

2019 SECOND CONSULTATION

1 July – 30 September 2019

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

Summary of comments

Name	Summary
APPPC Σ	Agreed comments submitted based on the conclusions of the 20th APPPC regional workshop on draft ISPMs.
COSAVE	Ver también archivo del grupo del Taller Regional de la CIPF para complementar y asegurar que todos los comentarios hayan sido introducidos en el grupo de la CIPF.
Cuba	No hay comentarios a la propuesta, solo añadir, que nuestra ONPF ha autorizado a entidades nacionales a realizar inspección y diagnóstico fundamentalmente entre otras actividades.
European Union	Comments submitted by the European Commission on behalf of the European Union and its 28 Member States.
Libya	I agree with comments
Malawi	Need to put clauses to avoid private sector to force NPPO to start to implement this once approved
Nigeria	NPPO Nigeria agrees with the draft ISPM on the Authorization of Entities to perform Phytosanitary actions and to be supported by policy framework.
OIRSA	Proyecto de norma con las observaciones de los países incorporada.
Singapore	Singapore agreed with APPPC comments.
Trinidad and Tobago	T&T is in agreement with the comments made and collated by CAHFSA at the IPPC Regional Workshop for the Caribbean 2019

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

FAO sequential number	Para	Text	T	Comment
1	G	(General Comment)	C	Mexico If audit and supervision are not phytosanitary actions, then point 4.2.1 should be deleted, but if the steward decides that they are phytosanitary actions, it should be clarified that it is audit and what is supervision. <i>Category : SUBSTANTIVE</i>

2	G	(General Comment)	C	Lesotho Very useful standard and well written <i>Category : EDITORIAL</i>
3	G	(General Comment)	C	Guyana Guyana endorses this draft standard, however it is believed that there could be an inclusion of sanctions and or penalties for non-conformities as well as clear guidance on audits before moving forward. <i>Category : SUBSTANTIVE</i>
4	G	(General Comment)	C	Peru Per#250; ratifica los comentarios y sugerencias concordados a nivel del COSAVE y en el Taller Regional realizado en Medell#237;n, Colombia. <i>Category : SUBSTANTIVE</i>
5	G	(General Comment)	C	Cuba No hay comentarios a la propuesta. <i>Category : SUBSTANTIVE</i>
6	G	(General Comment)	C	Poland Poland would like to formally endorse the EPPO comments submitted via the IPPC online Comment System. <i>Category : TECHNICAL</i>
7	G	(General Comment)	C	Canada Canada supports the draft ISPM on requirements for NPPOs if authorizing entities to perform phytosanitary actions. <i>Category : SUBSTANTIVE</i>
8	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 the Republic of Belarus, to perform phytosanitary activities listed in the draft Standard. <i>Category : SUBSTANTIVE</i>
9	G	(General Comment)	C	Russian Federation Article VI of the International Plant Protection Convention provides that each contracting party, to the best of its ability, must ensure the establishment of the national plant protection organization with the main responsibilities under this article. Inspection and other related activities leading to issuance of phytosanitary certificates shall be carried out only by or under the authority of the official national plant protection organization (Article V.2 (a) of the IPPC), since this is the only way countries can accept a phytosanitary certificate as a reliable document. As clarified at the 1997 FAO Conference when adopting the 1997 revised IPPC text: it should be understood that "public officers who are technically qualified and duly authorized by the official national plant protection organization" include employees of the national plant

			<p>protection organization. The term “public” in this context refers to those employed by the government, not by a private company. The sentence “includes employees of the national plant protection organization” means that such an employee can, but does not have to be directly an employee of the NPPO. In this context, private companies cannot take part in all phytosanitary measures that precede the issuance of a phytosanitary certificate such as surveillance, sampling, laboratory analysis.</p> <p>In accordance with the proposed draft standard, responsibility for ensuring authority under the IPPC rests with the NPPO where action is delegated to “business”. In this case, if the authorized entity, for example, carries out phytosanitary inspection at import, which does not meet the requirements, goods infected with regulated organisms will be imported into the country. Then the NPPO may revoke or suspend the authorization issued to the entity. We believe that such actions lead to a serious pest risk related to the introduction and further spread of regulated organisms if the entity has performed a substandard inspection. At the same time, the entity will only be deprived of such authorization, and the regulated organism will cause multibillion-dollar damage to the country’s agriculture, that is, the measure of responsibility of an entity is incomparable with potential losses.</p> <p>The IPPC considers the possibility of authorizing entities to perform phytosanitary actions only in cases where the NPPO is not in a position to perform such functions itself. The adoption of an international standard on this topic will set a precedent and will allow the delegation of authority to be considered as a normal situation.</p> <p>At the same time, the NPPO should develop and improve phytosanitary control systems in its country, and fulfill the obligations taken under the IPPC. The inspection functions of the NPPO regarding export and import should not be transferred to entities (“business”), since the main aim of “business” is personal gain, the opinion of “business” about the presence or absence of a quarantine pest in products may not be objective.</p> <p>The International Standards should determine the application of phytosanitary measures and contribute to improving the phytosanitary situation in the world. Since the authorization of entities to perform phytosanitary actions is not a phytosanitary measure, it should not be adopted as an International Standard for Phytosanitary Measures. State policy on the delegation of authority should be determined at a national level. If unified approaches for authorization are needed, an appropriate recommendation can be developed, so we do not support the</p>
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				adoption of the draft ISPM "Authorization of entities to perform phytosanitary actions". <i>Category : SUBSTANTIVE</i>
10	G	(General Comment)	C	Malawi There is need to put some clauses in the draft ISPM to avoid private entities/ private sector forcing NPPOs to implement this ISPM once it approved. The NPPO should look at legal frame and see if they are ready to give some of their activities to private sector. If it not clear stated then some private sector will take advantage and force NPPO to implement this. <i>Category : SUBSTANTIVE</i>
11	G	(General Comment)	C	Trinidad and Tobago T&T is in agreement with the comments made and collated by CAHFSA at the IPPC Regional Workshop for the Caribbean 2019 <i>Category : SUBSTANTIVE</i>
12	G	(General Comment)	C	Paraguay De acuerdo con los comentarios de COSAVE. <i>Category : TECHNICAL</i>
13	G	(General Comment)	C	European Union This draft ISPM is not yet ready for presentation to CPM for adoption. More time is needed to understand the impact and feasibility of the implementation of the current content of the Standard in different countries. EU recommends aligning with the draft ISPM which is being developed on audit in the phytosanitary context. We, nevertheless, submit the following specific comments to give an indication of issues that, in our view, still need to be addressed. <i>Category : SUBSTANTIVE</i>
14	G	(General Comment)	C	Eswatini Standard is relevant <i>Category : SUBSTANTIVE</i>
15	G	(General Comment)	C	Slovenia Slovenia would like to formally endorse the EPPO comments submitted via the IPPC Online Comment System. <i>Category : TECHNICAL</i>
16	G	(General Comment)	C	Israel Israel would like to formally endorse the EPPO comments submitted via the IPPC Online Comment System <i>Category : SUBSTANTIVE</i>
17	G	(General Comment)	C	Georgia The regulation of the authorization of entities to perform phytosanitary actions is not covered by the IPPC, and we are convinced that National Plant Quarantine Organizations (NPPOs) functioning, including the authorization, should be regulated strictly at the national level. In addition, the authorization of entities to perform phytosanitary actions is not a phytosanitary

			<p>measure, since a phytosanitary measure is any legislation, regulation or official procedure having the purpose to prevent the introduction or spread of quarantine pests, or to limit the economic impact of regulated non-quarantine pests (ISPM 5). The draft ISPM is not aimed to prevent the introduction or spread of quarantine pests, or to limit the economic impact of regulated non-quarantine pests as it enables legal entities, including business-structures, to carry out phytosanitary procedures independently, without the NPPO intervention. And the main goal of business-structures is to earn of money, that can lead to biased results.</p> <p>We are deeply sure that standards should regulate phytosanitary issues that will contribute into the improvement of the phytosanitary situation in the world and the development of NPPOs and RPPOs. In our opinion, the development of standards, that would define the policy and functioning of the NPPO, may negatively affect the activities and fulfillment of obligations prescribed by the IPPC for the contracting parties. Thus, we do not support the taking over the draft ISPM "Authorization of entities to perform phytosanitary actions".</p> <p>Carrying out the phytosanitary control is a state function, having the task to maintain the country's phytosanitary security. Carrying out the phytosanitary control is not "trade" or "business".</p> <p>We understand that according to the draft standard, responsibility remains with the NPPO, and the implementation of measures is delegated to "business". In this case, if the delegated person, for example, carries out the phytosanitary control during import, the quality of which does not meet the requirements, as a result, the consignments with quarantine pests can be introduced into the country. Then the NPPO may revoke or suspend the permit issued to the legal entity. But, such actions cannot set off economic losses, or stabilize the phytosanitary state of the country after the introduction of quarantine pests.</p> <p>The draft standard defines the role and responsibility of the NPPO, which provides for the training and control of entities, documentation maintenance and description of the control processes. In this case, the effectiveness of the NPPO, along with fulfillment of its main functions and obligations under the IPPC, reduces to "0".</p> <p>The Article IV of IPPC states that each contracting party shall make provision, to the best of its ability, for an official national plant protection organization with the main responsibilities set out in this Article.</p> <p>The current standard provides key provisions that enable National Plant Quarantine Organizations (NPPOs) to authorize private entities to carry out the phytosanitary actions that goes against the IPPC basic principles and this possibility is considered by IPPC</p>
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			<p>only if the NPPO is not able to exercise such functions for whatever reasons.</p> <p>Inspection and other related activities leading to issuance of phytosanitary certificates shall be carried out only by or under the authority of the official national plant protection organization (Article V.2 IPPC), so that the authorities of importing contracting parties may accept the phytosanitary certificates with confidence as dependable documents.</p> <p>This was clarified at the FAO Conference in 1997 during adoption of the 1997 revision of the IPPC: "It is understood that ... 'public officers who are technically qualified and duly authorized by the national plant protection organization' include officers from the national plant protection organization". "Public" in this context means employed by a level of government, not by a private company. "Include officers from the national plant protection organization" means that the officer may be directly employed by the NPPO, but does not have to be directly employed by the NPPO.</p> <p>Therefore, private companies cannot take part in all phytosanitary measures prior the issuance of a phytosanitary certificate, such as inspection, sampling, laboratory examination.</p> <p>The Background describes situations that are often the exception rather than the rule, and the implementation of such specific phytosanitary actions as inspection, analysis, and surveillance are inspector's functions.</p> <p>The implementation of the draft in the context of authorizing entities to carry out sampling and analysis will complicate, and in some cases exclude the possibility of meeting the requirements of the International Plant Protection Convention such as the responsibilities of the NPPO, the development of phytosanitary diagnostics and science.</p> <p>In addition, the implementation of the project lead to the following:</p> <ul style="list-style-type: none"> - increased number of notifications; - Impossibility for the partner countries in some cases to fulfill their obligations in international trade; - increased risks of temporary embargoes on plant imports; - Suspension of technical development of state phytosanitary laboratories; - Deterioration of the phytosanitary state of the territories of countries that implement the standard. <p>The standard implementation will not have a positive impact on the environment, and especially on plant biodiversity. Since the exercise of functions by authorized bodies cannot assure the phytosanitary safety.</p> <p>The phytosanitary control system will be weakened due to the disinterest of private companies to invest in biodiversity and environment maintaining.</p> <p>Since the regulation of authorization of entities to perform</p>
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18	G	(General Comment)	C	<p>Myanmar</p> <p>We agree all APPPC comments as the reviewers.</p> <p><i>Category : SUBSTANTIVE</i></p>
19	G	(General Comment)	C	<p>EPPO</p> <p>This draft ISPM is not yet ready for presentation to CPM for adoption. More time is needed to understand the impact and feasibility of the implementation of the current content of the Standard in different countries.</p> <p>EPPO recommends aligning with the draft ISPM which is being developed on audit in the phytosanitary context.</p> <p><i>Category : SUBSTANTIVE</i></p>
20	G	(General Comment)	C	<p>Caribbean Agricultural Health and Food Safety Agency</p> <p>Guyana has reviewed this draft ISPM and has no objection towards the adoption of this standard. However, the alignment of national legislation to facilitate this standard in a significant potential issue for its effective implementation. Also, resources constraints may also pose a challenge.</p> <p><i>Category : SUBSTANTIVE</i></p>
21	G	(General Comment)	C	<p>Caribbean Agricultural Health and Food Safety Agency</p> <p>Generally agree with the contents of the draft ISPM.</p> <p><i>Category : SUBSTANTIVE</i></p>
22	G	(General Comment)	C	<p>Caribbean Agricultural Health and Food Safety Agency</p> <p>T&T endorses the revision of the draft ISPM. This draft ISPM is important especially as it relates to some of the Sections in the Plant Health Model Bill. This is currently being reviewed by CARICOM member states inclusive of Trinidad and Tobago. This will then feed into the revision of the Plant Protection Act (T&T).</p> <p><i>Category : EDITORIAL</i></p>
23	G	(General Comment)	C	<p>IPPC Regional Workshop Europe and Central Asia</p> <p>A document substantiating the position of some countries on the need to stop the development of the draft ISPM on authorizing entities to perform phytosanitary actions will be prepared. Some participants in the Workshops noted that 'authorization of entities' is not a phytosanitary measure and therefore it is not a topic that should be covered by an ISPM. Therefore, It could better be</p>

				rearranged into a recommendation. The IPPC (Article 4) states the requirement to set up an NPPO and establish its functions. However, some participants explained that their interpretation is that only on an exceptional basis, authorities may delegate to legal entities and these should be 'governmental entities' and not private entities or individuals. These are examples of aspects that are not reflected in the current draft. Some participants reported that customs services had tried to take over NPPOs' functions to perform border inspections of consignments while refusing to take the responsibility in case of pest introduction. A number of participants considered that this type of behaviours might be encouraged by the adoption of this draft ISPM. The countries that have elaborated this substantiating document are willing to engage in drafting a new recommendation, based on the draft ISPM, to be then submitted to CPM. <i>Category : SUBSTANTIVE</i>
24	G	(General Comment)	C	PPPO Implementation material for the standard that reminds NPPOs of their ability to request information about how their import conditions will be met (e.g. if authorized entities will be used) in bilateral negotiations would be helpful. <i>Category : SUBSTANTIVE</i>
25	G	(General Comment)	C	PPPO The PPPO supports the standard. <i>Category : SUBSTANTIVE</i>
26	G	(General Comment)	C	Barbados This ISPM is clear and well written <i>Category : EDITORIAL</i>
27	G	(General Comment)	C	Moldova Согласно МСФМ 5 «Глоссарий фитосанитарных терминов» «фитосанитарная мера - Законодательство, регламентация или официальная процедура, направленная на предотвращение интродукции или распространения карантинных вредных организмов или на ограничение экономического воздействия регулируемых не карантинных вредных организмов». Таким образом Международные стандарты по фитосанитарным мерам имеют своей целью регламентацию определенных действий, направленных на ограничение распространения вредных организмов и снижение экономического при этом экономического эффекта. Считаем, что предлагаемый проект не является сферой регулирования МККЗР, а имеет отношение к организации работы НОКЗР. Также следует отметить, что, при создании национального законодательства что управление НОКЗР в том числе и функция уполномочивания должна и может регулироваться сугубо на национальном уровне.

			<p>Стандарты должны регулировать фитосанитарные вопросы, которые будут способствовать улучшению фитосанитарной ситуации в мире. Придерживаемся мнения, что разработка стандартов, определяющих политику и управления НОКЗР может негативно отразиться на деятельности организации и выполнении обязательств, предписанных МККЗР договаривающимся сторонам. Тем самым мы не поддерживаем принятие проекта МСФМ &#171;Уполномочивание юридических лиц на осуществление фитосанитарных действий&#187;</p> <p>Мы понимаем, что по стандарту ответственность всё-таки остается за НОКЗР, а проведение мер делегируется &#171;бизнесу&#187;. В таком случае, если делегированное лицо, например, будет проводить фитосанитарный контроль при импорте, качество которого не будет отвечать требованиям, в результате в страну будут ввезены грузы, зараженные карантинными организмами. Тогда НОКЗР может аннулировать или приостановить разрешение, выданное юридическому лицу. Для аннулирования или приостановления авторизации необходимо осуществление определенных процедур, что также влечет распространение карантинных организмов, изменение фитосанитарного состояния определенных территорий и страны в целом,</p> <p>Статья VI МККЗР предусматривает, что каждая договаривающаяся сторона, в силу своих возможностей, должна обеспечить создание официальной национальной организации по карантину и защите растений с основными обязанностями согласно данной статье.</p> <p>В настоящем стандарте приводятся основные положения, предоставляющие возможность Национальным организациям по карантину и защите растений (НОКЗР) уполномочивать частных юридических лиц на осуществление фитосанитарных действий, что противоречит основным принципам МККЗР, эта возможность рассматривается МККЗР лишь исключительно в случаях если НОКЗР не в состоянии по тем или другим причинам осуществлять такие функции.</p> <p>Досмотр и другие мероприятия, связанные с выдачей фитосанитарных сертификатов, должны проводиться только официальной национальной организацией по карантину и защите растений или под ее руководством (статья V.2 (а) МККЗР), поскольку только таким образом страны могут принимать ФС в качестве надежного документа. Но если часть действий предшествующих выдачи фитосанитарного сертификата будет делегирована другим лицам, есть риск что уровень прослеживаемости и гарантии, которые обеспечивает на сегодняшний день НОКЗР выдавая фитосанитарный</p>
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			<p>сертификат, будут снижены или полностью утеряны.</p> <p>Как было разъяснено на Конференции ФАО в 1997 году при принятии пересмотренного текста МКЗР 1997 года: "следует понимать, что "государственные должностные лица, технически квалифицированные и должным образом уполномоченные официальной национальной организацией по карантину и защите растений" включают сотрудников национальной организации по карантину и защите растений". Термин "государственный" в данном контексте подразумевает нанятые на службу правительством, а не частной компанией. Фраза "включают сотрудников национальной организации по карантину и защите растений" означает, что такой сотрудник может, но не обязательно должен быть непосредственно служащим НОКЗР.</p> <p>Таким образом частные компании не могут принимать участия во всех фитосанитарных мероприятиях, которые предшествуют выдаче фитосанитарного сертификата, таких как надзор, отбор образцов, лабораторная экспертиза.</p> <p>Контрольные функции НОКЗР, касательно экспорта и импорта не должны передаваться юридическим лицам (&#171;бизнесу&#187;), поскольку основная задача &#171;бизнеса&#187; – финансовые поступления. Показатели которые будет проводить &#171;бизнес&#187; не всегда будут объективными.</p> <p>НОКЗР должна развивать и усовершенствовать в своей стране системы фитосанитарного контроля, исполнять обязательства взятые при подписании МКЗР.</p> <p>Поскольку регламентация уполномочивания юридических лиц на осуществление фитосанитарных действий не является фитосанитарной процедурой, то и не может быть утверждена Международным Стандартом по Фитосанитарным Мерам. Мы считаем, что в случае необходимости для ряда стран получения унифицированных условий для авторизации их (условия) можно изменить статус и форму данного проекта таким образом неся информационный смысл: Рекомендации по уполномочиванию юридических лиц на осуществление некоторых фитосанитарных действий&#187; .</p> <p><i>Category : EDITORIAL</i></p>
28	G	(General Comment)	<p>C Antigua and Barbuda</p> <p>Antigua and Barbuda accepts the changes that have been made in the first consultation and has no further comment on this draft standard at this time</p> <p><i>Category : SUBSTANTIVE</i></p>
29	G	(General Comment)	<p>C OIRSA</p> <p>Reiteramos nuestra opini&#243;n respecto a que: El prop&#243;sito de la Norma es definir los requisitos que deben</p>

				cumplir las ONPF si desean autorizar entidades para realizar acciones fitosanitarias, sin embargo, en el contenido de esta norma se definen ciertos roles y responsabilidad que deben cumplir las entidades autorizadas por las ONPF para auditar o supervisar otras entidades, lo cual no ha sido definido, ni es parte de esta normativa. Adicionalmente, la auditoría o supervisión no son acciones fitosanitarias. <i>Category : TECHNICAL</i>
30	G	(General Comment)	C	OIRSA Guatemala ya tiene un convenio de delegación al oirsa de la cuarentena ya que ellos se encargan de darle el tratamiento adecuado. seria importante que se presente este ejemplo. <i>Category : SUBSTANTIVE</i>
31	G	(General Comment)	C	Venezuela Venezuela, en la actualidad autoriza a entidades particulares, un limitado conjunto de acciones fitosanitarias (aplicación de tratamientos fitosanitarios, diagnósticos de laboratorio, entre otros), pero se reserva el derecho a autorizar otro conjunto de acciones que solo pueden ser conducidas por la ONPF, acogiéndonos a lo establecido en el artículo V.2 (a) de la CIPF, sin estar obligados para hacerlo. <i>Category : TECHNICAL</i>
32	G	(General Comment)	C	Mozambique This standard is definitely well come as it may alleviate the tasks of the NPPO and give more celerity for the phytosanitary actions. However for the context of Mozambique we think that we will still need more time to be able to authorize the third parties to perform phytosanitary actions. Since the NPPO still have no enough capability to carry out its core activities is practically difficulty to be able to license, audit and supervise the third party. Witch mean that by authoring the third parties in this context it will weaken the system and affect the credibility of the NPPO. Also the NPPO may not have capabilities to approve new legislations which can be aligned with this proposed standard <i>Category : TECHNICAL</i>
33	G	(General Comment)	C	Malawi Malawi supports draft ISPM: Authorisation of entities to perform phytosanitary actions (2014-002) <i>Category : SUBSTANTIVE</i>
34	G	(General Comment)	C	Botswana NPPOs without legal instruments to authorize entities will have to amend their acts. <i>Category : TECHNICAL</i>
35	G	(General Comment)	C	New Zealand 1. Implementation and guidance material to supplement the ISPM will be critical to ensure the integrity of the system. Such material

				<p>may include guidance for training, competency, and skills, management of conflict of interest. Case studies will be helpful to demonstrate how an authorisation system and its elements can be established.</p> <p>2. The term supervision/supervise is used throughout the text. Definition and clarity are required to ensure common understanding of what supervision is about and under what circumstances supervision is required.</p> <p>3. It is important to ensure linkage and alignment between this ISPM and the draft ISPM on Audit in Phytosanitary Context which is currently under development.</p> <p><i>Category : SUBSTANTIVE</i></p>
DRAFT ISPM: Requirements for national plant protection organizations if authorizing entities to perform phytosanitary actions (2014-002)				
36	1	DRAFT ISPM: REQUIREMENTS FOR NATIONAL PLANT PROTECTION ORGANIZATIONS IF AUTHORIZING AUTHORIZATION OF ENTITIES TO PERFORM PHYTOSANITARY ACTIONS (2014-002)	P	<p>Japan</p> <p>The title should be brought back to the original title during 1st consultation.</p> <p>The title has been modified in light of the concerns raised from several countries during the 1st consultation that NPPOs can decide whether or not they authorize entities and there is no obligation for NPPOs to do so. However, the current title is too explanatory for a title and the above concerns have been already addressed by revising the main texts.</p> <p><i>Category : SUBSTANTIVE</i></p>
37	1	DRAFT ISPM: REQUIREMENTS FOR NATIONAL PLANT PROTECTION ORGANIZATIONS IF AUTHORIZING ENTITIES TO PERFORM PHYTOSANITARY ACTIONS (2014-002)	C	<p>Ukraine</p> <p>General Comments on the draft ISPM</p> <p>The regulation of the authorization of entities to perform phytosanitary actions is not covered by the IPPC, and we are convinced that National Plant Quarantine Organizations (NPPOs) functioning, including the authorization, should be regulated strictly at the national level. In addition, the authorization of entities to perform phytosanitary actions is not a phytosanitary measure, since a phytosanitary measure is any legislation, regulation or official procedure having the purpose to prevent the introduction or spread of quarantine pests, or to limit the economic impact of regulated non-quarantine pests (ISPM 5). The draft ISPM is not aimed to prevent the introduction or spread of quarantine pests, or to limit the economic impact of regulated non-quarantine pests as it enables legal entities, including business-structures, to carry out phytosanitary procedures independently, without the NPPO intervention. And the main goal of business-structures is making money, that can lead to biased results.</p> <p>We are deeply sure that standards should regulate phytosanitary issues that will contribute into the improvement of the phytosanitary situation in the world and the development of NPPOs and RPPOs. In our opinion, the development of standards, that would define the policy and functioning of the NPPO, may negatively affect the activities and fulfillment of obligations</p>

