | C | Mexico In follow-up to the previous comment it is necessary to include the procedure of how the NPPO will authorize the entities that carried out the audits, since they must have experience and competence. <i>Category : SUBSTANTIVE</i> |
| 725 | 105 | 4.1 Auditorías para autorizar a una entidad | C | OIRSA Fiscalización extraordinaria <i>Category : TECHNICAL</i> |
| 726 | 106 | Before granting authorization authorizing, the NPPO (or its authorized entity) should carry out an initial evaluation of the entity's entity and its quality manual (or documentation in lieu of a quality manual). | P | European Union There is no clarity on whether audits and supervision can also be delegated to a legal entity or should always be performed by the NPPO itself. This clarity is needed before this can be included here. This issue could also be covered in the standard to be developed under the topic "audits in the phytosanitary context". <i>Category : SUBSTANTIVE</i> |
| 727 | 106 | Before granting authorization authorizing, the NPPO (or its authorized entity) should carry out an initial evaluation of the entity's entity and its quality manual (or documentation in lieu of a quality manual). | P | EPPO There is no clarity on whether audits and supervision can also be delegated to a legal entity or should always be performed by the NPPO itself. This clarity is needed before this can be included here. This issue could also be covered in the standard to be developed under the topic "audits in the phytosanitary context". <i>Category : SUBSTANTIVE</i> |
| 728 | 106 | Before granting authorization, the NPPO (or its authorized entity) should carry out an initial evaluation of the entity's quality manual (or documentation in lieu of a quality manual). | P | IPPC Regional Workshop Central Asia & Central Europe In line with the deletion of section 3.2.1. <i>Category : EDITORIAL</i> |
| 729 | 106 | Before granting authorization, the NPPO (or its authorized entity) should carry out an initial evaluation of the entity's quality manual (or documentation in lieu of a quality manual). | P | China The supervision and auditing to entities should be performed by NPPO itself, to insure the authorized entities perform phytosanitary actions according to the requirement of NPPO. <i>Category : SUBSTANTIVE</i> |

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| 730 | 106 | Before granting authorization, the NPPO (or its authorized entity) NPPO should carry out an initial evaluation of the entity's quality manual (or documentation in lieu of a quality manual). | P | APPPC 41) China (3 Sep 2018 10:22 AM) The supervision and auditing to entities should be performed by NPPO itself, to insure the authorized entities perform phytosanitary actions according to the requirement of NPPO. <i>Category : SUBSTANTIVE</i> |
| 731 | 107 | When the quality manual (or other documentation sufficient <u>satisfactory</u> to address the specific phytosanitary actions) is acceptable, the NPPO (or its authorized entity) should carry out an audit to evaluate the entire system and the capability of the entity to implement the standard operating procedures for each phytosanitary action. | P | Canada More appropriate term. <i>Category : EDITORIAL</i> |
| 732 | 107 | When Once the quality manual (or other documentation sufficient to address the specific phytosanitary actions) is acceptable, the NPPO (or its authorized entity) should carry out an audit to evaluate the entire system and the capability of the entity to implement the standard operating procedures for each phytosanitary action. | P | Grenada <i>Category : EDITORIAL</i> |
| 733 | 107 | When the quality manual (or other documentation sufficient to address the specific phytosanitary actions) is acceptable, the NPPO (or its authorized entity) should carry out an audit to evaluate the entire system and the capability of the entity to implement the standard operating procedures for each phytosanitary action. | C | Grenada This standard is necessary and endorsed by the NPPO of Grenada <i>Category : SUBSTANTIVE</i> |
| 734 | 107 | When Once the quality manual (or other documentation sufficient to address the specific phytosanitary actions) is acceptable, the NPPO (or its authorized entity) should carry out an audit to evaluate the entire system and the capability of the entity to implement the standard operating procedures for each phytosanitary action. | P | Grenada <i>Category : EDITORIAL</i> |
| 735 | 107 | When the quality manual (or other documentation sufficient to address the specific phytosanitary actions) is acceptable, the NPPO (or its authorized entity) should carry out an audit to evaluate the entire system and the capability of the entity to implement to implement the standard operating procedures for each phytosanitary action. | P | Viet Nam <i>Category : EDITORIAL</i> |
| 736 | 107 | When the quality manual (or other documentation sufficient to address the specific phytosanitary actions) in lieu of a quality manual is acceptable, the NPPO (or its authorized entity) should carry out an audit to evaluate the entire system and the capability of the entity to implement to implement the standard operating procedures for each phytosanitary action. | P | European Union Consistency with paragraph 66 (and paragraph 106). <i>Category : EDITORIAL</i> |
| 737 | 107 | When the quality manual (or other documentation sufficient to address the specific phytosanitary actions) is acceptable, the NPPO (or its authorized entity) should carry out an audit to evaluate the entire system and the capability of the entity to implement to implement the <u>documented</u> standard operating procedures for each phytosanitary action. | P | European Union As according to paragraph 66 the: documented quality management system = documented quality manual (or documentation in lieu of a quality manual) + documented standard operating procedures, standard operating procedures should be "documented" (i.e. in |

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| | | | | written). |
| | | | | <i>Category : TECHNICAL</i> |
| 738 | 107 | When the quality manual (or other documentation sufficient to address the specific phytosanitary actions) is acceptable, the NPPO (or its authorized entity) should carry out an audit to evaluate the entire system and the capability of the entity to implement to implement the standard operating procedures for each phytosanitary action. | P | European Union There is no clarity on whether audits and supervision can also be delegated to a legal entity or should always be performed by the NPPO itself. This clarity is needed before this can be included here. This issue could also be covered in the standard to be developed under the topic "audits in the phytosanitary context". <i>Category : SUBSTANTIVE</i> |
| 739 | 107 | When the quality manual (or other documentation sufficient to address the specific phytosanitary actions in lieu of a quality manual) is acceptable, the NPPO (or its authorized entity) should carry out an audit to evaluate the entire system and the capability of the entity to implement the <u>documented</u> standard operating procedures for each phytosanitary action. | P | EPPO As according to paragraph 66 the: documented quality management system = documented quality manual (or documentation in lieu of a quality manual) + documented standard operating procedures, standard operating procedures should be "documented" (i.e. in written) . There is no clarity on whether audits and supervision can also be delegated to a legal entity or should always be performed by the NPPO itself. This clarity is needed before this can be included here. This issue could also be covered in the standard to be developed under the topic "audits in the phytosanitary context". Consistency with paragraph 66 (and paragraph 106). <i>Category : EDITORIAL</i> |
| 740 | 107 | When Once the quality manual (or other documentation sufficient to address the specific phytosanitary actions) is acceptable, the NPPO (or its authorized entity) should carry out an audit to evaluate the entire system and the capability of the entity to implement the standard operating procedures for each phytosanitary action. | P | Caribbean Agricultural Health and Food Safety Agency <i>Category : EDITORIAL</i> |
| 741 | 107 | When the quality manual (or other documentation sufficient to address the specific phytosanitary actions) is acceptable, the NPPO (or its authorized entity) should carry out an audit to evaluate the entire system and the capability of the entity to implement the standard operating procedures for each phytosanitary action. | P | IPPC Regional Workshop Central Asia & Central Europe In line with the deletion of section 3.2.1. <i>Category : EDITORIAL</i> |
| 742 | 107 | When the quality manual (or other documentation sufficient to address the specific phytosanitary actions) is acceptable, the NPPO (or its authorized entity) should carry out an audit to evaluate the entire system and the capability of the entity to implement to implement the standard operating procedures for each phytosanitary action. | P | Japan <i>Category : EDITORIAL</i> |
| 743 | 107 | When the quality manual (or other documentation sufficient to address the specific phytosanitary actions) is acceptable, the NPPO (or its authorized entity) <u>NPPO</u> should carry out an audit to evaluate the entire system and the capability of the entity to implement the standard operating procedures for each phytosanitary action. | P | China The supervision and auditing to entities should be performed by NPPO itself, to insure the authorized entities perform phytosanitary actions according to the requirement of NPPO. <i>Category : SUBSTANTIVE</i> |

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| 744 | 107 | When the quality manual (or other documentation sufficient to address the specific phytosanitary actions) is acceptable, the NPPO (or its authorized entity) should carry out an audit to evaluate the entire system and the capability of the entity to implement the standard operating procedures for each phytosanitary action. | P | APPPC (42) China (3 Sep 2018 10:22 AM) The supervision and auditing to entities should be performed by NPPO itself, to insure the authorized entities perform phytosanitary actions according to the requirement of NPPO. <i>Category : SUBSTANTIVE</i> |
| 745 | 107 | When the quality manual (or other documentation sufficient to address the specific phytosanitary actions) is acceptable, the NPPO (or its authorized entity) should carry out an audit to evaluate the entire system and the capability of the entity to implement to implement the standard operating procedures for each phytosanitary action. | P | APPPC (108) New Zealand (7 Sep 2018 6:44 AM) (85) Singapore (5 Sep 2018 12:49 PM) Missing space 9) Nepal (9 Aug 2018 5:19 PM) <i>Category : EDITORIAL</i> |
| 746 | 107 | When the quality manual (or other documentation sufficient to address the specific phytosanitary actions) is acceptable, the NPPO (or its authorized entity) should carry out an audit to evaluate the entire system and the capability of the entity to implement the standard operating procedures for each phytosanitary action. | C | Australia This may not always be applicable as individuals may be trained and assessed by the NPPO prior to being approved. The individuals quality manual would not be evaluated by the NPPO only their competency. As per the previous comment, it seems practical to make an additional section on the authorisation of individuals as well as entities. <i>Category : TECHNICAL</i> |
| 747 | 107 | When the quality manual (or other documentation sufficient to address the specific phytosanitary actions) is acceptable, the NPPO (or its authorized entity) should carry out an audit to evaluate the entire system and the capability of the entity to implement to implement the standard operating procedures for each phytosanitary action. | P | NEPPO <i>Category : EDITORIAL</i> |
| 748 | 107 | When the quality manual (or other documentation sufficient to address the specific phytosanitary actions) is acceptable, the NPPO (or its authorized entity) should carry out an audit to evaluate the entire system and the capability of the entity to implement to implement the standard operating procedures for each phytosanitary action. | P | Singapore <i>Category : EDITORIAL</i> |
| 749 | 107 | Cuando el manual de calidad (u otra documentación suficiente para abordar las acciones fitosanitarias específicas) sea aceptable, la ONPF (o la entidad autorizada por la ONPF) debería llevar a cabo una auditoría a fin de evaluar todo el sistema y la capacidad de la entidad para aplicar el procedimiento normalizado de actuación respecto de cada acción fitosanitaria. <u>La ONPF debería normalmente otorgar autorización a la entidad si la auditoría del sistema realizada por la ONPF (o por la entidad autorizada por esta) demuestra el cumplimiento de los requisitos de la ONPF para la autorización de entidades.</u> | P | Costa Rica <i>Category : EDITORIAL</i> |
| 750 | 108 | At each step of the audit, the NPPO (or its authorized entity) should provide recommendations for improvement as necessary. | P | Viet Nam The supervision and auditing to entities should be performed by |

