2018 First Consultation: Draft Spec on Use of systems approaches (2015-004)

Consolidated reconciliation report for review

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

FAO sequential number	Para	Text	T	Comment
1	G	(General Comment)	C	**Chile** Chile support and agrees with comments of COSAVE *Category : TECHNICAL*
2	G	(General Comment)	C	**Paraguay** Paraguay support COSAVE comments. *Category : TECHNICAL*
3	G	(General Comment)	C	**Guyana** The document is accepted in its entirety. *Category : SUBSTANTIVE*
4	G	(General Comment)	C	**Brazil** Brazil supports COSAVE's comments. *Category : SUBSTANTIVE*
5	G	(General Comment)	C	**Mexico** Mexico is in agreement with the document *Category : SUBSTANTIVE*
6	G	(General Comment)	C	**Japan** If the definition of "wood commodities" in the draft specification for ISPM is the same as the definition of "wood" in ISPM5 and ISPM39, this specification should be developed as an annex of ISPM39. In this case, it is better to call "wood" rather than "wood commodities" in this draft specification in order to avoid confusion. For refrect the definition of "wood" in ISPM5 already indicates "commodities". If the definition of "wood commodities" is different from the definition of "wood", the definition of "wood commodities" in the draft should be made clear. *Category : SUBSTANTIVE*
7	G	(General Comment)	C	**Peru** senasa shares all the comments of this norm, made by cosave *Category : SUBSTANTIVE*
8	G	(General Comment)	C	**Algeria** No COMMENT *Category : SUBSTANTIVE*
9	G	(General Comment)	C	**Colombia** If the risk assessment stage indicates that there are no quarantine pests subject to regulation, no phytosanitary measure should be applied. If the stage in question is not taken into account and an ISPM that establishes phytosanitary measures for commodities and pathways is applied directly, the principle of technical justification will be violated, which establishes that "the contracting parties shall technically justify the phytosanitary measures on the basis of conclusions reached by using an

				appropriate pest risk analysis or, where applicable, another comparable examination and evaluation of available scientific information". An example of this is the existing ISPMs on fruit flies (ISPM 26 Establishment of pest free areas for fruit flies (Tephritidae), ISPM 30: Establishment of areas of low pest prevalence for fruit flies (Tephritidae) (now annexed to ISPM 35), ISPM 35: Systems approach for pest risk management of fruit flies (Tephritidae) and ISPM 28: Phytosanitary treatments for regulated pests), which provide general guidelines on different mitigation measures for this pest group but do not exclude at any time performing the pest risk analysis or the bilateral negotiation process of the measures to be applied. *Category : SUBSTANTIVE*
10	G	(General Comment)	C	**Colombia** It is considered that the draft specification should be an annex for ISPM No. 39 "International Wood Movement" *Category : SUBSTANTIVE*
11	G	(General Comment)	C	**NEPPO** No comment *Category : SUBSTANTIVE*
12	G	(General Comment)	C	**Lao People's Democratic Republic** No comments *Category : TECHNICAL*
13	G	(General Comment)	C	**OIRSA** this draft standard does not present anything new or has no new technical basis that other standards already approved have it (ISPM: 1, 2). *Category : SUBSTANTIVE*
14	G	(General Comment)	C	**Malawi** No cooment *Category : SUBSTANTIVE*
15	G	(General Comment)	C	**Malawi** No comment *Category : SUBSTANTIVE*
16	G	(General Comment)	C	**Malawi** No comment *Category : SUBSTANTIVE*
17	G	(General Comment)	C	**Nicaragua** Estamos de acuerdo que se haga la revisión de esta norma ya sea como anexo o creación de la misma para la aplicación del sistema aproach, bajo los factores mencionados, por un comité de especialista en la materia. *Category : EDITORIAL*

DRAFT SPECIFICATION FOR ISPM: Use of systems approaches in managing THE pest risks associated with the movement of wood commodities (2015-004)				
18	1	**DRAFT SPECIFICATION FOR ISPM: USE OF SYSTEMS APPROACHES IN MANAGING THE PEST RISKS ASSOCIATED WITH THE MOVEMENT OF WOOD COMMODITIES (2015-004)**	C	**Kenya** Kenya propose removal of the words " use of " in the title and the topic put as an annex to ISPM 39 on International movement of wood instead of an ISPM *Category : SUBSTANTIVE*
Reason for the standard				
19	26	Countries predominantly rely on treatments to manage the pest risks associated with the movement of wood commodities. In particular, heat treatment or methyl bromide fumigation are used widely to manage pest risks. ~~The availability~~ While methyl bromide use of Quarantine and Pre-shipment (QPS) purposes is allowed methyl bromide treatment is ~~diminishing in response to the Montreal Protocol on substances that deplete the ozone layer~~ not always available, and heat treatment is not always a practical ~~for~~ fmeans of addressing pest ~~risk in every circumstance~~risk. A systems approach may provide ~~a more~~ an effective option for addressing pest risks in some ~~cases~~instances, particularly where pest risks may not be ~~fully~~ adequately managed or are difficult to manage by a single phytosanitary measure. Integrated pest management measures within a systems approach may also provide additional options to facilitate or expand trade while effectively managing pest risks.	P	**New Zealand** *Category : TECHNICAL*
20	26	Countries predominantly rely on treatments to manage the pest risks associated with the movement of wood commodities. In particular, heat treatment or methyl bromide fumigation are used widely to manage pest risks~~. The availability of methyl bromide is diminishing in response to the Montreal Protocol on substances that deplete the ozone layer .~~ and heat treatment is not always practical for addressing pest risk in every circumstance. A systems approach may provide a more effective option for addressing pest risks in some cases, particularly where pest risks may not be fully managed or are difficult to manage by a single phytosanitary measure. Integrated measures within a systems approach may also provide additional options to facilitate or expand trade while effectively managing pest risks.	P	**New Zealand** This comment is not correct. The Montreal Protocol allows the QPS use of methyl bromide. *Category : TECHNICAL*
21	26	Countries predominantly rely on treatments to manage the pest risks associated with the movement of wood ~~commodities~~commodities across their borders. In particular, heat treatment or methyl bromide fumigation are used widely to manage pest risks. The availability of methyl bromide is diminishing in response to the Montreal Protocol on substances that deplete the ozone layer and heat treatment is	P	**New Zealand** *Category : EDITORIAL*

