

**Addendum 1: EPPO comments for 2020 Second Consultation: CPM Recommendation on Safe provision of food and other aid (2018-026) OCS by 2020/9/30**

**AGREED BY THE EPPO PANEL ON GLOBAL PHYTOSANITARY AFFAIRS**

**Summary**

Para	Text	Comment
G	(General Comment)	<p><i>Category : SUBSTANTIVE</i></p> <p><b>EPPO</b></p> <p>We have concerns in relation to the implications of this Recommendation. It clearly includes aspects which tend to extend the scope of the IPPC – both in terms of what it covers (some non-plant pests) and the ability under the Convention to take action against non-plant pests.</p> <p>Reference to anything beyond the competence of the IPPC should not be included (e.g. animal health).</p> <p>The appendixes are not finalized and need further work.</p>
1	<b>DRAFT CPM RECOMMENDATION: Safe provision of food and other <u>humanitarian</u> aid to prevent the introduction of plant pests during an emergency situation (2018-026)</b>	<p><i>Category : EDITORIAL</i></p> <p><b>EPPO</b></p> <p>Global change. For consistency need to refer to 'food and other humanitarian' aid. This then matches the first line in the recommendations section.</p>
24	The provision of food and other aid assists areas or countries that are at risk of food and economic insecurity as a result of war and conflict, crop failures, and natural disasters including storms, earthquakes, tsunamis and volcanic eruptions. Assistance can be urgent and short-term, or ongoing over the long term. The driver for this recommendation is <u>the</u> provision of urgent, disaster-relief assistance, but the principles of phytosanitary preparedness and response apply equally to the provision of ongoing aid.	<p><i>Category : EDITORIAL</i></p> <p><b>EPPO</b></p> <p>Better English.</p>
25	There has been a significant increase in severe weather events which may be attributed to climate change, as well as human-induced and natural disasters that have precipitated the urgent need for food, water and machinery to prevent or ameliorate humanitarian crises. For example, Tonga has experienced three category 4 cyclones and one category <del>5 (Cyclone Ian)</del> 5 since 2010, while the Pacific region as a whole is increasingly experiencing damaging storms and storm surges.	<p><i>Category : EDITORIAL</i></p> <p><b>EPPO</b></p> <p>Unnecessary text - The other cyclones are not named.</p>

	These events are not limited to developing countries or the Pacific region, and have occurred in all regions of the world.	
25	There has been a significant increase in severe weather events which may be attributed to climate change, as well as human-induced and natural disasters that have precipitated the urgent need for food, water and machinery to prevent or <del>ameliorate-mitigate</del> humanitarian crises. For example, Tonga has experienced three category 4 cyclones and one category 5 (Cyclone Ian) since 2010, while the Pacific region as a whole is increasingly experiencing damaging storms and storm surges. These events are not limited to developing countries or the Pacific region, and have occurred in all regions of the world.	<p><i>Category : EDITORIAL</i></p> <p><b>EPPO</b></p> <p>Better wording.</p>
26	In providing aid, donors should be aware that the provision of aid supplies, unless appropriately prepared to meet the phytosanitary requirements of the recipient country, can in itself cause <del>long-standing</del> <u>long-term</u> damage to <del>the recipients of the aid</del> . There are a number of examples of long-term impacts on the economy, environment and communities from pests introduced with aid, long after the country has recovered from the emergency situation. This should be considered by donors when preparing aid. National plant protection organizations (NPPOs) are impacted by these emergency situations, but are still bound by their role to manage effectively the risk posed by pests associated with imports of relief supplies received in the aftermath of such disasters. For example, crops and grain provided as food aid may be infested with quarantine pests.	<p><i>Category : EDITORIAL</i></p> <p><b>EPPO</b></p> <p>To shorten and add clarity.</p>
26	In providing aid, donors should be aware that the provision of aid supplies, unless appropriately prepared to meet the phytosanitary requirements of the recipient country, can in itself cause long-standing damage to the recipients of the aid. There are a number of examples of long-term impacts on the economy, environment and communities from pests introduced with aid, long after the country has recovered from the emergency situation. This should be considered by donors when preparing aid. National plant protection organizations (NPPOs) are impacted by these emergency situations, but are still bound by their role to manage effectively the risk posed by pests associated with imports of relief supplies received in the aftermath of such disasters. For example,	<p><i>Category : SUBSTANTIVE</i></p> <p><b>EPPO</b></p> <p>Important requirement to be recalled in consistency with the first sentence of the paragraph.</p>