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| | | | | NPPO itself, to insure the authorized entities perform phytosanitary actions according to the requirement of NPPO <i>Category : SUBSTANTIVE</i> |
| 751 | 108 | At each step of the audit, the NPPO (or its authorized entity) should provide recommendations for improvement as necessary. | P | European Union There is no clarity on whether audits and supervision can also be delegated to a legal entity or should always be performed by the NPPO itself. This clarity is needed before this can be included here. This issue could also be covered in the standard to be developed under the topic "audits in the phytosanitary context". <i>Category : SUBSTANTIVE</i> |
| 752 | 108 | At each step of the audit, the NPPO (or its authorized entity) should provide recommendations for improvement as necessary. | P | EPPO There is no clarity on whether audits and supervision can also be delegated to a legal entity or should always be performed by the NPPO itself. This clarity is needed before this can be included here. This issue could also be covered in the standard to be developed under the topic "audits in the phytosanitary context". <i>Category : SUBSTANTIVE</i> |
| 753 | 108 | At each step of the audit, the NPPO (or its authorized entity) should provide recommendations for improvement as necessary. | P | IPPC Regional Workshop Central Asia & Central Europe In line with the deletion of section 3.2.1. <i>Category : EDITORIAL</i> |
| 754 | 108 | At each step of the audit, the NPPO (or its authorized entity) should provide recommendations for improvement as necessary. | P | China The supervision and auditing to entities should be performed by NPPO itself, to insure the authorized entities perform phytosanitary actions according to the requirement of NPPO. <i>Category : SUBSTANTIVE</i> |
| 755 | 108 | At each step of the audit, the NPPO (or its authorized entity) should provide recommendations for improvement as necessary. | P | APPPC 43) China (3 Sep 2018 10:23 AM) The supervision and auditing to entities should be performed by NPPO itself, to insure the authorized entities perform phytosanitary actions according to the requirement of NPPO. <i>Category : SUBSTANTIVE</i> |
| 756 | 108 | At each step of the audit, the The NPPO (or its authorized entity) should <u>may</u> provide recommendations <u>observation or opportunity</u> for improvement (OFI) as necessary. | P | APPPC (73) Thailand (5 Sep 2018 12:30 PM) Thailand would like to revise this paragraph by employing common terms used in auditing. So, the term "recommendation" should be replaced by the term "observation and OFI". <i>Category : SUBSTANTIVE</i> |
| 757 | 108 | At each step of the audit, the The NPPO (or its authorized entity) should <u>may</u> provide recommendations <u>observation or opportunity</u> for improvement (OFI) as necessary. | P | Thailand Thailand would like to revise this paragraph by employing common terms used in auditing. So, the term "recommendation" should be replaced by the term "observation and OFI". <i>Category : SUBSTANTIVE</i> |
| 758 | 108 | At each step of the audit, the NPPO (or its authorized entity) should provide recommendations for improvement as necessary. | C | Ukraine Suggested version: At each step of the audit, the NPPO should provide recommendations for performance improvement as necessary |

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| 759 | 109 | The NPPO should normally grant authorization to the entity if the system audit conducted by the NPPO (or its authorized entity) demonstrates that the NPPO's requirements for authorization of entities have been met. | P | Viet Nam The entities should be authorized if the entities meet the NPPO's requirements for authorization of entities <i>Category : SUBSTANTIVE</i> |
| 760 | 109 | The If an NPPO considers the authorization of an entity, the NPPO should normally grant authorization to the entity if the system audit conducted by the NPPO (or its authorized entity) demonstrates that the NPPO's requirements for authorization of entities have been met. | P | European Union To make clear that it is first of all up to the NPPO whether they would like to consider authorization of an entity. <i>Category : SUBSTANTIVE</i> |
| 761 | 109 | The NPPO should normally grant authorization to the entity if the system audit conducted by the NPPO (or its authorized entity) demonstrates that the NPPO's requirements for authorization of entities have been met. <u>The NPPO may grant a temporary authorization, e.g. if the NPPO (or its authorized entity) needs to assess the entity during the realization of specific phytosanitary actions.</u> | P | European Union Such a provisional authorization may be useful in some cases, because without any authorization the entity would not be allowed to perform some tasks. <i>Category : SUBSTANTIVE</i> |
| 762 | 109 | The NPPO should normally grant authorization to the entity if the system audit conducted by the NPPO (or its authorized entity) demonstrates that the NPPO's requirements for authorization of entities have been met. | P | European Union There is no clarity on whether audits and supervision can also be delegated to a legal entity or should always be performed by the NPPO itself. This clarity is needed before this can be included here. This issue could also be covered in the standard to be developed under the topic "audits in the phytosanitary context". <i>Category : SUBSTANTIVE</i> |
| 763 | 109 | The If an NPPO considers the authorization of an entity, the NPPO should normally grant authorization to the entity if the system audit conducted by the NPPO (or its authorized entity) demonstrates that the NPPO's requirements for authorization of entities have been met. <u>The NPPO may grant a temporary authorization, e.g. if the NPPO (or its authorized entity) needs to assess the entity during the realization of specific phytosanitary actions.</u> | P | EPPO Such a provisional authorization may be useful in some cases, because without any authorization the entity would not be allowed to perform some tasks. There is no clarity on whether audits and supervision can also be delegated to a legal entity or should always be performed by the NPPO itself. This clarity is needed before this can be included here. This issue could also be covered in the standard to be developed under the topic "audits in the phytosanitary context". To make clear that it is first of all up to the NPPO whether they would like to consider authorization of an entity. <i>Category : SUBSTANTIVE</i> |
| 764 | 109 | The NPPO should normally grant authorization to the entity if the system audit conducted by the NPPO (or its authorized entity) demonstrates that the NPPO's requirements for authorization of entities have been met. | P | IPPC Regional Workshop Central Asia & Central Europe In line with the deletion of section 3.2.1. <i>Category : EDITORIAL</i> |
| 765 | 109 | The NPPO should normally grant authorization to the entity if the system audit conducted by the NPPO (or its authorized entity) demonstrates that the NPPO's requirements for authorization of entities have been met. | P | Japan The entities should be authorized if the entities meet the NPPO's requirements for authorization of entities. <i>Category : SUBSTANTIVE</i> |

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| 766 | 109 | The NPPO should normally grant authorization to the entity if the system audit conducted by the NPPO (or its authorized entity) demonstrates that the NPPO's requirements for authorization of entities have been met. | P | China The supervision and auditing to entities should be performed by NPPO itself, to insure the authorized entities perform phytosanitary actions according to the requirement of NPPO. <i>Category : SUBSTANTIVE</i> |
| 767 | 109 | The NPPO should normally grant authorization to the entity if the system audit conducted by the NPPO (or its authorized entity) demonstrates that the NPPO's requirements for authorization of entities have been met. | P | APPPC (44) China (3 Sep 2018 10:23 AM) The supervision and auditing to entities should be performed by NPPO itself, to insure the authorized entities perform phytosanitary actions according to the requirement of NPPO. <i>Category : SUBSTANTIVE</i> |
| 768 | 109 | The NPPO should normally grant authorization to the entity if the system audit conducted by the NPPO (or its authorized entity) demonstrates that the NPPO's requirements for authorization of entities have been met. | P | APPPC (141) Japan (9 Sep 2018 10:33 AM) The entities should be authorized if the entities meet the NPPO's requirements for authorization of entities. <i>Category : SUBSTANTIVE</i> |
| 769 | 109 | The NPPO should normally grant authorization to the entity if the system audit conducted by the NPPO (or its authorized entity) demonstrates that the NPPO's requirements for authorization of entities have been met. <u>It may be understood that the NPPO should not grant authorization to the entity if the system audit conducted by the NPPO (or its authorized entity) does not demonstrate that the NPPO's requirements for authorization of entities have been met. But in any case this should be indicated and the results communicated to the applying entity.</u> | P | IPPC Regional Workshop Africa <i>Category : SUBSTANTIVE</i> |
| 770 | 109 | The NPPO should normally grant authorization to the entity if the system audit conducted by the NPPO (or its authorized entity) demonstrates that the NPPO's requirements for authorization of entities have been met. <u>The outcomes of an audit could also lead for a rejection. So it appears logical to say some thing under such a situation.</u> | P | Eritrea <i>Category : SUBSTANTIVE</i> |
| 771 | 109 | La ONPF debería normalmente otorgar autorización a la entidad si la auditoría del sistema realizada por la ONPF (o por la entidad autorizada por esta) demuestra el cumplimiento de los requisitos de la ONPF para la autorización de entidades. | P | OIRSA Eliminar para ser consistente con todo el cuerpo de la norma <i>Category : SUBSTANTIVE</i> |
| 772 | 109 | La ONPF debería normalmente otorgar autorización a la entidad si la auditoría del sistema realizada por la ONPF (o por la entidad autorizada por esta) demuestra el cumplimiento de los requisitos de la ONPF para la autorización de entidades. | P | Costa Rica Se traslada como párrafo 108 <i>Category : EDITORIAL</i> |

| 4.2 Audits to maintain authorization | | | |
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| 773 | 110 | 4.5.2 Audits to maintain authorization | P APPPC 74) Thailand (5 Sep 2018 12:31 PM) re-numbering <i>Category : EDITORIAL</i> |
| 774 | 110 | 4.5.2 Audits to maintain authorization | P Thailand re-numbering <i>Category : EDITORIAL</i> |
| 775 | 110 | 4.2 Auditorías para mantener la autorización | C OIRSA LA FISCALIZACIÓN REGULAR Y EXTRAORDINARIA <i>Category : TECHNICAL</i> |
| 776 | 111 | The NPPO should determine the ongoing frequency of the audits to maintain authorization, based on the level of riskand complexity associated with the phytosanitary actions,the performance and the conformance of the <u>authorized</u> entity. | P Canada To provide clarity. <i>Category : TECHNICAL</i> |
| 777 | 111 | The NPPO should determine the ongoing frequency of the audits to maintain authorization, based on the level of riskand <u>risk and</u> complexity associated with the phytosanitary actions, the performance and the conformance of the entity. | P Canada <i>Category : EDITORIAL</i> |
| 778 | 111 | The NPPO should determine the ongoing frequency of the audits to maintain authorization, based on the level of riskand <u>risk and</u> complexity associated with the phytosanitary actions,the performance and the conformance of the entity <u>entity (e.g. once a year)</u> . | P Japan Delete the "ongoing" because it is not necessary. The frequency of the audits should be decided based on the level of risk and complexity associated with the phytosanitary actions, the performance and the conformance of the entity. The interval between the audits (i.e. frequency) can be extended on the basis of the level of risk and complexity and the results of the previous audits (e.g. once every few years). <i>Category : SUBSTANTIVE</i> |
| 779 | 111 | The NPPO should determine the ongoing frequency of the audits to maintain authorization, based on the level of riskand <u>risk and</u> complexity associated with the phytosanitary <u>Phytosanitary</u> actions, the performance and the conformance of the entity. | P Ghana <i>Category : EDITORIAL</i> |
| 780 | 111 | The NPPO should determine the ongoing frequency of the audits to maintain authorization, based on the level of riskand complexity associated with the phytosanitary actions,the performance and the conformance of the entity. | C PPPO clarification needed on this paragraph <i>Category : SUBSTANTIVE</i> |
| 781 | 111 | The NPPO should determine the ongoing frequency of the audits to maintain authorization, based on the level of riskand <u>risk and</u> complexity associated with the phytosanitary actions, the performance and the conformance of the entity. | P Caribbean Agricultural Health and Food Safety Agency <i>Category : EDITORIAL</i> |
| 782 | 111 | The NPPO should determine the ongoing frequency of the audits to maintain authorization, based on the level of riskand <u>risk, scope and</u> complexity associated with the phytosanitary actions, and the performance and the conformance of the entity. | P New Zealand Length of a season, range of actions carried out etc. should also influence audit frequency. Complexity can be limited to the complexity of one task - not the variety of tasks. <i>Category : TECHNICAL</i> |