		not always practical for addressing pest risk in every circumstance. A systems approach may provide a more effective option for addressing pest risks in some cases, particularly where pest risks may not be fully managed or are difficult to manage by a single phytosanitary measure. Integrated measures within a systems approach may also provide additional options to facilitate or expand trade while effectively managing pest risks.		
22	26	Countries predominantly rely on treatments and processing to manage the pest risks associated with the movement of wood commodities. In particular, heat treatment or methyl bromide fumigation are used widely to manage pest risks. The availability of methyl bromide is diminishing in response to the Montreal Protocol on substances that deplete the ozone layer and heat treatment is not always practical for addressing pest risk in every circumstance. A systems approach may provide a more effective option for addressing pest risks in some cases, particularly where pest risks may not be fully managed or are difficult to manage by a single phytosanitary measure. Integrated measures within a systems approach may also provide additional options to facilitate or expand trade while effectively managing pest risks.	P	**New Zealand** Most countries differentiate their import phytosanitary requirements for wood products based on the level of processing – it is very common to require more treatments and assurances for less processed products like logs than for more processed products like timber. Often no treatment or assurance is required for processed wood products such as fibreboard and plywood (see also ISPM 32). *Category : TECHNICAL*
23	26	Countries predominantly rely on treatments to manage the pest risks associated with the movement of wood commodities. In particular, heat treatment or methyl bromide fumigation are used widely to manage pest risks. The availability of methyl bromide is diminishing in response to the Montreal Protocol on substances that deplete the ozone layer and heat treatment is not always practical for addressing pest risk in every circumstance. A systems approach may provide a more effective option for ~~addressing~~ managing pest risks in some cases, particularly where pest risks may not be fully managed or are difficult to manage by a single phytosanitary measure. Integrated measures within a systems approach may also provide additional options to facilitate or expand trade while effectively managing pest risks.	P	**Argentina** For consistency. *Category : TECHNICAL*
24	26	Countries predominantly rely on treatments to manage the pest risks associated with the movement of wood commodities. In particular, heat treatment or methyl bromide fumigation are used widely to manage pest risks. The availability of methyl bromide is diminishing in response to the Montreal Protocol on substances that deplete the ozone layer and heat treatment is not always practical for addressing pest risk in every circumstance. A systems approach may provide a more effective option for ~~addressing~~ managing pest risks in some cases, particularly where pest risks may not be fully managed or are difficult to manage by a single phytosanitary measure. Integrated measures within a systems approach	P	**Uruguay** For consistency *Category : TECHNICAL*

		may also provide additional options to facilitate or expand trade while effectively managing pest risks.		
25	26	Countries predominantly rely on treatments to manage the pest risks associated with the movement of wood commodities. In particular, heat treatment or methyl bromide fumigation are used widely to manage pest risks. The availability of methyl bromide is diminishing in response to the Montreal Protocol on substances that deplete the ozone layer and heat treatment is not always practical for addressing pest risk in every circumstance. A systems approach may provide a more effective option for ~~addressing~~ managing pest risks in some cases, particularly where pest risks may not be fully managed or are difficult to manage by a single phytosanitary measure. Integrated measures within a systems approach may also provide additional options to facilitate or expand trade while effectively managing pest risks.	P	**COSAVE** For consistency. *Category : TECHNICAL*
26	27	A systems approach is ~~often designed to be equivalent~~ a group of a number of phytosanitary measures that could adequately manage the pest risks in combination but each measure on its own is less ~~restrictive than other phytosanitary measures~~restrictive.	P	**New Zealand** The original sentence implies that a systems approach is not to the same standard as it is "less restrictive". *Category : TECHNICAL*
Scope and purpose				
27	29	Although the systems approach concept is described in ISPM 14 (*The use of integrated measures in a systems approach for pest risk management*) and operationalized for wood commodities in ISPM 39 (*International movement of wood*), the existing standards do not provide specific technical guidance on the types of phytosanitary measures that may be used to address the pest risks associated with wood commodities. The proposed standard (or ~~annex)~~ annex to ISPM 39?) should provide specific technical guidance on the types of measures that may be used within a systems approach for wood, including the different wood species occurring world-wide and the major pest groups associated with these species. Different measures for different wood species shall be described~~controlled by the measures,~~ and how to evaluate the efficacy or effectiveness of the individual measures as well as of the overall systems approach. The standard should provide guidance on the respective responsibilities of the national plant protection organization (NPPO) ~~in supervising the system and~~) of ~~industry in implementing the measures~~exporting country to meet phytosanitary import requirements.	P	**European Union** Different wood species should be covered. The objective is to meet phytosanitary import requirements. *Category : TECHNICAL*
28	29	~~Although the~~ The systems approach concept is described in ISPM 14 (*The use of integrated measures in a systems approach for pest risk management*) and	P	**European Union**