			<p>prescribed by the IPPC for the contracting parties. Thus, we do not support the taking over the draft ISPM "Authorization of entities to perform phytosanitary actions".</p> <p>Carrying out the phytosanitary control is a state function, having the task to maintain the country's phytosanitary security. Carrying out the phytosanitary control is not "trade" or "business". We understand that according to the draft standard, responsibility remains with the NPPO, and the implementation of measures is delegated to "business". In this case, if the delegated person, for example, carries out the phytosanitary control during import, the quality of which does not meet the requirements, as a result, the consignments with quarantine pests can be introduced into the country. Then the NPPO may revoke or suspend the permit issued to the legal entity. But, such actions cannot set off economic losses, or stabilize the phytosanitary state of the country after the introduction of quarantine pests.</p> <p>The draft standard defines the role and responsibility of the NPPO, which provides for the training and control of entities, documentation maintenance and description of the control processes. In this case, the effectiveness of the NPPO, along with fulfillment of its main functions and obligations under the IPPC, reduces to "0".</p> <p>The Article IV of IPPC states that each contracting party shall make provision, to the best of its ability, for an official national plant protection organization with the main responsibilities set out in this Article.</p> <p>The current standard provides key provisions that enable National Plant Quarantine Organizations (NPPOs) to authorize private entities to carry out the phytosanitary actions that goes against the IPPC basic principles and this possibility is considered by IPPC only if the NPPO is not able to exercise such functions for whatever reasons.</p> <p>Inspection and other related activities leading to issuance of phytosanitary certificates shall be carried out only by or under the authority of the official national plant protection organization (Article V.2 IPPC), so that the authorities of importing contracting parties may accept the phytosanitary certificates with confidence as dependable documents.</p> <p>This was clarified at the FAO Conference in 1997 during adoption of the 1997 revision of the IPPC: "It is understood that ... 'public officers who are technically qualified and duly authorized by the national plant protection organization' include officers from the national plant protection organization". "Public" in this context means employed by a level of government, not by a private company. "Include officers from the national plant protection organization" means that the officer may be directly employed by the NPPO, but does not have to be directly employed by the NPPO.</p>
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			<p>Therefore, private companies cannot take part in all phytosanitary measures prior the issuance of a phytosanitary certificate, such as inspection, sampling, laboratory examination.</p> <p>The Background describes situations that are often the exception rather than the rule, and the implementation of such specific phytosanitary actions as inspection, analysis, and surveillance are inspector's functions.</p> <p>The implementation of the draft in the context of authorizing entities to carry out sampling and analysis will complicate, and in some cases exclude the possibility of meeting the requirements of the International Plant Protection Convention such as the responsibilities of the NPPO, the development of phytosanitary diagnostics and science.</p> <p>In addition, the implementation of the project lead to the following:</p> <ul style="list-style-type: none"> - increased number of notifications; - impossibility for the partner countries in some cases to fulfill their obligations in international trade; - increased risks of temporary embargoes on plant imports; - suspension of technical development of state phytosanitary laboratories; - deterioration of the phytosanitary state of the territories of countries that implement the standard. <p>The standard implementation will not have a positive impact on the environment, and especially on plant biodiversity. Since the exercise of functions by authorized bodies cannot assure the phytosanitary safety.</p> <p>The phytosanitary control system will be weakened due to the disinterest of private companies to invest in biodiversity and environment maintaining.</p> <p>Since the regulation of authorization of entities to perform phytosanitary actions is not a phytosanitary procedure, it cannot be approved by the International Standard for Phytosanitary Measures.</p> <p>We consider that, if necessary, all requirements and procedures for authorizing the entities to perform phytosanitary actions should be adopted in the form of the appropriate Guidelines (Recommendations) "Authorization of entities to perform phytosanitary actions".</p> <p><i>Category : SUBSTANTIVE</i></p>
38	1	DRAFT ISPM: REQUIREMENTS FOR NATIONAL PLANT PROTECTION ORGANIZATIONS IF AUTHORIZING ENTITIES TO PERFORM PHYTOSANITARY ACTIONS (2014-002)	<p>C Viet Nam</p> <p>Proposal for details of phytosanitary actions will be allow to authorize</p> <p><i>Category : SUBSTANTIVE</i></p>
39	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>

40	13	2016-05 SC approved Specification 65 (<i>Authorization of entities to perform phytosanitary <u>Phytosanitary</u> actions</i>).	P	Ghana <i>Category : EDITORIAL</i>
41	25	2019-05 SC-7 changed title to <i>Requirements for NPPOs if authorizing entities to perform phytosanitary <u>Phytosanitary</u> actions</i>	P	Ghana <i>Category : EDITORIAL</i>
Introduction				
42	30	<u>INTRODUCTION EGYPT IS NOT IN AGREEMENT WITH AUTHORIZING REPRESENTATIVES FOR NPPO ACTIVITIES SUCH AS (E.G. ISSUING THE PHYTOSANITARY CERTIFICATES, INSPECTING AGRICULTURE COMMODITIES, DELEGATING TECHNICAL FOR SURVEYING A PEST, PREPARING PRA AND TECHNICAL FILES ..ETC.) ANY OF THESE TASKS SHOULD BE FULLY CARRIED OUT BY NPPO BODIES. ALTHOUGH, NPPO CAN DELEGATE OTHER ENTITIES IN SPECIFIC TASKS UPON THEIR CHOICES ACCORDING TO CERTAIN CRITERIA OR BY PROVIDING ACCREDITED CERTIFICATES (ISO, BRC, GAP, HACCP..ETC.). HOWEVER, SUCH AUTHORIZATION SHOULD BE UNDER THE FULL SUPERVISION OF THE NPPO AUTHORITY.</u>	P	Egypt <i>Category : TECHNICAL</i>
Scope				
43	32	This standard provides requirements for national plant protection organizations (NPPOs) if they decide to authorize entities to perform specific phytosanitary actions on their behalf.	C	United States of America It should be mentioned somewhere in the draft, perhaps in the scope, that the details on audit requirements will be a scope of another ISPM, devoted entirely to the subject. <i>Category : SUBSTANTIVE</i>
44	32	This standard provides requirements for national plant protection organizations (NPPOs) if they decide to authorize entities to perform specific phytosanitary actions on their behalf.	C	South Africa Propose this additional sentence: "The standard also provides guidance for appointing an entity to audit authorized entities" because auditing is not a phytosanitary action by itself. <i>Category : SUBSTANTIVE</i>
45	32	This standard provides requirements for national plant protection organizations <u>National Plant Protection Organizations</u> (NPPOs) if they decide to authorize entities to perform specific phytosanitary <u>Phytosanitary</u> actions on their behalf.	P	Ghana <i>Category : EDITORIAL</i>
46	33	In accordance with Article V.2(a) of the IPPC, this standard does not cover the issuance of phytosanitary certificates <u>certificates and NPPO core activities such as development and establishment of phytosanitary measures.</u>	P	Japan The text "NPPO core activities such as development and establishment of phytosanitary measures" in paragraph 49 should be described in "Scope" to highlight the extent of the area or subject of the ISPM. The activities that are not under the scope of this ISPM based on

				<p>Article V.2 (a) of the IPPC is not only “the issuance of phytosanitary certificates” but also “NPPO core activities such as development and establishment of phytosanitary measures”.</p> <p>Article V.2(a) of the IPPC provides that inspection and other related activities leading to issuance of phytosanitary certificates can be carried out under the authority of the official national plant protection organization, which means that activities (e.g. development and establishment of phytosanitary measures) cannot be subject to “authorization for phytosanitary actions” because these activities are not other related activities leading to the issuance of phytosanitary certificate. <i>Category : SUBSTANTIVE</i></p>
47	33	In accordance with Article V.2(a) of the IPPC, this standard does not cover the issuance of phytosanitary certificates. <u>Authorization for phytosanitary actions does not include NPPO core activities such as issuance of phytosanitary certificates or development and establishment of phytosanitary measures because these are not phytosanitary actions.</u>	P	<p>China</p> <p>The activities which are not covered by this standard should be clarified.</p> <p>In the scope, it is said that this standard does not cover the issuance of phytosanitary certificates in accordance with article of the IPPC. But the sentence in 1. Basic Understanding of Authorization emphasizes that both the issuance of phytosanitary certificates and the development and establishment of phytosanitary measures are not included because of they are not phytosanitary action.</p> <p>These two places involved two different reasons, which could easily lead to misunderstanding. <i>Category : SUBSTANTIVE</i></p>
Definitions				
48	38	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	<p>Ghana</p> <p><i>Category : EDITORIAL</i></p>
Outline of Requirements				
49	40	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, and suspension and revocation of authorization.	P	<p>Brazil</p> <p>We consider that audits are not phytosanitary actions and should not be covered by this ISPM <i>Category : SUBSTANTIVE</i></p>
Background				
50	42	Article IV of the IPPC lays down the roles and responsibilities for NPPOs. It is becoming common practice, however, for many NPPOs to authorize entities to perform specific phytosanitary actions such as inspection, monitoring, sampling,	C	<p>Indonesia</p> <p>The roles and responsibilities of NPPO should be mentioned on the background (in new paragraph) <i>Category : SUBSTANTIVE</i></p>

		testing, surveillance and treatment. In order to foster confidence between NPPOs there is a need to harmonize the requirements for such authorizations and to ensure that the practice aligns with the principles of the IPPC. The NPPO remains responsible for phytosanitary actions performed by entities on their behalf.		
51	42	Article IV of the IPPC lays down the roles and responsibilities for NPPOs. It is becoming common practice, however, for many NPPOs to authorize entities to perform specific phytosanitary actions such as inspection, monitoring, sampling, testing, surveillance and treatment. In order to foster confidence between NPPOs there is a need to harmonize the requirements for such authorizations and to ensure that the practice aligns with the principles of the IPPC. The NPPO remains NPPOs remain responsible for phytosanitary actions performed by entities on their behalf.	P	Indonesia Indonesia propose to replace 'NPPO remains' to 'NPPOs remain' <i>Category : EDITORIAL</i>
52	42	Article IV of the IPPC lays down the roles and responsibilities for NPPOs. Article V.2(a) of the IPPC provides for the possibility for NPPOs to authorize entities to perform phytosanitary actions. It is becoming common practice, however, for many NPPOs to authorize entities to perform specific phytosanitary actions such as inspection, monitoring, sampling, testing, surveillance and treatment. In order to foster confidence between NPPOs there is a need to harmonize the requirements for such authorizations and to ensure that the practice aligns with the principles of the IPPC. If an <u>The</u> NPPO decides to authorize entities, it remains responsible for the phytosanitary actions performed by the entities on their <u>its</u> behalf.	P	European Union The paragraph has been improved to recall an important aspect of the Convention (the new second sentence was the first sentence of paragraph 46). The suggested changes improve and clarify the text. <i>Category : SUBSTANTIVE</i>
53	42	Article IV of the IPPC lays down the roles and responsibilities for NPPOs. It is becoming common practice, however, for many NPPOs to authorize entities to perform specific phytosanitary actions such as inspection, monitoring, sampling, testing, surveillance and treatment. In order to foster confidence between NPPOs there is a need to harmonize the requirements for such authorizations <u>of specific phytosanitary actions</u> and to ensure that the practice aligns with the principles of the IPPC. The NPPO remains responsible for phytosanitary actions performed by entities on their behalf.	P	European Union 1. This is a contradiction with the Convention (Article IV) ('role' does not appear in the text of the Convention). 2. it is not clear what 'such' refers to. <i>Category : TECHNICAL</i>
54	42	Article IV of the IPPC lays down the roles and responsibilities for NPPOs. It is becoming common practice, however, for many NPPOs to authorize entities to perform specific phytosanitary actions such as inspection, monitoring, sampling, testing, surveillance and treatment. In order to foster confidence between NPPOs <u>NPPOs</u> , there is a need to harmonize the requirements for such authorizations and to ensure that the practice aligns with the principles of the IPPC. The NPPO remains responsible for phytosanitary actions performed by entities on their behalf.	P	European Union Clearer with an added comma. <i>Category : EDITORIAL</i>

55	42	Article IV of the IPPC lays down the roles and responsibilities for NPPOs.- <u>Article V.2(a) of the IPPC provides for the possibility for NPPOs to authorize entities to perform phytosanitary actions. It is becoming common practice, however, for many NPPOs to authorize entities to perform specific phytosanitary actions such as inspection, monitoring, sampling, testing, surveillance and treatment.</u> In order to foster confidence between NPPOs NPPOs, there is a need to harmonize the requirements for such authorizations authorization of specific phytosanitary actions and to ensure that the practice aligns with the principles of the IPPC. <u>If an NPPO decides to authorize entities it</u> The NPPO remains responsible for <u>the</u> phytosanitary actions performed by <u>the</u> entities on <u>their</u> its behalf.	P	EPPO Clearer with an added comma. The paragraph has been improved to recall an important aspect of the Convention (the new second sentence was the first sentence of paragraph 46). The suggested changes improve and clarify the text. This is a contradiction with the Convention (Article IV) ('role' does not appear in the text of the Convention). it is not clear what 'such' refers to. <i>Category : TECHNICAL</i>
56	42	Article IV of the IPPC lays down the roles and responsibilities for NPPOs. It is becoming common practice, however, for many NPPOs to authorize entities to perform specific phytosanitary actions such as inspection, monitoring, sampling, testing, surveillance and treatment. In order to foster confidence between NPPOs there is a need to harmonize the requirements for such authorizations and to ensure that the practice aligns with the principles of the IPPC. The NPPO remains responsible for phytosanitary actions performed by entities on their behalf.	P	IPPC Regional Workshop Europe and Central Asia The deletion of this sentence might help addressing some of the concerns raised by certain CPs about the need for this Standard. <i>Category : SUBSTANTIVE</i>
57	42	Article IV of the IPPC lays down the roles and responsibilities for NPPOs. It is becoming common practice, however, for many <u>some</u> NPPOs to authorize entities to perform specific phytosanitary actions such as inspection, monitoring, sampling, testing, surveillance and treatment. In order to foster confidence between NPPOs there is a need to harmonize the requirements for such authorizations and to ensure that the practice aligns with the principles of the IPPC. The NPPO remains responsible for phytosanitary actions performed by entities on their behalf.	P	China There are not "many" country conduct authorization. It is less rigorous to use "many". <i>Category : SUBSTANTIVE</i>
58	42	Article IV of the IPPC lays down the roles and responsibilities for NPPOs. It is becoming common practice, however, for many NPPOs to authorize entities to perform specific phytosanitary actions such as inspection, monitoring, sampling, testing, surveillance and treatment. In order to foster confidence between NPPOs there is a need to harmonize the requirements for such authorizations and to ensure that the practice aligns with the principles of the IPPC. The NPPO remains responsible for phytosanitary <u>Phytosanitary</u> actions performed by entities on their behalf.	P	Ghana <i>Category : EDITORIAL</i>
IMPACTS ON BIODIVERSITY AND THE ENVIRONMENT				
59	44	Prevention of the introduction and spread of quarantine pests is beneficial to biodiversity through the protection of plant health and the decrease in the use of treatments having a negative environmental impact. Authorization programmes may	P	Argentina We suggest to revise the relevance to maintain this section in all ISPMs through the appropriate CPM bodies, because it contains general declarations that do not provide guidance to NPPOs <i>Category : TECHNICAL</i>

		<u>have a positive impact on biodiversity and environment, because they may contribute to improve delivery of phytosanitary actions</u>		
60	44	Prevention of the introduction and spread of quarantine pests is beneficial to biodiversity through the protection of plant health and the decrease in the use of treatments having a negative environmental impact.	P	Costa Rica Authorization programmes may have a positive impact on biodiversity and environment, because they may contribute to improve delivery of phytosanitary actions. We suggest to revise the relevance to maintain this section in all ISPMs through the appropriate CPM bodies, because it contains general declarations that do not provide guidance to NPPO. <i>Category : TECHNICAL</i>
61	44	Prevention of the introduction and spread of quarantine-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.	P	Indonesia The regulated pest includes quarantine pest and regulated non quarantine pest. <i>Category : SUBSTANTIVE</i>
62	44	Prevention of the introduction and spread of quarantine-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.	P	European Union Because of treatments against non-regulated quarantine pests and for consistency with other standards (e.g. ISPMs 42 and 43). <i>Category : SUBSTANTIVE</i>
63	44	Prevention of the introduction and spread of quarantine pests is beneficial-crucial to <u>the conservation of</u> biodiversity through the protection of plant health and the decrease in the use of treatments having a negative environmental impact.	P	China Support APPPC comment <i>Category : SUBSTANTIVE</i>
64	44	Prevention of the introduction and spread of quarantine pests is beneficial to <u>Authorization programmes may have a positive impact on biodiversity through the protection of plant health and the decrease in the use environment, because they may contribute to improve delivery of treatments having a negative environmental impact-phytosanitary actions</u>	P	Uruguay We suggest to revise the relevance to maintain this section in all ISPMs through the appropriate CPM bodies, because it contains general declarations that do not provide guidance to NPPOs. New text proposed to be more related with the content of this draft <i>Category : TECHNICAL</i>
65	44	Prevention-Phytosanitary actions to protect of the introduction and spread of quarantine pests is beneficial to biodiversity through-because of leading to the protection of plant health and the decrease in the use of treatments having a negative environmental impact <u>impact within a territory. This standard contributes to the protection of biodiversity and the environment by fostering confidence to perform specific phytosanitary actions.</u>	P	Japan To more clarify the explanation about the benefits between the requirement of the ISPM (i.e. phytosanitary action and authorization for phytosanitary action) and biodiversity & environment.. The logic of the description of the draft text may be opposite. Add the reason why the standard contributes to BIODIVERSITY AND THE ENVIRONMENT because of not enough information here. <i>Category : TECHNICAL</i>
66	44	Prevention of the introduction and spread of quarantine-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.	P	EPPO Because of treatments against non-regulated quarantine pests and for consistency with other standards (e.g. ISPMs 42 and 43). <i>Category : SUBSTANTIVE</i>

67	44	Prevention of the introduction and spread of quarantine-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.	P	IPPC Regional Workshop Europe and Central Asia Because of treatments against non-regulated quarantine pests and for consistency with other standards (e.g. ISPMs 42 and 43). <i>Category : SUBSTANTIVE</i>
68	44	Prevention of the introduction and spread of quarantine pests is beneficial-crucial to the conservation of biodiversity through the protection of plant health and the decrease in the use of treatments having a negative environmental impact.	P	APPPC To replace with "crucial to the conservation of "; instead of "is beneficial"; . This is to strengthen the impacts on biodiversity. <i>Category : SUBSTANTIVE</i>
69	44	Prevention of the introduction and spread of quarantine pests is beneficial-crucial to the conservation of biodiversity through the protection of plant health and the decrease in the use of treatments having a negative environmental impact.	P	Singapore To strengthen the impact of incursion of quarantine pests to the conservation of biodiversity. <i>Category : EDITORIAL</i>
70	44	Prevention of the introduction and spread of quarantine-pests-regulated pest is beneficial to biodiversity through the protection of plant health and the decrease in the use of treatments having a negative environmental impact.	P	China The regulated pest includes quarantine pest and regulated non quarantine pest. Intercepting the spread of the latter is also benefit to biodiversity and the environment. <i>Category : SUBSTANTIVE</i>
71	44	Prevention of the introduction and spread of quarantine pests is beneficial to biodiversity through the protection of plant health and the decrease in the use of treatments having a negative environmental impact.	C	COSAVE Se sugiere que a través de los órganos de la CMF que correspondan se revise la pertinencia de mantener esta sección en las NIMF, dado que son declaraciones de carácter general que no brindan orientación a las ONPF. We suggest to revise the relevance to maintain this section in all ISPMs through the appropriate CPM bodies, because it contains general declarations that do not provide guidance to NPPOs <i>Category : TECHNICAL</i>
72	44	Prevention of the introduction and spread of quarantine pests is beneficial to biodiversity through the protection of plant health and the decrease in the use of treatments having a negative environmental impact. Authorization programmes may have a positive impact on biodiversity and environment, because they may contribute to improve delivery of phytosanitary actions.	P	COSAVE <i>Category : TECHNICAL</i>
Requirements				
73	46	Article V.2(a) of the IPPC provides There is no obligation for the possibility for NPPOs to authorize entities to perform phytosanitary actions entities. However, there is no obligation for NPPOs if an NPPO decides to do so, authorize entities, the following requirements apply.	P	European Union Reference to article V.2(a) was moved to paragraph 42 because it does not fit in the section on requirements. The second sentence was modified to improve clarity. <i>Category : SUBSTANTIVE</i>
74	46	Article V.2(a) of the IPPC provides for the possibility for NPPOs to authorize entities to perform <u>specific</u> phytosanitary actions. However, there is no obligation for NPPOs to do so <u>authorize entities for these actions.</u>	P	Japan to be more explicit <i>Category : EDITORIAL</i>