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| 783 | 111 | The NPPO should determine the ongoing frequency of the audits to maintain authorization, based on the level of risk <u>and-risk, scope and</u> complexity associated with the phytosanitary actions, and the performance and the conformance of the entity. | P | APPPC 109) New Zealand (7 Sep 2018 6:47 AM) Length of a season, range of actions carried out etc. should also influence audit frequency. Complexity can be limited to the complexity of one task - not the variety of tasks. <i>Category : TECHNICAL</i> |
| 784 | 111 | The NPPO should determine the ongoing frequency of the audits to maintain authorization, based on the level of risk <u>and</u> complexity associated with the phytosanitary actions, the performance and the conformance of the entity. | P | APPPC (138) Japan (9 Sep 2018 12:54 AM) "ongoing" is not necessary. <i>Category : SUBSTANTIVE</i> |
| 785 | 111 | The NPPO should determine the ongoing frequency of the audits to maintain authorization, based on the level of risk <u>and-risk and</u> complexity associated with the phytosanitary actions, the performance and the conformance of the entity. | P | APPPC 169) Philippines (12 Sep 2018 3:32 AM) 10) Nepal (9 Aug 2018 5:20 PM) <i>Category : EDITORIAL</i> |
| 786 | 111 | The NPPO should determine the ongoing frequency of the audits to maintain authorization, based on the level of risk <u>and-risk and</u> complexity associated with the phytosanitary actions, the performance and the conformance of the entity. | P | Philippines <i>Category : EDITORIAL</i> |
| 787 | 111 | The NPPO should determine the ongoing frequency of the audits to maintain authorization, based on the level of risk <u>and-phytosanitary risk and</u> complexity associated with the phytosanitary actions, the performance and the conformance of the entity. | P | Costa Rica To clarify, at the time of performing the audit, other risks that are not the responsibility of the NPPO are not included. <i>Category : TECHNICAL</i> |
| 788 | 111 | The NPPO should determine the ongoing frequency of the audits to maintain authorization, based on the level of risk <u>and-risk and</u> complexity associated with the phytosanitary actions, the the performance and the conformance of the entity. | P | NEPPO <i>Category : EDITORIAL</i> |
| 789 | 111 | The NPPO should determine the ongoing frequency of the audits to maintain authorization, based on the level of risk <u>and-risk and</u> complexity associated with the phytosanitary actions, the the performance and the conformance of the entity. | P | Singapore <i>Category : EDITORIAL</i> |
| 790 | 111 | La ONPF debería determinar la frecuencia con la que han de realizarse auditorías para mantener la autorización, teniendo en cuenta el nivel de riesgo <u>fitosanitario</u> y la complejidad que conllevan las acciones fitosanitarias, así como el rendimiento y la conformidad de la entidad. | P | OIRSA Para clarificar términos <i>Category : EDITORIAL</i> |
| 791 | 112 | Audits to maintain authorization should be conducted at least once a year on the entity's entire system. Additional audits on a -specific part or parts of the entity's system may be conducted as necessary. | P | European Union Better wording. <i>Category : EDITORIAL</i> |
| 792 | 112 | Audits to maintain authorization should be conducted at least once a year on <u>regular basis and</u> the entity's entire system frequency should be based on the results of previous audits. <u>If necessary audits should be conducted yearly.</u> Additional audits on a specific part or parts of the entity's system may be conducted as necessary. | P | European Union Audit on the entity's entire system on a yearly basis may be considered too frequent in some circumstances and not frequent enough in other cases. <i>Category : SUBSTANTIVE</i> |

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| 793 | 112 | Audits to maintain authorization should be conducted at least once a year on regular basis and the entity's entire system <u>frequency should be based on the results of previous audits. If necessary audits can be yearly conducted.</u> Additional audits on a specific part or parts of the entity's system may be conducted as necessary. | P | EPPO Audit on the entity's entire system on a yearly basis may be considered too frequent in some circumstances and not frequent enough in other cases. Better wording <i>Category : EDITORIAL</i> |
| 794 | 112 | Audits to maintain authorization should be conducted at least once a year on the entity's entire system. Additional audits on a specific part or parts of the entity's system may be conducted as necessary. | P | Japan The frequency of the audits should be decided based on the level of risk and complexity associated with the phytosanitary actions, the performance and the conformance of the entity. The interval between the audits (i.e. frequency) can be extended on the basis of the level of risk and complexity and the results of the previous audits (e.g. once every few years). <i>Category : SUBSTANTIVE</i> |
| 795 | 112 | Audits to maintain authorization should be conducted at least once a year <u>depending on compliance on</u> the entity's entire system. Additional audits on a specific part or parts of the entity's system may be conducted as necessary. | P | PPPO add depending on compliance <i>Category : TECHNICAL</i> |
| 796 | 112 | Audits to maintain authorization should be conducted at least once a year on the entity's entire system. Additional audits on a specific part or parts of the entity's system may be conducted as necessary. | C | PPPO clarification of this paragraph <i>Category : SUBSTANTIVE</i> |
| 797 | 112 | Audits to maintain authorization should be conducted at least once a year on the entity's entire system. Additional audits on a specific part or parts of the entity's system may be conducted, as necessary. <u>necessary and as documented in the arrangement.</u> | P | United States of America NPPO and the third party should decide how often the audit should occur to remain compliant and authorized to meet NPPO's requirements <i>Category : SUBSTANTIVE</i> |
| 798 | 112 | Audits (announced or unannounced) to maintain authorization should be conducted at least once a year on the entity's entire systems <u>system (system audit)</u> . Additional audits on a specific part or parts of the entity's system <u>(surveillance audit)</u> may be conducted <u>at an appropriate time</u> as <u>frequent as</u> necessary. | P | New Zealand In seasonal industries timeliness of audits is very important. Suggest to make the sentence "Additional audits on a specific part or parts of the entity's system may be conducted at appropriate times as necessary." a separate paragraph, as this is about a different type of the audit (audit of a specific part of the system) from the system audit (audit of the entire system) discussed in the first sentence. <i>Category : SUBSTANTIVE</i> |
| 799 | 112 | Audits to maintain authorization should be conducted at least once a year on the entity's entire system. Additional audits on a specific part or parts of the entity's system may be conducted as necessary. | P | APPPC (86) Singapore (5 Sep 2018 12:52 PM) Additional paragraph to emphasise the need for an audit to verify the implementation of corrective actions as part of the authorisation process. <i>Category : SUBSTANTIVE</i> |

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| | | <u>Audits should be conducted to evaluate the implementation and efficacy of corrective action(s) agreed between the NPPO (or entity authorised to audit or supervise) and the authorised entity following a detection of non-conformity.</u> | | |
| 800 | 112 | Audits to maintain authorization should <u>may</u> be conducted at least once a year on the entity's entire system. Additional audits on a specific part or parts of the entity's system may be conducted as necessary. | P | APPPC (134) Japan (8 Sep 2018 2:02 AM) To comply with paragraph 111. Frequency of the audits should be determined based on the level of risk and complexity associated with the phytosanitary actions. <i>Category : SUBSTANTIVE</i> |
| 801 | 112 | Audits to maintain authorization should be conducted at least once a year on the entity's entire system. Additional audits (<u>announced or unannounced</u>) on a specific part or parts of the entity's system may be conducted <u>at appropriate times</u> as necessary. | P | APPPC (110) New Zealand (7 Sep 2018 6:48 AM) In seasonal industries timeliness of audits is very important. Suggest to make the sentence "Additional audits on a specific part or parts of the entity's system may be conducted at appropriate times as necessary." a separate paragraph, as this is about a different type of the audit (audit of a specific part of the system) from the system audit (audit of the entire system) discussed in the first sentence. <i>Category : TECHNICAL</i> |
| 802 | 112 | Audits to maintain authorization should be conducted at least once a year on the entity's entire system. Additional audits on a specific part or parts of the entity's system may be conducted as necessary. | C | Ukraine Suggested version: Audits to maintain authorization should be conducted regularly; their frequency shall be based on the results of previous audits. If necessary, audits may be conducted once a year. Additional audits on a specific part or parts of the entity's system may be conducted as necessary. Audits should be unbiased!!! <i>Category : SUBSTANTIVE</i> |
| 803 | 112 | Audits to maintain authorization should be conducted at least once a year on the entity's entire system. Additional audits on a specific part or parts of the entity's system may be conducted as necessary. <u>Audits should be conducted to evaluate the implementation and efficacy of corrective action(s) agreed between the NPPO (or the entity authorised to audit or supervise) and the authorised entity following a detection of non-conformity.</u> | P | Singapore To emphasize the need for an audit to verify the implementation of corrective actions as part of the authorisation process. <i>Category : SUBSTANTIVE</i> |
| 804 | 112 | Audits to maintain authorization should be conducted at least once a year on the entity's entire system. Additional audits on a specific part or parts of the entity's system may be conducted as necessary. | C | Mexico It is very broad to perform audits every year to the entire system of the entity, it is proposed to establish, depending on the authorization period, audits of monitoring, monitoring and re-evaluation in the latter if it should be the entire system. <i>Category : SUBSTANTIVE</i> |

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| 805 | 112 | A efectos de mantener la autorización deberían realizarse al menos una vez al año auditorías de todo el sistema de la entidad <u>entidad relacionado con las acciones fitosanitarias ejecutadas</u> . Podrán realizarse, según sea necesario, auditorías adicionales de una o varias partes específicas del sistema de la entidad. | P | OIRSA Responsabilidad ONPF Category : <i>TECHNICAL</i> |
| 806 | 112 | A efectos de mantener la autorización deberían realizarse al menos una vez al año auditorías de todo el sistema de la entidad <u>entidad relacionado con las acciones fitosanitarias ejecutadas</u> . Podrán realizarse, según sea necesario, auditorías adicionales de una o varias partes específicas del sistema de la entidad. | P | Costa Rica enmarcar solo la competencias de la CIPF Category : <i>EDITORIAL</i> |
| 5. Types of Nonconformity | | | | |
| 807 | 113 | 5. Types of Nonconformity<u>Non-conformity</u> | P | Japan Category : <i>EDITORIAL</i> |
| 808 | 113 | 56. Types of Nonconformity | P | APPPC (75) Thailand (5 Sep 2018 12:31 PM) re-numbering Category : <i>EDITORIAL</i> |
| 809 | 113 | 5. Types of Nonconformity | C | APPPC (131) New Zealand (7 Sep 2018 8:00 AM) For discussion and consideration. Does this standard need to be so specific in addressing categorisation of non-conformities by NPPOs? If NPPOs have already developed and are operating systems for categorising non-conformance, then the the categorisation of nonconformity would be unnecessary. The requirement could simply be that categorisation of non-compliance is transparent and manages risk to the satisfaction of trading partner's NPPO. Category : <i>SUBSTANTIVE</i> |
| 810 | 113 | 56. Types of Nonconformity | P | Thailand re-numbering Category : <i>EDITORIAL</i> |
| 811 | 113 | 5. Tipos de no conformidad<u>incumplimiento</u> | P | OIRSA Mejor comprensión del párrafo Category : <i>TECHNICAL</i> |
| 812 | 114 | When the authorized entity does not meet the requirements specified by the <u>NPPONPPO or their own documented system</u> , this should be considered as a nonconformity. | P | Viet Nam Any authorized entity that dose not follow their own standard operating procedures or documented information/system should also be defined as nonconformity Category : <i>SUBSTANTIVE</i> |
| 813 | 114 | When the authorized entity does not meet the requirements specified by the NPPO, this should be considered as a nonconformity <u>non-conformity</u> . | P | Japan Category : <i>EDITORIAL</i> |