		operationalized for wood commodities in ISPM 39 (*International movement of wood*), the existing standards do not provide specific technical guidance on the types of phytosanitary measures that may be used to address the pest risks associated with wood commodities. The proposed standard (or annex) should provide comprehensive and specific technical guidance on the types of measures that may be used within a systems approach for wood, the major pest groups controlled by the measures, and how to evaluate the efficacy or effectiveness of the individual measures as well as of the overall systems approach. The standard should provide guidance on the respective responsibilities of the national plant protection organization (NPPO) in supervising the system and of industry in implementing the measures.		*Category : EDITORIAL*
29	29	~~Although~~ While the systems approach concept is described in ISPM 14 (*The use of integrated measures in a systems approach for pest risk management*) and operationalized for wood commodities in ISPM 39 (*International movement of wood*), the existing standards do not provide specific technical guidance on the types of phytosanitary measures that may be used to address the pest risks associated with wood commodities. The proposed standard (or annex) should provide specific technical guidance on the major pest groups to be managed by the measures, the types of measures that may be used within a systems approach for ~~wood~~certain types of wood products, ~~the major pest groups~~ and how to evaluate a given systems approach and the efficacy or effectiveness of the individual measures applied within that systems approach. The standard should provide guidance on the respective responsibilities of the national plant protection organization (NPPO) in supervising the system and of industry in implementing the measures.~~controlled by the measures, and how to evaluate the efficacy or effectiveness of the individual measures as well as of the overall systems approach. The standard should provide guidance on the respective responsibilities of the national plant protection organization (NPPO) in supervising the system and of industry in implementing the measures.~~	P	**New Zealand** *Category : TECHNICAL*
30	29	Although the systems approach concept is described in ISPM 14 (*The use of integrated measures in a systems approach for pest risk management*) and operationalized for wood commodities in ISPM 39 (*International movement of wood*), the existing standards do not provide specific technical guidance on the types of phytosanitary measures that may be used to address the pest risks associated with wood ~~commodities~~commodities as described in ISPM 39. The proposed standard (or annex) should provide specific technical guidance on the types of measures that may be used within a systems approach for wood, the major	P	**United States of America** To clarify which commodities are covered by the proposed draft. *Category : TECHNICAL*

		pest groups controlled by the measures, and how to evaluate the efficacy or effectiveness of the individual measures as well as of the overall systems approach. The standard should provide guidance on the respective responsibilities of the national plant protection organization (NPPO) in supervising the system and of industry in implementing the measures.		
31	29	Although the systems approach concept is described in ISPM 14 (*The use of integrated measures in a systems approach for pest risk management*) and operationalized for wood commodities in ISPM 39 (*International movement of wood*), the existing standards do not provide specific technical guidance on the types of phytosanitary measures that may be used to address the pest risks associated with wood commodities. The proposed standard (or annex) should provide specific technical guidance on the types of measures that may be used within a systems approach for wood, including the different wood species occurring world-wide and the major pest groups associated with these species. Different measures for different wood species shall be described~~controlled by the measures~~, and how to evaluate the efficacy or effectiveness of the individual measures as well as of the overall systems approach. The standard should provide guidance on the respective responsibilities of the national plant protection organization (NPPO) ~~in supervising the system and~~ of ~~industry in implementing the measures~~exporting countries to meet phytosanitary import requirements.	P	**EPPO** More precise *Category : TECHNICAL*
32	29	Although the systems approach concept is described in ISPM 14 (*The use of integrated measures in a systems approach for pest risk management*) and operationalized for wood commodities in ISPM 39 (*International movement of wood*), the existing standards do not provide specific technical guidance on the types of phytosanitary measures that may be used to address the pest risks associated with wood commodities. The proposed standard (or ~~annex)~~ annex to ISPM 39) should provide specific technical guidance on the types of measures that may be used within a systems approach for wood, the major pest groups controlled by the measures, and how to evaluate the efficacy or effectiveness of the individual measures as well as of the overall systems approach. The standard should provide guidance on the respective responsibilities of the national plant protection organization (NPPO) in supervising the system and of industry in implementing the measures.	P	**EPPO** If this is what is meant *Category : TECHNICAL*
33	29	~~Although the~~ The systems approach concept is described in ISPM 14 (*The use of integrated measures in a systems approach for pest risk management*) and operationalized for wood commodities in ISPM 39 (*International movement of wood*), the existing standards do not provide specific technical guidance on the	P	**EPPO** *Category : EDITORIAL*

