

2020 FIRST CONSULTATION

1 July – 30 September 2020

Compiled comments for Draft PT: Irradiation Treatment for Tortricidae on fruits (2017-011)

Summary of comments

Name	Summary
Cuba	No hay comentarios al documento propuesto.
European Union	The comments have been introduced by the European Commission on behalf of the European Union and its Member States.
Myanmar	Agree with the document
OIRSA	Revisión Completa
Viet Nam	Viet Nam would like to support agreement with this draft

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

FAO sequential number	Para	Text	T	Comment
1	G	(General Comment)	C	Guyana Guyana has no reservation regarding the draft document at this point. <i>Category : SUBSTANTIVE</i>
2	G	(General Comment)	C	Australia Australia has reviewed this phytosanitary treatment and is supportive of this treatment and the respective text. <i>Category : TECHNICAL</i>
3	G	(General Comment)	C	China More evidences for tolerance comparing or large-scale confirmatory trails on Tortricidae species are recommended to be done for this PT. This is a general standard for the family Tortricidae, but currently only Grapholita molesta has been conducting the large-scale confirmatory tests, more species should be tested to support the generic dose defined in this standard. <i>Category : SUBSTANTIVE</i>
4	G	(General Comment)	C	Costa Rica I agree with the draft. No comments <i>Category : SUBSTANTIVE</i>
5	G	(General Comment)	C	Paraguay Paraguay agrees with Cosave's comments <i>Category : TECHNICAL</i>
6	G	(General Comment)	C	Argentina We have no comments on this phytosanitary treatment <i>Category : SUBSTANTIVE</i>

7	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>
8	G	(General Comment)	C	OIRSA Sin comentarios trascendentales para este documento. <i>Category : SUBSTANTIVE</i>
9	G	(General Comment)	C	Barbados Barbados has no changes to make to this draft ISPM . <i>Category : SUBSTANTIVE</i>
10	G	(General Comment)	C	European Union The comments by the EU are provided without prejudice to the European Union food safety legislation imposing limitations on the acceptance of irradiated goods. <i>Category : SUBSTANTIVE</i>
11	G	(General Comment)	C	Mexico I support the document as it is and I have no comments <i>Category : SUBSTANTIVE</i>
12	G	(General Comment)	C	Uruguay We agree with the document as it is <i>Category : TECHNICAL</i>
13	G	(General Comment)	C	Qatar We don't have any comment <i>Category : SUBSTANTIVE</i>
14	G	(General Comment)	C	Malawi we agree with draft annex <i>Category : SUBSTANTIVE</i>
15	G	(General Comment)	C	Thailand Thailand has no objection on the proposed draft Irradiation treatment for Tortricidae on fruits. <i>Category : SUBSTANTIVE</i>
16	G	(General Comment)	C	Singapore Singapore is supportive of this. <i>Category : EDITORIAL</i>
DRAFT ANNEX TO ISPM 28: Irradiation treatment for Tortricidae on fruits (2017-011)				
17	1	DRAFT ANNEX TO ISPM 28: Irradiation treatment for Tortricidae on fruits (2017-011)	C	Nepal We don't have any comments to this document <i>Category : EDITORIAL</i>
18	1	DRAFT ANNEX TO ISPM 28: Irradiation treatment for Tortricidae on fruits (2017-011)	C	Viet Nam Viet Nam would like to support agreement with this draft <i>Category : SUBSTANTIVE</i>
19	24	The scope of phytosanitary treatments does not include issues related to pesticide registration or other domestic requirements for contracting parties' approval of treatments. Treatments adopted by the Commission on Phytosanitary Measures may not provide information on specific effects on human health or food safety, which should be addressed using domestic procedures before contracting parties approve a treatment. In addition,	C	Panama The version in spanish change the word "Consideration" to the word "test". Its important to maintain the correlation between words in all the languages. <i>Category : TRANSLATION</i>