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| 814 | 114 | When the authorized entity does not meet the requirements specified by the <u>NPPONPPO or their own documented system</u> , this should be considered as a nonconformity. | P | APPPC 160) APPPC (11 Sep 2018 9:44 AM) Any authorized entity that dose not follow their own standard operating procedures or documented information/system should also be defined as nonconformity. <i>Category : SUBSTANTIVE</i> |
| 815 | 114 | When the authorized entity does not meet the requirements specified by the <u>NPPONPPO or their own documented information</u> , this should be considered as a nonconformity. | P | Thailand Any authorized entity that dose not follow their own standard operating procedures or documented information should also be defined as nonconformity. <i>Category : SUBSTANTIVE</i> |
| 816 | 115 | A nonconformity may be identified during audits, supervision, investigations, <u>records from authorized entities</u> or through notification of non-compliance (ISPM 13 (<i>Guidelines for the notification of non-compliance and emergency action</i>)). | P | Japan A nonconformity may be identified through records from authorized entities. This proposed change is supported by APPPC as well as by Japan. <i>Category : SUBSTANTIVE</i> |
| 817 | 115 | A nonconformity may be identified during audits, supervision, investigations, <u>records from authorized entities</u> or through notification of non-compliance (ISPM 13 (<i>Guidelines for the notification of non-compliance and emergency action</i>)). | P | Viet Nam A nonconformity may be identified through records from authorized entities <i>Category : SUBSTANTIVE</i> |
| 818 | 115 | A nonconformity may be identified during audits, supervision, investigations, <u>records from authorized entities</u> , or through notification of non-compliance (ISPM 13 (<i>Guidelines for the notification of non-compliance and emergency action</i>)). | P | Korea, Republic of A nonconformity may be identified through records from authorized entities. <i>Category : SUBSTANTIVE</i> |
| 819 | 115 | A nonconformity may be identified during audits, <u>supervision, supervision or</u> investigations, or through notification of non-compliance (ISPM 13 (<i>Guidelines for the notification of non-compliance and emergency action</i>)). | P | European Union To better distinguish the case of notifications of non-compliance. <i>Category : EDITORIAL</i> |
| 820 | 115 | A nonconformity may be identified during audits, <u>supervision, supervision or</u> investigations, or through notification of non-compliance (ISPM 13 (<i>Guidelines for the notification of non-compliance and emergency action</i>)). | P | EPPO To better distinguish the case of notifications of non-compliance. <i>Category : EDITORIAL</i> |
| 821 | 115 | A <u>noneconformity-non-conformity</u> may be identified during audits, supervision, investigations, or through notification of non-compliance (ISPM 13 (<i>Guidelines for the notification of non-compliance and emergency action</i>)). | P | Japan <i>Category : EDITORIAL</i> |
| 822 | 115 | A nonconformity may be identified during audits, supervision, investigations, <u>records from authorized entities</u> or through notification of non-compliance (ISPM 13 (<i>Guidelines for the notification of non-compliance and emergency action</i>)). | P | China A non-conformity may be identified through records from authorized entities. <i>Category : SUBSTANTIVE</i> |
| 823 | 115 | A nonconformity may be identified during audits, supervision, investigations, <u>records from authorized entities</u> or through notification of non-compliance | P | APPPC 76) Thailand (5 Sep 2018 12:32 PM) Any authorized entity that dose not follow their own standard operating procedures or documented information should also be |

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| | | (ISPM 13 (<i>Guidelines for the notification of non-compliance and emergency action</i>)). | | defined as nonconformity. <i>Category : SUBSTANTIVE</i> |
| 824 | 115 | A nonconformity may be identified during audits, supervision, investigations , or through notification of non-compliance (ISPM 13 (<i>Guidelines for the notification of non-compliance and emergency action</i>)). | P | Mexico Deleted, as this concept is not very clear. <i>Category : TECHNICAL</i> |
| 825 | 116 | The type and number of nonconformities identified should be used by the NPPO to determine the ongoing status of the entity (authorized, suspended or revoked) and the subsequent audit frequency. | C | European Union The list of types of non conformities proposed for paragraph 121 could be further developed drawing on the list, for example in ISPM 36. <i>Category : SUBSTANTIVE</i> |
| 826 | 116 | The type and number of nonconformities identified should be used by the NPPO to determine the ongoing status of the entity (authorized, suspended or revoked) and the subsequent audit frequency. | P | European Union Confusing word (the entity will determine if the current status of the entity is still appropriate, and if not it will change it). <i>Category : EDITORIAL</i> |
| 827 | 116 | The type and number of nonconformities identified should be used by the NPPO to determine the ongoing status of the entity (authorized, suspended or revoked) and the subsequent audit frequency. | C | EPPO The list of types of non conformities proposed for paragraph 121 could be further developed drawing on the list, for example in ISPM 36. <i>Category : SUBSTANTIVE</i> |
| 828 | 116 | The type and number of nonconformities identified should be used by the NPPO to determine the ongoing status of the entity (authorized, suspended or revoked) and the subsequent audit frequency. | P | EPPO Confusing word (the entity will determine if the current status of the entity is still appropriate, and if not it will change it). <i>Category : EDITORIAL</i> |
| 829 | 116 | The type and number of noneonformities-non-conformities identified should be used by the NPPO to determine the ongoing status of the entity (authorized, suspended or revoked) and the subsequent audit frequency. | P | Japan <i>Category : EDITORIAL</i> |
| 830 | 116 | The type and number of nonconformities identified should be used by the NPPO to determine the ongoing status of the entity (authorized, suspended or revoked) and the subsequent follow up audit frequency. | P | APPPC 77) Thailand (5 Sep 2018 12:32 PM) The term "follow up audit" is more appropriate than the term "subsequent audit". <i>Category : EDITORIAL</i> |
| 831 | 116 | The type and number of nonconformities identified should be used by the NPPO to determine the ongoing status of the entity (authorized, suspended or revoked) and the subsequent follow up audit frequency. | P | Thailand The term "follow up audit" is more appropriate than the term "subsequent audit". <i>Category : EDITORIAL</i> |
| 832 | 117 | Any nonconformity identified should result in-If a corrective action to be agreed between nonconformity is identified, the NPPO (or should require the entity authorized to audit or supervise) and the authorized entity being audited to take a corrective action. | P | European Union It should be clear that the NPPO decides on the corrective actions, it still may be discussed with the entity but this is not a requirement in all cases. <i>Category : SUBSTANTIVE</i> |
| 833 | 117 | Any nonconformity identified should result in-If a corrective action to be agreed between nonconformity is identified, the NPPO (or should require the entity | P | EPPO It should be clear that the NPPO decides on the corrective actions, it still may be discussed with the entity but this is not a requirement in all cases. |

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| | | authorized to audit or supervise) and the authorized entity being audited <u>to take a corrective action</u> . | | Category : <i>SUBSTANTIVE</i> |
| 834 | 117 | Any nonconformity identified should result in a corrective action to be preemptively agreed between the NPPO (or the entity authorized to audit or supervise) and the authorized entity being audited. | P | Caribbean Agricultural Health and Food Safety Agency Category : <i>SUBSTANTIVE</i> |
| 835 | 117 | Any nonconformity non-conformity identified should result in a corrective action to be agreed between the NPPO (or the entity authorized to audit or supervise) and the authorized entity being audited. | P | Japan Category : <i>EDITORIAL</i> |
| 836 | 117 | Cualquier no conformidad detectada debería dar lugar a una acción correctiva que han de acordar la ONPF (o la entidad autorizada para auditar o supervisar) y la entidad autorizada que está siendo auditada. | P | OIRSA Este concepto no está contemplado en el ámbito de la norma. Category : <i>TECHNICAL</i> |
| 837 | 118 | Nonconformities <u>Non-conformities</u> may be considered as critical nonconformities non-conformities (section 5.1) or other nonconformities non-conformities (section 5.2). | P | Japan Category : <i>EDITORIAL</i> |
| 5.1 Critical nonconformity | | | | |
| 838 | 119 | 5.1 Critical nonconformity | C | Mozambique For consistence, please provide examples of critical nonconformity Category : <i>TECHNICAL</i> |
| 839 | 119 | 5.1 Critical nonconformity non-conformity | P | Japan Category : <i>EDITORIAL</i> |
| 840 | 119 | 5.1 5.1 Critical nonconformity | P | APPPC (78) Thailand (5 Sep 2018 12:33 PM) re-numbering Category : <i>EDITORIAL</i> |
| 841 | 119 | 5.1 5.1 Critical nonconformity | P | Thailand re-numbering Category : <i>EDITORIAL</i> |
| 842 | 119 | 5.1 No conformidades erueiales críticas | P | OIRSA Mejor comprensión del párrafo Category : <i>EDITORIAL</i> |
| 843 | 119 | 5.1 No conformidades erueiales críticas | P | Costa Rica termino más utilizado Category : <i>EDITORIAL</i> |
| 844 | 120 | Critical nonconformity is nonconformity that immediately impacts the integrity of and trust in <u>of and trust in</u> the NPPO's phytosanitary system and that requires an immediate corrective action <u>to action to</u> be identified and implemented. | P | Grenada Category : <i>EDITORIAL</i> |
| 845 | 120 | Critical nonconformity non-conformity is nonconformity that immediately impacts the integrity of and trust in <u>of and trust in</u> the NPPO's phytosanitary system and that requires an immediate corrective action <u>to action to</u> be identified and implemented. | P | Japan Category : <i>EDITORIAL</i> |