75	46	Article V.2(a) of the IPPC provides for the possibility for NPPOs to authorize entities to perform phytosanitary actions. However, there is no obligation for NPPOs to do so. There is no obligation for NPPOs to authorize entities. However, if an NPPO decides to authorize entities, the following requirements apply.	P	EPPO Reference to article V.2(a) was moved to paragraph 42 because it does not fit in the section on requirements. The second sentence was modified to improve clarity. <i>Category : SUBSTANTIVE</i>
76	46	Article V.2(a) of the IPPC provides for the possibility for NPPOs to authorize entities to perform phytosanitary actions. However, there is no obligation for NPPOs <u>are not obliged</u> to do so.	P	NEPPO <i>Category : EDITORIAL</i>
77	46	Article V.2(a) of the IPPC provides for the possibility for NPPOs to authorize entities to perform phytosanitary actions. However, there is no obligation for NPPOs to do so. <u>Authorization or not shouldn't be used as the evaluation standard for NPPO to fulfill SPS Agreement and IPPC Convention.</u>	P	China Because of the restriction of the national legal framework, the NPPO in some countries can't carry out authorization. The implementation of ISPMs is one of the evaluation criteria of NPPO. But the implementation of authorization couldn't be used as a criteria. <i>Category : SUBSTANTIVE</i>
78	46	Article V.2(a) of the IPPC provides for the possibility for NPPOs to authorize entities to perform <u>phytosanitary-Phytosanitary</u> actions. However, there is no obligation for NPPOs to do so.	P	Ghana <i>Category : EDITORIAL</i>
1. Basic Understanding of Authorization				
79	48	Authorization may be used by NPPOs to recognize entities to perform specific phytosanitary actions. When an NPPO decides to authorize entities, it has sole responsibility for deciding which entity is authorized and for which specific phytosanitary actions. <u>The NPPO also has the responsibility for deciding who can audit or supervise on its behalf.</u>	P	Saint Kitts And Nevis The additional sentence lends to further paragraphs which outline that the NPPO may authorize persons to perform phytosanitary actions, as well as authorize persons or entities to audit or supervise on its behalf. <i>Category : SUBSTANTIVE</i>
80	48	Authorization may be used by NPPOs to recognize entities to perform specific phytosanitary actions. When an NPPO decides to authorize entities, it has sole responsibility for deciding which entity is authorized and for which specific phytosanitary actions. <u>The NPPO may also authorise entities to perform audit and supervision</u>	P	Barbados This is to capture these activities which are addressed later in the document. <i>Category : SUBSTANTIVE</i>
81	48	Authorization may be used by NPPOs to recognize entities to perform specific phytosanitary actions. <u>When-If</u> an NPPO decides to authorize entities, it has sole responsibility for deciding which entity is authorized and for which specific phytosanitary actions.	P	European Union 'If' is clearer than 'when' because it is conditional and it helps translating into other languages (global change to be done). <i>Category : EDITORIAL</i>
82	48	Authorization may be used by NPPOs to recognize entities to perform specific phytosanitary actions. When an NPPO decides to authorize entities, it has sole responsibility for deciding which entity is authorized and for which specific phytosanitary actions. <u>When an NPPO decides to authorize entities, it has the</u>	P	Ghana <i>Category : SUBSTANTIVE</i>

		<u>sole responsibility and is obliged to give the first option to an indigenous entity before considering a foreign entity should no indigenous competent entity exist in the NPPO country</u>		
83	48	Authorization may be used by NPPOs to recognize entities to perform specific phytosanitary actions.- If <u>When</u> an NPPO decides to authorize entities, it has sole responsibility for deciding which entity is authorized and for which specific phytosanitary actions.	P	EPPO 'If' is clearer than 'when' because it is conditional and it helps translating into other languages (global change to be done). <i>Category : EDITORIAL</i>
84	48	Authorization may be used by NPPOs to recognize <u>authorise</u> entities to perform specific phytosanitary actions. When an NPPO decides to authorize entities, it has sole responsibility for deciding which entity is authorized and for which specific phytosanitary actions.	P	Australia Consistency of language <i>Category : EDITORIAL</i>
85	48	Authorization may be used by NPPOs to recognize entities to perform specific phytosanitary actions. When an NPPO decides to authorize entities, it has sole responsibility for deciding which entity is authorized and for which specific phytosanitary actions.- <u>The NPPO may also authorise entities to perform audit and supervision</u>	P	Caribbean Agricultural Health and Food Safety Agency To capture later mention of such authorization and to make it clear that this is an option for NPPOs <i>Category : SUBSTANTIVE</i>
86	48	Authorization may be used by NPPOs to recognize entities to perform specific phytosanitary actions. <u>When an NPPO decides to authorize entities, it has sole responsibility for deciding which entity is authorized and for which specific phytosanitary actions.</u>	C	United States of America Does this mean that NPPO can authorize an entity to perform a phytosanitary action; but can not authorize an entity to further authorize other entities to perform such actions? How many levels of authorization is the responsibility of the NPPO and who audits and supervises other sub-entities? What about accreditation of facilities to further authorize other facilities? This concept perhaps needs to be clarified in the first paragraph of this Background section. <i>Category : SUBSTANTIVE</i>
87	48	Authorization may be used by NPPOs <u>NPPOs, if allowed by their legal framework</u> , to recognize entities to perform specific phytosanitary actions. When an NPPO decides to authorize entities, it has sole responsibility for deciding which entity is authorized and for which specific phytosanitary actions.	P	NEPPO <i>Category : SUBSTANTIVE</i>
88	48	Authorization may be used by NPPOs to recognize entities to perform specific phytosanitary actions.- <u>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.</u> When an NPPO decides to authorize entities, it has sole responsibility for deciding which entity is authorized and for which specific phytosanitary actions.	P	Japan Move from 3rd sentence in paragraph No 49 to here. It is thought that the ISPM readers can understand better if the examples are described in the former paragraph rather than the latter one <i>Category : TECHNICAL</i>

89	48	Authorization may be used by NPPOs to recognize entities to perform specific phytosanitary <u>actions and to audit authorized entities or supervise phytosanitary</u> actions. When an NPPO decides to authorize entities, it has sole responsibility for deciding which entity is authorized and for which specific phytosanitary actions.	P	Japan In this ISPM, authorization of entities covers “authorizing entities to audit or supervise”, but the concept appears for the first time in “4.2.1 Roles and responsibilities of entities authorized to audit or supervise”. It is better to add the explanation in “1. Basic Understanding of Authorization” to increase better understanding of overview of authorization. <i>Category : SUBSTANTIVE</i>
90	48	Authorization may be used by NPPOs to recognize entities to perform specific phytosanitary <u>Phytosanitary</u> actions. When an NPPO decides to authorize entities, it has sole responsibility for deciding which entity is authorized and for which specific phytosanitary <u>Phytosanitary</u> actions.	P	Ghana <i>Category : EDITORIAL</i>
91	49	With the authorization, the phytosanitary action is performed by the entity but the responsibility remains with the NPPO. Authorization may be given only to carry out phytosanitary 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. Individuals assisting personnel of the NPPO in the presence and direct oversight of the NPPO need not be authorized. Authorization for phytosanitary actions does not include NPPO core activities such as issuance of phytosanitary certificates or development and establishment of phytosanitary measures because these are not phytosanitary actions. The NPPO should have sufficient staff with the necessary expertise to carry out oversight of authorized entities.	P	Argentina Deleted because individuals assisting personnel of the NPPO are outside of the scope of the standard. In addition the sentence is not clear. <i>Category : TECHNICAL</i>
92	49	With the authorization, the phytosanitary action is performed by the entity but the responsibility remains with the NPPO. Authorization may be given only to carry out phytosanitary 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. Individuals assisting personnel of the NPPO in the presence and direct oversight of the NPPO need not be authorized. Authorization for phytosanitary actions does not include NPPO core activities such as issuance of phytosanitary certificates or development and establishment of phytosanitary measures because these are not phytosanitary actions. The NPPO should have sufficient staff with the necessary expertise to carry out oversight of authorized entities.	P	Costa Rica Deleted because individuals assisting personnel of the NPPO are outside of the scope of the standard. In addition the sentence is not clear <i>Category : TECHNICAL</i>

93	49	<u>The NPPO is responsible for ensuring that the authorized entity performs the phytosanitary actions according to the NPPO's requirements.</u> With the authorization, the phytosanitary action is performed by the entity but the responsibility remains with the NPPO. Authorization may be given only to carry out phytosanitary actions to implement phytosanitary measures that are decided by the NPPO. Examples of phytosanitary actions that an NPPO may <u>decide to</u> authorize an entity to perform include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine and destruction. Individuals assisting personnel of the NPPO in the presence and direct oversight of the NPPO need not be authorized. Authorization for phytosanitary actions does not include NPPO core activities such as issuance of phytosanitary certificates or development and establishment of phytosanitary measures because these are not phytosanitary actions. The NPPO should have sufficient staff with the necessary expertise to carry out oversight <u>oversight, including auditing,</u> of authorized entities.	P	European Union 1. New first sentence: this is an important aspect that needs to be stated explicitly in a prominent place and it might help addressing some of the concerns raised by certain CPs about the need for this Standard. 2. To make more explicit that it is a decision of the NPPO to authorize (global change to be done). 3. It is useful to make clear that auditing is included. <i>Category : SUBSTANTIVE</i>
94	49	With the authorization, the phytosanitary action is performed by the entity but the responsibility remains with the NPPO. Authorization may be given only to carry out phytosanitary 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. Individuals assisting personnel of the NPPO in the presence and direct oversight of the NPPO need not be authorized. Authorization for phytosanitary actions does not include NPPO core activities such as issuance of phytosanitary certificates or development and establishment of phytosanitary measures because these are not phytosanitary actions. The NPPO should have sufficient staff with the necessary expertise to carry out oversight of authorized entities.	P	Japan Move to after 1st sentence in paragraph No 48. Refer to the reason in paragraph 48. <i>Category : SUBSTANTIVE</i>
95	49	With the authorization, the phytosanitary action is performed by the entity but the responsibility remains with the NPPO. Authorization may be given only to carry out phytosanitary 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. Individuals assisting personnel of the NPPO in the presence and direct oversight of the NPPO need not be authorized. Authorization for phytosanitary actions does not include NPPO core activities such as issuance of phytosanitary certificates or development and establishment of phytosanitary measures because these are not phytosanitary actions. The NPPO	P	Uruguay Deleted because individuals assisting personnel of the NPPO are outside of the scope of the standard. In addition the sentence is not clear. <i>Category : TECHNICAL</i>

		should have sufficient staff with the necessary expertise to carry out oversight of authorized entities.		
96	49	With the authorization, the phytosanitary action is performed by the entity but the responsibility remains with the NPPO. Authorization may be given only to carry out phytosanitary 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. Individuals assisting personnel of the NPPO in the presence and direct oversight of the NPPO need not be authorized. Authorization for phytosanitary actions does not include NPPO core activities such as issuance of phytosanitary certificates or development and establishment of phytosanitary measures because these are not phytosanitary actions. The NPPO should have sufficient staff with the necessary expertise to carry out oversight of authorized entities. <u>Where the NPPO have insufficient staff without the necessary expertise to carry out oversight of authorized entities, the NPPO cannot or is not eligible to authorized entities to perform specific actions on their behalf.</u>	P	Ghana <i>Category : TECHNICAL</i>
97	49	<u>The NPPO is responsible for ensuring that the authorized entity performs the phytosanitary actions according to the NPPO's requirements.</u> With the authorization, the phytosanitary action is performed by the entity but the responsibility remains with the NPPO. Authorization may be given only to carry out phytosanitary actions to implement phytosanitary measures that are decided by the NPPO. Examples of phytosanitary actions that an NPPO may <u>decide to</u> authorize an entity to perform include monitoring, sampling, inspection, testing, surveillance, treatment, treatment and post-entry quarantine and destruction <u>(e.g. as included in ISPM 6, 23, 42).</u> Individuals assisting personnel of the NPPO in the presence and direct oversight of the NPPO need not be authorized. Authorization for phytosanitary actions does not include NPPO core activities such as issuance of phytosanitary certificates or development and establishment of phytosanitary measures because these are not phytosanitary actions. The NPPO should have sufficient staff with the necessary expertise to carry out oversight of authorized entities.	P	EPPO This is an important aspect that needs to be stated explicitly in a prominent place and it might help addressing some of the concerns raised by certain CPs about the need for this Standard. These are examples (the list of phytosanitary actions is not exhaustive) and 'destruction' is not a clear example. Reference to other ISPMs where authorization is mentioned is helpful. It is useful to make clear that auditing is included. To make more explicit that it is a decision of the NPPO to authorize (global change to be done). This sentence is not relevant anymore because it was linked to a sentence on public entities that has been deleted. <i>Category : SUBSTANTIVE</i>
98	49	With the authorization, the phytosanitary action is performed by the entity but the responsibility remains with the NPPO. Authorization may be given only to carry out phytosanitary 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,	P	Australia Authorisation is provided to approved diagnostic labs <i>Category : EDITORIAL</i>

		treatment, post-entry quarantine-quarantine, diagnostics and destruction. Individuals assisting personnel of the NPPO in the presence and direct oversight of the NPPO need not be authorized. Authorization for phytosanitary actions does not include NPPO core activities such as issuance of phytosanitary certificates or development and establishment of phytosanitary measures because these are not phytosanitary actions. The NPPO should have sufficient staff with the necessary expertise to carry out oversight of authorized entities.		
99	49	With the authorization, the phytosanitary action is performed by the entity but the responsibility remains with the NPPO. Authorization may be given only to carry out phytosanitary 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. Individuals assisting personnel of the NPPO in the presence and direct oversight of the NPPO need not be authorized. Authorization for phytosanitary actions does not include NPPO core activities such as issuance of phytosanitary certificates or development and establishment of phytosanitary measures because these are not phytosanitary actions. The NPPO should have sufficient staff with the necessary expertise to carry out oversight <u>and control</u> of authorized entities.	P	IPPC Regional Workshop Europe and Central Asia These examples might raise concerns for some countries. It is enough with some typical examples on which countries may agree. About "surveillance" it is mentioned in the standard ISPM 6 – Surveillance is one of the core activities of NPPOs. Surveillance underpins several activities, therefore is not good example. in the last sentence, it suggested to note as it is in ISPM 20, 2nd section. <i>Category : SUBSTANTIVE</i>
100	49	With the authorization, the phytosanitary action is performed by the entity but the responsibility remains with the NPPO. Authorization may be given only to carry out phytosanitary 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. Individuals assisting personnel of the NPPO in the presence and direct oversight of the NPPO need not be authorized. Authorization for phytosanitary actions does not include NPPO core activities such as issuance of phytosanitary certificates or development and establishment of phytosanitary measures because these are not phytosanitary actions. The NPPO should have sufficient staff with the necessary expertise to carry out oversight of authorized entities.	C	South Africa Propose amendment of the sentence: "Authorization for phytosanitary actions does not include NPPO core activities such as issuance of phytosanitary certificates or development and establishment of phytosanitary measures because these are not phytosanitary actions." To read as:" Authorization for phytosanitary actions does not include the issuance of phytosanitary certificates or development and establishment of phytosanitary measures because these are not phytosanitary actions". The reason being that the phrase: "core activities" was not described in the IPPC text or any ISPM". <i>Category : SUBSTANTIVE</i>
101	49	With the authorization, the phytosanitary action is performed by the entity but the responsibility remains with the NPPO. Authorization may be given only to carry out phytosanitary 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. Individuals assisting personnel of	P	China The activities which are not covered by this standard should be clarified. In the scope, it is said that this standard does not cover the issuance of phytosanitary certificates in accordance with article of the IPPC. But this sentence emphasizes that both the issuance of phytosanitary certificates and the development and establishment of phytosanitary measures are not included because of they are not phytosanitary action. These two places involved

		the NPPO in the presence and direct oversight of the NPPO need not be authorized. Authorization for phytosanitary actions does not include NPPO core activities such as issuance of phytosanitary certificates or development and establishment of phytosanitary measures because these are not phytosanitary actions. The NPPO should have sufficient staff with the necessary expertise to carry out oversight of authorized entities.		two different reasons, which could easily lead to misunderstanding. <i>Category : SUBSTANTIVE</i>
102	49	With the authorization, the phytosanitary action is performed by the entity but the responsibility remains with the NPPO. Authorization may be given only to carry out phytosanitary 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. Individuals assisting personnel of the NPPO in the presence and direct oversight of the NPPO need not be authorized. Authorization for phytosanitary actions does not include NPPO core activities such as issuance of phytosanitary certificates or development and establishment of phytosanitary measures because these are not phytosanitary actions. The NPPO should have sufficient staff with the necessary expertise to carry out oversight of authorized entities.	C	COSAVE Deleted because individuals assisting personnel of the NPPO are outside of the scope of the standard. In addition the sentence is not clear. <i>Category : TECHNICAL</i>
103	49	With the authorization, the phytosanitary action is performed by the entity but the responsibility remains with the NPPO. Authorization may be given only to carry out phytosanitary 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. Individuals assisting personnel of the NPPO in the presence and direct oversight of the NPPO need not be authorized. Authorization for phytosanitary actions does not include NPPO core activities such as issuance of phytosanitary certificates or development and establishment of phytosanitary measures because these are not phytosanitary actions. The NPPO should have sufficient staff with the necessary expertise to carry out oversight of authorized entities.	P	COSAVE <i>Category : TECHNICAL</i>
104	49	With the authorization, the phytosanitary action is performed by the entity but the responsibility remains with the NPPO. Authorization may be given only to carry out phytosanitary actions to implement phytosanitary <u>Phytosanitary</u> measures that are decided by the NPPO. Examples of phytosanitary <u>Phytosanitary</u> actions that an NPPO may authorize an entity to perform include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine and destruction.	P	Ghana <i>Category : EDITORIAL</i>

		Individuals assisting personnel of the NPPO in the presence and direct oversight of the NPPO need not be authorized. Authorization for phytosanitary <u>Phyotosanitary</u> actions does not include NPPO core activities such as issuance of phytosanitary <u>Phyotosanitary</u> certificates or development and establishment of phytosanitary <u>Phyotosanitary</u> measures because these are not phytosanitary <u>Phyotosanitary</u> actions. The NPPO should have sufficient staff with the necessary expertise to carry out oversight of authorized entities.		
105	50	In this standard, “entities” include the providers of phytosanitary action (e.g. individuals, organizations, enterprises) and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). <u>In some cases, authorization of entities may require an NPPO to approve individuals within the entity</u> (such as those responsible for specific phytosanitary actions), relevant documentation, their facilities, or any combination of these. The NPPO and the entity should determine the nature of the authorization agreement.	C	Mexico Even individuals are considered within this proposed standard, It might be considered to clarify in the text, where it applies, that NPPO is able to authorized individuals who cover the required profile, and not necessarily be part of an enterprise or organization. <i>Category : SUBSTANTIVE</i>
106	50	In this standard, “entities” include the providers of phytosanitary action (e.g. individuals, organizations, 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 <u>facilities and their operational procedures</u> , or any combination of these. The NPPO and the entity should determine the nature of the authorization agreement.	P	Saint Kitts And Nevis <i>Category : SUBSTANTIVE</i>
107	50	In this standard, “entities” include the providers of phytosanitary action (e.g. individuals, organizations, 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, <u>their operational procedures</u> or any combination of these. The NPPO and the entity should determine the nature of the authorization agreement.	P	Argentina Important to ensure the quality of the authorized entity <i>Category : TECHNICAL</i>
108	50	In this standard, “entities” include the providers of phytosanitary action (e.g. individuals, organizations, 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, <u>their operational procedures</u> or any combination of these. The NPPO and the entity should determine the nature of the authorization agreement.	P	Costa Rica Important to ensure the quality of the authorized phytosanitary actions <i>Category : SUBSTANTIVE</i>

109	50	In this standard, “entities” include the providers of phytosanitary action (e.g. individuals, organizations, 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, <u>their operational procedures</u> or any combination of these. The NPPO and the entity should determine the nature of the authorization agreement.	P	Barbados <i>Category : SUBSTANTIVE</i>
110	50	In this standard, “entities” include the providers of phytosanitary action (e.g. individuals, organizations, 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 <u>facilities operational procedures</u> , or any combination of these. The NPPO and the entity should determine the nature of the authorization agreement.	P	COSAVE their operational procedures, or any combination of these. The NPPO and the entity should determine the nature of the authorization agreement: Important to ensure the quality of the authorized entity. <i>Category : TECHNICAL</i>
111	50	In this standard, “entities” include the providers of phytosanitary action (e.g. <u>individuals</u> , organizations, enterprises) and, where appropriate, their facilities (such as equipment, laboratories, treatment enclosures). In some cases, authorization of entities may require an NPPO to <u>approve-authorize</u> individuals within the entity (such as those responsible for specific phytosanitary actions), <u>approve</u> relevant documentation, their facilities, or any combination of these. The NPPO and the entity should determine the nature of the authorization agreement.	P	European Union 1. Phytosanitary actions are generally delegated to organisations therefore individuals should not be included in the example. 2. The term “approved” should not be used for individuals. 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 to use the term “authorize” to give authority to a person or a body to do something. <i>Category : TECHNICAL</i>
112	50	In this standard, “entities” include the providers of phytosanitary action (e.g. individuals, organizations, 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, <u>their</u> facilities, or any combination of these. The NPPO and the entity should determine the nature of the authorization agreement.	P	European Union Better English. <i>Category : EDITORIAL</i>
113	50	In this standard, “entities” include the providers of phytosanitary action (e.g. individuals, organizations, 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	P	European Union The last sentence is not relevant anymore because it was linked to a sentence on public entities that has been deleted. <i>Category : SUBSTANTIVE</i>

		facilities, or any combination of these. The NPPO and the entity should determine the nature of the authorization agreement.		
114	50	In this standard, “entities” include the providers of phytosanitary action (e.g. individuals, organizations, 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, <u>their operational procedures</u> or any combination of these. The NPPO and the entity should determine the nature of the authorization agreement.	P	Uruguay Important to ensure the quality of the authorized entity <i>Category : TECHNICAL</i>
115	50	In this standard, “entities” include the providers of phytosanitary action (e.g. individuals , organizations, enterprises) 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), approve relevant documentation, their facilities, or any combination of these. The NPPO and the entity should determine the nature of the authorization agreement.	P	EPPO The term “approved” should not be used for individuals. 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 to use the term “authorize” to give authority to a person or a body to do something. Better English. Phytosanitary actions are generally delegated to organisations therefore individuals should not be included in the example. This sentence is not relevant anymore because it was linked to a sentence on public entities that has been deleted. <i>Category : SUBSTANTIVE</i>
116	50	In this standard, “entities” include the providers of phytosanitary action (e.g. individuals, organizations, 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, <u>their operational procedures</u> or any combination of these. The NPPO and the entity should determine the nature of the authorization agreement.	P	Caribbean Agricultural Health and Food Safety Agency <i>Category : SUBSTANTIVE</i>
117	50	In this standard, “entities” include the providers of phytosanitary action (e.g. individuals, organizations, 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. The NPPO and the entity should determine the nature of the authorization agreement.	C	OIRSA Debe incluir la aprobación de procedimientos además. <i>Category : TECHNICAL</i>

1.1 Authorization programme			
118	51	1.1 Authorization programme	C Indonesia Indonesia proposes to combine subsection 1.1 into section 1 <i>Category : SUBSTANTIVE</i>
119	51	1.1 2. Authorization programme	P Korea, Republic of To combine these two parts, delete the title of 2 and change 1,1, to 2. Both of these two sections are about authorization programme. It will be clearer after combine. <i>Category : TECHNICAL</i>
120	51	1.1 2 Authorization programme	P China Combine these two parts, delete the title of 2 and change 1.1 to 2. Both of these two sections are about authorization programme. It will be clearer after combine. <i>Category : EDITORIAL</i>
121	52	Under its phytosanitary regulatory system, an NPPOs-NPPO wishing to authorize entities to perform specific phytosanitary actions should establish an authorization programme.	P Saint Kitts And Nevis <i>Category : EDITORIAL</i>
122	52	Under its phytosanitary regulatory system, an NPPOs wishing deciding to authorize entities to perform specific phytosanitary actions should establish an authorization programme.	P Argentina In line with the Scope <i>Category : TECHNICAL</i>
123	52	Under its phytosanitary regulatory system, an NPPOs wishing deciding to authorize entities to perform specific phytosanitary actions should establish an authorization programme.	P Costa Rica In line with the standard Scope. <i>Category : TECHNICAL</i>
124	52	Under its phytosanitary regulatory system, an NPPOs wishing deciding to authorize entities to perform specific phytosanitary actions should establish an authorization programme.	P COSAVE deciding: In line with the scope <i>Category : TECHNICAL</i>
125	52	Under its phytosanitary regulatory system, an NPPOs-NPPO wishing to authorize entities to perform specific phytosanitary actions should establish an authorization programme.	P Indonesia Indonesia propose to delete 's' <i>Category : EDITORIAL</i>
126	52	Under its phytosanitary regulatory system, an NPPOs wishing deciding to authorize entities to perform specific phytosanitary actions should establish an authorization programme.	P Uruguay In line with the scope <i>Category : TECHNICAL</i>
127	52	Under its phytosanitary regulatory system, an NPPOs-NPPO wishing to authorize entities to perform specific phytosanitary actions should establish an authorization programme.	P Korea, Republic of This para could be broadened to a more generic term "phytosanitary systems" to apply to both import and export systems. <i>Category : EDITORIAL</i>