		types of phytosanitary measures that may be used to address the pest risks associated with wood commodities. The proposed standard (or annex) should provide comprehensive and specific technical guidance on the types of measures that may be used within a systems approach for wood, the major pest groups controlled by the measures, and how to evaluate the efficacy or effectiveness of the individual measures as well as of the overall systems approach. The standard should provide guidance on the respective responsibilities of the national plant protection organization (NPPO) in supervising the system and of industry in implementing the measures.		
34	30	The standard (or annex) should provide guidance to NPPOs on the use, within the context of a systems approach, of specific phytosanitary measures that act independently but when applied together mitigate the quarantine pest risks associated with wood commodities. This guidance should be as specific as ~~possible~~possible for all types of wood (coniferous, tropical or temperate hardwoods), for example by focusing on pest groups associated with wood or on pests of specific areas within the wood. The standard should build upon guidance already established by the International Plant Protection Convention (IPPC) and should identify specific procedures and practices that may be practically applied during the production of wood commodities (from planting to export) to ~~control quarantine pests~~meet phytosanitary import requirements. The standard should also provide detailed guidance on the specific pests controlled by a combination of measures in a systems approach, and the monitoring and oversight required to ensure the effectiveness of the system.	P	**European Union** See our technical comment on the previous paragraph. *Category : TECHNICAL*
35	30	The standard (or annex) should provide guidance to NPPOs on the use, within the context of a systems approach, of specific phytosanitary measures that act independently but when applied together mitigate the quarantine pest risks associated with wood commodities. This guidance should be as specific as possible, for example by focusing on pest groups associated with wood or on pests of specific areas within the wood. The standard should build upon guidance already established by the International Plant Protection Convention (IPPC) and should identify specific procedures and practices that may be practically applied during the production of wood commodities (from planting to export) to control quarantine pests. The standard should also provide detailed guidance on the requirements to meet to provide assurance for a specific ~~pests~~ pest or pest group controlled by a combination of measures in a systems approach~~, and the~~ . The monitoring and oversight required to ensure the effectiveness of the ~~systems~~systems approach should also be described.	P	**New Zealand** Suggest re-wording of this paragraph as it is not clear whether it is describing the purpose or the tasks. e.g. the following sentence is confusing: "of specific phytosanitary measures that act independently but when applied together mitigate the quarantine pest risks associated with wood commodities". another example is that the para above discussed "major pest groups" wheras this para references "specific pests". *Category : TECHNICAL*

36	30	The standard (or annex) should provide guidance to NPPOs on the use, within the context of a systems approach, of specific phytosanitary measures that act independently but when applied together mitigate the quarantine pest risks associated with wood commodities. This guidance should be as specific as possible, for example by focusing on pest groups associated with wood or on pests of specific areas within the wood, or pests of specific types of wood commodities. The standard should build upon guidance already established by the International Plant Protection Convention (IPPC) and should identify specific procedures and practices that may be practically applied during the production of wood commodities (from planting to export) to control quarantine pests. The standard should also provide detailed guidance on the specific pests controlled by a combination of measures in a systems approach, and the monitoring and oversight required to ensure the effectiveness of the system.	P	**United States of America** Added for clarity *Category : EDITORIAL*
37	30	The standard (or annex) should provide guidance to NPPOs on the use, within the context of a systems approach, of specific phytosanitary measures that act independently ~~but~~ and when applied ~~together~~ together, mitigate the quarantine pest risks associated with wood commodities. This guidance should be as specific as possible, for example by focusing on pest groups associated with wood or on pests of specific areas within the wood. The standard should build upon guidance already established by the International Plant Protection Convention (IPPC) and should identify specific procedures and practices that may be practically applied during the production of wood commodities (from planting to export) to control quarantine pests. The standard should also provide detailed guidance on the specific pests controlled by a combination of measures in a systems approach, and the monitoring and oversight required to ensure the effectiveness of the system.	P	**United States of America** Suggest using the Glossary definition for SA here. *Category : EDITORIAL*
38	30	The standard (or annex) should provide guidance to NPPOs on the use, within the context of a systems approach, of specific phytosanitary measures that act independently but when applied together mitigate the quarantine pest risks associated with wood commodities. This guidance should be as specific as possible, for all types of wood (coniferous, tropical or temperate hardwoods), for example by focusing on pest groups associated with wood or on pests of specific areas within the wood. The standard should build upon guidance already established by the International Plant Protection Convention (IPPC) and should identify specific procedures and practices that may be practically applied during the production of wood commodities (from planting to export) ~~to control quarantine pests~~meet phytosanitary import requirements. The standard should also provide detailed guidance on the specific pests controlled by a combination of	P	**EPPO** More precise *Category : TECHNICAL*

		measures in a systems approach, and the monitoring and oversight required to ensure the effectiveness of the system.		
39	30	The standard (or annex) should provide guidance to NPPOs on the use, within the context of a systems approach, of specific phytosanitary measures that act independently but when applied together mitigate the quarantine pest risks associated with wood commodities. This guidance should be as specific as possible, for example by focusing on pest groups associated with wood or on pests of specific ~~areas~~ structures within the wood. The standard should build upon guidance already established by the International Plant Protection Convention (IPPC) and should identify specific procedures and practices that may be practically applied during the production of wood commodities (from planting to export) to control quarantine pests. The standard should also provide detailed guidance on the specific pests controlled by a combination of measures in a systems approach, and the monitoring and oversight required to ensure the effectiveness of the system.	P	**Colombia** Change the word "areas" with "structures". The term area can be confused with geographical region. The term "structures" is relevant to the context of the phrase. *Category : EDITORIAL*
Tasks				
40	32	The expert working group (EWG) should undertake the following tasks: (1) Consider what kind of "wood commodities" should be covered by the ISPM.	P	**Japan** Refer to the General comment. It should clarify the definition of "wood commodity" in the draft, if "wood commodities" is different from "wood". *Category : SUBSTANTIVE*
41	32	The expert working group (EWG) should undertake the following tasks: - Proper wood disposal and stockpiling.	P	**Colombia** Tasks should include the determination of phytosanitary measures related to the proper disposal and stockpiling of wood (period from harvest to mobilization outside the production site). It is necessary to include this task, due to the fact that one of the stages of greatest risk in this type of production system is the periods in which harvested wood is left in the production site without any type of protection or bio-security conditions. *Category : SUBSTANTIVE*
42	33	Consider existing ISPMs (e.g. No. 14 (*The use of integrated measures in a systems approach for pest risk management*~~)~~), No. 32 (*Categorization of commodities according to their pest risk),* and No. 39 (*International movement of wood*)) as well as any relevant regional standards, or accredited programmes based on systems approaches.	P	**New Zealand** ISPM 32 deserves specific mention here. This standard is already very useful in determining pest risk and level of regulation warranted for some processed wood products. *Category : TECHNICAL*
43	34	Describe the wood production practices and major pest groups associated with ~~the commodities covered by the standard~~wood commodities.	P	**European Union** *Category : EDITORIAL*