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| 846 | 120 | Critical nonconformity is nonconformity that immediately impacts the integrity of and trust in <u>of and trust in</u> the NPPO's phytosanitary system and that requires an immediate corrective action to <u>action to</u> be identified and implemented. | P | Australia <i>Category : EDITORIAL</i> |
| 847 | 120 | Critical nonconformity is nonconformity that immediately impacts the integrity of and trust in the NPPO's phytosanitary system and that requires an immediate corrective action to be identified and implemented. | C | United States of America The authorization programme should specify with examples what this critical nonconformities may be. <i>Category : SUBSTANTIVE</i> |
| 848 | 120 | Critical nonconformity is nonconformity that immediately impacts the integrity of and trust in <u>of and trust in</u> the NPPO's phytosanitary system and that requires an immediate-a rapid corrective action to <u>action to</u> be identified and implemented. <u>An entity can be suspended immediately from performing the authorized phytosanitary action if a critical nonconformance is identified, before the corrective actions have been implemented.</u> | P | New Zealand Immediacy of impact is irrelevant. Corrective actions may take time to be identified and implemented, hence the deletion of "immediate". It should also be recognised that an entity can be suspended immediately from performing the authorized phytosanitary action if a critical nonconformance is identified, before the corrective actions have been implemented. the meaning of this is different from the following para. <i>Category : SUBSTANTIVE</i> |
| 849 | 120 | Critical nonconformity is nonconformity that immediately impacts the integrity of and trust in <u>of and trust in</u> the NPPO's phytosanitary system and that requires an immediate-a rapid corrective action to <u>action to</u> be identified and implemented. | P | APPPC (111) New Zealand (7 Sep 2018 6:54 AM) Immediacy of impact is irrelevant <i>Category : EDITORIAL</i> |
| 850 | 120 | Critical nonconformity is nonconformity that immediately impacts the integrity of and trust in <u>of and trust in</u> the NPPO's phytosanitary system and that requires an immediate corrective action to <u>action to</u> be identified and implemented. | P | APPPC (170) Philippines (12 Sep 2018 3:32 AM) <i>Category : EDITORIAL</i> |
| 851 | 120 | Critical nonconformity is nonconformity that immediately impacts the integrity of and trust in the NPPO's phytosanitary system and that requires an immediate corrective action to <u>action to</u> be identified and implemented. | P | Philippines <i>Category : EDITORIAL</i> |
| 852 | 120 | Critical nonconformity is nonconformity that immediately impacts the integrity of and trust in <u>of and trust in</u> the NPPO's phytosanitary system and that requires an immediate corrective action to be identified and implemented. | P | Philippines <i>Category : EDITORIAL</i> |
| 853 | 120 | Critical nonconformity is nonconformity that immediately impacts the integrity of and of <u>of and</u> trust in the NPPO's phytosanitary system and that requires an immediate corrective action to <u>action to</u> be identified and implemented. | P | NEPPO <i>Category : EDITORIAL</i> |
| 854 | 120 | Critical nonconformity is nonconformity that immediately impacts the integrity of and trust in <u>of and trust in</u> the NPPO's phytosanitary system and that requires an immediate corrective action to <u>action to</u> be identified and implemented. | P | Singapore <i>Category : EDITORIAL</i> |
| 855 | 120 | Critical nonconformity is <u>a</u> nonconformity that immediately impacts the integrity of and trust in the NPPO's phytosanitary system and that requires an immediate corrective action to be identified and implemented. | P | Singapore <i>Category : EDITORIAL</i> |

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| 856 | 121 | If the authorized entity does not immediately not immediately implement the mutually agreed corrective action or the corrective action is action is not implemented to the satisfaction of the NPPO (or the entity authorized to audit or supervise), the authorization of the entity should be suspended or suspended or revoked by the NPPO. | P | Canada <i>Category : EDITORIAL</i> |
| 857 | 121 | If the authorized entity does not immediately not immediately implement the mutually agreed corrective action or the corrective action is actions not implemented to the satisfaction of the NPPO (or the entity authorized to audit or supervise) NPPO , the authorization of the entity should be suspended or suspended or revoked by the NPPO. | P | European Union There is no clarity on whether audits and supervision can also be delegated to a legal entity or should always be performed by the NPPO itself. This clarity is needed before this can be included here. This issue could also be covered in the standard to be developed under the topic "audits in the phytosanitary context". <i>Category : SUBSTANTIVE</i> |
| 858 | 121 | If the authorized entity does not immediately not immediately implement the mutually agreed corrective action or the corrective action is actions not implemented to the satisfaction of the NPPO (or the entity authorized to audit or supervise), the authorization of the entity should be suspended or suspended or revoked by the NPPO. | P | European Union The NPPO is responsible for the corrective action needed, they may discuss this with the entity but the corrective action need not necessarily be mutually agreed. It is first of all the responsibility of the NPPO and need not necessarily be agreed mutually. <i>Category : SUBSTANTIVE</i> |
| 859 | 121 | If the authorized entity does not immediately not immediately implement the mutually agreed corrective action or the corrective action is actions not implemented to the satisfaction of the NPPO (or the entity authorized to audit or supervise), the authorization of the entity should be suspended or suspended or revoked by the NPPO. <u>This is the case when:</u> <u>a) there is evidence of failing to properly perform delegated actions;</u> <u>b) there is a failure to take appropriate and timely action to remedy the shortcomings identified; or</u> <u>c) the independence or impartiality of entity has been shown to be compromised.</u> | P | European Union Nonconformities should be identified. This short list might be replaced by a more elaborated list (see comment on para 116 with reference to ISPM 36). <i>Category : SUBSTANTIVE</i> |
| 860 | 121 | If the authorized entity does not immediately not immediately implement the mutually agreed corrective action or the corrective action is action is not implemented to the satisfaction of the NPPO (or the entity authorized to audit or supervise) NPPO , the authorization of the entity should be suspended or suspended or revoked by the NPPO. <u>This is the case when:</u> <u>a) there is evidence of failing to properly perform delegated tasks;</u> <u>b) there is a failure to take appropriate and timely action to remedy the shortcomings identified; or</u> <u>c) the independence or impartiality of entity has been shown to be compromised.</u> | P | EPPO The NPPO is responsible for the corrective action needed, they may discuss this with the entity but the corrective action need not necessarily be mutually agreed. Nonconformities should be identified. This short list might be replaced by a more elaborated list (see comment on para 116 with reference to ISPM 36). There is no clarity on whether audits and supervision can also be delegated to a legal entity or should always be performed by the NPPO itself. This clarity is needed before this can be included here. This issue could also be covered in the standard to be developed under the topic "audits in the phytosanitary context". <i>Category : SUBSTANTIVE</i> |
| 861 | 121 | If the authorized entity does not immediately not immediately implement the mutually agreed corrective action or the corrective action is action is not | P | Japan |

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| | | implemented to the satisfaction of the NPPO (or the entity authorized to audit or supervise), the authorization of the entity should be suspended <u>or suspended or</u> revoked by the NPPO. | | <i>Category : EDITORIAL</i> |
| 862 | 121 | If the authorized entity does not immediately implement the mutually agreed corrective action or the corrective action is not implemented to the satisfaction of the NPPO (or the entity authorized to audit or supervise), the authorization of the entity should be suspended or revoked by the NPPO. | C | Australia It would be useful to include a dispute resolution clause <i>Category : TECHNICAL</i> |
| 863 | 121 | If the authorized entity does not immediately implement the mutually agreed corrective action or the corrective action is not implemented to the satisfaction of the NPPO (or the entity authorized to audit or supervise), the authorization of the entity should be suspended or revoked by the NPPO. | C | United States of America Time frame should be specified in the agreement, immediate is not necessarily the thought after solution. <i>Category : TECHNICAL</i> |
| 864 | 121 | If the authorized entity does not immediately <u>not</u> implement the mutually agreed corrective action <u>within the timeframe specified in the arrangement</u> or the corrective action is <u>actions</u> not implemented to the satisfaction of the NPPO (or the entity authorized to audit or supervise), the authorization of the entity should be suspended <u>or suspended or</u> revoked by the NPPO. | P | United States of America <i>Category : TECHNICAL</i> |
| 865 | 121 | If the authorized entity does not immediately <u>not</u> implement the mutually agreed corrective action <u>within an agreed timeframe, which should be as rapid as possible</u> , or the corrective action is <u>action is</u> not implemented to the satisfaction of the NPPO (or the entity authorized to audit or supervise), the authorization of the entity should be suspended <u>or suspended or</u> revoked by the NPPO. | P | New Zealand Immediate is "now" but corrective action normally takes a measure of time - to agree and implement. <i>Category : TECHNICAL</i> |
| 866 | 121 | If the authorized entity does not immediately <u>not</u> implement the mutually agreed corrective action or the corrective action is <u>action within an agreed time frame (which should be as rapid as possible) or the corrective action is</u> not implemented to the satisfaction of the NPPO (or the entity authorized to audit or supervise), the authorization of the entity should be suspended <u>or suspended or</u> revoked by the NPPO. | P | APPPC (112) New Zealand (7 Sep 2018 6:57 AM) Immediate is "now" but corrective action normally takes a measure of time - to agree and implement. <i>Category : EDITORIAL</i> |
| 867 | 121 | If the authorized entity does not immediately <u>not immediately</u> implement the mutually agreed corrective action or the corrective action is <u>action is not</u> implemented to the satisfaction of the NPPO (or the entity authorized to audit or supervise), the authorization of the entity should be suspended or revoked by the NPPO. | P | Egypt <i>Category : EDITORIAL</i> |
| 868 | 121 | If the authorized entity does not immediately implement the mutually agreed corrective action or the corrective action is not implemented to the satisfaction of the NPPO (or the entity authorized to audit or supervise), the authorization of the entity should be suspended <u>or suspended or</u> revoked by the NPPO. | P | Egypt <i>Category : EDITORIAL</i> |

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| 869 | 121 | If the authorized entity does not immediately not immediately implement the mutually -agreed corrective action or the corrective action is action is not implemented to the satisfaction of the NPPO (or the entity authorized to audit or supervise), the authorization of the entity should be suspended or suspended or revoked by the NPPO. | P | Australia The corrective action may not need to be mutually agreed. <i>Category : TECHNICAL</i> |
| 870 | 121 | If the authorized entity does not immediately not immediately implement the mutually agreed corrective action or the corrective action is action is not implemented to the satisfaction of the NPPO (or the entity authorized to audit or supervise), the authorization of the entity should be suspended or revoked by the NPPO. | P | NEPPO <i>Category : EDITORIAL</i> |
| 871 | 121 | If the authorized entity does not immediately not immediately implement the mutually agreed corrective action or the corrective action is action is not implemented to the satisfaction of the NPPO (or the entity authorized to audit or supervise), the authorization of the entity should be suspended or suspended or revoked by the NPPO. | P | Singapore <i>Category : EDITORIAL</i> |
| 872 | 121 | Si la entidad autorizada no ejecuta inmediatamente la acción correctiva mutuamente acordada o si la ONPF (o la entidad autorizada para auditar o supervisar) no considera satisfactoria la ejecución de la acción correctiva, la ONPF debería debería suspender o revocar la autorización de la entidad. | P | OIRSA Mejor comprensión del párrafo <i>Category : EDITORIAL</i> |
| 5.2 Other nonconformity | | | | |
| 873 | 122 | 5.2 Other nonconformity | C | Mozambique For consistence, please provide examples of other nonconformity <i>Category : TECHNICAL</i> |
| 874 | 122 | 5.2 Other nonconformity non-conformity | P | Japan <i>Category : EDITORIAL</i> |
| 875 | 122 | 5.2 Other nonconformity | P | APPPC 79) Thailand (5 Sep 2018 12:33 PM) re-numbering <i>Category : EDITORIAL</i> |
| 876 | 122 | 5.2 Other nonconformity Lesser nonconformity | P | IPPC Regional Workshop Africa The word 'lesser' differentiates the severity of this type of nonconformity from 'Critical nonconformity' <i>Category : TECHNICAL</i> |
| 877 | 122 | 5.2 Other nonconformity | P | Thailand re-numbering <i>Category : EDITORIAL</i> |
| 878 | 123 | Other nonconformity is nonconformity that does do not directly or immediately impact the integrity of and trust in the NPPO's phytosanitary system but that will | P | European Union Improvement. <i>Category : EDITORIAL</i> |