128	52	Under its phytosanitary regulatory system, ana NPPOs NPPO wishing to authorize entities to perform specific phytosanitary actions should establish an authorization programme.	P	Caribbean Agricultural Health and Food Safety Agency <i>Category : EDITORIAL</i>
129	52	Under its phytosanitary regulatory system, an NPPOs wishing deciding to authorize entities to perform specific phytosanitary actions should establish an authorization programme.	P	OIRSA En línea con el Scope de la norma. Que indica que es una decisión de las ONPF si autorizan una entidad <i>Category : EDITORIAL</i>
130	52	Under its phytosanitary regulatory system, an NPPOs wishing to authorize entities to perform specific phytosanitary actions should establish an authorization programme.	C	South Africa Propose deletion of: "an" because it is grammatically incorrect <i>Category : EDITORIAL</i>
131	52	Under its phytosanitary regulatory system, an NPPOs NPPO wishing to authorize entities to perform specific phytosanitary actions should establish an authorization programme.	P	New Zealand This para could be broadened to a more generic term 'phytosanitary systems' to apply to both import and export systems. The term regulatory (or similar) is not used in ISPM 7, and is included within ISPM 5 in regards to import regulatory systems. The use of the term 'regulatory' may imply that an authorization programme only applies to phytosanitary import regulatory systems [ISPM 20] not to phytosanitary certification systems [ISPM 7]. <i>Category : SUBSTANTIVE</i>
132	52	Under its phytosanitary regulatory system, an NPPOs wishing to authorize entities to perform specific phytosanitary <u>Phytosanitary</u> actions should establish an authorization programme.	P	Ghana <i>Category : EDITORIAL</i>
133	53	Prior to deciding to authorize entities to perform phytosanitary actions, NPPOs should ensure that their country's legal framework enables them to authorize, suspend, revoke and reinstate authorizations, <u>as well as grant the authority to make sanctions</u> . NPPOs should only set up authorization programmes that result in effective phytosanitary actions that are delivered with integrity and transparency. The authorization programme should ensure that the authorized entities are accountable to the NPPO for these actions and that phytosanitary security is maintained, consistent with the provisions of the IPPC and ISPMs.	P	Saint Kitts And Nevis <i>Category : SUBSTANTIVE</i>
134	53	Prior to deciding to authorize entities to perform phytosanitary actions, NPPOs should ensure that their country's legal framework enables them to authorize, suspend, revoke and reinstate authorizations <u>authorizations as well as granting the authority to sanction and prosecute</u> . NPPOs should only set up authorization programmes that result in effective phytosanitary actions that are delivered with integrity and transparency. The authorization programme should ensure that the authorized entities are accountable to the NPPO for these actions and that	P	Barbados <i>Category : SUBSTANTIVE</i>

		phytosanitary security is maintained, consistent with the provisions of the IPPC and ISPMs.		
135	53	Prior to deciding to authorize entities to perform phytosanitary actions <u>actions and developing an authorization programme</u> , NPPOs should ensure that their country's legal framework enables them to authorize, suspend, revoke and reinstate authorizations. NPPOs should only set up authorization programmes that result in effective phytosanitary actions that are delivered with integrity and transparency. The authorization programme should ensure that the authorized entities are accountable to the NPPO for these actions and that phytosanitary security is maintained, consistent with the provisions of the IPPC and ISPMs.	P	European Union 1. For a better link with the previous paragraph. 2. New paragraph because this is a new idea. <i>Category : EDITORIAL</i>
136	53	Prior to deciding to authorize entities to perform phytosanitary actions, NPPOs should ensure that their country's legal framework enables them to authorize, suspend, revoke and reinstate authorizations. NPPOs should only set up authorization programmes that result in effective phytosanitary actions that are delivered with integrity and transparency. The authorization programme should ensure that the authorized entities are accountable to the NPPO for these actions and that phytosanitary security is maintained, consistent with the provisions of the IPPC and ISPMs.	C	EPPO During translation into Russian it was noted that it is not clear what does 'integrity' mean in the context of 'phytosanitary action'. Terms such as honesty, trustworthy or correctness can be used instead for translation purposes. <i>Category : TRANSLATION</i>
137	53	Prior to deciding to authorize entities to perform phytosanitary actions <u>actions and developing an authorization programme</u> , NPPOs should ensure that their country's legal framework enables them to authorize, suspend, revoke and reinstate authorizations. NPPOs should only set up authorization programmes that result in effective phytosanitary actions that are delivered with integrity and transparency. The authorization programme should ensure that the authorized entities are accountable to the NPPO for these actions and that phytosanitary security is maintained, consistent with the provisions of the IPPC and ISPMs.	P	EPPO New paragraph because this is a new idea. For a better link with the previous paragraph. <i>Category : EDITORIAL</i>
138	53	Prior to deciding to authorize entities to perform phytosanitary actions, NPPOs should ensure that their country's legal framework enables them to authorize, suspend, revoke and reinstate authorizations <u>authorizations as well as granting the authority to sanction and prosecute</u> . NPPOs should only set up authorization programmes that result in effective phytosanitary actions that are delivered with integrity and transparency. The authorization programme should ensure that the authorized entities are accountable to the NPPO for these actions and that	P	Caribbean Agricultural Health and Food Safety Agency <i>Category : SUBSTANTIVE</i>

		phytosanitary security is maintained, consistent with the provisions of the IPPC and ISPMs.		
139	53	Prior to deciding to authorize entities to perform phytosanitary actions, NPPOs should ensure that their country's legal framework enables them to authorize, suspend, revoke and reinstate authorizations. NPPOs should only set up authorization programmes that result in effective phytosanitary actions that are delivered with integrity and transparency. The authorization programme should ensure that the authorized entities are accountable to the NPPO for these actions and that phytosanitary security is maintained, consistent with the provisions of the IPPC and ISPMs.	C	IPPC Regional Workshop Europe and Central Asia During translation into Russian it was noted that it is not clear what does 'integrity' mean in the context of 'phytosanitary action'. Terms such as honesty, trustworthy or correctness can be used instead for translation purposes. <i>Category : TRANSLATION</i>
140	53	Prior to deciding to authorize entities to perform phytosanitary actions, NPPOs should ensure that their country's legal framework enables them to authorize, suspend, revoke and reinstate authorizations. NPPOs should only set up authorization programmes that result in effective phytosanitary actions that are delivered with integrity and transparency. The authorization programme should ensure that the authorized entities are accountable to the NPPO for these actions and that phytosanitary security is maintained, consistent with the provisions of the IPPC and ISPMs.	C	OIRSA En casos de corrupción, también el amparo legal para perseguir legalmente. <i>Category : SUBSTANTIVE</i>
141	53	Prior to deciding to authorize entities to perform phytosanitary actions, NPPOs should ensure that their country's legal framework enables them to authorize, suspend, revoke and reinstate authorizations. NPPOs should only set up authorization programmes that result in effective phytosanitary actions that are delivered with integrity and transparency. The authorization programme should ensure that the authorized entities are accountable to the NPPO for these actions and that phytosanitary security is maintained, consistent with the provisions of the IPPC and ISPMs.	C	South Africa Propose replacement of: "phytosanitary security" with: "credibility of the NPPO" since the word: "phytosanitary security" is inconsistent with the IPPC text or any other relevant ISPM <i>Category : TECHNICAL</i>
142	53	Prior to deciding to authorize entities to perform phytosanitary <u>Phytosanitary</u> actions, NPPOs should ensure that their country's legal framework enables them to authorize, suspend, revoke and reinstate authorizations. NPPOs should only set up authorization programmes that result in effective phytosanitary <u>Phytosanitary</u> actions that are delivered with integrity and transparency. The authorization programme should ensure that the authorized entities are accountable to the NPPO for these actions and that phytosanitary <u>Phytosanitary</u> security is maintained, consistent with the provisions of the IPPC and ISPMs.	P	Ghana <i>Category : EDITORIAL</i>

2. Development of Authorization Programme			
143	54	2. Development of Authorization Programme	P Korea, Republic of To combine these two parts, delete the title of 2 and change 1.1 to 2. Both of these two sections are about authorization programme. It will be clearer after combine. <i>Category : TECHNICAL</i>
144	54	2. Development of Authorization Programme	P China Combine these two parts, delete the title of 2 and change 1.1 to 2. Both of these two sections are about authorization programme. It will be clearer after combine. <i>Category : EDITORIAL</i>
145	55	The NPPO should develop <u>and maintain</u> an authorization programme that is appropriate for its purposes, first defining the programme's scope and objectives. <u>When developing With an authorization-authorisation programme, the NPPO shouldshould develop and maintain:</u>	P Singapore NPPO should develop and maintain an authorisation programme and not only develop. <i>Category : SUBSTANTIVE</i>
146	55	The NPPO should develop an authorization programme that is appropriate for its purposes, first defining <u>phytosanitary actions covered by</u> the <u>programme's scope programme</u> and <u>its</u> objectives. When developing an authorization programme, the NPPO should:	P European Union The word 'scope' is not clear therefore reworded to be more specific. <i>Category : TECHNICAL</i>
147	55	The NPPO should develop <u>and maintain</u> an authorization programme that is appropriate for its purposes, first defining the programme's scope and objectives. When developing an authorization programme, the NPPO should:	P China Support APPPC comment <i>Category : SUBSTANTIVE</i>
148	55	The NPPO should develop an authorization programme that is appropriate for its purposes, first defining the <u>programme's scope-phytosanitary actions covered by the programme</u> and <u>its</u> objectives. When developing an authorization programme, the NPPO should:	P EPPO The word 'scope' is not clear therefore reworded to be more specific. <i>Category : TECHNICAL</i>
149	55	The NPPO should develop <u>and maintain</u> an authorization programme that is appropriate for its purposes, first defining the programme's scope and objectives. <u>When developing With an authorization programme, the NPPO shouldshould develop and maintain:</u>	P Korea, Republic of An authorisation system should be developed, and as equally important, maintained to ensure the integrity of an NPPO's phytosanitary system. <i>Category : EDITORIAL</i>
150	55	The NPPO should develop <u>and maintain</u> an authorization programme that is appropriate for its purposes, first defining the programme's scope and objectives. <u>When developing an authorization With the authorisation programme, the NPPO shouldshould develop and maintain:</u>	P APPPC To include a critical element of maintenance of the authorisation programme in addition to NPPO's development of the programme. <i>Category : SUBSTANTIVE</i>
151	55	The NPPO should develop <u>and maintain</u> an authorization programme that is appropriate for its purposes, first defining the programme's scope and objectives. When developing an authorization programme, the NPPO should:	P Philippines <i>Category : SUBSTANTIVE</i>

152	55	The NPPO should develop <u>and maintain</u> an authorization programme that is appropriate for its purposes, first defining the programme's scope and objectives. When developing an authorization programme, the NPPO should:	P	Thailand To include maintenance component ie "maintain" <i>Category : SUBSTANTIVE</i>
153	55	The NPPO should develop <u>and maintain</u> an authorization programme that is appropriate for its purposes, first defining the programme's scope and objectives. When developing With an authorization programme, the NPPO should <u>should develop and maintain</u> :	P	New Zealand An authorisation system should be developed, and as equally important, maintained, to ensure the integrity of an NPPO's phytosanitary system. <i>Category : TECHNICAL</i>
154	56	set the requirements that must be met by an entity to be authorized	P	Singapore Editorial changes due to change in the last sentence prior to this i.e. develop and maintain. To delete all "develop" in the preceding sentences. (APPPC comment) <i>Category : EDITORIAL</i>
155	56	set the requirements that must be met by an entity to be authorized	P	Korea, Republic of To delete " set the" <i>Category : EDITORIAL</i>
156	56	the set the requirements that must be met by an entity to be authorized	P	APPPC to delete the "set" due to rephrasing of the last sentence of the earlier paragraph. <i>Category : EDITORIAL</i>
157	56	set the requirements that must be met by an entity to be authorized	P	New Zealand <i>Category : EDITORIAL</i>
158	57	develop procedures for receiving, maintaining and delivering information, including its confidentiality	P	Korea, Republic of To delete "develop" <i>Category : EDITORIAL</i>
159	57	the develop procedures for receiving, maintaining and delivering information, including its confidentiality	P	APPPC To delete the word - develop due to rephrasing of the last sentence in the earlier paragraph. <i>Category : EDITORIAL</i>
160	57	develop <u>specific</u> procedures <u>of each phytosanitary action</u> for receiving, maintaining and delivering information, including its confidentiality	P	Viet Nam More specific of phytosanitary action <i>Category : SUBSTANTIVE</i>
161	57	develop procedures for receiving, maintaining and delivering information, including its confidentiality	P	New Zealand <i>Category : EDITORIAL</i>
162	58	develop a process, from the time of receipt of the required information <u>required by the NPPO</u> and its subsequent evaluation to the decision on whether to grant authorization to the entity	P	European Union Clearer. <i>Category : EDITORIAL</i>
163	58	develop a process, from the time of receipt of the required information <u>required by the NPPO</u> and its subsequent evaluation to the decision on whether to grant authorization to the entity	P	EPPO Clearer. <i>Category : EDITORIAL</i>

164	58	develop a process, from the time of receipt of the required information and its subsequent evaluation to the decision on whether to grant authorization to the entity	P	Korea, Republic of To delete "develop" Category : EDITORIAL
165	58	develop a process, from the time of receipt of the required information and its subsequent evaluation to the decision on whether to grant authorization to the entity	C	United States of America To improve clarity. Category : EDITORIAL
166	58	develop a process, from that describes the time of receipt of steps taken prior to entering an agreement with an entity, during the required information and its subsequent evaluation period, and when concluding to form the decision on whether to grant authorization to the entity	P	United States of America Category : EDITORIAL
167	58	develop a process, from the time of receipt of the required information and its subsequent evaluation to the decision on whether to grant authorization to the entity	P	APPPC To delete the word - develop due to rephrasing of the last sentence in the earlier paragraph Category : EDITORIAL
168	58	a develop a process, from the time of receipt of the required information and its subsequent evaluation to the decision on whether to grant authorization to the entity	P	New Zealand Category : EDITORIAL
169	59	develop a training plan to ensure that NPPO personnel have the expertise to manage the authorization programme	P	Korea, Republic of To delete "develop" Category : EDITORIAL
170	59	develop a training plan to ensure that NPPO personnel have the expertise to manage the authorization programme	P	APPPC To delete the word - develop due to rephrasing of the last sentence in the earlier paragraph. Category : EDITORIAL
171	59	a develop a training plan to ensure that NPPO personnel have the expertise to manage the authorization programme	P	New Zealand Category : EDITORIAL
172	59	develop a training plan to ensure that NPPO personnel have the expertise to manage the authorization programme	C	New Zealand Implementation issue. IPPC guidance materials on topics of training, competency, and skills would be helpful. Category : SUBSTANTIVE
173	60	develop training or identify minimum training, equipment, competency and skills requirements for entities to perform phytosanitary actions; these requirements should be equivalent to those required for the NPPO if it were to undertake the same phytosanitary actions	P	Korea, Republic of To delete "develop" Category : EDITORIAL
174	60	develop training or identify minimum training, equipment, competency and skills requirements for entities to perform phytosanitary actions; these requirements should be equivalent to those required for the NPPO if it were to undertake the same phytosanitary actions	P	United States of America if any training is needed to meet the requirements, this should be a responsibility of the entity. Category : TECHNICAL

175	60	develop training or identify minimum training, equipment, competency and skills requirements for entities to perform phytosanitary actions; these requirements should be equivalent to those required for the NPPO if it were to undertake the same phytosanitary actions	P	APPPC To delete the word - develop due to rephrasing of the last sentence in the earlier paragraph. <i>Category : EDITORIAL</i>
176	60	develop training or identify minimum training, equipment, competency and skills requirements for entities to perform phytosanitary actions; these requirements should be equivalent to those required for the NPPO if it were to undertake the same phytosanitary actions	P	New Zealand <i>Category : EDITORIAL</i>
177	61	develop a template agreement that can be used to formalize the authorization of entities and make the authorization legally binding	P	European Union This requirement is too detailed to fit in the legal system of all countries and could be interpreted in different ways. <i>Category : SUBSTANTIVE</i>
178	61	develop a template agreement that can be used to formalize the authorization of entities and make the authorization legally binding	P	EPPO This requirement is too detailed to fit in the legal system of all countries and could be interpreted in different ways. <i>Category : SUBSTANTIVE</i>
179	61	develop a template agreement that can be used to formalize the authorization of entities and make the authorization legally binding	P	Korea, Republic of To delete "develop" <i>Category : EDITORIAL</i>
180	61	develop a template agreement that can be used to formalize the authorization of entities and make the authorization obligations of both parties legally binding	P	IPPC Regional Workshop Europe and Central Asia Clearer and it helps to avoid confusion <i>Category : TECHNICAL</i>
181	61	develop a template agreement <u>for phytosanitary services</u> that can be used to formalize the authorization of entities and make the authorization legally binding	P	United States of America <i>Category : TECHNICAL</i>
182	61	develop a template agreement that can be used to formalize the authorization of entities and make the authorization legally binding	P	APPPC To delete the word - develop due to rephrasing of the last sentence in the earlier paragraph <i>Category : EDITORIAL</i>
183	61	develop a template agreement that can be used to formalize the authorization of entities and make the authorization legally binding, <u>with a basis in relevant regulation</u>	P	Grenada <i>Category : SUBSTANTIVE</i>
184	61	develop a template agreement that can be used to formalize the authorization of entities and make the authorization legally binding	P	New Zealand <i>Category : EDITORIAL</i>
185	62	determine a validity period for authorization agreement, including <u>arrangements for</u> review and prolongation if appropriate	P	European Union Clearer. <i>Category : EDITORIAL</i>
186	62	determine a validity period for authorization agreement, including <u>arrangements for</u> review and prolongation if appropriate	P	EPPO Clearer. <i>Category : EDITORIAL</i>
187	62	determine a validity period for authorization agreement, including review and prolongation if appropriate	P	Korea, Republic of To delete "determine"

				<i>Category : EDITORIAL</i>
188	62	specify the dates determine a validity period for which the authorization agreement agreement is valid , including review and prolongation if appropriate	P	United States of America For clarity <i>Category : EDITORIAL</i>
189	62	determine a validity period for authorization agreement, including review and prolongation if appropriate	P	APPPC To delete the word - determine due to rephrasing of the last sentence in the earlier paragraph. <i>Category : EDITORIAL</i>
190	62	determine a validity period for authorization agreement, including review and prolongation if appropriate	P	New Zealand <i>Category : EDITORIAL</i>
191	62	determine a validity period for authorization agreement, including review and prolongation-extension if appropriate	P	New Zealand changing to commonly used language <i>Category : EDITORIAL</i>
192	63	develop specific performance criteria, guidelines, guidelines and performance-based verification processes for the actions performed by the entities	P	European Union Useless comma. <i>Category : EDITORIAL</i>
193	63	develop specific performance criteria, guidelines, guidelines and performance-based verification processes for the actions performed by the entities	P	EPPO Useless comma. <i>Category : EDITORIAL</i>
194	63	develop specific performance criteria, guidelines, and performance-based verification processes for the actions performed by the entities	P	Korea, Republic of To delete "develop" <i>Category : EDITORIAL</i>
195	63	develop specific performance criteria, guidelines, and performance-based verification processes for the actions performed by the entities	C	United States of America There seems to be redundancy between this para and the next one. Perhaps it is necessary to clarify if these are different. <i>Category : TECHNICAL</i>
196	63	develop specific performance criteria, guidelines, and performance-based verification processes for the actions performed by the entities	P	APPPC To delete the word = develop due to rephrasing of last sentence in the earlier paragraph. <i>Category : EDITORIAL</i>
197	63	develop specific performance criteria, guidelines, and performance-based verification processes for the actions performed by the entities	P	New Zealand <i>Category : EDITORIAL</i>
198	64	develop an audit or monitoring process and supporting tools, including audit or monitoring checklists and templates for audit or monitoring reports, and templates for preventive and corrective action reports	P	European Union It is not clear what "preventive action reports" are. <i>Category : SUBSTANTIVE</i>
199	64	develop an audit or monitoring process and supporting tools, including audit or monitoring checklists and templates for audit or monitoring reports, and templates for preventive and corrective action reports	P	EPPO It is not clear what "preventive action reports" are. <i>Category : SUBSTANTIVE</i>
200	64	develop an audit or monitoring process and supporting tools, including audit or monitoring checklists and templates for audit or monitoring reports, and templates for preventive and corrective action reports	P	Korea, Republic of To delete "develop" <i>Category : EDITORIAL</i>

201	64	develop -an audit or monitoring process and supporting tools, including audit or monitoring checklists and templates for audit or monitoring reports, and templates for preventive and corrective action reports	P	APPPC To delete the word - develop due to rephrasing of last sentence in the earlier paragraph. <i>Category : EDITORIAL</i>
202	64	develop an audit or monitoring <u>specific</u> process <u>for each phytosanitary action</u> and supporting tools, including audit or monitoring checklists and templates for audit or monitoring reports, and templates for preventive and corrective action reports	P	Viet Nam More specific of phytosanitary action <i>Category : SUBSTANTIVE</i>
203	64	develop -an audit or monitoring process and supporting tools, including audit or monitoring checklists and templates for audit or monitoring reports, and templates for preventive and corrective action reports	P	New Zealand <i>Category : EDITORIAL</i>
204	64	develop an audit or monitoring process and supporting tools, including which may include audit or monitoring checklists and templates for audit or monitoring reports, and templates for preventive and corrective action reports	P	New Zealand There are a number of tools which are possible to use, and it is not necessary to have checklists, templates etc in all cases. <i>Category : SUBSTANTIVE</i>
205	65	develop criteria to determine nonconformities <u>nonconformities according to their country's legal framework.</u>	P	Mexico For clarification <i>Category : SUBSTANTIVE</i>
206	65	develop -criteria to determine nonconformities	P	Korea, Republic of To delete "develop"; <i>Category : EDITORIAL</i>
207	65	develop -criteria to determine nonconformities	P	APPPC To delete the word - develop due to rephrasing of the last sentence in the earlier paragraph. <i>Category : EDITORIAL</i>
208	65	develop criteria to determine nonconformities	C	Viet Nam We are Need to develop to determine nonconformities??? Should be meet all the criteria or some criteria <i>Category : SUBSTANTIVE</i>
209	65	develop criteria to determine nonconformities	C	OIRSA Add: according to their country's legal framework. <i>Category : TECHNICAL</i>
210	65	develop criteria to determine <u>and classify</u> nonconformities	P	Nigeria since there are different types of nonconformities, NPPOs should develop criteria for differentiating and classifying nonconformities. <i>Category : TECHNICAL</i>
211	65	develop -criteria to determine nonconformities	P	New Zealand <i>Category : EDITORIAL</i>
212	66	develop a process to address nonconformity, this including, where appropriate, <u>the mechanism by which the NPPO</u> suspending or revoking authorization	P	Mexico Better wording <i>Category : SUBSTANTIVE</i>
213	66	develop -a process to address nonconformity, this including, where appropriate, suspending or revoking authorization	P	Korea, Republic of To delete "develop"; <i>Category : EDITORIAL</i>