44	34	Describe the wood production practices and major pest groups associated with the commodities covered by the standard.	C	**European Union** Would this be more specific than what is already in ISPM 39? *Category : SUBSTANTIVE*
45	34	~~Describe~~ List and describe the wood production practices of all types of wood worldwide and major pest groups associated with the commodities covered by the standard.	P	**European Union** Listing should be included; different types of wood should be covered. *Category : TECHNICAL*
46	34	Describe the ~~wood~~ forest production ~~practices~~ systems, wood processing practices, supply chains and the major pest ~~groups~~groups or specific high risk pests associated with the commodities covered by the standard.	P	**New Zealand** *Category : TECHNICAL*
47	34	Describe the wood production practices and major pest groups associated with the commodities covered by the standard.	C	**EPPO** Would this be more specific than what is already in ISPM 39? *Category : TECHNICAL*
48	34	~~Describe~~ List and describe the wood production practices of all types of wood worldwide and major pest groups associated with ~~the commodities covered by the standard~~wood commodities.	P	**EPPO** More precise *Category : TECHNICAL*
49	34	Describe the wood production practices and major pest groups associated with the commodities covered by the standard.	P	**New Zealand** The subsequent numbering should be changed if the addition is accepted. *Category : EDITORIAL*
50	34	Describe the wood production practices and major pest groups associated with the commodities covered by the standard. (3) Describe the circumstances for use of a systems approach for wood commodities.	P	**New Zealand** Suggest to include this addition. *Category : TECHNICAL*
51	34	Describe the wood production and manufacture practices and major pest groups associated with the commodities covered by the standard.	P	**Nepal** *Category : SUBSTANTIVE*
52	35	Identify and provide specific guidance for NPPOs on possible phytosanitary measures ~~(e.g.~~ for all types of wood (coniferous, tropical or temperate hardwoods) and pest groups associated with wood or for pests of specific areas within the ~~wood)~~ wood that may be integrated into a systems approach to address the pest risks posed by wood commodities, considering the species and characteristics of the wood, the production processes and pests likely to be associated with the commodity. The measures may be applied during pre-harvest, harvest, ~~transportation of the raw material~~transportation, storage, processing, or at ~~export and import~~export, and may include:	P	**European Union** Different types of wood should be covered. We recommend deleting 'raw material' as it is not necessary to limit in this way. Storage should be added. In principle, systems approaches should be composed of the combination of phytosanitary measures that are possible to implement within the exporting country. However, where the exporting country proposes measures that should be implemented within the territory of importing country and the use of integrated measures in a systems approach for pest risk management, ISPM 14 International Plant Protection Convention ISPM 14-7 importing country agrees, measures within the importing country may be combined in systems approaches.

				Category : TECHNICAL
53	35	Identify and provide specific guidance for NPPOs on possible phytosanitary measures (e.g. for pest groups associated with wood or for pests of specific areas within the wood) that may be integrated into a systems approach to address the pest risks posed by wood commodities, considering the species and characteristics of the wood, the production processes and pests likely to be associated with the commodity. The measures may be applied during pre-harvest, harvest, transportation of the raw material, processing, or at export and import, and may include:	C	**New Zealand** Collectively the measures constitute an equivalent phytosanitary treatment. If the contributing parts are phytosanitary treatments in themselves one would not pragmatically add additional measures about that phytosanitary treatment which would add cost. *Category : TECHNICAL*
54	35	Identify and provide specific guidance for NPPOs on possible phytosanitary measures (e.g. for pest groups associated with wood or for pests of specific areas within the wood) that may be integrated into a systems approach to address the pest risks posed by wood commodities, considering the species and characteristics of the wood, the production processes and pests likely to be associated with the commodity. The measures may be applied during pre-harvest, harvest, storage, transportation of the raw material, processing, or at export and import, and may include:	P	**Japan** Add "storage" because the measures for raw materials and/or processed materials at the storage site is important for the pest risk management. *Category : TECHNICAL*
55	35	Identify and provide specific guidance for NPPOs on possible phytosanitary measures (e.g. for pest groups associated with wood or for pests of specific areas within the wood) that may be integrated into a systems approach to address the pest risks posed by wood commodities, considering the species and characteristics of the wood, the production processes and pests likely to be associated with the commodity. The measures may be applied during pre-harvest, harvest, transportation of the raw material, processing, or at export and import, and may ~~include~~include and not limited to:	P	**United States of America** There could be other important measures to consider and this additional wording will make it more inclusive. *Category : TECHNICAL*
56	35	Identify and provide specific guidance for NPPOs on possible phytosanitary measures (e.g. for pest groups associated with wood or for pests of specific areas within the wood) that may be integrated into a systems approach to address the pest risks posed by wood commodities, considering the species and characteristics of the wood, the production processes and pests likely to be associated with the commodity. The measures may be applied during pre-harvest, harvest, transportation of the raw material, processing, or at export and import, and may include:	C	**United States of America** Please consider shorter sentences for clarity and ease of reading in para 35.. *Category : EDITORIAL*
57	35	Identify and provide specific guidance for NPPOs on possible phytosanitary measures (e.g. for pest groups associated with wood or for pests of specific areas within the wood) that may be integrated into a systems approach to address the pest risks posed by wood commodities, considering the species and characteristics of	P	**EPPO** We recommend deleting 'raw material' as it is not necessary to limit in this way. We recommend deleting 'and import' as in principle, systems