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| | | need corrective actions to be taken within a timeframe specified by the NPPO (or the entity authorized to audit or supervise). | | |
| 879 | 123 | Other nonconformity is nonconformity that does not directly or immediately impact the integrity of and trust in the NPPO's phytosanitary system but that will need corrective actions to be taken within a timeframe specified by the NPPO (or the entity authorized to audit or supervise). <u>Suspension or revocation of the authorization is not needed but may be considered when repeatedly other nonconformities are identified or when corrective actions are not taken within the required timeframe.</u> | P | European Union To indicate that other nonconformities do not lead to suspension or revocation but when happening repeatedly or when corrective actions not taken this may be considered. <i>Category : SUBSTANTIVE</i> |
| 880 | 123 | Other nonconformity is nonconformity that does not directly or immediately impact the integrity of and trust in the NPPO's phytosanitary system but that will need <u>requires</u> corrective actions to be taken within a timeframe specified by the NPPO (or the entity authorized to audit or supervise). | P | European Union More appropriate wording for an ISPM and consistency with paragraph 120. <i>Category : EDITORIAL</i> |
| 881 | 123 | Other nonconformity is nonconformity that does do not directly or immediately impact the integrity of and trust in the NPPO's phytosanitary system but that will need <u>requires</u> corrective actions to be taken within a timeframe specified by the NPPO (or the entity authorized to audit or supervise). <u>Suspension or revocation of the authorization is not needed but may be considered when repeatedly other nonconformities are identified or when corrective actions are not taken within the required timeframe.</u> | P | EPPO More appropriate wording for an ISPM and consistency with paragraph 120. To indicate that other nonconformities do not lead to suspension or revocation but when happening repeatedly or when corrective actions not taken this may be considered. Improvement <i>Category : EDITORIAL</i> |
| 882 | 123 | Other nonconformity-non-conformity <u>is nonconformity-non-conformity</u> that does not directly or immediately impact the integrity of and trust in the NPPO's phytosanitary system but that will need corrective actions to be taken within a timeframe specified by the NPPO (or the entity authorized to audit or supervise). | P | Japan <i>Category : EDITORIAL</i> |
| 883 | 123 | Other nonconformity is nonconformity that does not directly or immediately impact the integrity of and trust in the NPPO's phytosanitary system but that will need corrective actions to be taken within a timeframe specified by the NPPO (or the entity authorized to audit or supervise). | C | United States of America The authorization programme should specify with examples what other nonconformities may be. <i>Category : SUBSTANTIVE</i> |
| 884 | 123 | Other nonconformity is <u>a</u> nonconformity that does not directly or immediately impact the integrity of and trust in the NPPO's phytosanitary system but that will need corrective actions to be taken within a timeframe specified by the NPPO (or the entity authorized to audit or supervise). | P | APPPC (87) Singapore (5 Sep 2018 12:53 PM) Missing " a" <i>Category : EDITORIAL</i> |
| 885 | 123 | Other nonconformity is nonconformity that does not directly or immediately impact the integrity of and trust in the NPPO's phytosanitary system but that will need corrective actions to be taken within a timeframe <u>time frame</u> specified by the NPPO (or the entity authorized to audit or supervise). | P | IPPC Regional Workshop Africa <i>Category : EDITORIAL</i> |

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| 886 | 123 | Other nonconformity is nonconformity that does not directly or immediately impact the integrity of and trust in the NPPO's phytosanitary system but that will need corrective actions to be taken within a timeframe specified by the NPPO (or the entity authorized to audit or supervise). | C | IPPC Regional Workshop Africa replace the term 'other nonconformity' with 'lesser nonconformity'. <i>Category : SUBSTANTIVE</i> |
| 887 | 123 | Other nonconformity is <u>a</u> nonconformity that does not directly or immediately impact the integrity of and trust in the NPPO's phytosanitary system but that will need corrective actions to be taken within a timeframe specified by the NPPO (or the entity authorized to audit or supervise). | P | Singapore inclusion of missing "a" for better sentence structure. <i>Category : EDITORIAL</i> |
| 888 | 123 | Se consideran otras no conformidades las que no afectan de forma directa o inmediata a la integridad y la confianza en el sistema fitosanitario de la ONPF, pero requerirán la ejecución de acciones correctivas en un plazo especificado por la ONPF (o la entidad autorizada para auditar o supervisar supervisar) y podrá <u>continuar operando únicamente bajo la supervisión directa de la ONPF (o de la entidad autorizada para auditar o supervisar) hasta que se subsane. En caso contrario, se consideraría como una no conformidad crítica.</u> | P | OIRSA Mejor comprensión del párrafo y aclarando responsabilidades de la ONPF <i>Category : TECHNICAL</i> |
| 6. Suspension,Revocation andReinstatement of Authorization | | | | |
| 889 | 124 | 6. Suspension,Revocation andReinstatement and Reinstatement of Authorization | P | Ghana <i>Category : EDITORIAL</i> |
| 890 | 124 | 6. Suspension,Revocation andReinstatement of Authorization | C | PPPO the basis for revocation needs to be established. The understanding about suspension is immediate shut down of a system, however, this draft allows for operation to continue and suspension is only carried out if corrective actions are not implemented. <i>Category : TECHNICAL</i> |
| 891 | 124 | 6. Suspension,Revocation andReinstatement of Authorization | C | PPPO add to each action, to communicate all decisions to relevant authorities. <i>Category : SUBSTANTIVE</i> |
| 892 | 124 | 6. Suspension,Revocation andReinstatement of Authorization | C | PPPO add in each action, that each decision is communicated to other NPPOs <i>Category : SUBSTANTIVE</i> |
| 893 | 124 | 6. Suspension,Revocation andReinstatement and Reinstatement of Authorization <u>In the context of this standard, three types of authorization status change are as follows.</u> | P | Japan Add an explanation of authorization status. <i>Category : SUBSTANTIVE</i> |
| 894 | 124 | 6. Suspension,Revocation andReinstatement of Authorization | C | United States of America Needs a paragraph or opening statement to specify that "An authorized entity may or may not operate when their |

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| | | | | authorization is under the specific status below". Could include "pending" and "active" authorization status to cover the full spectrum of possible status. <i>Category : SUBSTANTIVE</i> |
| 895 | 124 | 67. Suspension, Revocation and Reinstatement of Authorization | P | APPPC (80) Thailand (5 Sep 2018 12:33 PM) re-numbering <i>Category : EDITORIAL</i> |
| 896 | 124 | 6. Suspension, Revocation and Reinstatement of Authorization <u>In the context of this standard, three types of authorization status change are as follows.</u> | P | APPPC (136) Japan (8 Sep 2018 5:03 PM) Add an explanation of authorization status <i>Category : SUBSTANTIVE</i> |
| 897 | 124 | 6. Suspension, Revocation and Reinstatement of Authorization | P | APPPC 171) Philippines (12 Sep 2018 3:32 AM) 113) New Zealand (7 Sep 2018 6:59 AM) <i>Category : EDITORIAL</i> |
| 898 | 124 | 6. Suspension, Revocation and Reinstatement of Authorization | C | Jamaica Consider the use of the word "Probation" as per the definition for Suspension "Suspension" – An entity whose authorization has been temporarily discontinued for a specified time to effect corrective action. <i>Category : SUBSTANTIVE</i> |
| 899 | 124 | 6. Suspension, Revocation and Reinstatement of Authorization | P | Philippines <i>Category : EDITORIAL</i> |
| 900 | 124 | 6. Suspension, Revocation and Reinstatement of Authorization | P | NEPPO <i>Category : EDITORIAL</i> |
| 901 | 124 | 6. Suspension, Revocation and Reinstatement of Authorization | C | Montenegro wording in point 5 paragraph 3 <i>Category : EDITORIAL</i> |
| 902 | 124 | 67. Suspension, Revocation and Reinstatement of Authorization | P | Thailand re-numbering <i>Category : EDITORIAL</i> |
| 903 | 124 | 6. Medidas para la atención de las no conformidades críticas Suspensión, revocación y restablecimiento de la autorización | P | OIRSA Usó términos correctos <i>Category : TECHNICAL</i> |
| 904 | 125 | Suspension. An entity whose authorization is suspended may continue to operate only under the direct supervision of the NPPO (or the entity authorized to audit or supervise). | P | Canada <i>Category : EDITORIAL</i> |

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| 905 | 125 | Suspension. An entity whose authorization is suspended may continue to operate only <u>after corrective actions were taken</u> under the direct supervision of the NPPO (or the entity authorized to audit or supervise). | P | Panama To clarify the concept of suspension. <i>Category : TECHNICAL</i> |
| 906 | 125 | Suspension. An entity whose authorization is suspended may continue to operate only under the direct supervision of the NPPO (or the entity authorized to audit or supervise) <u>supervise</u>) as far as these phytosanitary actions are not prohibited. | P | European Union This is to make clear that a legal entity whose powers are suspended may continue the activities that are not prohibited. <i>Category : SUBSTANTIVE</i> |
| 907 | 125 | Suspension. An entity whose authorization is suspended may continue to operate only under the direct supervision of the NPPO (or the entity authorized to audit or supervise) <u>supervise</u>) as far as these phytosanitary actions are not prohibited. | P | EPPO This is to make clear that a legal entity whose powers are suspended may continue the activities that are not prohibited. <i>Category : SUBSTANTIVE</i> |
| 908 | 125 | Suspension. An entity whose authorization is suspended may continue to operate only under the direct supervision of the NPPO (or the entity authorized to audit or supervise). | P | Ghana <i>Category : EDITORIAL</i> |
| 909 | 125 | Suspension. An entity whose authorization is suspended may continue to operate only under the direct supervision of the NPPO (or the entity authorized to audit or supervise) <u>shall cease operation.</u> | P | PPPO replace..." may continue to operate only under the direct supervision of the NPPO (or the entity authorized to audit or supervise)" with... 'shall cease operation' <i>Category : TECHNICAL</i> |
| 910 | 125 | Suspension. An entity whose authorization is suspended may continue to operate only <u>after corrective actions are undertaken</u> under the direct supervision of the NPPO (or the entity authorized <u>by the NPPO</u> to audit or supervise). | P | Caribbean Agricultural Health and Food Safety Agency For clarity <i>Category : SUBSTANTIVE</i> |
| 911 | 125 | Suspension. An entity whose authorization is suspended may continue to operate only under the direct supervision of the NPPO (or the entity authorized to audit or supervise). <u>Must only resume after corrective measures have been put in place.</u> | P | Mozambique For rigorousness of authorized entities consider to add the requirements to resume <i>Category : TECHNICAL</i> |
| 912 | 125 | Suspension. An entity whose authorization is suspended may continue to operate only under the direct supervision of the NPPO (or the entity authorized to audit or supervise). | P | Japan <i>Category : EDITORIAL</i> |
| 913 | 125 | Suspension. An entity whose authorization is suspended may continue to operate only under the direct supervision of the NPPO (or the entity authorized to audit or supervise). | C | Australia Clarification required on how an Authorized entity can still carry out phytosanitary actions while suspended. An Entity can not perform actions under the Authorisation until the suspension is lifted, although there may be exceptions. During this time the entity can continue to operate in a normal capacity, however, they will not be considered an Authorised entity. Once corrective actions have taken place the authorisation can be reinstated. <i>Category : TECHNICAL</i> |
| 914 | 125 | Suspension. An entity whose authorization is suspended may continue to operate only under the direct <u>(i.e. line of sight)</u> supervision of the NPPO (or the entity authorized to audit or supervise). | P | New Zealand <i>Category : EDITORIAL</i> |