214	66	develop a process to address nonconformity, this including, where appropriate, suspending or revoking authorization	P	APPPC To delete the word - develop due to rephrasing of the last sentence in the earlier paragraph. <i>Category : EDITORIAL</i>
215	66	develop a process to address nonconformity, this including, where appropriate, suspending or revoking authorization	C	OIRSA Add: the mechanism by which the NPPO.. <i>Category : TECHNICAL</i>
216	66	develop a process to address nonconformity, this including, including where appropriate, suspending-suspending, reinstating, or revoking authorization	P	New Zealand A process for reinstatement following suspension has not been included in this section. It would be helpful to either include this within [66] or insert a new para immediately afterwards: "develop a process to reinstate a suspended entity, following a suspension" <i>Category : SUBSTANTIVE</i>
217	67	develop a process for the authorized entity to voluntarily withdraw from the authorization agreement with the NPPO	P	Korea, Republic of <i>Category : EDITORIAL</i>
218	67	develop a process for the authorized entity to voluntarily withdraw from the authorization agreement with the NPPO	P	APPPC To delete the word - develop due to rephrasing of the last sentence of the earlier paragraph. <i>Category : EDITORIAL</i>
219	67	develop a process for the authorized entity to voluntarily withdraw from the authorization agreement with the NPPO	P	Philippines <i>Category : SUBSTANTIVE</i>
220	67	develop a process for the authorized entity to voluntarily withdraw from the authorization agreement with the NPPO- <u>develop a process for reinstatement of authorisation from suspension or voluntary withdrawal from the authorisation programme.</u>	P	Singapore new bullet point to cover reinstatement of authorisation. <i>Category : SUBSTANTIVE</i>
221	67	develop a process for the authorized entity to voluntarily withdraw from the authorization agreement with the NPPO- <u>develop a process for reinstatement of authorisation from suspension or voluntary withdrawal from the authorisation programme.</u>	P	Singapore There is a need for the reinstatement programme to reinstate interested members. <i>Category : SUBSTANTIVE</i>
222	67	develop a process for the authorized entity to voluntarily withdraw from the authorization agreement with the NPPO	P	New Zealand <i>Category : EDITORIAL</i>
223	68	<u>a process to</u> identify risks which may arise from authorization and which need to be managed through the authorization programme	P	Korea, Republic of To add "a process to"; <i>Category : EDITORIAL</i>
224	68	identify <u>phytosanitary</u> risks which may arise from authorization and which need to be managed through the authorization programme	P	United States of America If this is intended only to manage phytosanitary risks? Otherwise needs more clear language. <i>Category : TECHNICAL</i>

225	68	<u>a process to</u> identify risks which may arise from authorization and which need to be managed through the authorization programme	P	New Zealand <i>Category : EDITORIAL</i>
226	69	develop contingency plans for continuity of action in the event that an authorized entity has its authorization suspended or revoked or has withdrawn <u>withdraws</u> from the authorization programme	P	European Union Better English. <i>Category : EDITORIAL</i>
227	69	develop contingency plans for <u>ensuring</u> continuity of action in the event that an authorized entity has its authorization suspended or revoked or has withdrawn from the authorization programme	P	European Union It is crucial to ensure that specific phytosanitary long-term knowledge is maintained. <i>Category : TECHNICAL</i>
228	69	develop contingency plans for <u>ensuring</u> continuity of action in the event that an authorized entity has its authorization suspended or revoked or has withdrawn <u>withdraws</u> from the authorization programme	P	EPPO It is crucial to ensure that specific phytosanitary long-term knowledge is maintained. Better English? <i>Category : EDITORIAL</i>
229	69	develop contingency plans for continuity of action in the event that an authorized entity has its authorization suspended or revoked or has withdrawn from the authorization programme	P	Korea, Republic of To delete "develop" <i>Category : EDITORIAL</i>
230	69	develop contingency plans for continuity of action in the event that an authorized entity has its authorization suspended or revoked or has withdrawn from the authorization programme	P	APPPC To delete the word - develop due to rephrasing of the last sentence of the earlier paragraph. <i>Category : EDITORIAL</i>
231	69	develop contingency plans for continuity of action in the event that an authorized entity has its authorization suspended or revoked or has withdrawn from the authorization programme	C	Viet Nam In case of only one suitable authorization, how to do for this situation <i>Category : SUBSTANTIVE</i>
232	69	develop contingency plans for continuity of action in the event that an authorized entity has its authorization suspended or revoked or has withdrawn from the authorization programme	P	New Zealand <i>Category : EDITORIAL</i>
233	70	develop a process to ensure efficient and effective communication between the NPPO and the authorized entity	P	Korea, Republic of To delete "develop" <i>Category : EDITORIAL</i>
234	70	develop a process to ensure efficient and effective communication between the NPPO and the authorized entity	P	APPPC To delete the word - develop due to rephrasing of the last sentence in the earlier paragraph. <i>Category : EDITORIAL</i>
235	70	develop a process to ensure efficient and effective communication between the NPPO and the authorized entity- <u>develop process on reinstating suspended authorized entity, upon compliance with the identified non-conformities</u>	P	Philippines <i>Category : SUBSTANTIVE</i>
236	70	develop a process to ensure efficient and effective communication between the NPPO and the authorized entity	P	New Zealand <i>Category : EDITORIAL</i>

237	71	develop a process to maintain an up-to-date list of authorized entities.	P	Korea, Republic of To delete "develop"; <i>Category : EDITORIAL</i>
238	71	develop a process to maintain an up-to-date <u>a current</u> list of authorized entities.	P	United States of America Is this more related to implementation? Otherwise, perhaps use the suggested wording. <i>Category : TECHNICAL</i>
239	71	develop a process to maintain an up-to-date list of authorized entities.	P	APPPC To delete the word - develop due to rephrasing of the last sentence in the earlier paragraph. <i>Category : EDITORIAL</i>
240	71	develop a process to maintain an up-to-date list of authorized entities.	P	New Zealand <i>Category : EDITORIAL</i>
3. Criteria for Eligibility of Entities				
241	72	3. Criteria for Eligibility of Entities	C	Saint Kitts And Nevis This Section should be renamed to cover all types of entities that may authorized. There should be an introductory paragraph about eligibility and one subsection to outline the criteria for entities authorized to perform phytosanitary actions and another subsection to outline the criteria for entities authorized to audit or supervise on behalf of the NPPO. <i>Category : SUBSTANTIVE</i>
242	72	3. Criteria for Eligibility of Entities <u>Entities to Perform Phytosanitary Actions and Audits</u>	P	Caribbean Agricultural Health and Food Safety Agency The standard discusses both types of entities <i>Category : SUBSTANTIVE</i>
243	73	The NPPO should ensure that the entity meets the following <u>all</u> criteria:	P	Viet Nam all criteria or some criteria <i>Category : SUBSTANTIVE</i>
244	74	it has legal status to <u>can legally</u> operate in the country of authorization	P	New Zealand 1. The original text is ambiguous. 2. The use of the word ' legal status' is unusual. 3. New Zealand would like to clarify that this section is not implying that entities must have a legal status under a phytosanitary legislative framework. 4. The ISPM shouldn't result in a mandatory change of law in a country e.g. having a specific Act, so long as a country has the appropriate legal framework to enable the authorisation. 5. The proposed text makes it clear that the intent is not to require special legislation for this system, but instead that they are operating within the law of the country. <i>Category : SUBSTANTIVE</i>
245	75	it has the ability to enter into an agreement with the NPPO- <u>for organizations and enterprises there should be an appointed/identified individual who is responsible for delivery of phytosanitary actions</u>	P	Singapore To include a new bullet point here to reflect this point. (APPPC comment)

				<i>Category : SUBSTANTIVE</i>
246	75	it has the ability to enter into an agreement with the NPPO- <u>for organizations and enterprises there should be an appointed/identified individual who is responsible for delivery of phytosanitary actions</u>	P	China Support APPPC comment <i>Category : SUBSTANTIVE</i>
247	75	it has the ability to enter into an agreement with the NPPO	C	United States of America This is a vague requirement. Needs specifics or suggest removing. <i>Category : SUBSTANTIVE</i>
248	75	it has the ability to enter into an agreement with the NPPO <u>for organizations and enterprises there should be an appointed/identified individual who is responsible for delivery of phytosanitary actions</u>	P	New Zealand 1. New sub-sentence proposed under para [75], to align with para [112] "to provide notification (within an agreed time frame) to the NPPO upon, a major change in management or location, or nonconformity". 2. It is a usual and reasonable requirement to appoint an operator for compliant delivery of services. <i>Category : SUBSTANTIVE</i>
249	76	<u>- for organizations and enterprises there should be an appointed/identified individual who is responsible for delivery of phytosanitary actions</u> 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	P	APPPC To insert a new bullet point - "for organisations and enterprises, there should be an appointed/identified individual who is responsible for delivery of phytosanitary actions." as a norm criteria. <i>Category : SUBSTANTIVE</i>
250	78	it has documentation demonstrating <u>describing</u> the process by which it will consistently meet the requirements set by the NPPO for the phytosanitary actions to be performed	P	United States of America Shows that actual process exists. <i>Category : TECHNICAL</i>
251	79	it is impartial and declares free of any possible conflicts of interest, identifying how these would be managed as regards the specific phytosanitary actions to be performed <u>interest</u>	P	Argentina Deleted text is in contradiction with section 3.1 of ISPM 7 stating that personnel should be subject to restrictions and obligations equivalent to those for government officials and have no conflict of interest. <i>Category : TECHNICAL</i>
252	79	it is impartial and declares free any possible conflicts of interest, identifying how these would be managed as regards the specific phytosanitary actions to be performed.	P	Costa Rica Deleted text is in contradiction with section 3.1 of ISPM 7 stating that personnel should be subject to restrictions and obligations equivalent to those for government officials and have no conflict of interest. <i>Category : TECHNICAL</i>
253	79	it is impartial and declares any possible conflicts of interest, identifying how these would be managed as regards the specific phytosanitary actions to be performed	C	Kenya It may not be a criteria. Can be put under a different clause <i>Category : TECHNICAL</i>
254	79	it is impartial and declares free from any possible conflicts <u>conflict of interest, identifying how these would be managed as regards interest in the outcome of the</u> specific phytosanitary actions to be performed	P	European Union The absence of conflict of interest is a very important requirement that is included in the regulation of several countries that have decided to authorize entities to perform phytosanitary actions on the behalf of the NPPO. These criteria are required to ensure the integrity and trust in the authorization programme.

				<i>Category : SUBSTANTIVE</i>
255	79	it is impartial and declares free of any possible conflicts-conflict of interest, identifying how these would be managed as regards the specific phytosanitary actions to be performed.	P	Uruguay Deleted text is in contradiction with section 3.1 of ISPM 7 stating that personnel should be subject to restrictions and obligations equivalent to those for government officials and have no conflict of interest. <i>Category : TECHNICAL</i>
256	79	it is impartial and declares free from any possible conflicts-conflict of interest, identifying how these would be managed as regards interest in the outcome of the specific phytosanitary actions to be performed	P	EPPO The absence of conflict of interest is a very important requirement that is included in the regulation of several countries that have decided to authorize entities to perform phytosanitary actions on the behalf of the NPPO. These criteria are required to ensure the integrity and trust in the authorization programme. <i>Category : SUBSTANTIVE</i>
257	79	it is <u>honest</u> , impartial and declares free from any possible conflicts-conflict of <u>interest, identifying how these would be managed-interest</u> as regards the specific phytosanitary actions to be performed	P	IPPC Regional Workshop Europe and Central Asia The absence of conflict of interest is a very important requirement that is included in the regulation of several countries that have decided to authorize entities to perform phytosanitary actions on the behalf of the NPPO. These criteria are required to ensure the integrity and trust in the authorization programme. <i>Category : SUBSTANTIVE</i>
258	79	it is impartial and declares any possible conflicts of interest <u>interest to the authorization, identifying nd describes</u> how these conflicts of interests would be managed as regards the specific phytosanitary actions to be performed-managed	P	United States of America To streamline the language. <i>Category : EDITORIAL</i>
259	79	it is impartial and declares any possible conflicts of interest, identifying how these would be managed as regards the specific phytosanitary actions to be performed	C	COSAVE El texto eliminado es contradictorio a lo establecido en la sección 3.1 de la NIMF 7, donde se dice que el personal debe estar sujeto a obligaciones y equivalentes al personal de la ONPF y no tener conflicto de intereses. Deleted text is in contradiction with section 3.1 of ISPM 7 stating that personnel should be subject to restrictions and obligations equivalent to those for government officials and have no conflict of interest. <i>Category : TECHNICAL</i>
260	79	it is impartial and declares free of any possible conflicts of interest, identifying how these would be managed as regards the specific phytosanitary actions to be performed.	P	COSAVE <i>Category : TECHNICAL</i>
261	80	it has a clear statement of liability for damages if these result-results from actions it performs in its role as an authorized entity	P	Indonesia Indonesia propose 'results' <i>Category : EDITORIAL</i>
262	80	it has a clear statement of liability for damages if these result from actions it performs in its role as an authorized entity	C	United States of America The NPPO should include this in the authorization agreement, and this statement must be worded more carefully since this is an

				agreement with the public as represented by the NPPO. Suggest moving this in the Section 2. <i>Category : SUBSTANTIVE</i>
263	81	it has a process to ensure efficient and effective resolution of conflicts between the authorized entity and the client, including a process for escalation to submit of issues to the NPPO.	P	Saint Kitts And Nevis The change in term from escalate to submit is more appropriate in this context. <i>Category : SUBSTANTIVE</i>
264	81	it has a process to ensure efficient and effective resolution of conflicts between the authorized entity and the client, including a process for escalation to elevate of issues to the NPPO NPPO for a final decision.	P	Argentina More appropriate term <i>Category : TECHNICAL</i>
265	81	it has a process to ensure efficient and effective resolution of conflicts between the authorized entity and the client, including a process for escalation elevation of issues to the NPPO NPPO for a final decision.	P	Costa Rica clarify, most appropriate word <i>Category : TECHNICAL</i>
266	81	it has a process to ensure efficient and effective resolution of conflicts between the authorized entity and the client, including a process for escalation of to elevate issues to the NPPO.	P	COSAVE to elevate: More appropriate term <i>Category : TECHNICAL</i>
267	81	it has a process to ensure efficient and effective resolution of conflicts between the authorized entity and the client, including a process for escalation of issues to the NPPO.	P	European Union The term "client" is not very clear in the framework of this Standard and these concepts are sufficiently covered by section 4.1. <i>Category : EDITORIAL</i>
268	81	it has a process to ensure efficient and effective resolution of conflicts between the authorized entity and the client, including a process for escalation of to elevate issues to the NPPO NPPO for a final decision.	P	Uruguay More appropriate term <i>Category : TECHNICAL</i>
269	81	it has a process to ensure efficient and effective resolution of conflicts between the authorized entity and the client, including a process for escalation of issues to the NPPO.	P	EPPO The term "client" is not very clear in the framework of this Standard and these concepts are sufficiently covered by section 4.1. <i>Category : TECHNICAL</i>
270	81	it has a process to ensure efficient and effective resolution of conflicts between the authorized entity and the client, including a process for escalation of to submit issues to the NPPO.	P	Caribbean Agricultural Health and Food Safety Agency To clarify the meaning of the bullet point <i>Category : TECHNICAL</i>
271	81	<u>If appropriate</u> , it has a process to ensure efficient and effective resolution of conflicts between the authorized entity and the client, including a process for escalation of issues to the NPPO.	P	IPPC Regional Workshop Europe and Central Asia As there is not always a "client" different from the NPPO (e.g. for surveillance activities), it is suggested to add "if appropriate". Alternative wording suggested: "... and the client (if different from the NPPO)" NB: As the term "client" is not very clear in the framework of this standard, perhaps a more appropriate wording could be used?

				<i>Category : TECHNICAL</i>
272	81	it has a process to ensure efficient and effective resolution of conflicts between the authorized entity and the client, including a process for escalation of issues to the NPPO.	C	United States of America The presumption is that the NPPO is a client of the entity. Needs to clarify what this statement means. <i>Category : TECHNICAL</i>
273	81	it has a process to ensure efficient and effective resolution of conflicts between with the authorized entity and the client, including a process for escalation of issues to the NPPO.	P	NEPPO <i>Category : TECHNICAL</i>
274	81	it has a process to ensure efficient and effective resolution of conflicts between the authorized entity and the client, including a process for escalation of issues to the NPPO.	C	OIRSA "Elevation" es mayor termino que "Escalation". "Escalation" implica un incremento de algo negativo tal como un conflicto En este caso, se interpretaría que enviaría la situación a la ONPF para empeorarla. <i>Category : TECHNICAL</i>
4.1 Roles and responsibilities of the NPPO				
275	86	to evaluate the entity against the requirements set by the NPPO regarding its documented procedures and their implementation on-site, and propose suggestions for improvement as necessary	C	United States of America This para comprises several distinct requirements: -ensure the entity's documented procedures fulfil requirements set by the NPPO -obtain evidence that required procedures are conducted correctly -propose suggestions for improvement as necessary Suggest to remove the last part - it is not the NPPO's responsibility to provide ideas for continual improvement, it also opens the NPPO to significant liability. <i>Category : TECHNICAL</i>
276	87	to clearly define the phytosanitary actions the entity is authorized to perform and the performance criteria	C	United States of America The NPPO can only suggest performance criteria if it created the product themselves (e.g., material, bio-assay, etc). Suggest removing second part of sentence. <i>Category : TECHNICAL</i>
277	89	to notify entities that do not meet the criteria for eligibility and provide the rationale for the decision	C	Kenya This point should be the second point. Rearrange the points according to the procedure <i>Category : TECHNICAL</i>
278	89	to notify entities that do not meet the criteria for eligibility and provide the rationale for the decision <u>decision to revoke such entities</u>	P	IPPC Regional Workshop Europe and Central Asia The aim should be clearly expressed <i>Category : TECHNICAL</i>
279	90	to train NPPO and, if needed, authorized entities <u>entities'</u> personnel and ensure that their skills and competencies are maintained at an adequate level to consistently implement the authorization programme	P	Caribbean Agricultural Health and Food Safety Agency <i>Category : EDITORIAL</i>
280	90	to train NPPO <u>personnel</u> and, if needed, authorized entities personnel and ensure that their skills and competencies are maintained at an adequate level to consistently implement the authorization programme	P	PPPO propose to add details <i>Category : EDITORIAL</i>

281	90	to train NPPO <u>personnel</u> and, if needed, authorized entities personnel and ensure that their skills and competencies are maintained at an adequate level to consistently implement the authorization programme	P	Japan to make it more clear <i>Category : EDITORIAL</i>
282	90	to train NPPO and, if needed, authorized entities personnel and ensure that their skills and competencies are maintained at an adequate level to consistently implement the authorization programme	C	South Africa Propose insertion of the word: "personnel" after NPPO since it is the NPPO personnel that has to be trained. <i>Category : EDITORIAL</i>
283	90	to train NPPO <u>personnel</u> and, if needed, authorized entities personnel and ensure that their skills and competencies are maintained at an adequate level to consistently implement the authorization programme	P	China NPPO should train their personnel. <i>Category : EDITORIAL</i>
284	90	to train NPPO <u>personnel</u> and, if needed, authorized entities <u>entities'</u> personnel and ensure that their skills and competencies are maintained at an adequate level to consistently implement the authorization programme	P	New Zealand <i>Category : EDITORIAL</i>
285	93	to implement processes for addressing identified nonconformities, including determining the corrective actions and, where appropriate, suspending or revoking authorization, which may include regulatory enforcement	C	IPPC Regional Workshop Europe and Central Asia What is the meaning of "which may include regulatory enforcement"? Isn't this obvious? <i>Category : TECHNICAL</i>
286	93	to implement processes for addressing identified nonconformities, including determining the corrective actions and, where appropriate, suspending or revoking authorization, which may include regulatory enforcement	C	United States of America Verify that there are no redundancies with sections 2 and 6. <i>Category : TECHNICAL</i>
287	93	to implement processes for addressing identified nonconformities, including determining the corrective actions <u>and requiring the authorized entity to take the actions.</u> and, where appropriate, suspending or revoking authorization, which may include regulatory enforcement	P	Japan Requiring entities to take corrective actions for addressing nonconformities is described in Para140 "6. Types of Nonconformity", but it should be included in "4.1 Roles and responsibilities of the NPPO" and "4.2.1 Roles and responsibilities of entities authorized to audit or supervise" rather than in "6. Types of Nonconformity". To delete para 140, accordingly. <i>Category : SUBSTANTIVE</i>
288	94	to implement processes for the entity to voluntarily withdraw from the authorization <u>programme</u> <u>agreement with the NPPO</u> , when needed	P	European Union For consistency with paragraph 67. <i>Category : EDITORIAL</i>
289	94	to implement processes for the entity to voluntarily withdraw from the authorization programme, when needed	P	China (APPPC comments) There is no need to emphasize voluntary, because the subject of withdraw is the entity. It will not lead to misunderstanding and will not conflict with NPPO's suspension or revocation of authorization without voluntary. <i>Category : SUBSTANTIVE</i>
290	94	to implement processes for the entity to voluntarily withdraw from the authorization <u>programme</u> <u>agreement with the NPPO</u> , when needed	P	EPPO For consistency with paragraph 67. <i>Category : EDITORIAL</i>
291	94	to implement processes for the entity to voluntarily withdraw from the authorization programme, when needed	P	IPPC Regional Workshop Europe and Central Asia Is voluntary needed? <i>Category : SUBSTANTIVE</i>

292	94	to implement processes for the entity to voluntarily withdraw from the authorization programme, when needed	C	United States of America Same as the previous comment. <i>Category : TECHNICAL</i>
293	94	to implement processes for the entity to voluntarily withdraw from the authorization programme, when needed- <u>to implement processes for reinstatement of authorisation for suspension or voluntary withdrawal from the authorisation programme.</u>	P	Singapore There is a need to include processes for reinstatement for interested members. <i>Category : SUBSTANTIVE</i>
294	95	to maintain documentation, including records and published lists of authorized entities, corresponding authorized phytosanitary action, authorization period , and authorization code , <u>period</u> if applicable	P	European Union 'Authorisation code' is a very specific example. It is proposed to be deleted. <i>Category : EDITORIAL</i>
295	95	to maintain documentation, including records and published lists of authorized entities, corresponding authorized phytosanitary action, authorization period , and authorization code , <u>period</u> if applicable	P	EPPO 'Authorisation code' is a very specific example. It is proposed to be deleted. <i>Category : TECHNICAL</i>
296	95	to maintain documentation, including records and published lists of authorized entities, corresponding authorized phytosanitary action, authorization period , and authorization code <u>period</u> , if applicable	P	IPPC Regional Workshop Europe and Central Asia 'Authorisation code' is a very specific example. It is proposed to be deleted. <i>Category : TECHNICAL</i>
297	97	to ensure that NPPO personnel involved in authorization of entities maintain impartiality and are free of any conflicts of interest.- <u>to ensure that entities authorised to audit and supervise on behalf of the NPPO are assessed against the criteria for eligibility</u>	P	Barbados <i>Category : SUBSTANTIVE</i>
298	97	to ensure that NPPO personnel involved in authorization of entities maintain impartiality and are free of any conflicts of interest.- <u>to ensure that entities authorised to audit and supervise on behalf of the NPPO are assessed against the criteria for eligibility</u>	P	Caribbean Agricultural Health and Food Safety Agency <i>Category : SUBSTANTIVE</i>
299	97	to ensure that NPPO personnel involved in authorization of entities maintain impartiality and are free of any conflicts of interest.- <u>to ensure that the authorized entities maintain impartiality and are free of any conflicts of interest.</u>	P	NEPPO <i>Category : SUBSTANTIVE</i>
4.2 Roles and responsibilities of the entity				
300	99	The roles and responsibilities of the entity should include the following:	C	Indonesia Indonesia proposes to add: - Provide regular report of the activities to the NPPO <i>Category : SUBSTANTIVE</i>
301	101	to enter into an <u>a written</u> agreement to perform the specific phytosanitary actions	P	European Union An important aspect to be specified. <i>Category : TECHNICAL</i>
302	101	to enter into an <u>a written</u> agreement to perform the specific phytosanitary actions	P	EPPO An important aspect to be specified. <i>Category : TECHNICAL</i>