		the wood, the production processes and pests likely to be associated with the commodity. The measures may be applied during pre-harvest, harvest, ~~transportation of the raw material~~transportation, processing, or at ~~export and import~~export, and may include:		approaches should be composed of the combination of phytosanitary measures that are possible to implement within the exporting country. However, where the exporting country proposes measures that should be implemented within the territory of importing country and the use of integrated measures in a systems approach for pest risk management, ISPM 14 International Plant Protection Convention ISPM 14-7 importing country agrees, measures within the importing country may be combined in systems approaches. *Category : TECHNICAL*
58	35	Identify and provide specific guidance for NPPOs on possible phytosanitary measures ~~(e.g.~~ for all types of wood (coniferous, tropical or temperate hardwoods) and pest groups associated with wood or for pests of specific areas within the ~~wood)~~ wood that may be integrated into a systems approach to address the pest risks posed by wood commodities, considering the species and characteristics of the wood, the production processes and pests likely to be associated with the commodity. The measures may be applied during pre-harvest, harvest, transportation of the raw material, storage, processing, or at export and import, and may include:	P	**EPPO** More precise and complete *Category : TECHNICAL*
59	36	selection of wood in terms of silviculture, species and place of origin	P	**United States of America** *Category : TECHNICAL*
60	36	selection of wood in terms of species and place of origin	C	**United States of America** Needs better clarification of the meaning *Category : EDITORIAL*
61	38	pest monitoring application of pest control with chemical or biological pesticides	P	**New Zealand** *Category : TECHNICAL*
62	38	pest monitoring	C	**United States of America** Pests present in the production area or in the wood itself after harvesting? *Category : TECHNICAL*
63	39	sorting of wood . prevention measures against infestation and contamination by pests at storage areas/sites	P	**Japan** Wood commodities may be stored at outdoor/indoor storage sites temporally or over a long period before export or moving to next process. Wood commodities are likely to be infested by pests during storage if no measures for prevention of its infestation and contamination is taken. It is one the important components of systems approach. *Category : TECHNICAL*

64	39	sorting of wood	C	**United States of America** what does this mean and which wood - type, origin, visible damage? *Category : TECHNICAL*
65	40	mechanical production processes such as debarking, sawing, planing, chipping etc.	P	**European Union** We suggest to add chipping. *Category : TECHNICAL*
66	40	~~mechanical production~~ physical (mechanical) processes such as debarking, sawing, ~~planing~~planning, etc.	P	**New Zealand** *Category : EDITORIAL*
67	40	mechanical production processes such as debarking, sawing, planing, chipping etc.	P	**EPPO** List more complete *Category : TECHNICAL*
68	41	sampling for testing and laboratory diagnostics	P	**European Union** Diagnostics is not a measure in itself. *Category : TECHNICAL*
69	41	laboratory diagnostics	C	**United States of America** Is this pest collection and identification? *Category : TECHNICAL*
70	41	sampling for testing and laboratory diagnostics	P	**EPPO** Diagnostics is not a measure in itself *Category : TECHNICAL*
71	42	~~application of phytosanitary treatments~~	P	**Colombia** In task No. 3 it is indicated that within the framework of the systems approach, "the application of phytosanitary treatments" could be included, which generates confusion. In the international phytosanitary context there are three types of mitigation measures: pest free areas, systems approach and quarantine treatments. If phytosanitary treatments are included as part of a systems approach, a double measure would be requested to mitigate the same pest, which is contrary to international phytosanitary standards. Regarding phytosanitary treatments, it is important that the IPPC indicates how phytosanitary treatments should be differentiated, which should be used as a single measure (Probit 9) and should be part of a systems approach. *Category : SUBSTANTIVE*
72	42	application of ~~phytosanitary~~ treatments	P	**Argentina** To avoid confusion with treatments as phytosanitary measures. *Category : TECHNICAL*
73	42	application of ~~phytosanitary~~ treatments	P	**Uruguay** To avoid confusion with treatments as phytosanitary measures *Category : TECHNICAL*

74	42	application of ~~phytosanitary~~ treatments	P	**COSAVE** To avoid confusion with treatments as phytosanitary measures. *Category : TECHNICAL*
75	43	other applicable tools and measures to address pest risks identified by pest risk analysis.	P	**European Union** 'Measures' should be added. *Category : TECHNICAL*
76	43	other applicable tools and measures to address pest risks identified by pest risk analysis.	P	**EPPO** More precise *Category : TECHNICAL*
77	43	other applicable tools to ~~address~~ manage pest risks identified by pest risk analysis.	P	**Argentina** For consistency. *Category : TECHNICAL*
78	43	other applicable tools to ~~address~~ manage pest risks identified by pest risk analysis.	P	**Uruguay** For consistency *Category : TECHNICAL*
79	43	other applicable tools to ~~address~~ manage pest risks identified by pest risk analysis.	P	**COSAVE** For consistency. *Category : TECHNICAL*
80	44	Consider the technical justification of the above-listed measures and combinations of the measures in systems approaches to manage pest risks. (5)Consider the relationship between infested areas and pest free areas and the general aspects (including the practical application) of surveillance within the systems approach.	P	**Japan** There is a concern whether the proposed measures in the systems approach are as effective as conventional chemical treatments. Since there is no scientific evidence indicated in the current proposal, the EWG should clarify the technical justification to apply the measures and combinations of the measures. *Category : SUBSTANTIVE*
81	44	Consider the relationship between infested areas and pest free areas and the general aspects (including the practical application) of surveillance within the systems approach. [44bis] Consider whether systems approach concepts in unmanaged forest ecosystems are practical.	P	**European Union** Considered to be an important task, which was missing. *Category : SUBSTANTIVE*
82	44	Consider the relationship between infested areas and pest free areas and the general aspects (including the practical application) of surveillance within the systems approach.	C	**European Union** Not clear, is it possible to explain clearer what is meant by 'relationship between infested areas and pest free areas' and to clarify what is the purpose of it ? *Category : TECHNICAL*
83	44	Consider the ~~relationship~~ differences between systems approaches for infested areas and pest free ~~areas~~ areas s and the general aspects (including the practical application) of surveillance within the systems approach.	P	**United States of America** For clarity. *Category : EDITORIAL*