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| 915 | 125 | Suspension. An entity whose authorization is suspended may continue to operate only under the direct (<i>i.e. line of sight</i>) supervision of the NPPO (or the entity authorized to audit or supervise). | P | APPPC (132) New Zealand (7 Sep 2018 8:05 AM) <i>Category : EDITORIAL</i> |
| 916 | 125 | Suspension. An entity whose authorization is suspended may continue to operate only under the direct supervision of the NPPO (or the entity authorized to audit or supervise). | P | APPPC (172) Philippines (12 Sep 2018 3:33 AM) <i>Category : EDITORIAL</i> |
| 917 | 125 | Suspension. An entity whose authorization is suspended may continue to operate only under the direct supervision of the NPPO (or the entity authorized to audit or supervise). | C | Jamaica Suspension. An entity whose authorization is suspended may continue to operate only after corrective actions are undertaken and under the direct supervision of the NPPO (or the entity authorized to audit or supervise). <i>Category : SUBSTANTIVE</i> |
| 918 | 125 | Suspension. Suspension - An entity whose authorization is suspended may continue to operate only under the direct supervision of the NPPO (or the entity authorized to audit or supervise). | P | IPPC Regional Workshop Africa <i>Category : EDITORIAL</i> |
| 919 | 125 | Suspension. An entity whose authorization is suspended may continue to operate only <i>after corrective actions were taken</i> under the direct supervision of the NPPO (or the entity authorized to audit or supervise). | P | Costa Rica To clarify the concept of suspension. <i>Category : TECHNICAL</i> |
| 920 | 125 | Suspension. An entity whose authorization is suspended may continue to operate only under the direct supervision of the NPPO (or the entity authorized to audit or supervise). | C | Ukraine Suggested version: An entity whose authorization is suspended may continue to operate only in actions that have not been forbidden as a result of audit. <i>Category : SUBSTANTIVE</i> |
| 921 | 125 | Suspension. An entity whose authorization is suspended may continue to operate only under the direct supervision of the NPPO (or the entity authorized to audit or supervise). | P | Singapore To include a missing space. <i>Category : EDITORIAL</i> |
| 922 | 125 | Suspension. An entity whose authorization is suspended may continue to operate only under the direct supervision of the NPPO (or the entity authorized to audit or supervise). <i>Suspensión temporal: Cuando se suspenda la autorización de una entidad, esta podrá continuar operando únicamente bajo la supervisión directa de la ONPF (o de la entidad autorizada para auditar o supervisar).</i> <i>Se agregó temporal para aclarar esta definición faltaría definir suspensión indefinida.</i> | P | Nicaragua Suspensión. Cuando se suspenda la autorización de una entidad, esta podrá continuar operando únicamente bajo la supervisión directa de la ONPF (o de la entidad autorizada para auditar o supervisar). <i>Category : SUBSTANTIVE</i> |
| 923 | 125 | Suspension. An entity whose authorization is suspended may continue to operate only <i>after corrective actions were taken</i> under the direct supervision of the NPPO (or the entity authorized to audit or supervise). | P | Argentina To clarify the concept of suspension. <i>Category : TECHNICAL</i> |

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| 924 | 125 | Suspension. An entity whose authorization is suspended may continue to operate only <u>after corrective actions were taken</u> under the direct supervision of the NPPO (or the entity authorized to audit or supervise). | P | Uruguay To clarify the concept of suspension <i>Category : TECHNICAL</i> |
| 925 | 125 | Suspension. An entity whose authorization is suspended may continue to operate only <u>after corrective actions were taken</u> under the direct supervision of the NPPO (or the entity authorized to audit or supervise). | P | COSAVE To clarify the concept of suspension. <i>Category : TECHNICAL</i> |
| 926 | 125 | Suspensión Suspensión Temporal. Cuando se suspenda la autorización de una entidad, esta podrá continuar operando únicamente bajo la supervisión directa de la ONPF (o de la entidad autorizada para auditar o supervisar). | P | OIRSA Se agregó temporal para aclarar esta definición faltaría definir suspensión indefinida. <i>Category : TECHNICAL</i> |
| 927 | 125 | Suspensión. Cuando se suspenda la autorización de una entidad, esta podrá continuar operando únicamente bajo la supervisión directa de la ONPF (o de la entidad autorizada para auditar o supervisar). | C | OIRSA Se recomienda que este término sea evaluado ya que una entidad no puede contar con una suspensión y seguir trabajando. Suspensión. Cuando se suspenda la autorización de una entidad, esta no podrá continuar operando hasta que solvente las observaciones realizadas. <i>Category : TECHNICAL</i> |
| 928 | 125 | Suspensión. Cuando se suspenda la autorización de una entidad, esta podrá continuar operando únicamente bajo la supervisión directa <u>deberá subsanar las no conformidades dentro de la ONPF (o de la entidad autorizada para auditar o supervisar) un tiempo definido</u> | P | OIRSA uso correctos de términos <i>Category : TECHNICAL</i> |
| 929 | 125 | Suspensión. Cuando se suspenda la autorización de una entidad, esta podrá continuar operando únicamente bajo la supervisión directa de la ONPF (o de la entidad autorizada para auditar o supervisar). | C | Colombia Presentar una definición del término permitirá aclarar que acciones se deben realizar. Lo anterior teniendo en cuenta que de la forma en que actualmente está planteada no evidencia ningún cambio en la operación normal, debido que la auditoria es algo que siempre se da. <i>Category : SUBSTANTIVE</i> |
| 930 | 125 | Suspensión Suspensión temporal. Cuando se suspenda la autorización de una entidad, esta podrá continuar operando únicamente bajo la supervisión directa de la ONPF (o de la entidad autorizada para auditar o supervisar). | P | Nicaragua Suspensión temporal: Cuando se suspenda la autorización de una entidad, esta podrá continuar operando únicamente bajo la supervisión directa de la ONPF (o de la entidad autorizada para auditar o supervisar). Se agregó temporal para aclarar esta definición faltaría definir suspensión indefinida. <i>Category : SUBSTANTIVE</i> |
| 931 | 126 | Revocation. An entity whose authorization is revoked should no longer <u>have its perform</u> phytosanitary actions <u>recognized by on behalf of</u> the <u>authorizing NPPO within the NPPO's phytosanitary system</u> NPPO. | P | European Union For clarity. <i>Category : EDITORIAL</i> |
| 932 | 126 | Revocation. An entity whose authorization is revoked should no longer <u>have its perform</u> phytosanitary actions <u>recognized by on behalf of</u> the <u>authorizing NPPO within the NPPO's phytosanitary system</u> NPPO. | P | EPPO For clarity. <i>Category : EDITORIAL</i> |

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| 933 | 126 | Revocation. An entity whose authorization is revoked should no longer have its phytosanitary actions recognized by the authorizing NPPO within the NPPO's phytosanitary -Phytosanitary system. | P | Ghana <i>Category : EDITORIAL</i> |
| 934 | 126 | Revocation. An entity whose authorization is revoked should no longer have its phytosanitary actions recognized by the authorizing NPPO within the NPPO's phytosanitary system. | C | Jamaica Only critical non conformities should result in revocation. <i>Category : SUBSTANTIVE</i> |
| 935 | 126 | Revocation. Revocation - An entity whose authorization is revoked should no longer have its phytosanitary actions recognized by the authorizing NPPO within the NPPO's phytosanitary system. | P | IPPC Regional Workshop Africa <i>Category : EDITORIAL</i> |
| 936 | 126 | Revocation. An entity whose authorization is revoked should no longer have its phytosanitary actions recognized by the authorizing NPPO within the NPPO's phytosanitary system. | C | Ukraine We believe the standard has to define more specific conditions and timeframe under which an NPPO may suspend, revoke, reinstate or issue authorizations. <i>Category : SUBSTANTIVE</i> |
| 937 | 126 | Revocación. Cuando se revoque la autorización de una entidad, la ONPF que concedió la autorización debería-deberá dejar de reconocer las acciones fitosanitarias de la entidad en el marco del sistema fitosanitario de la ONPF. | P | OIRSA Mejor comprensión del párrafo <i>Category : EDITORIAL</i> |
| 938 | 127 | Reinstatement. An entity whose authorization has been suspended or revokedand <u>revoked and</u> that wishes to have its authorization status reinstated should apply to the NPPO for reinstatement. | P | Canada <i>Category : EDITORIAL</i> |
| 939 | 127 | Reinstatement. An entity whose authorization has been suspended or revokedand <u>and</u> that wishes to have its authorization status reinstated should apply to the NPPO for reinstatement. <u>only</u> <u>after corrective actions were taken.</u> | P | Panama Created by merging other changes together <i>Category : TECHNICAL</i> |
| 940 | 127 | Reinstatement. An entity whose authorization has been suspended or revokedand <u>revoked and</u> that wishes to have its authorization status reinstated should apply to the NPPO for reinstatement. | P | European Union The details very much depend on the type and numbers of non-conformities. An appendix with examples as in ISPM 36 would help. <i>Category : SUBSTANTIVE</i> |
| 941 | 127 | Reinstatement. An entity whose authorization has been suspended or revokedand <u>revoked and</u> that wishes to have its authorization status reinstated should apply to the NPPO for reinstatement. | P | European Union Useless word. <i>Category : EDITORIAL</i> |
| 942 | 127 | Reinstatement. An entity whose authorization has been suspended or revokedand that wishes to have its authorization status reinstated should apply to the NPPO for reinstatement. | P | EPPO Useless word <i>Category : EDITORIAL</i> |
| 943 | 127 | Reinstatement. An entity whose authorization has been suspended or revokedand that wishes to have its authorization status reinstated should apply to the NPPO for reinstatement. | C | EPPO The details very much depend on the type and numbers of non-conformities. An appendix with examples as in ISPM 36 would help. <i>Category : SUBSTANTIVE</i> |