303	103	operating procedures describing how specific phytosanitary actions are performed (i.e. who does what, when, where and how)- <u>quality control procedures</u>	P	Thailand Thailand would like to propose to add a new bullet, namely "quality control procedures", to cover the requirement specified in section 6.1 Documentation of procedures of DRAFT ISPM: REQUIREMENTS FOR THE USE OF MODIFIED ATMOSPHERE TREATMENTS AS PHYTOSANITARY MEASURES. <i>Category : SUBSTANTIVE</i>
304	104	<u>skills and competency of personnel</u>	C	United States of America This and several other bullets here are redundancies with the paragraphs that follow. <i>Category : EDITORIAL</i>
305	109	a list of equipment and their maintenance or calibration schedule and maintenance, where appropriate <u>especially for treatment and laboratory testing activities</u>	P	Thailand "list of equipment" is not needed for all authorized activities. This requirement should be specified for some activities in which calibration and maintenance are important, such as treatment and laboratory testing. <i>Category : SUBSTANTIVE</i>
306	111	management of nonconformity- <u>Identification and management of conflict of interest [A1]</u>	P	Singapore To include additional point - id and management of conflict of interest. (APPPC comment) <i>Category : SUBSTANTIVE</i>
307	111	management of nonconformity- <u>Identification and management of conflict of interest</u>	P	China Support APPPC comment <i>Category : SUBSTANTIVE</i>
308	111	management of nonconformity <u>Identification and management of conflict of interest</u>	P	Korea, Republic of To include additional bullet "Identification and management of conflict of interest" <i>Category : SUBSTANTIVE</i>
309	111	management of nonconformity- <u>Identification and management of conflict of interest.</u>	P	APPPC To include additional point - id and management of conflict of interest. <i>Category : SUBSTANTIVE</i>
310	111	management of nonconformity <u>Identification and management of conflict of interest</u>	P	New Zealand 1. New bullet point following [111] (sub-bullet of [102]) 2. This aligns with [79] as a criteria for eligibility of the entity, but relates to the ongoing and active management of conflict of interest 3. IPPC guidance materials on topics of conflict of interest would be helpful <i>Category : SUBSTANTIVE</i>
311	112	to provide notification (within an agreed time frame) to the NPPO upon, a major change in management or location, <u>change in processes</u> , or nonconformity	P	Saint Kitts And Nevis <i>Category : SUBSTANTIVE</i>
312	112	to provide notification (within an agreed time frame) to the NPPO upon, a major change in management or location, or nonconformity <u>nonconformity or proecesse</u>	P	Argentina It is an important element that should be indicated if any changes are made <i>Category : TECHNICAL</i>

313	112	to provide notification (within an agreed time frame) to the NPPO upon, a major change in management or location, or nonconformity <u>nonconformity or processes</u>	P	Costa Rica It is an important element that should be indicated if any changes are made <i>Category : TECHNICAL</i>
314	112	to provide notification (within an agreed time frame) to the NPPO upon, a major change in management or location, <u>changes in processes</u> or nonconformity	P	Barbados This strengthens the authority of the NPPO <i>Category : SUBSTANTIVE</i>
315	112	to provide notification (within an agreed time frame) to the NPPO upon, a major change in management or location, or nonconformity <u>nonconformity or prcesses.</u>	P	COSAVE nonconformity or processes: It is an important element that should be indicated if any changes are made <i>Category : TECHNICAL</i>
316	112	to provide notification (within an agreed time frame) to the NPPO upon, a major change in management or location, or <u>a critical</u> nonconformity	P	Singapore To include "critical" NC for clarity. <i>Category : SUBSTANTIVE</i>
317	112	to provide notification (within an agreed time frame) to the NPPO upon, a major change in management or location, or nonconformity <u>nonconformity or any other information that has an impact on the specific phytosanitary action that has been authorized.</u>	P	European Union Additional useful guidelines. <i>Category : SUBSTANTIVE</i>
318	112	to provide notification (within an agreed time frame) to the NPPO upon, a major change in management or location <u>location of a facility</u> , or nonconformity	P	European Union More precise wording. Consistency with paragraph 50. <i>Category : EDITORIAL</i>
319	112	to provide notification (within an agreed time frame) to the NPPO upon, a major change in management or location, or nonconformity <u>nonconformity or processes</u>	P	Uruguay It is an important element that should be indicated if any changes are made <i>Category : TECHNICAL</i>
320	112	to provide notification (within an agreed time frame) to the NPPO upon, a major change in management or location, or <u>critical</u> nonconformity	P	Korea, Republic of To add "a critical" be clearer meaning. <i>Category : EDITORIAL</i>
321	112	to provide notification (within an agreed time frame) to the NPPO upon, a major change in management or location <u>location of a facility</u> , or nonconformity <u>nonconformity or any other information that has an impact on the specific phytosanitary action that has been authorized.</u>	P	EPPO More precise wording. Consistency with paragraph 50. Additional useful guidelines. <i>Category : SUBSTANTIVE</i>
322	112	to provide notification (within an agreed time frame) to the NPPO upon, a major change in management or location, <u>changes in processes</u> or nonconformity	P	Caribbean Agricultural Health and Food Safety Agency <i>Category : SUBSTANTIVE</i>
323	112	to provide notification (within an agreed time frame) to the NPPO upon, a major change in management or location, or nonconformity <u>nonconformity or processes</u>	P	OIRSA Es un elemento importante que se debe indicar si sufre algún cambio <i>Category : SUBSTANTIVE</i>
324	112	to provide notification (within an agreed time frame) to the NPPO upon, a <u>any</u> major change in management or location, or nonconformity	P	Singapore replace "a" with "any" <i>Category : EDITORIAL</i>

325	112	to provide notification (within an agreed time frame) to the NPPO upon, upon a major change in management or location, or <u>a critical</u> nonconformity	P	New Zealand <i>Category : TECHNICAL</i>
326	115	to train personnel and ensure that their skills and competencies are maintained at an adequate level to consistently carry out the specific phytosanitary actions to conform with the requirements set by the NPPO	C	United States of America Who has the authority to remove certification of trained personnel that fail to meet the required standards (and can they be retrained then recertified)? <i>Category : TECHNICAL</i>
327	116	to maintain and provide quality management system documents <u>documented procedures</u> (including records of its activities) to the NPPO as required	P	Canada Change as per first consultation comments and SC-7 agreement to replace QMS and SOPs to "documented procedures" throughout the draft standard. <i>Category : SUBSTANTIVE</i>
328	116	to maintain and provide quality management system documents <u>documented procedures</u> (including records of its activities) to the NPPO as required	P	European Union For consistency with paragraph 102. <i>Category : EDITORIAL</i>
329	116	to maintain and provide quality management system documents (including records of its activities) <u>according to documented procedures to</u> the NPPO as required	P	Japan The word "quality management system" has a different meaning, i.e. "documented procedures", so delete "quality management system". The requirements for "documented procedures" are described in paragraph 102-111. The entities need to maintain and provide quality documents according to the requirements of the documented procedures. <i>Category : SUBSTANTIVE</i>
330	116	to maintain and provide quality management system documents <u>documented procedures</u> (including records of its activities) to the NPPO as required	P	EPPO For consistency with paragraph 102. <i>Category : EDITORIAL</i>
331	116	to maintain and provide quality management system documents <u>documented procedures</u> (including records of its activities) to the NPPO as required	P	Thailand To be in line with section 4.2 dash 3. <i>Category : SUBSTANTIVE</i>
332	117	to undergo monitoring, audits and controls by the NPPO (or its authorized entity) as described in the requirements set by the NPPO	P	Argentina It doesn't matter who monitors, audits and controls once it is described by the NPPO <i>Category : TECHNICAL</i>
333	117	to undergo monitoring, audits and controls by the NPPO (or its authorized entity) as described in the requirements set by the NPPO	P	COSAVE NPPO as described: doesn't matter who monitors, audits and controls once it is described by the NPPO <i>Category : TECHNICAL</i>
334	117	to undergo monitoring, audits and controls by the NPPO (or its authorized entity) as described in the requirements set by the NPPO	P	European Union This should be deleted following the EU recommendation to delete the entire section 4.2.1. <i>Category : SUBSTANTIVE</i>
335	117	to undergo monitoring, audits and controls by the NPPO (or its authorized entity) as described in the requirements set by the NPPO	P	Uruguay It doesn't matter who monitors, audits and controls once it is described by the NPPO <i>Category : TECHNICAL</i>

336	117	to undergo monitoring, audits and controls by the NPPO (or its authorized entity) as described in the requirements set by the NPPO	P	EPPO This should be deleted following the EPPO recommendation to delete the entire section 4.2.1. <i>Category : SUBSTANTIVE</i>
337	118	to comply with the requirements established-set in the <u>authorization agreement, the</u> phytosanitary procedures, standards, legislation and guidelines of the NPPO	P	European Union To be more precise. <i>Category : TECHNICAL</i>
338	118	to comply with the requirements established-set in the <u>authorization agreement, the</u> phytosanitary procedures, standards, legislation and guidelines of the NPPO	P	EPPO To be more precise. Better wording, consistency with paragraph 55. <i>Category : EDITORIAL</i>
339	118	to comply with the requirements established in the phytosanitary procedures, standards, legislation and guidelines of the NPPON NPPO <u>that relate to the authorization</u>	P	United States of America For clarity <i>Category : EDITORIAL</i>
340	119	to maintain the confidentiality of the information obtained through the authorized phytosanitary actions <u>actions as well as the record for the agreed period of time.</u>	P	Costa Rica It is necessary to establish a time in which the records are kept <i>Category : TECHNICAL</i>
341	119	to maintain the confidentiality of the information obtained through the authorized phytosanitary actions. <u>- to provide a regular report of activities to the NPPO</u>	P	Singapore To include a new bullet point for entity to do this reporting. <i>Category : SUBSTANTIVE</i>
342	119	to maintain the confidentiality of the information obtained through the authorized phytosanitary actions. <u>- to provide a regular report of activities to the NPPO</u>	P	China Support APPPC comments <i>Category : SUBSTANTIVE</i>
343	119	to maintain the confidentiality of the information obtained through the authorized phytosanitary actions. <u>- to provide a regular report of activities to the NPPO</u>	P	APPPC To add in a new bullet point for the entity to provide a regular report of activities to the NPPO for better oversight of the NPPO. <i>Category : SUBSTANTIVE</i>
344	119	to maintain the confidentiality of the information obtained through the authorized phytosanitary actions. <u>-to provide periodically to the NPPO an activity report on the phytosanitary action authorized</u>	P	IPPC Regional Workshop Africa <i>Category : TECHNICAL</i>
345	119	to maintain the confidentiality of the information obtained through the authorized phytosanitary actions. <u>-, as well as the records for the agreed period of time (a least two years)</u>	P	OIRSA Es necesario establecer un tiempo en el cual se mantengan los registros <i>Category : TECHNICAL</i>
4.2.1 Roles and responsibilities of entities authorized to audit or supervise				
346	120	4.2.1 Roles and responsibilities of entities authorized to audit or supervise	C	Saint Kitts And Nevis How does the NPPO authorize an entity to audit or supervise on its behalf? There should be a subsection in Section 3 to detail the eligibility of persons who will audit or supervise on behalf of the NPPO. <i>Category : SUBSTANTIVE</i>

347	120	4.2.1 Roles and responsibilities of entities authorized to audit or supervise	C	Costa Rica have not clear that the authorized auditing or supervision are phytosanitary actions, and suggest to review this item and to be more accurate. <i>Category : SUBSTANTIVE</i>
348	120	4.2.1 Roles and responsibilities of entities authorized to audit or supervise	C	Brazil We consider that audit and supervision are not phytosanitary actions, so the whole item might be deleted. <i>Category : SUBSTANTIVE</i>
349	120	4.2.1 Roles and responsibilities of entities authorized to audit or supervise	P	European Union EU suggests deleting the whole section because this is not a phytosanitary action. This aspect will be dealt with by the separate Standard on audit which is under development. <i>Category : SUBSTANTIVE</i>
350	120	4.2.1 Roles and responsibilities of entities authorized to audit or supervise	P	EPPO EPPO suggests deleting the whole section because this is not a phytosanitary action. This aspect will be dealt by the separate Standard on audit which is under development. <i>Category : SUBSTANTIVE</i>
351	120	4.2.1 Roles and responsibilities of entities authorized to audit or supervise	C	Caribbean Agricultural Health and Food Safety Agency Should there be a corresponding sub-section in section 3. Criteria for eligibility to address how to authorize a person or entity to audit or supervise on the NPPO's behalf? <i>Category : SUBSTANTIVE</i>
352	120	4.2.1 Roles and responsibilities of entities authorized to audit or supervise	P	IPPC Regional Workshop Europe and Central Asia It was suggested deleting the whole section because this is not a phytosanitary action. This aspect will be dealt by the separate Standard on audit which is under development. <i>Category : SUBSTANTIVE</i>
353	120	4.2.1 Roles and responsibilities of entities authorized to audit or supervise	C	United States of America Suggest combining 4.2.1 with the previous section. Some requirements are redundant and can be streamlined in one section, with specific designations for which party they are intended. Otherwise, the section 4.2.1 is not well developed. <i>Category : EDITORIAL</i>
354	120	4.2.1 Roles and responsibilities of entities authorized to audit or supervise	C	Philippines With the Philippine context, it is NPPO's responsibility to audit and/or supervise phytosanitary measures to maintain and verify effectiveness of the programme or the measure. <i>Category : SUBSTANTIVE</i>
355	120	4.2.1 Roles and responsibilities of entities authorized to audit or supervise	C	OIRSA Sigo manteniendo mi postura que esta acci3n no es prudente ya que implica que a la ONPF le tocar3a auditar a la entidad auditora. En teor3a, la ONPF podr3a

				autorizar a la agencia que audita a la agencia auditora que finalmente auditaría a la entidad autorizada. Significa que la ONPF se va alejando progresivamente de sus responsabilidades directas. <i>Category : TECHNICAL</i>
356	120	4.2.1 Roles and responsibilities of entities authorized to audit or supervise	C	New Zealand Supervise/supervision needs to be defined. Also see general comment. <i>Category : SUBSTANTIVE</i>
357	121	The NPPO may authorize entities to audit other authorized entities or to supervise phytosanitary actions. The roles and responsibilities of an entity that audits other authorized entities or supervises phytosanitary actions should include the following:	P	Argentina To give an introduction to the item 4.2.1 <i>Category : TECHNICAL</i>
358	121	The NPPO may authorize entities to audit other authorized entities or to supervise phytosanitary actions. The roles and responsibilities of an entity that audits other authorized entities or supervises phytosanitary actions should include the following:	P	COSAVE The NPPO may authorize entities to audit other authorized entities or to supervise phytosanitary actions.: To give an introduction to the item 4.2.1 <i>Category : TECHNICAL</i>
359	121	The roles and responsibilities of an entity that audits other authorized entities or supervises phytosanitary actions should include the following:	P	European Union <i>Category : SUBSTANTIVE</i>
360	121	The NPPO may authorize entities to audit other authorized entities or to supervise phytosanitary actions. The roles and responsibilities of an entity that audits other authorized entities or supervises phytosanitary actions should include the following:	P	Uruguay To give an introduction to the section 4.2.1 <i>Category : TECHNICAL</i>
361	121	The roles and responsibilities of an An entity that audits other authorized entities or supervises phytosanitary actions should meet the requirements in section 4.2. The roles and responsibilities of the entity should also include the following:	P	Japan To specify that an entity authorized to audit or supervise should meet the requirements in section 4.2 "Roles and responsibilities of the entity" as well as the requirements in section 4.2.1 "Roles and responsibilities of entities authorized to audit or supervise". <i>Category : SUBSTANTIVE</i>
362	121	The In addition to the requirements established in section 4.2, the roles and responsibilities of an entity that audits other authorized entities or supervises phytosanitary actions should include the following:	P	United States of America Makes a reference to the previous section <i>Category : EDITORIAL</i>
363	121	The roles and responsibilities of an entity that audits other authorized entities or supervises phytosanitary actions by a non-authorized entity should include the following:	P	New Zealand • I (Viv) assume that the points in section 4.2.1 are in addition to 4.2? this para may need some update to clarify that is the case (I'm not sure if that is how the ISPMs would normally work?) Also • Definition for 'supervise/supervised' should be considered. I would assume that if the NPPO (or its authorised entity) are supervising someone undertake a phytosanitary action, that the person/organisation that is being supervised is a non-authorized

				<p>entity?</p> <ul style="list-style-type: none"> The suggested clarification will help for later sections which just refer to the "NPPO (or its authorised entity)" <p>New Zealand I'm not sure about adding "by a non-authorized entity. If an entity was not authorised then it shouldn't perform phyto action. agree supervise/supervision needs to be defined. we suggested this last year I think.</p> <p>Category : <i>TECHNICAL</i></p>
364	122	to 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	<p>European Union</p> <p>Category : <i>SUBSTANTIVE</i></p>
365	122	to develop and carry out an action plan or procedures for dealing with nonconformities <u>of the entities it audits</u> that compromise the integrity of and trust in the programme, including notification <u>(within an agreed time frame)</u> of these to the authorizing NPPO	P	<p>China</p> <p>Support to APPPC comments</p> <p>Category : <i>SUBSTANTIVE</i></p>
366	122	to 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 <u>within an agreed time frame</u> of these to the authorizing NPPO	P	<p>Korea, Republic of</p> <p>To add "within an agreed time frame" requirement of reporting the nonconformity</p> <p>Category : <i>SUBSTANTIVE</i></p>
367	122	to develop and carry out an <u>action plan or procedures</u> for dealing with nonconformities that compromise the integrity of and trust in the programme, including notification of these to the authorizing NPPO	C	<p>United States of America</p> <p>What is the difference between the two?</p> <p>Category : <i>EDITORIAL</i></p>
368	122	to develop and carry out an action plan or procedures for dealing with nonconformities <u>"of the entities it audits"</u> that compromise the integrity of and trust in the programme, including notification of these to the authorizing NPPO	P	<p>APPPC</p> <p>To insert a sentence - "of the entities it audits for better clarity on the source of the nonconformities.</p> <p>Category : <i>SUBSTANTIVE</i></p>
369	122	- to develop and conduct an action plan or procedures to audit or supervise the authorised entities according to the authorisation programme including to deal with nonconformities that comprise the integrity of and trust in the programme and notifying the authorising NPPO of the outcomes of audit or supervision. to 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	<p>Singapore</p> <p>Rephrase the paragraph to include audit or supervision work by authorised entities that was missing in the original paragraph</p> <p>Category : <i>SUBSTANTIVE</i></p>
370	122	to develop and carry out an action plan or procedures <u>procedures, including determining the corrective actions and requiring the authorized entity to take the actions,</u> for dealing with nonconformities that compromise the integrity of and trust in the programme, including notification of these to the authorizing NPPO	P	<p>Japan</p> <p>Requiring entities to take corrective actions for addressing nonconformities is described in Para140 "6. Types of Nonconformity", but it should be included in "4.1 Roles and responsibilities of the NPPO" and "4.2.1 Roles and responsibilities</p>

				of entities authorized to audit or supervise” rather than in “6. Types of Nonconformity”. To delete para 140, accordingly. <i>Category : SUBSTANTIVE</i>
371	122	to develop and carry out an action plan or procedures for dealing with nonconformities <u>of the entities it audits</u> that compromise the integrity of and trust in the programme, including notification <u>(within an agreed time frame)</u> of these to the authorizing NPPO	P	New Zealand 1. Section 4.2 already includes the need for the entity to notify the NPPO of a nonconformity in their system. 2. Suggests that this para make clear that is referring to nonconformities of the entities it audits, and the need to report to the NPPO in a timely manner. 3. Add requirement of reporting the nonconformity within an agreed time frame. <i>Category : TECHNICAL</i>
372	123	to maintain confidentiality of information gained through its phytosanitary actions	P	European Union <i>Category : SUBSTANTIVE</i>
373	123	to maintain confidentiality of information gained through its phytosanitary actions <u>auditing or supervisory activities.</u>	P	United States of America This seems to be more relevant to audits/ supervision. <i>Category : TECHNICAL</i>
374	124	to maintain impartiality and independence from the entities it audits or supervises, and be free from any conflict of interest	P	European Union <i>Category : SUBSTANTIVE</i>
375	124	to maintain impartiality and independence from the entities it audits or supervises, and be free from any conflict of interest	C	United States of America This is appropriate for an auditor but not for a supervising entity. A supervising entity has a direct financial interest in the work performed. <i>Category : TECHNICAL</i>
376	124	to maintain impartiality and independence from the entities it audits or supervises, identify <u>and be free from manage</u> any conflict of interest	P	APPPC To be clearer with addition of “identify and manage”; any conflict of interest. <i>Category : SUBSTANTIVE</i>
377	124	to maintain impartiality and independence from the entities it audits or supervises, and be free from identify and manage any conflict of interest	P	New Zealand For smaller countries it is sometimes not possible to find people who are completely free from conflicts of interest. If a conflict is identified and managed appropriately the necessary impartiality can still be attained. <i>Category : SUBSTANTIVE</i>
378	125	to ensure personnel have the relevant training and experience to perform the specific audits being conducted	P	European Union <i>Category : SUBSTANTIVE</i>
379	125	to ensure personnel have the relevant training and experience to perform the specific audits being conducted- <u>To ensure that the facilities used are able to deliver the expected results</u>	P	IPPC Regional Workshop Africa <i>Category : TECHNICAL</i>
380	126	to undertake internal audits to provide continuous feedback and identify system gaps (if applicable).	P	European Union <i>Category : SUBSTANTIVE</i>