		potential effects of treatments on product quality are considered for some host commodities before their international adoption. However, evaluation of any effects of a treatment on the quality of commodities may require additional consideration. There is no obligation for a contracting party to approve, register or adopt the treatments for use in its territory.		
Treatment schedule				
20	32	Minimum absorbed dose of 250 Gy to prevent emergence of viable adults from irradiated eggs and larvae of Tortricidae.	C	Egypt Referring to a scientific review would be a good credit for reliability of the data provided <i>Category : TECHNICAL</i>
21	33	There is 95% confidence that the treatment according to this schedule prevents the emergence of normal-looking <u>and fertile</u> adults from not less than 99.9949% of eggs and larvae of Tortricidae.	P	China The Adults should be abnormal-looking and sterile, so that the efficacy for phytosanitary treatment can be guaranteed. <i>Category : SUBSTANTIVE</i>
22	35	This treatment should not be applied to fruit stored in a modified atmosphere because the modified atmosphere may affect the treatment efficacy.	P	PPPO Modified Atmospheric Packaging (MAP) that ensue low oxygen conditions are banned by IPPC for irradiated produce. But this doesn't seem to have enough scientific evidence, as per Follett & Neven 2018. <i>Category : TECHNICAL</i>
Other relevant information				
23	40	The TPPT also considered Arthur (2004), Arthur <i>et al.</i> (2016a, b), Batchelor <i>et al.</i> (1984), Bestagno <i>et al.</i> (1973), Burditt (1986), Burditt and Hungate (1989), Burditt and Moffitt (1985), Dentener <i>et al.</i> (1990), Faria <i>et al.</i> (1998), Follett (2008), Follett and Lower (2000), Follett and Snook (2012), Hallman (2004), Hallman <i>et al.</i> (2013), Hofmeyr <i>et al.</i> (2016a, b), Lester and Barrington (1997), Lin <i>et al.</i> (2003), Mansour (2003), Mansour and Al-Attar (2014), Nadal-Nadel et al. (2018) and Wit and van de Vrie (1986).	P	European Union Typo: see [65]. <i>Category : EDITORIAL</i>
24	40	The TPPT also considered Arthur (2004), Arthur <i>et al.</i> (2016a, b), Batchelor <i>et al.</i> (1984), Bestagno <i>et al.</i> (1973), Burditt (1986), Burditt and Hungate (1989), Burditt and Moffitt (1985), Dentener <i>et al.</i> (1990), Faria <i>et al.</i> (1998), Follett (2008), Follett and Lower (2000), Follett and Snook (2012), Hallman (2004), Hallman et al. (2013) , Hofmeyr <i>et al.</i> (2016a, b), Lester and Barrington (1997), Lin <i>et al.</i> (2003), Mansour (2003), Mansour and Al-Attar (2014), Nadal <i>et al.</i> (2018) and Wit and van de Vrie (1986).	P	European Union This reference is already included in [38] and [40] begins with: "The TPPT also considered...". <i>Category : EDITORIAL</i>
25	40	The TPPT also considered Arthur (2004), Arthur <i>et al.</i> (2016a, b), Batchelor <i>et al.</i> (1984), Bestagno <i>et al.</i> (1973), Burditt (1986), Burditt and Hungate (1989), Burditt and Moffitt (1985), Dentener <i>et al.</i> (1990), Faria <i>et al.</i> (1998), Follett (2008), Follett and Lower (2000), Follett and Snook (2012), Hallman (2004), Hallman et al. (2013) , Hofmeyr <i>et al.</i> (2016a, b), Lester and Barrington (1997), Lin <i>et al.</i> (2003), Mansour (2003), Mansour and Al-Attar (2014), Nadal-Nadel et al. (2018) and Wit and van de Vrie (1986).	P	EPPO This reference is already included in [38] and [40] begins with: "The TPPT also considered...". Typo: see [65]. <i>Category : EDITORIAL</i>