84	44	Consider the relationship between infested areas and pest free areas and the general aspects (including the practical application) of surveillance within the systems approach. Consider whether systems approach concepts in unmanaged forest ecosystems is practical.	P	**EPPO** Important aspect to be considered *Category : TECHNICAL*
85	44	Consider the relationship between infested areas and pest free areas and the general aspects (including the practical application) of surveillance within the systems approach.	C	**EPPO** We believe the purpose of this task is not clear. Please clarify. *Category : SUBSTANTIVE*
86	44	Consider the ~~relationship between~~ infested areas and ~~pest free areas and~~ the general aspects (including the practical application) of surveillance within the systems approach.	P	**Colombia** Free areas is a different measure and is not part of the systems approach; therefore, it should not be included. *Category : SUBSTANTIVE*
87	44	Consider the relationship between infested areas and pest free areas or areas of low pest prevalence and the general aspects ~~(including~~ (including the practical application) of surveillance within the systems approach.	P	**New Zealand** Establishing that an area is low pest prevalence can be part of a systems approach when it is not possible to achieve area freedom. *Category : TECHNICAL*
88	44	Consider the relationship ~~between infested areas~~ among measures applied and ~~pest free areas and the general aspects (including the practical application) of~~ other applicable procedures such as surveillance within the systems approach.	P	**Argentina** A SA is developed in cases where pests are present in the area. Thus it is not clear why EGW should consider the relationship between infested and pest free area. *Category : TECHNICAL*
89	44	Consider the relationship ~~between infested areas~~ among measures applied and ~~pest free areas and the general aspects (including the practical application) of~~ other applicable procedures such as surveillance within the systems approach.	P	**Uruguay** A SA is developed in cases where pests are present in the area. Thus it is not clear why the EGW should consider the relationship between infested and pest free area. *Category : SUBSTANTIVE*
90	44	Consider the relationship ~~between infested areas~~ among measures applied and ~~pest free areas and the general aspects (including the practical application) of~~ other applicable procedures such as surveillance within the systems approach.	P	**COSAVE** A SA is developed in cases where pests are present in the area. Thus it is not clear why EGW should consider the relationship between infested and pest free area. *Category : TECHNICAL*
91	45	Consider ~~whether~~ how the intended use of the ~~commodity affects~~ commodities may affect pest ~~risk~~risks.	P	**European Union** *Category : EDITORIAL*
92	45	Consider ~~whether~~ how the intended use of the ~~commodity affects~~ commodities may affect pest ~~risk~~risks.	P	**EPPO** Improvement and coherent with ISPM 39 (section 3) *Category : EDITORIAL*

93	45	~~Consider whether the intended use of the commodity affects pest risk.~~	P	**Argentina** This is part of the pest risk assessment stage of PRA, and this draft relates to the pest risk management stage. *Category : TECHNICAL*
94	45	~~Consider whether the intended use of the commodity affects pest risk~~.	P	**Uruguay** This is part of the pest risk assessment stage of PRA, and this draft relates to the pest risk management stage. *Category : TECHNICAL*
95	45	~~Consider whether the intended use of the commodity affects pest risk.~~	P	**COSAVE** This is part of the pest risk assessment stage of PRA, and this draft relates to the pest risk management stage. *Category : TECHNICAL*
96	46	Describe procedures required to assess the effectiveness of the integrated measures as well as of the overall systems approach.	C	**United States of America** Should this be integrated measures? Or rather be individual measures *Category : TECHNICAL*
97	46	Describe procedures required to assess the ~~effectiveness~~ effectiveness/efficacy of the integrated measures as well as of the overall systems approach.	P	**New Zealand** *Category : EDITORIAL*
98	47	Describe the specific responsibilities of the NPPO of the exporting country, the NPPO of the importing country, and third parties.	C	**European Union** If 'third parties' include industry this should be made clearer. Unless this is clearly understood. *Category : TECHNICAL*
99	47	Describe the specific responsibilities of the NPPO of the exporting country, the NPPO of the importing country, and third parties.	C	**United States of America** Please give examples of third parties *Category : TECHNICAL*
100	47	Describe the specific responsibilities of the NPPO of the exporting country, the NPPO of the importing country, and third parties.	C	**EPPO** If 'third parties' include industry this should be made clearer. Unless this is clearly understood. *Category : TECHNICAL*
101	47	Describe the specific responsibilities and requirements of the NPPO of the exporting country, the NPPO of the importing country, and third parties.	P	**Nepal** *Category : SUBSTANTIVE*
102	49	Consider whether this topic should be a standard or an annex to an existing standard (i.e. ISPM 39).	C	**European Union** It seems that the topic is closely connected with ISPM 39. We would expect it to be an annex, since the ISPM already has a section on SA. *Category : TECHNICAL*
103	49	Consider whether this topic should be a standard or an annex to an existing standard (i.e. ISPM 39).	C	**EPPO** We consider the topic closely connected with ISPM 39 and would expect it to be an annex of it, also considering that this ISPM already has a section on System Approaches. *Category : SUBSTANTIVE*
104	49	Consider whether this topic should be a standard or an annex to an existing standard (i.e. ~~ISPM 39)~~ISPM No. 39 or No. 14).	P	**New Zealand** *Category : TECHNICAL*