5. Process for Audits			
381	127	5. Process for Audits	C Brazil Once audits are not phytosanitary actions the whole item might be deleted. <i>Category : SUBSTANTIVE</i>
5.1 Audits to authorize an entity			
382	129	If an NPPO decides to consider the authorization of an entity, the NPPO (or its authorized entity) should first carry out an initial evaluation of the entity's documented procedures.	P Argentina As a first step to decide the authorization, the NPPO by itself should evaluate de documented procedures. Once the documents are acceptable the NPPO may delegate the audit to an entity <i>Category : TECHNICAL</i>
383	129	If an NPPO decides to consider the authorization of an entity, the NPPO (or its authorized entity) NPPO should first carry out an initial evaluation of the entity's documented procedures.	P Costa Rica As a first step to decide the authorization, the NPPO by itself should evaluate de documented procedures. Once the documents are acceptable the NPPO may delegates the audit to an entity. <i>Category : SUBSTANTIVE</i>
384	129	If an NPPO decides to consider the authorization of an entity, the NPPO (or its authorized entity) should first carry out an initial evaluation of the entity's documented procedures.	C Brazil In this item 5.1 "authorized entity" is being used for those entities authorized to perform actions and those authorized to audit. It should be more clear: "authorized entity to perform audit" or "authorized entity to perform phytosanitary action". <i>Category : SUBSTANTIVE</i>
385	129	If an NPPO decides to consider the authorization of an entity, the NPPO (or its authorized entity) should first carry out an initial evaluation of the entity's documented procedures-.	P COSAVE should first carry out an initial evaluation of the entity's documented procedures.: As a first step to decide the authorization, the NPPO by itself should evaluate de documented procedures. Once the documents are acceptable the NPPO may delegate the audit to an entity. <i>Category : TECHNICAL</i>
386	129	If an NPPO decides to consider the authorization of an entity, the NPPO (or its authorized entity) should first carry out an initial evaluation of the entity's documented procedures.	P European Union This should be deleted following the EU recommendation to delete the entire section 4.2.1. <i>Category : SUBSTANTIVE</i>
387	129	If an NPPO decides to consider the authorization of an entity, the NPPO (or its authorized <u>audit</u> entity) should first carry out an initial evaluation of the entity's documented procedures.	P China (APPPC comment) The expression "its authorised entity" is not clear here. Because both the entity for phytosanitary action and the entity for audit can be authorised. <i>Category : SUBSTANTIVE</i>
388	129	If Before an NPPO decides to consider the authorization of an entity, the NPPO (or its authorized entity) should first carry out an initial evaluation of the entity's documented procedures.	P Japan An initial evaluation should be carried out before an NPPO decides the authoritzation of an entity. <i>Category : TECHNICAL</i>

389	129	If an NPPO decides to consider the authorization of an entity, the NPPO (or its authorized entity) should first carry out an initial evaluation of the entity's documented procedures.	P	Uruguay As a first step to decide the authorization, the NPPO by itself should evaluate the documented procedures. Once the documents are acceptable the NPPO may delegate the audit to an entity <i>Category : TECHNICAL</i>
390	129	If an NPPO decides to consider the authorization of an entity, the NPPO (or its authorized entity) should first carry out an initial evaluation of the entity's documented procedures.	P	EPPO This should be deleted following the EPPO recommendation to delete the entire section 4.2.1. <i>Category : SUBSTANTIVE</i>
391	129	If an NPPO decides to consider the authorization of an entity, the NPPO (or its authorized <u>audit</u> entity) should first carry out an initial evaluation of the entity's documented procedures.	P	Korea, Republic of To include "audit"; to make it clearer. <i>Category : SUBSTANTIVE</i>
392	129	If an NPPO decides to consider the authorization of an entity, the NPPO (or its authorized entity) should first carry out an initial evaluation of the entity's documented procedures.	P	IPPC Regional Workshop Europe and Central Asia This should be deleted following the recommendation to delete the entire section 4.2.1. <i>Category : SUBSTANTIVE</i>
393	129	If an NPPO decides to consider the authorization of an entity, the NPPO (or its authorized <u>audit</u> entity) should first carry out an initial evaluation of the entity's documented procedures.	P	APPPC To be clearer with addition of authorised "audit" entity. <i>Category : SUBSTANTIVE</i>
394	130	When the documented procedures are acceptable, the NPPO (or its <u>the authorized entity</u>) <u>entity to perform the audit</u> should carry out an audit to evaluate the entire system and the capability of the entity to implement the documented operating procedures for each phytosanitary action.	P	Argentina To make clear that the authorized entity referred here is that entity authorized to perform the audit <i>Category : TECHNICAL</i>
395	130	When the documented procedures are acceptable, the NPPO (or its authorized entity) <u>entity to perform the audit</u> should carry out an audit to evaluate the entire system and the capability of the entity to implement the documented operating procedures for each phytosanitary action.	P	Costa Rica To make clear that the authorized entity referred here is that entity authorized to perform the audit. <i>Category : SUBSTANTIVE</i>
396	130	When the documented procedures are acceptable, the NPPO (or its authorized entity) <u>entity to perform the audit</u> should carry out an audit to evaluate the entire system and the capability of the entity to implement the documented operating procedures for each phytosanitary action.	P	COSAVE (or its authorized entity to perform the audit) should carry out an audit to evaluate the entire system and the capability of the entity to implement the documented operating procedures for each phytosanitary action.: To make clear that the authorized entity referred here is that entity authorized to perform the audit <i>Category : TECHNICAL</i>
397	130	When the documented procedures are acceptable, the <u>The</u> NPPO (or its authorized entity) should carry out an audit to evaluate the entire system and the capability of the entity to implement the documented operating procedures for each phytosanitary action.	P	European Union 1. Document check is part of the audit and not a separate action. 2. This should be deleted following the EU recommendation to delete the entire section 4.2.1. <i>Category : SUBSTANTIVE</i>
398	130	When the documented procedures are acceptable, the NPPO (or its authorized <u>audit</u> entity) should carry out an audit to evaluate the entire system and the capability of	P	China The expression "its authorised entity" is not clear here. Because

		the entity to implement the documented operating procedures for each phytosanitary action.		both the entity for phytosanitary action and the entity for audit can be authorised. <i>Category : SUBSTANTIVE</i>
399	130	When the documented procedures are acceptable, the NPPO (or its-the <u>entity</u>) <u>entity to perform the audit</u> should carry out an audit to evaluate the entire system and the capability of the entity to implement the documented operating procedures for each phytosanitary action.	P	Uruguay To make clear that the authorized entity referred here is the entity authorized to perform the audit <i>Category : TECHNICAL</i>
400	130	When the documented procedures are acceptable, the 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 documented operating procedures for each phytosanitary action.	P	EPPO Checking documented procedures is part of the audit and not a separate action. This should be deleted following the EPPO recommendation to delete the entire section 4.2.1. <i>Category : SUBSTANTIVE</i>
401	130	When the documented procedures are 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 documented operating procedures for each phytosanitary action.	P	IPPC Regional Workshop Europe and Central Asia This should be deleted following the recommendation to delete the entire section 4.2.1. <i>Category : SUBSTANTIVE</i>
402	130	When the documented procedures are acceptable, the NPPO (or its authorized entity) should carry out an audit to evaluate <u>all documented processes and records of the entire system entity as they relate to the scope of authorization</u> and the capability of the entity to implement the documented operating procedures for each phytosanitary action.	P	United States of America More precision. <i>Category : EDITORIAL</i>
403	130	When the documented <u>specific</u> procedures <u>of each phytosanitary action (e.g. SOP)</u> are 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 documented operating procedures for each phytosanitary action.	P	Viet Nam More specific <i>Category : SUBSTANTIVE</i>
404	130	When the documented procedures are 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 documented operating <u>documented</u> procedures for each phytosanitary action.	P	Thailand The term "operating" should be deleted. This context should refer to all documented procedures implemented by entity. <i>Category : SUBSTANTIVE</i>
405	131	At each step of the audit, the NPPO (or its authorized entity) <u>NPPO</u> should provide feedback to the <u>authorized</u> entity on observations or opportunities for improvement as necessary.	P	Costa Rica The audit entity reports to the NPPO and the NPPO provides feedback to the authorized entity. <i>Category : SUBSTANTIVE</i>
406	131	At each step of the audit, the NPPO (or its authorized entity) should provide feedback to the <u>authorized</u> entity on observations or opportunities for improvement as necessary.	P	Brazil The audit entity reports to the NPPO and the NPPO provides feedback to the authorized entity. <i>Category : SUBSTANTIVE</i>

407	131	At each step of the audit, the NPPO (or its authorized entity) should provide feedback to the entity on observations or opportunities for improvement as necessary.	P	European Union This should be deleted following the EU recommendation to delete the entire section 4.2.1. <i>Category : SUBSTANTIVE</i>
408	131	At each step of the audit, the NPPO (or its authorized entity) should provide feedback to the entity on observations or and opportunities for improvement as necessary.	P	European Union Better wording. <i>Category : EDITORIAL</i>
409	131	At each step of the audit, the NPPO (or its authorized <u>audit</u> entity) should provide feedback to the entity on observations or opportunities for improvement as necessary.	P	China The expression "its authorised entity" is not clear here. Because both the entity for phytosanitary action and the entity for audit can be authorised. <i>Category : SUBSTANTIVE</i>
410	131	At each step of the audit, the NPPO (or its authorized entity) should provide feedback to the entity on observations or and opportunities for improvement as necessary.	P	EPPO Better wording? This should be deleted following the EPPO recommendation to delete the entire section 4.2.1. <i>Category : SUBSTANTIVE</i>
411	131	At each step of the audit, the NPPO (or its authorized entity) should provide feedback to the entity on observations or opportunities for improvement as necessary.	P	IPPC Regional Workshop Europe and Central Asia This should be deleted following the recommendation to delete the entire section 4.2.1. <i>Category : SUBSTANTIVE</i>
412	131	At each step of the audit, the NPPO (or its authorized entity) should provide feedback to the entity on observations or opportunities for improvement as necessary.	C	United States of America The NPPO opens itself to numerous liabilities by providing recommendations for fixing something. There is a reason other international auditing organizations avoid telling an organization how to fix a nonconformity. This action also stifles innovation and places process failures in the hands of the NPPO. Suggest removing this clause. <i>Category : SUBSTANTIVE</i>
413	131	At each step of the audit, the NPPO (or its authorized <u>audit</u> entity) should provide feedback to the entity on observations or opportunities for improvement as necessary.	P	APPPC To be clearer with addition of authorised "audit" entity. <i>Category : SUBSTANTIVE</i>
414	132	The decision about whether to grant authorization rests solely with the NPPO. The NPPO should normally grant authorization, 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	Argentina It doesn't matter who conducted the audit <i>Category : TECHNICAL</i>
415	132	The decision about whether to grant authorization rests solely with the NPPO. The NPPO should normally grant authorization, if the system audit conducted by the NPPO (or its authorized entity) conducted demonstrates that the NPPO's requirements for authorization of entities have been met.	P	Costa Rica It doesn't matter who conducted the audit. <i>Category : TECHNICAL</i>

416	132	The decision about whether to grant authorization rests solely with the NPPO. The NPPO should normally grant authorization, 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	Canada Deletion consistent with SC decision to not get into types of audit. <i>Category : SUBSTANTIVE</i>
417	132	The decision about whether to grant authorization rests solely with the NPPO. The NPPO should normally grant authorization, 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	COSAVE It doesn't matter who conducted the audit <i>Category : TECHNICAL</i>
418	132	The decision about whether to grant authorization rests solely with the NPPO. The NPPO should normally grant authorization, 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 This should be deleted following the EU recommendation to delete the entire section 4.2.1. <i>Category : SUBSTANTIVE</i>
419	132	The decision about whether to grant authorization rests solely with the NPPO. The NPPO should normally grant authorization, only authorize 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 For clarity. <i>Category : EDITORIAL</i>
420	132	The decision about whether to grant authorization rests solely with the NPPO. The NPPO should normally grant authorization, if the system audit conducted by the NPPO (or its authorized audit entity) demonstrates that the NPPO's requirements for authorization of entities have been met.	P	China The expression "its authorised entity" is not clear here. Because both the entity for phytosanitary action and the entity for audit can be authorised. <i>Category : SUBSTANTIVE</i>
421	132	The decision about whether to grant authorization rests solely with the NPPO. The NPPO should normally grant authorization, 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	Uruguay It doesn't matter who conducted the audit <i>Category : TECHNICAL</i>
422	132	The decision about whether to grant authorization rests solely with the NPPO. The NPPO should normally grant authorization, only authorize the entity if the system audit conducted by the NPPO (or its authorized entity) -NPPO demonstrates that the NPPO's requirements for authorization of entities have been met.	P	EPPO For clarity This should be deleted following the EPPO recommendation to delete the entire section 4.2.1. <i>Category : SUBSTANTIVE</i>
423	132	The decision about whether to grant authorization rests solely with the NPPO. The NPPO should normally only grant authorization, authorization 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 Europe and Central Asia For clarity. This should be deleted following the recommendation to delete the entire section 4.2.1. <i>Category : SUBSTANTIVE</i>
424	132	The decision about whether to grant authorization rests solely with the NPPO. The NPPO should normally should grant authorization, if the system audit conducted	P	PPPO Propose to delete the word normally as it provides unnecessary grey area around the authorization. <i>Category : SUBSTANTIVE</i>

		by the NPPO (or its authorized entity) demonstrates that the NPPO's requirements for authorization of entities have been met.		
425	132	The decision about whether to grant authorization rests solely with the NPPO. The NPPO should normally grant authorization, if the system audit conducted by the NPPO (or its authorized audit entity) demonstrates that the NPPO's requirements for authorization of entities have been met.	P	APPPC To be clearer with addition of authorised " audit" entity. <i>Category : SUBSTANTIVE</i>
426	132	The decision about whether to grant authorization rests solely with the NPPO. The NPPO should normally grant authorization, 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 To avoid confusion. The processes of the audits which are described in this section and "the system audit" are the same. <i>Category : TECHNICAL</i>
5.2 Audits to maintain authorization				
427	134	The NPPO should determine the minimum frequency of the audits to maintain authorization, based on the scope <u>and complexity</u> of the phytosanitary actions and the associated level of pest risk and complexity risk , the performance of the authorized entity and the nonconformities identified, and the results of previous audits.	P	European Union For clarity. <i>Category : EDITORIAL</i>
428	134	The NPPO should determine the minimum frequency of the audits to maintain authorization, based on the scope of the phytosanitary actions and the associated level of pest risk and complexity, the performance of the authorized entity <u>to be audited</u> and the nonconformities identified, and the results of previous audits.	P	Japan To avoid confusion about "its authorized entity" in the section 5.1 and "the authorized entity" in this section because two types of entities are different. <i>Category : TECHNICAL</i>
429	134	The NPPO <u>(or its authorized entity)</u> should determine conduct audits to maintain authorization by the minimum frequency of the audits to maintain authorization determined by the NPPO , based on the scope of the phytosanitary actions and the associated level of pest risk and complexity, the performance of the authorized entity and the nonconformities identified, and the results of previous audits.	P	Japan Even though this section needs to provide information about "Audits to maintain authorization", no information about this point. So add information about "Audits to maintain authorization" that the NPPOs as well as entities authorized to audit (i.e. its authorized entity) can conduct audits to maintain authorization. Additionally, as only NPPOs can decide the minimum frequency of the audits, "determined by the NPPO" is added. <i>Category : TECHNICAL</i>
430	134	The NPPO should determine the minimum frequency of the audits to maintain authorization, based on the scope of the phytosanitary actions and the associated level of pest risk and complexity, the performance of the authorized entity and the nonconformities identified, and the results of previous audits. <u>The NPPOs may conduct unscheduled audit upon receipt of notify from a third party.</u>	P	Korea, Republic of To add more a case of unscheduled audit <i>Category : SUBSTANTIVE</i>
431	134	The NPPO should determine the minimum frequency of the audits to maintain authorization, based on the scope and complexity of the phytosanitary actions and	P	EPPO For clarity.

		the associated level of pest risk and complexity risk, the performance of the authorized entity and the nonconformities identified, and the results of previous audits.		<i>Category : EDITORIAL</i>
432	134	The NPPO should determine the minimum frequency of the audits to maintain authorization, based on the scope of the phytosanitary actions and the associated level of pest risk and complexity, the performance of the authorized entity and the nonconformities identified, and the results of previous audits. <u>NPPO may conduct unannounced audit when there is frequent notification of nonconformities from the importing trading partners.</u>	P	Philippines <i>Category : SUBSTANTIVE</i>
433	134	The NPPO should determine the minimum frequency of the audits to maintain authorization, based on the scope of the phytosanitary actions and the associated level of pest risk and complexity, the performance of the authorized entity and the nonconformities identified, and the results of previous audits. <u>The NPPOs may conduct unscheduled audit upon receipt of notify from a third party</u>	P	Viet Nam add more a case of unscheduled audit <i>Category : SUBSTANTIVE</i>
434	134	The NPPO should determine the minimum frequency of the audits to maintain authorization, based on the scope of the phytosanitary actions and the associated level of pest risk and complexity, the performance of the authorized entity and the nonconformities identified, and the results of previous audits. <u>The minimum frequency of the audits should be at least one year.</u>	P	China The minimum frequency of the audits should be clarified in case the audit can't be timely conducted. <i>Category : SUBSTANTIVE</i>
435	135	Audits may be conducted on a specific part <u>parts</u> or parts of the entity's system, as necessary.	P	European Union Better wording. <i>Category : EDITORIAL</i>
436	135	Audits may be conducted on a specific part or parts of the entity's system, as necessary.	P	EPPO Better wording. <i>Category : EDITORIAL</i>
437	135	Audits may be conducted <u>by the NPPO (or its authorised audit entity)</u> on a specific part or parts of the entity's system, as necessary.	P	APPPC to add in "or its authorised audit entity" to be consistent with whole document. <i>Category : SUBSTANTIVE</i>
438	135	Audits may be conducted <u>by the NPPO (or its authorized entity)</u> on a specific part or parts of the entity's system, as necessary.	P	New Zealand To align with section 5.1 and make clear that either the NPPO or authorized entity can audit <i>Category : SUBSTANTIVE</i>
6. Types of Nonconformity				
439	136	6. Types of Nonconformity	C	Viet Nam Propose to clarify an entity that meets all the criteria is appropriate or an entity that meets one or some criteria is not allow <i>Category : SUBSTANTIVE</i>

440	137	When A non-conformity is when the authorized entity does not meet the requirements specified by the NPPO, this should be considered NPPO as a nonconformity set out in the authorization agreement..	P	European Union To be more precise about what a nonconformity is. <i>Category : TECHNICAL</i>
441	137	When A non-conformity is when the authorized entity does not meet the requirements specified by the NPPO, this should be considered NPPO as a nonconformity set out in the authorization agreement.	P	EPPO To be more precise about what a nonconformity is. <i>Category : TECHNICAL</i>
442	137	When the authorized entity does not meet the requirements specified by the NPPO, this should be considered as a nonconformity.	C	United States of America Should the difference between nonconformity and noncompliance (e.g., as in ISPM 13) be indicated here? <i>Category : TECHNICAL</i>
443	137	When the authorized entity does not meet the requirements specified by the NPPO <u>NPPO or their own documented procedures</u> , this should be considered as a nonconformity.	P	Thailand Any authorized entity that does not follow their own documented procedures should also be defined as nonconformity. The term “the requirements specified by the NPPO” may be not cover all of documented procedures. <i>Category : SUBSTANTIVE</i>
444	138	A nonconformity may be identified during audits, supervision audits or investigations supervision , or through investigations triggered by notification of non-compliance (ISPM 13 (<i>Guidelines for the notification of non-compliance and emergency action</i>)).	P	Argentina To clarify that nonconformity may identified by investigation conducted as a consquence of non-compliance. <i>Category : TECHNICAL</i>
445	138	A nonconformity may be identified during audits, supervision, or investigations, supervision or through investigations triggered by notification of non-compliance (ISPM 13 (<i>Guidelines for the notification of non-compliance and emergency action</i>))) or through complaint .	P	Costa Rica To clarify that nonconformity may identified by investigation conducted as a consquence of non -compliance <i>Category : TECHNICAL</i>
446	138	A nonconformity may be identified during audits, supervision or investigations, or through investigations triggered by notification of non-compliance (ISPM 13 (<i>Guidelines for the notification of non-compliance and emergency action</i>)).	P	Uruguay To clarify that nonconformity may be identified by investigation conducted as a consquence of a notification of non-compliance <i>Category : TECHNICAL</i>
447	138	A nonconformity may be identified during audits, supervision or investigations, or through notification of non-compliance (ISPM 13 (<i>Guidelines for the notification of non-compliance and emergency action</i>)).	C	New Zealand Supervision needs to be defined and context needs to be given. See general comment too. <i>Category : SUBSTANTIVE</i>
448	138	A nonconformity may be identified during audits, supervision or investigations, or through notification of non-compliance (ISPM 13 (<i>Guidelines for the notification of non-compliance and emergency action</i>)).	C	COSAVE To clarify that nonconformity may identified by investigation conducted as a consquence of non-compliance. <i>Category : TECHNICAL</i>
449	138	A nonconformity may be identified during audits, supervision audits or investigations supervision , or through investigations triggered by notification of non-compliance (ISPM 13 (<i>Guidelines for the notification of non-compliance and emergency action</i>)).	P	COSAVE <i>Category : TECHNICAL</i>

450	140	If a nonconformity is identified, the NPPO (or the entity authorized to audit or supervise) should require the authorized entity to take corrective action.	P	Brazil The NPPO should be the one who requires corrective actions, even when the nonconformity is identified by a third party. <i>Category : SUBSTANTIVE</i>
451	140	If a nonconformity is identified, the NPPO (or the entity authorized to audit or supervise) should require the authorized entity to take corrective action.	P	Argentina In the event of an audit entity performs the audit, the audit entity reports to the NPPO and the NPPO requires corrective actions to the authorized entity. Better to the NPPO keep the handles on the system. <i>Category : TECHNICAL</i>
452	140	If a nonconformity is identified, the NPPO (or the entity authorized to audit or supervise) <u>NPPO</u> should require the authorized entity to take corrective action.	P	Costa Rica In the event of an audit entity performs the audit, the audit entity reports to the NPPO and the NPPO requires corrective actions to the authorized entity. Better to the NPPO keep the handles on the system. <i>Category : SUBSTANTIVE</i>
453	140	If a nonconformity is identified, the NPPO (or the entity authorized to audit or supervise) should require the authorized entity to take corrective action.	P	COSAVE NPPO should: In the event of an audit entity performs the audit, the audit entity reports to the NPPO and the NPPO requires corrective actions to the authorized entity. Better to the NPPO keep the handles on the system. <i>Category : TECHNICAL</i>
454	140	If a nonconformity is identified, the NPPO (or the entity authorized to audit or supervise) should require the authorized entity to take corrective action.	P	European Union This should be deleted following the EU recommendation to delete the entire section 4.2.1. <i>Category : SUBSTANTIVE</i>
455	140	If a nonconformity is identified, the NPPO (or the entity authorized to its authorised audit or supervise) <u>entity</u>) should require the authorized entity to take corrective action.	P	China Support to APPPC comments <i>Category : SUBSTANTIVE</i>
456	140	If a nonconformity is identified, the NPPO (or the entity authorized to audit or supervise) should require the authorized entity to take corrective action.	P	Uruguay In the event of an audit entity performs the audit, the audit entity reports to the NPPO and the NPPO requires corrective actions to the authorized entity. <i>Category : TECHNICAL</i>
457	140	If a nonconformity is identified, the NPPO (or the entity authorized to audit or supervise) <u>NPPO</u> should require the authorized entity to take corrective action.	P	EPPO This should be deleted following the EPPO recommendation to delete the entire section 4.2.1. <i>Category : SUBSTANTIVE</i>
458	140	If a nonconformity is identified, the NPPO (or the entity authorized to audit or supervise) should require the authorized entity to take corrective action.	P	IPPC Regional Workshop Europe and Central Asia This should be deleted following the recommendation to delete the entire section 4.2.1. <i>Category : SUBSTANTIVE</i>
459	140	If a nonconformity is identified, the NPPO (or the entity authorized to its authorised audit or supervise) <u>entity</u>) should require the authorized entity to take corrective action.	P	APPPC To replace with a consistent term - its authorised audit entity with rest of this ISPM. <i>Category : SUBSTANTIVE</i>