26	41	Extrapolation of treatment efficacy to all fruits was based on knowledge and experience that radiation dosimetry systems measure the actual radiation dose absorbed by the target pest independent of host commodity, and evidence from research studies on a variety of pests and commodities as listed in the references. It is recognized, however, that treatment efficacy has not been tested for all potential fruit hosts-pest species of the target pestfamily . If evidence becomes available to show that the extrapolation of the treatment to cover all fruit hosts of Tortricidae is incorrect, then the treatment will be reviewed.	P	China We should focus on research on the radio-tolerance of the target pest, which is not affected by the host plants. Category : <i>SUBSTANTIVE</i>
27	41	Extrapolation of treatment efficacy to all fruits was based on knowledge and experience that radiation dosimetry systems measure the actual radiation dose absorbed by the target pest independent of host commodity, and evidence from research studies on a variety of pests and commodities as listed in the references. It is recognized, however, that treatment efficacy has not been tested for all potential fruit hosts of the target pest. If evidence becomes available to show that the extrapolation of the treatment to cover all fruit hosts of Tortricidae is incorrect, then the treatment will be reviewed.	C	Botswana agreed Category : <i>SUBSTANTIVE</i>
28	41	Extrapolation of treatment efficacy to all fruits was based on knowledge and experience that radiation dosimetry systems measure the actual radiation dose absorbed by the target pest independent of host commodity, and evidence from research studies on a variety of pests and commodities as listed in the references. It is recognized, however, that treatment efficacy has not been tested for all potential fruit hosts of the target pest. If evidence becomes available to show that the extrapolation of the treatment to cover all fruit hosts of Tortricidae is incorrect, then the treatment will be reviewed.	C	Malawi There is need to relook at this statement so that it is not challenged scientifically Category : <i>SUBSTANTIVE</i>
References				
29	59	Hofmeyr, H., Hofmeyr, M. & Slabbert, K. 2016a. Postharvest phytosanitary disinfection of <i>Thaumatotibia leucotreta</i> (Lepidoptera: Tortricidae) in citrus fruit: Tolerance of eggs and larvae to ionizing radiation. <i>Florida Entomologist</i>, 99: 48–53.	P	European Union Moved after [60]: alphabetical order. Category : <i>EDITORIAL</i>
30	59	Hofmeyr, H., Hofmeyr, M. & Slabbert, K. 2016a. Postharvest phytosanitary disinfection of <i>Thaumatotibia leucotreta</i> (Lepidoptera: Tortricidae) in citrus fruit: Tolerance of eggs and larvae to ionizing radiation. <i>Florida Entomologist</i>, 99: 48–53.	P	EPPO Moved after [60]: alphabetical order. Category : <i>EDITORIAL</i>
31	60	Hofmeyr, H., Hattingh, V., Hofmeyr, M. & Slabbert, K. 2016b 2016a. Postharvest phytosanitary disinfection of <i>Thaumatotibia leucotreta</i> (Lepidoptera: Tortricidae) in citrus fruit: Validation of an ionizing radiation treatment. <i>Florida Entomologist</i> , 99: 54–58. Hofmeyr, H., Hofmeyr, M. & Slabbert, K. 2016b.	P	European Union Moved from [59]: alphabetical order. Category : <i>EDITORIAL</i>

		Postharvest phytosanitary disinfection of <i>Thaumatotibia leucotreta</i> (Lepidoptera: Tortricidae) in citrus fruit: Tolerance of eggs and larvae to ionizing radiation. <i>Florida Entomologist</i>, 99: 48–53.		
32	60	Hofmeyr, H., Hattingh, V., Hofmeyr, M. & Slabbert, K. 2016b 2016a . Postharvest phytosanitary disinfection of <i>Thaumatotibia leucotreta</i> (Lepidoptera: Tortricidae) in citrus fruit: Validation of an ionizing radiation treatment. <i>Florida Entomologist</i> , 99: 54–58. Hofmeyr, H., Hofmeyr, M. & Slabbert, K. 2016b . Postharvest phytosanitary disinfection of <i>Thaumatotibia leucotreta</i> (Lepidoptera: Tortricidae) in citrus fruit: Tolerance of eggs and larvae to ionizing radiation. <i>Florida Entomologist</i>, 99: 48–53.	P	EPPO Moved from [59]: alphabetical order. Category : EDITORIAL