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| 944 | 127 | Reinstatement. An entity whose authorization has been suspended or revoked and revoked and that wishes to have its authorization status reinstated should apply to the NPPO for reinstatement. | P | Ghana <i>Category : EDITORIAL</i> |
| 945 | 127 | Reinstatement. An entity whose authorization has been suspended or revoked and that wishes to have its authorization status reinstated should apply to the NPPO for reinstatement. <u>An entity whose institution is revoked can resume operation only when the NPPO has undertaken an audit, is content with the corrective actions taken and has lifted the suspension</u> | P | PPPO add 127b <i>Category : SUBSTANTIVE</i> |
| 946 | 127 | Reinstatement. An entity whose authorization has been suspended or revoked and and that wishes to have its authorization status reinstated should apply to the NPPO for reinstatement. <u>If an entity is suspended more that twice for critical non-conformities, its authorization is considered revoked.</u> | P | Caribbean Agricultural Health and Food Safety Agency <i>Category : SUBSTANTIVE</i> |
| 947 | 127 | Reinstatement. An entity whose authorization has been suspended or revoked and revoked and that wishes to have its authorization status reinstated should apply to the NPPO for reinstatement. | P | Japan <i>Category : EDITORIAL</i> |
| 948 | 127 | Reinstatement. An entity whose authorization has been suspended or revoked and that wishes to have its authorization status reinstated should apply to the NPPO for reinstatement. | C | Jamaica A section on the criteria for reinstatement should be included in this document. Entities that were previously revoked and are interested in being reinstated must be treated as a new applicant. Include Reinstatement for Suspension . Entities that were suspended or put on probation by the NPPO, should only be reinstated once the corrective actions are verified and validated without the need for reapplication. <i>Category : SUBSTANTIVE</i> |
| 949 | 127 | Reinstatement. An entity whose authorization has been suspended or revoked and revoked and that wishes to have its authorization status reinstated should apply to the NPPO for reinstatement. | P | APPPC (173) Philippines (12 Sep 2018 3:33 AM) (115) New Zealand (7 Sep 2018 7:00 AM) <i>Category : EDITORIAL</i> |
| 950 | 127 | Reinstatement. An entity whose authorization has been suspended or revoked and and that wishes to have its authorization status reinstated should apply to the NPPO for reinstatement. <u>only after corrective actions were taken</u> | P | Costa Rica According to description of revocation in paragraph 126 we conclude that revocation is definitive, therefore the entity could not apply for reinstatement. The entity could be reinstated only if it was suspended. <i>Category : TECHNICAL</i> |

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| 951 | 127 | Reinstatement. An entity whose authorization has been suspended or revoked and revoked and that wishes to have its authorization status reinstated should apply to the NPPO for reinstatement. | P | NEPPO <i>Category : EDITORIAL</i> |
| 952 | 127 | Reinstatement. An entity whose authorization has been suspended or revoked and and that wishes to have its authorization status reinstated should apply to the NPPO for reinstatement. | P | Argentina According to description of revocation in paragraph 126 we conclude that revocation is definitive, therefore the entity could not apply for reinstatement. The entity could be reinstated only if it was suspended. <i>Category : TECHNICAL</i> |
| 953 | 127 | Reinstatement. An entity whose authorization has been suspended or revoked and and that wishes to have its authorization status reinstated should apply to the NPPO for reinstatement. | P | Uruguay According to description of revocation in paragraph 126 we conclude that revocation is definitive, therefore the entity could not apply for reinstatement. The entity could be reinstated only if it was suspended. <i>Category : TECHNICAL</i> |
| 954 | 127 | Reinstatement. An entity whose authorization has been suspended or revoked and and that wishes to have its authorization status reinstated should apply to the NPPO for reinstatement. | P | COSAVE According to description of revocation in paragraph 126 we conclude that revocation is definitive, therefore the entity could not apply for reinstatement. The entity could be reinstated only if it was suspended. <i>Category : TECHNICAL</i> |
| 955 | 127 | Restablecimiento. Cuando se suspenda o revoque la autorización de una entidad, si esta desea que se restablezca su condición de entidad autorizada debería solicitar autorizada, solicitará a la ONPF el restablecimiento de la autorización. | P | OIRSA Mejor comprensión del párrafo <i>Category : EDITORIAL</i> |
| 956 | 127 | Restablecimiento. Cuando se suspenda o revoque la autorización de una entidad, si esta desea que se restablezca su condición de entidad autorizada debería solicitar a la ONPF el restablecimiento de la autorización. | C | Colombia Presentar una definición del término permitirá aclarar que acciones se deben realizar. <i>Category : SUBSTANTIVE</i> |
| 957 | 128 | An entity that has voluntarily withdrawn from an authorization programme and that wishes to have its authorization status reinstated should reinstated should also apply to the NPPO for reinstatement. | P | Canada <i>Category : EDITORIAL</i> |
| 958 | 128 | An entity that has voluntarily withdrawn from an authorization programme and that wishes to have its authorization status reinstated should reinstated should also apply to the NPPO for reinstatement. | P | European Union Useless word. <i>Category : EDITORIAL</i> |
| 959 | 128 | An entity that has voluntarily withdrawn from an authorization programme arrangement and that wishes to have its authorization status reinstated should reinstated should also apply to the NPPO for reinstatement. | P | European Union The term "authorization programme" is not clear. The term "arrangement" is suggested (it is used e.g. in paragraphs 45, 53 and 64). <i>Category : TECHNICAL</i> |
| 960 | 128 | An entity that has voluntarily withdrawn from an authorization programme arrangement and that wishes to have its authorization status reinstated should also apply to the NPPO for reinstatement. | P | EPPO Useless word The term "authorization programme" is not clear. The term "arrangement" is suggested (it is used e.g. in paragraphs 45, 53 and 64). |

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| 961 | 128 | An entity that has voluntarily withdrawn from an authorization programme and that wishes to have its authorization status reinstated <u>should-reinstated should</u> also apply to the NPPO for reinstatement. | P | Japan <i>Category : EDITORIAL</i> |
| 962 | 128 | An entity that has voluntarily withdrawn from an authorization programme and that wishes to have its authorization status reinstated <u>should-reinstated, should</u> also apply to the NPPO for reinstatement. | P | Caribbean Agricultural Health and Food Safety Agency <i>Category : EDITORIAL</i> |
| 963 | 128 | An entity that has voluntarily withdrawn from an authorization programme and that wishes to have its authorization status reinstated should also apply to the NPPO for reinstatement. | C | United States of America Should "voluntary withdrawal" be another type of status? <i>Category : TECHNICAL</i> |
| 964 | 128 | An entity that has voluntarily withdrawn from an authorization programme and that wishes to have its authorization status reinstated <u>should-reinstated should</u> also apply to the NPPO for reinstatement. | P | APPPC 116) New Zealand (7 Sep 2018 7:00 AM) <i>Category : EDITORIAL</i> |
| 965 | 128 | An entity that has voluntarily withdrawn from an authorization programme and that wishes to have its authorization status reinstated <u>should-reinstated should</u> also apply to the NPPO for reinstatement. | P | IPPC Regional Workshop Africa <i>Category : EDITORIAL</i> |
| 966 | 128 | An entity that has voluntarily withdrawn from an authorization programme and that wishes to have its authorization status reinstated <u>should-reinstated should</u> also apply to the NPPO for reinstatement. | P | NEPPO <i>Category : EDITORIAL</i> |
| 967 | 128 | An entity that has voluntarily withdrawn from an authorization programme and that wishes to have its authorization status reinstated <u>should-reinstated should</u> also apply to the NPPO for reinstatement. | P | Singapore inclusion of missing space between words. <i>Category : EDITORIAL</i> |
| 968 | 129 | Potential implementation issues | C | Jamaica Developing countries may not be able to establish the legal framework needed for the implementation of this standard. Resources to implement the standard. Existing competencies in developing countries. <i>Category : SUBSTANTIVE</i> |
| 969 | 129 | Potential implementation issues | C | IPPC Regional Workshop Africa Fixing of costs-whereas NPPO may charge minimal fee as per the relevant regulations, private entities may push for higher profits leading to high costs of authorized services. There is need for the government to regulate the charges so that the industry is not forced to evade the authorized service providers. Moreover, the government may need to subsidize the initiate investments needed by the authorized private entities for purposes of price stabilization <i>Category : TECHNICAL</i> |
| 970 | 129 | Potential implementation issues<u>issues (compatibility with Standard 15?)</u> | P | Montenegro |

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| 971 | 130 | 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. <u>Inadequate human resource and the weak technical capacities of personnel of the entities and NPPO would greatly hinder the implementation of this standard. The lack or weak support for plant health in the legal framework would also limit the implementation of the standard. Therefore there is need to support NPPO's and private entities in terms of technical capacity development to enable them apply phytosanitary measures as indicated by the standard.</u> | P | Gambia Category : <i>SUBSTANTIVE</i> |
| 972 | 130 | 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. | C | Nigeria Previous comments by Nigeria stands . Category : <i>SUBSTANTIVE</i> |
| 973 | 130 | 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. | C | Caribbean Agricultural Health and Food Safety Agency Potential implementation issues include: -Legal framework -Entities authorized to conduct audit -Existing competencies within the country -Policy actions required -Role of internal phytosanitary systems and entities (not for import/export) -Additional costs to perform certain actions Category : <i>SUBSTANTIVE</i> |
| 974 | 130 | 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. | C | United States of America NPPOs may face funding challenges in implementing the standard. Category : <i>TECHNICAL</i> |
| 975 | 130 | 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. | C | IPPC Regional Workshop Africa Lack of Legal Framework and difficulties in enacting the laws and also lack of resources to enact the law by some African NPPOs will hinder the implementation of this standard. Category : <i>SUBSTANTIVE</i> |
| 976 | 130 | Esta sección no es parte de la norma. En el mayo de 2016 el Comité de Normas pidió a la secretaría de la CIPF para reunir información sobre los posibles problemas de implementación relacionados con este proyecto. Le rogamos indicar los detalles y propuestas sobre cómo hacer frente a estos posibles problemas de implementación. | C | Colombia Entre los principales problemas que presenta la implementación de esta NIMF para Colombia se encuentra: - Difícil implementación debido a que no existen entidades con la experiencia y conocimiento para ejecutar acciones fitosanitarias. - Los costos para la operación para las empresas autorizadas son demasiados altos, - Muchas de las acciones fitosanitarias realizadas por el ICA no tiene un costo para los beneficiarios, sin embargo, para cuando se tercericen se les deberá colocar un costo. - Resistencia al cambio por parte de los usuarios y procesos complejos para que acepten a las empresas autorizadas. |

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| | | | | - Criterios de imparcialidad por parte de las empresas autorizadas a emprender acciones fitosanitarias <i>Category : SUBSTANTIVE</i> |
| 977 | 130 | Esta sección no es parte de la norma. En el mayo de 2016 el Comité de Normas pidió a la secretaría de la CIPF para reunir información sobre los posibles problemas de implementación relacionados con este proyecto. Le rogamos indicar los detalles y propuestas sobre cómo hacer frente a estos posibles problemas de implementación. | C | Costa Rica No se tenga en el país la legislación para la implementación Capacidad técnica para la evaluación y la auditoría <i>Category : SUBSTANTIVE</i> |