460	140	If a nonconformity is identified, the NPPO (or the entity authorized to audit or supervise) should require the authorized entity to take corrective action.	P	Japan Requiring entities to take corrective actions for addressing nonconformities is described in Para140 "6. Types of Nonconformity", but it should be included in "4.1 Roles and responsibilities of the NPPO" and "4.2.1 Roles and responsibilities of entities authorized to audit or supervise" rather than in "6. Types of Nonconformity". To delete para 140, accordingly. <i>Category : SUBSTANTIVE</i>
461	140	If a nonconformity is identified, the NPPO (or the entity its authorized to audit or supervise) entity) should require the authorized entity to take corrective action.	P	New Zealand Consistency of wording <i>Category : EDITORIAL</i>
462	141	Nonconformities may be considered as critical nonconformities (section 6.1) or other nonconformities (section 6.2). <u>The NPPO of the import country have the right to require the NPPO of export country to provide information of the related authorized entity, if they find non-compliance.</u>	P	China In ISPM13 (Section 9.1) "The importing country should investigate the new or unexpected phytosanitary situation to justify the emergency actions taken. Any such action should be evaluated as soon as possible to ensure that its continuance is technically justified." <i>Category : SUBSTANTIVE</i>
6.1 Critical nonconformity				
463	142	6.1 Critical nonconformity	C	New Zealand It would be helpful to indicate how and who should determine a critical nonconformity. <i>Category : SUBSTANTIVE</i>
464	144	when there is evidence of failing to properly perform authorized phytosanitary actions	C	Grenada failure <i>Category : EDITORIAL</i>
465	144	when there is evidence of failing to properly perform authorized phytosanitary actions <u>when there is evidence of failing to notify the NPPO (within an agreed time frame) that a nonconformity has occurred</u>	P	New Zealand • New para following [144], to address the deliberate failure of the entity to notify the NPPO of a nonconformity New Zealand I still think we should qualify nonconformity. do we require to notify every single nonconformity? New Zealand I also notice use of nonconformity and noncompliance. are they interchangeable? if so the it should be consistent throughout the text. or is there difference? if so, are there definitions? <i>Category : SUBSTANTIVE</i>
466	145	when a corrective action is not implemented to the satisfaction of the NPPO (or the entity authorized to audit or supervise) <u>NPPO</u>	P	Argentina For consistency with previous comments <i>Category : TECHNICAL</i>
467	145	when a corrective action is not implemented to the satisfaction of the NPPO (or the entity authorized to audit or supervise) <u>NPPO</u>	P	Costa Rica For consistency with previous comments <i>Category : TECHNICAL</i>

468	145	when a corrective action is not implemented to the satisfaction of the NPPO (or the entity authorized to audit or supervise) <u>NPPO</u> .	P	COSAVE NPPO: consistency with previous comments. <i>Category : TECHNICAL</i>
469	145	when a corrective action is not implemented to the satisfaction of the NPPO (or the entity authorized to audit or supervise) <u>NPPO</u>	P	European Union This should be deleted following the EU recommendation to delete the entire section 4.2.1. <i>Category : SUBSTANTIVE</i>
470	145	when a corrective action is not implemented to the satisfaction of the NPPO (or the entity authorized to audit or supervise)	P	Uruguay : For consistency with previous comments <i>Category : TECHNICAL</i>
471	145	when a corrective action is not implemented to the satisfaction of the NPPO (or the entity authorized to audit or supervise)	P	EPPO This should be deleted following the EPPO recommendation to delete the entire section 4.2.1. <i>Category : SUBSTANTIVE</i>
472	145	when a corrective action is not implemented to the satisfaction of the NPPO (or the entity authorized to audit or supervise) <u>NPPO</u>	P	IPPC Regional Workshop Europe and Central Asia This should be deleted following the recommendation to delete the entire section 4.2.1. <i>Category : SUBSTANTIVE</i>
473	147	when the integrity or impartiality of the entity has been shown to be compromised. <u>when there is evidence of fraud.</u>	P	Brazil Fraud is very serious and immediately impacts the trust in the NPPO's system. Although it seems to be implicit in the previous item. <i>Category : SUBSTANTIVE</i>
474	147	when the integrity-integrity, confidentiality, or impartiality of the entity has been shown to be compromised.	P	United States of America One of the requirements under sections 2-4. <i>Category : TECHNICAL</i>
475	147	when the integrity or impartiality of the entity has been shown to be compromised.	C	OIRSA Adem's, cuando hay evidencia de corrupci'n. i.e tomando sobornos de los clientes. <i>Category : SUBSTANTIVE</i>
476	148	An entity's authorization to perform a specific phytosanitary action should be suspended <u>or revoked</u> immediately if a critical nonconformity is identified.	P	Argentina A critical nonconformity can also be the cause of revocation <i>Category : TECHNICAL</i>
477	148	An entity's authorization to perform a specific phytosanitary action should be suspended <u>or revoked</u> immediately if a critical nonconformity is identified.	P	Costa Rica Some critical nonconformities (like fraud) can be the cause of revocation <i>Category : TECHNICAL</i>
478	148	An entity's authorization to perform a specific phytosanitary action should be suspended <u>or revoked</u> immediately if a critical nonconformity is identified.	P	Uruguay A critical nonconformity can also be the cause of revocation <i>Category : TECHNICAL</i>
479	148	<u>The NPPO should have a system in place to manage the critical nonconformity.</u> An entity's authorization to perform a specific phytosanitary action should be suspended immediately if a critical nonconformity is identified.	P	Korea, Republic of The proposed text make it clear that NPPO is the decision maker for actions to take if a critical nonconformity is identified. <i>Category : SUBSTANTIVE</i>

480	148	An entity's authorization to perform a specific phytosanitary action should be suspended immediately <u>suspended and subsequent revocation</u> if a critical nonconformity is identified.	P	OIRSA Se considera que ante una no conformidad cr#237;tica, siguiendo el debido proceso deber#237;a suspenderse y revocarse la autorizaci#243;n hasta tanto no subsane la no conformidad. Estas son cr#237;ticas y est#225; comprometiendo la confianza de la ONPF. Adem#225;s, en esta secci#243;n no se indica cuando se debe aplicar realizar la revocatoria. En el caso de "otras no conformidades" que no afecten ni tiene un impacto podr#237;a darse sola la suspensi#243;n, pero m#225;s bien en este punto si se indica que puede revocarse si se identifica repetidamente o cuando se incumpla el plazo <i>Category : TECHNICAL</i>
481	148	An The NPPO should have a system in place to manage the critical nonconformity. The NPPO should suspend, or revoke an entity's authorization to perform a specific phytosanitary action should action, or require the entity that corrective actions must be suspended immediately taken , if a critical nonconformity is identified.	P	New Zealand The proposed text make it clear that NPPO is the decision maker for actions to take if a critical nonconformity is identified. Actions to take by the NPPO should include not only suspension, but also revocation, or corrective actions to be taken. Actions should be determined by the NPPO on a case by case basis, e.g. NPPO to consider: is it a genuine mistake? is it deliberate? is it breaking the integrity and trust? <i>Category : SUBSTANTIVE</i>
482	148	An entity's authorization to perform a specific phytosanitary action should be suspended immediately if a critical nonconformity is identified. <u>The decision about whether to suspend or withdraw authorization of the entity rests solely with the NPPO. If multiple critical and/or other nonconformities are identified the NPPO may also decide to revoke the entities authorization.</u>	P	New Zealand • This aligns with para [132], and gives the NPPO the appropriate level of oversight/accountability and helps manage conflict of interest/impartibility, particularly for entities authorized to audit who may then have an increased workload as a result of the suspension/revocation • Have also added revocation into this section, as it is already included under section 6.2, so seems to be lacking by not including in this section. New Zealand for consistency, change withdraw to revoke? <i>Category : SUBSTANTIVE</i>
483	148	An entity's authorization to perform a specific phytosanitary action should be suspended immediately if a critical nonconformity is identified.	C	COSAVE Una no conformidad critica tambi#233;n puede ser causa de revocaci#243;n. A critical nonconformity can also be the cause of revokation <i>Category : TECHNICAL</i>
484	148	An entity's authorization to perform a specific phytosanitary action should be suspended <u>or revoked</u> immediately if a critical nonconformity is identified.	P	COSAVE <i>Category : TECHNICAL</i>
6.2 Other nonconformity				

485	151	Other nonconformity requires corrective actions to be taken within a time frame specified by the NPPO (or the entity authorized to audit or supervise). <u>NPPO.</u>	P	Argentina In the event of an audit entity performs the audit, the audit entity reports to the NPPO and the NPPO requires corrective actions to the authorized entity. <i>Category : TECHNICAL</i>
486	151	Other nonconformity requires corrective actions to be taken within a time frame specified by the NPPO (or the entity authorized to audit or supervise).	P	Costa Rica In the event of an audit entity performs the audit, the audit entity reports to the NPPO and the NPPO requires corrective actions to the authorized entity. <i>Category : TECHNICAL</i>
487	151	Other nonconformity requires corrective actions to be taken within a time frame specified by the NPPO (or the entity authorized to audit or supervise) <u>NPPO.</u>	P	COSAVE In the event of an audit entity performs the audit, the audit entity reports to the NPPO and the NPPO requires corrective actions to the authorized entity. <i>Category : TECHNICAL</i>
488	151	Other nonconformity requires corrective actions to be taken within a time frame specified by the NPPO (or the entity authorized to audit or supervise) <u>NPPO.</u>	P	European Union This should be deleted following the EU recommendation to delete the entire section 4.2.1. <i>Category : SUBSTANTIVE</i>
489	151	Other nonconformity requires corrective actions to be taken within a time frame specified by the NPPO (or the entity authorized to audit or supervise) <u>NPPO.</u>	P	Uruguay Corrective actions are specified by the NPPO <i>Category : TECHNICAL</i>
490	151	Other nonconformity requires corrective actions to be taken within a time frame specified by the NPPO (or the entity authorized to audit or supervise).	P	EPPO This should be deleted following the EPPO recommendation to delete the entire section 4.2.1. <i>Category : SUBSTANTIVE</i>
491	151	Other nonconformity requires corrective actions to be taken within a time frame specified by the NPPO (or the entity its authorized to audit or supervise) <u>entity</u>).	P	New Zealand Consistency of wording <i>Category : EDITORIAL</i>
492	152	<u>Suspension or revocation of the authorization is not needed but may be considered when this type of nonconformity is repeatedly identified or when corrective actions are not taken within the required time frame.</u>	C	Canada Check font type. <i>Category : EDITORIAL</i>
493	152	Suspension or revocation of the authorization is not needed but may be considered when this type of nonconformity is repeatedly identified or when corrective actions are not taken within the required time frame. <u>The decision about whether to suspend or revoke authorization of the entity rests solely with the NPPO.</u>	P	New Zealand This aligns with para [132], and gives the NPPO the appropriate level of oversight/accountability and helps manage conflict of interest/impartibility, particularly for entities authorized to audit who may then have an increased workload as a result of the suspension/revocation <i>Category : SUBSTANTIVE</i>
7. Suspension and Revocation of Authorization				
494	153	7. Suspension and Revocation of Authorization	C	Viet Nam Clarify more How long to suspend and How to allow to authorization entity approval again? How to report of specific remedies of this authorization entity <i>Category : SUBSTANTIVE</i>

495	153	7. Suspension and Revocation of Authorization	C	South Africa Proposal to add “voluntary withdrawal” to the heading. <i>Category : SUBSTANTIVE</i>
496	154	<u>The decision about whether to suspend, revoke or reinstate authorization of the entity rests solely with the NPPO.</u> Suspension. The NPPO temporarily suspends the authorization of an entity for a specified time in order for the entity to implement corrective action.	P	China Support to APPPC comments <i>Category : SUBSTANTIVE</i>
497	154	<u>The decision about whether to suspend, revoke or reinstate authorization of the entity rests solely with the NPPO.</u> Suspension. The NPPO temporarily suspends the authorization of an entity for a specified time in order for the entity to implement corrective action.	P	APPPC To add in an additional statement - “The decision about whether to suspend, revoke or reinstate authorization of the entity rests solely with the NPPO.” for clarity. <i>Category : SUBSTANTIVE</i>
498	155	Revocation. The NPPO withdraws the authorization of an entity.	P	Grenada A third party appeal system should be considered, should the entity so desires <i>Category : SUBSTANTIVE</i>
499	156	An entity that has had its authorization suspended and that wishes to have its authorization reinstated should apply to the NPPO for reinstatement. Entities that have had their authorization revoked should make an application for a new authorization.	C	Mexico If an entity has been revoked, it should be taken into consideration if such nonconformity is critical, to evaluate if that entity is able to candidate for a new authorization. <i>Category : SUBSTANTIVE</i>
500	156	An entity that has had its authorization suspended and that wishes to have its authorization reinstated should apply to the NPPO for reinstatement. Entities that have had their <u>When an entity’s authorization revoked has been revoked, the NPPO should evaluate if the entity is eligible for a new authorization. Affected entities should make an application for a new authorization, according to the rules set by the NPPO.</u>	P	Argentina The NPPO decides according to its own rules <i>Category : TECHNICAL</i>
501	156	An entity that has had its authorization suspended and that wishes to have its authorization reinstated should apply to the NPPO for reinstatement. Entities that have had their <u>When an entity’s authorization revoked has been revoked, the NPPO should evaluate if the entity is eligible for a new authorization. Affected entities should make an application for a new authorization, according to the rules set by the NPPO.</u>	P	Costa Rica The NPPO decides according to its own rules NPPO can grant the new authorization immediately or can wait for a time, as a penalty. <i>Category : SUBSTANTIVE</i>
502	156	An entity that has had its authorization suspended and that wishes to have its authorization reinstated should apply to the NPPO for reinstatement. Entities that have had their authorization revoked should make an application for a new authorization <u>authorization according to the rules set by the NPPO.</u>	P	COSAVE The NPPO decides according to its own rules <i>Category : TECHNICAL</i>
503	156	An entity that has had its authorization suspended and that wishes to have its authorization reinstated should apply to the NPPO for reinstatement. Entities that	P	Uruguay The NPPO decides according to its own rules <i>Category : TECHNICAL</i>

		have had their <u>When an entity's authorization revoked has been revoked, the NPPO should evaluate if the entity is eligible for a new authorization. Affected entities should make an application for a new authorization, according to the rules set by the NPPO.</u>		
504	156	An entity that has had its authorization suspended and that wishes to have its authorization reinstated should apply to the NPPO for reinstatement. <u>The NPPO should verify that the corrective action has taken the place.</u> Entities that have had their authorization revoked should make an application for a new authorization.	P	United States of America To clarify the reinstatement requirement. <i>Category : TECHNICAL</i>
505	156	An entity that has had its authorization suspended and that wishes to have its authorization reinstated should apply to the NPPO for reinstatement. Entities that have had their authorization revoked should make an application for a new authorization.	C	OIRSA If an entity has been revoked, it should be taken into consideration if such nonconformity is critical, to evaluate if that entity is able to candidate for a new authorization. <i>Category : TECHNICAL</i>
506	156	<u>8. Reinstatement of Authorisation</u> An entity that has had its authorization suspended and that wishes to have its authorization reinstated should apply to the NPPO for reinstatement. Entities that have had their authorization revoked should make an application for a new authorization.	P	Singapore To start a paragraphs on reinstatement of authorisation i.e new section 8 to cover the remaining original sentences. <i>Category : SUBSTANTIVE</i>
507	156	<u>An entity's authorization to perform a specific phytosanitary action should be suspended immediately if a critical nonconformity is identified.</u> An entity that has had its authorization suspended and that wishes to have its authorization reinstated should apply to the NPPO for reinstatement. Entities that have had their authorization revoked should make an application for a new authorization.	P	Thailand New paragraph moved from section 6.1 <i>Category : SUBSTANTIVE</i>
508	156	An entity that has had its authorization suspended and that wishes to have its authorization reinstated should apply to the NPPO for reinstatement. Entities that have had their authorization revoked should make an application for a new authorization.	C	South Africa A suggestion to move the sentence: "An entity that has had its authorization suspended and that wishes to have its authorization reinstated should apply to the NPPO for reinstatement" under suspension because it talk more about suspension <i>Category : EDITORIAL</i>
509	156	An entity that has had its authorization suspended and that wishes to have its authorization reinstated should apply to the NPPO for reinstatement. <u>The decision about whether to have an entity's authorization reinstated rests solely with the NPPO.</u> Entities that have had their authorization revoked should make an application for a new authorization.	P	New Zealand This aligns with para [132], and gives the NPPO the appropriate level of oversight/accountability and helps manage conflict of interest/impartibility, particularly for entities authorized to audit who may then have an increased workload as a result of the suspension/revocation <i>Category : SUBSTANTIVE</i>
510	157	An entity that has <u>voluntarily</u> withdrawn from an authorization programme and that wishes to have its authorization reinstated should also apply to the NPPO for reinstatement.	C	Mexico ADD Text: has voluntarily withdrawn, and during his acting for NPPO who has not critical nonconformity, <i>Category : SUBSTANTIVE</i>

511	157	An entity that has voluntarily withdrawn from an authorization programme <u>agreement</u> and that wishes to have its authorization reinstated should also apply to the NPPO for reinstatement.	P	European Union For consistency with paragraph 67 which uses the term 'authorization agreement'. The word 'also' is not needed. <i>Category : EDITORIAL</i>
512	157	An entity that has voluntarily withdrawn from an authorization programme <u>agreement</u> and that wishes to have its authorization reinstated should also apply to the NPPO for reinstatement.	P	EPPO For consistency with paragraph 67 which uses the term 'authorization agreement'. The word 'also' is not needed. <i>Category : EDITORIAL</i>
513	157	An entity that has voluntarily withdrawn from an authorization programme <u>agreement</u> and that wishes to have its authorization reinstated should also apply to the NPPO for reinstatement. <u>The NPPO may revoke the authorization of an entity in case of reduction or end of the authorization programme.</u>	P	IPPC Regional Workshop Europe and Central Asia To give the possibility of revocation in the case of substantial modifications of the authorization programme. Alternative wording: "The NPPO may revoke the authorization of an entity if the authorization programme is reduced or terminated." For consistency with paragraph 67. <i>Category : TECHNICAL</i>
514	157	An entity that has voluntarily withdrawn from an authorization programme and that wishes to have its authorization reinstated should also apply to the NPPO for reinstatement.	C	OIRSA Add: has voluntarily withdrawn, and during his acting for NPPO who has not critical nonconformity, <i>Category : TECHNICAL</i>
515	157	An entity that has voluntarily withdrawn from an authorization programme and that wishes to have its authorization reinstated should also apply to the NPPO for reinstatement.	C	South Africa Proposal to add the heading: "Voluntarily withdrawal" <i>Category : EDITORIAL</i>
516	158	Potential implementation issues <u>In this standard, "entities" include the providers of phytosanitary action (e.g. individuals, organizations, 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. The NPPO and the entity should determine the nature of the authorization agreement.</u>	P	OIRSA Even individuals are considered within this proposed standard, It might be considered to clarify in the text, where it applies, that NPPO is able to authorized individuals who cover the required profile, and not necessarily be part of an enterprise or organization. <i>Category : TECHNICAL</i>
517	158	Potential implementation issues	C	Nigeria When the new ISPM is developed, arrangement should be made for the training of personnel to improve their capacity to implement the ISPM. <i>Category : SUBSTANTIVE</i>
518	159	This section is not part of the standard. The Standards Committee in May 2016 requested that the Secretariat gather information on any potential implementation	C	Saint Kitts And Nevis Potential implementation issues: suspension, revoking or voluntary withdrawal from the authorization programme can cause

		issues related to this draft. Please provide details and proposals on how to address these potential implementation issues.		a lack of the service offered by the NPPO. The programme is usually needed due to human resource constraints in the NPPO. Possible solution: established time period for withdrawal from programme e.g. one month notice for withdrawal. <i>Category : SUBSTANTIVE</i>
519	159	This section is not part of the standard. The Standards Committee in May 2016 requested that the Secretariat gather information on any potential implementation issues related to this draft. Please provide details and proposals on how to address these potential implementation issues. Data recording softwareThe availability of a data recording software to collect data during field actions, like visual inspections, sampling, trapping, allows to implement traceability and facilitates control of actions carried out by the authorized entities.	P	European Union A useful example from Italy. <i>Category : TECHNICAL</i>
520	159	This section is not part of the standard. The Standards Committee in May 2016 requested that the Secretariat gather information on any potential implementation issues related to this draft. Please provide details and proposals on how to address these potential implementation issues. Data recording softwareThe availability of a data recording software to collect data during field actions, like visual inspections, sampling, trapping, allows to implement traceability and facilitates control of actions carried out by the authorized entities.	P	EPPO A useful example from Italy. <i>Category : TECHNICAL</i>
521	159	This section is not part of the standard. The Standards Committee in May 2016 requested that the Secretariat 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 If the authorized entity chooses to voluntarily withdraw from the programme (or is even suspended or revoked), then this could compromise the ability of the NPPO to carry out phytosanitary actions, particularly if the NPPO does not have enough human resources to perform the actions itself. <i>Category : SUBSTANTIVE</i>
522	159	This section is not part of the standard. The Standards Committee in May 2016 requested that the Secretariat 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 There is a decision to develop a guide on implementation of this standard. This should help contracting parties with implementation, particularly in those areas where the concept of authorization is not currently used. <i>Category : SUBSTANTIVE</i>
523	159	This section is not part of the standard. The Standards Committee in May 2016 requested that the Secretariat gather information on any potential implementation issues related to this draft. Please provide details and proposals on how to address these potential implementation issues. Example from Italy:Data recording softwareThe availability of a data recording software to collect data during field actions, like visual inspections, sampling, trapping, allows to implement traceability and facilitates control of actions carried out by the authorized entities.	P	IPPC Regional Workshop Europe and Central Asia It would be good to have some more examples Ideas from Regional Workshop participants were welcome, the example of data recording was mentioned <i>Category : TECHNICAL</i>
524	159	This section is not part of the standard. The Standards Committee in May 2016 requested that the Secretariat gather information on any potential implementation	C	Philippines In the Philippines, it will be very difficult to authorize an entity to

		issues related to this draft. Please provide details and proposals on how to address these potential implementation issues.		conduct audit or supervise phytosanitary measure. It is the NPPO's (BPI-NPQS) obligation to oversee and verify the effectiveness of phytosanitary measures and authorization programmes <i>Category : SUBSTANTIVE</i>
525	159	This section is not part of the standard. The Standards Committee in May 2016 requested that the Secretariat 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 Brainstorm 1. High turnover of staff within authorized entities – Acredit the staff responsible for specific tasks and new ones whenever there are changes (Staff changes may call for suspension to allow training of new one) 2. Inadequate capacity for NPPOs to effectively audit the entities – Ensure capacity building for staff before implementation of the authorization program) 3. High cost to the client where there is no government intervention – Price ceiling/gazettement, tax rebates 4. Inadequate legal backing – Lobby for legislation 5. Integrity issues – Efficient monitoring and evaluation system 6. Disputes - Need for arbitration mechanisms in case of disputes arising between authorized entities and entities authorized to perform supervision or audits <i>Category : SUBSTANTIVE</i>
526	159	This section is not part of the standard. The Standards Committee in May 2016 requested that the Secretariat 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>POTENTIAL IMPLEMENTATION ISSUES</u> <u>Change of government policy may affect NPPOs authority in the future as it affect this standards.NPPOs may also require capacity to implement this standard.</u>	P	Nigeria <i>Category : SUBSTANTIVE</i>