105	50	~~Consider whether the ISPM could affect in a specific way (positively or negatively) the protection of biodiversity and the environment; if this is the case, the impact should be identified, addressed and clarified in the draft ISPM.~~	P	**New Zealand** *Category : TECHNICAL*
106	50	Consider whether the ISPM could affect in a specific way (positively or negatively) the protection of biodiversity and the environment; if this is the case, the impact should be identified, addressed and clarified in the draft ISPM.	C	**New Zealand** To delete. Suggest this should be out of scope for this standard as this would be addressed by pest risk analysis. *Category : TECHNICAL*
107	51	Consider the implementation of the ISPM by contracting parties and identify potential operational and technical implementation issues. Provide information and possible recommendation on these issues to the Standards Committee and to the Implementation and Capacity Development Committee.	P	**European Union** Important addition. *Category : SUBSTANTIVE*
108	51	Consider the implementation of the ISPM by contracting parties and identify potential operational and technical implementation issues. Provide information and possible recommendation on these issues to the Standards Committee and to the Implementation and Capacity Development Committee.	P	**EPPO** Important addition *Category : SUBSTANTIVE*
Expertise				
109	59	~~Five~~ Seven to ~~seven~~ ten experts with collective expertise in the following areas:	P	**European Union** The tasks are so large and the expertise needed quite extensive that a small group will not be qualified enough to cover it. *Category : SUBSTANTIVE*
110	59	Five to seven experts with collective expertise in the following areas:	C	**United States of America** Consider 1. Experts in trade of wood commodities, 2. Experts in production processes and harvesting of wood commodities. *Category : SUBSTANTIVE*
111	59	~~Five~~ Seven to ~~seven~~ ten experts with collective expertise in the following areas:	P	**EPPO** The tasks are so large and the expertise needed quite extensive that a small group will not be qualified enough to cover it. *Category : SUBSTANTIVE*
112	60	development or implementation of phytosanitary measures that ~~are~~ can be integrated into a systems ~~approaches~~ approach for managing pest ~~risk~~risks associated with wood commodities there-by creating a system that is equivalent to a given phytosanitary treatment	P	**New Zealand** *Category : TECHNICAL*
113	60	development and documentation or implementation of phytosanitary measures that are integrated into systems approaches for managing pest risk	P	**New Zealand** *Category : TECHNICAL*
114	63	conduct and design of pest surveys, ~~preferably~~ and surveillance in ~~silviculture~~forest production systems	P	**New Zealand** *Category : TECHNICAL*
115	64	pest risk analysis of pests associated with wood ~~commodities~~commodities including evaluation of quantitative or qualitative efficacy of measures	P	**New Zealand** *Category : TECHNICAL*

116	65	~~understanding~~ the management of ~~temperate~~ natural and ~~tropical forestry silviculture and~~ plantation forest with particular knowledge of forest pests, production systems, silviculture, harvesting and supply chains.	P	**New Zealand** *Category : TECHNICAL*
117	65	understanding of temperate and tropical forestry silviculture and production systems and sustainable management of forested systems..	P	**United States of America** Important part of production systems. *Category : TECHNICAL*
118	65	understanding of temperate and tropical forestry silviculture and production systems. - Wood technology	P	**Colombia** Experts in wood technology are required so that the effect of the proposed measures on wood characteristics and quality can be evaluated in the framework of the systems approach. *Category : SUBSTANTIVE*
119	65	understanding of temperate and tropical forestry silviculture and production systems. - Eco-friendly production and manufacture	P	**Nepal** *Category : SUBSTANTIVE*
Participants				
120	67	In addition to these experts, a member of the Technical Panel on Forest Quarantine with the equivalent expertise to the one described above should be invited to participate at the EWG meeting or meetings, or part of the meeting or meetings, as an invited expert.	P	**Argentina** TPFQ expert should have equivalent expertise otherwise should not be invited. *Category : TECHNICAL*
121	67	In addition to these experts, a member of the Technical Panel on Forest Quarantine with equivalent expertise to the one described above should be invited to participate at the EWG meeting or meetings, or part of the meeting or meetings, as an invited expert.	P	**Uruguay** TPFQ expert should have equivalent expertise otherwise should not be invited. *Category : TECHNICAL*
122	67	In addition to these experts, a member of the Technical Panel on Forest ~~Quarantine~~Quarantine with the equivalent expertise to the one described about should be invited to participate at the EWG meeting or meetings, or part of the meeting or meetings, as an invited expert.	P	**COSAVE** TPFQ expert should have equivalent expertise otherwise should not be invited. *Category : TECHNICAL*
References				
123	70	**ISPM 14.** 2017. *The use of integrated measures in a systems approach for pest risk management*. Rome, IPPC, FAO. **ISPM 32.** 2009. *Categorization of commodities according to their pest risk*. Rome, IPPC, FAO	P	**New Zealand** The risk categorisation of wood products in this standard is important to the proposed ISPM. *Category : TECHNICAL*