	crops and grain provided as food aid may be infested with quarantine <del>pests</del> <u>pests and should therefore meet the phytosanitary import requirements of the recipient country.</u>	
26	In providing aid, donors should be aware that the provision of aid supplies, unless appropriately prepared to meet the phytosanitary requirements of the recipient country, can in itself cause long-standing damage to the <del>recipients of the aid</del> <u>aid recipients</u> . There are a number of examples of long-term impacts on the economy, environment and communities from pests introduced with aid, long after the country has recovered from the emergency situation. This should be considered by donors when preparing aid. National plant protection organizations (NPPOs) are impacted by these emergency situations, but are still bound by their role to manage effectively the risk posed by pests associated with imports of relief supplies received in the aftermath of such disasters. For example, crops and grain provided as food aid may be infested with quarantine pests.	<i>Category : EDITORIAL</i> <b>EPPO</b> Better wording?
26	In providing aid, donors should be aware that the provision of aid supplies, unless appropriately prepared to meet the phytosanitary <u>import</u> requirements of the recipient country, can in itself cause long-standing damage to the recipients of the aid. There are a number of examples of long-term impacts on the economy, environment and communities from pests introduced with aid, long after the country has recovered from the emergency situation. This should be considered by donors when preparing aid. National plant protection organizations (NPPOs) are impacted by these emergency situations, but are still bound by their role to manage effectively the risk posed by pests associated with imports of relief supplies received in the aftermath of such disasters. For example, crops and grain provided as food aid may be infested with quarantine pests.	<i>Category : TECHNICAL</i> <b>EPPO</b> Please see ISPM 5 (Glossary of phytosanitary terms).
27	It can be difficult to manage pest risk effectively during an emergency situation. Authorities may demand that relief supplies are cleared without inspection by the NPPO and provided to those in need, even when it is clear that they would, <del>under normal risk-based clearance processes,</del> pose a pest risk that would require a treatment to address it, or would otherwise be re-exported or <del>destroyed</del> <u>destroyed under normal, risk-based</u>	<i>Category : EDITORIAL</i> <b>EPPO</b> They still pose a risk outside of this scenario if just phytosanitary measure cannot be applied to mitigate it on arrival.

	<p><u>clearance processes</u>. Mixed consignments in shipping or air containers, which have a range of goods and pose various pest risks, can experience delays in clearance and release as they need to be fully unpacked to verify whether they pose a pest risk. Damaged infrastructure may prevent the application of treatments to mitigate pest risks identified, and normal procedures to manage the risk associated with diversion from intended use may be similarly impacted. Re-export may not be an option either, leaving the NPPO to deal with the pest risk.</p>	
27	<p>It can be difficult to manage pest risk effectively during an emergency situation. Authorities may demand that relief supplies are cleared without inspection by the NPPO and provided to those in need, even when it is clear that they <del>would</del><u>could</u>, under normal risk-based clearance processes, pose a pest risk that would require a treatment to address it, or would otherwise be re-exported or destroyed. Mixed consignments in shipping or air containers, which have a range of goods and pose various pest risks, can experience delays in clearance and release as they need to be fully unpacked to verify whether they pose a pest risk. Damaged infrastructure may prevent the application of treatments to mitigate pest risks identified, and normal procedures to manage the risk associated with diversion from intended use may be similarly impacted. Re-export may not be an option either, leaving the NPPO to deal with the pest risk.</p>	<p><i>Category : EDITORIAL</i>  <b>EPPO</b>                  More appropriate.</p>
27	<p>It can be difficult to manage pest risk effectively during an emergency situation. Authorities may demand that relief supplies are cleared without inspection by the NPPO and provided to those in need, even when it is clear that they would, under normal risk-based clearance processes, pose a pest risk that would require a treatment to address it, or would otherwise be re-exported or destroyed. Mixed consignments in shipping or air containers, which have a range of goods and pose various pest risks, can experience delays in clearance and release as they need to be fully unpacked to verify whether they pose a pest risk. Damaged infrastructure may prevent the application of treatments to mitigate pest risks identified, and normal procedures to manage the risk associated with diversion from intended use may be similarly impacted. Re-export may not be an option either, leaving the NPPO to deal with the <u>unmanaged</u> pest risk.</p>	<p><i>Category : EDITORIAL</i>  <b>EPPO</b>                  Clearer, precision given.</p>

27	<p>It can be difficult to manage pest risk effectively during an emergency situation. Authorities may demand that relief supplies are cleared without inspection by the NPPO and provided to those in need, even when it is clear that they would, under normal risk-based clearance processes, pose a pest risk that would require a treatment to address it, or would otherwise be re-exported or destroyed. Mixed consignments in shipping or air containers, which have a range of goods and pose various pest risks, can experience delays in clearance and release as they need to be fully unpacked to verify whether they pose a pest risk. Damaged infrastructure may prevent the application of treatments to mitigate pest risks identified, and normal procedures to manage the <u>pest</u> risk associated with diversion from intended use may be similarly impacted. Re-export may not be an option either, leaving the NPPO to deal with the pest risk.</p>	<p><i>Category : TECHNICAL</i>  <b>EPPO</b>  Exact wording (please see ISPM 5).</p>
27	<p>It can be difficult to manage pest risk effectively during an emergency situation. Authorities may demand that relief supplies are cleared without inspection by the NPPO and provided to those in need, even when it is clear that they would, under normal risk-based clearance processes, pose a pest risk that would require a treatment to address it, or would otherwise be re-exported or destroyed. Mixed consignments in shipping or air containers, which have a range of goods and pose various pest risks, can experience delays in clearance and release as they need to be fully unpacked to verify whether they pose a pest risk. Damaged infrastructure may <u>prevent-impede</u> the application of treatments to mitigate pest risks identified, and normal procedures to manage the risk associated with diversion from intended use may be similarly impacted. Re-export may not be an option either, leaving the NPPO to deal with the pest risk.</p>	<p><i>Category : EDITORIAL</i>  <b>EPPO</b>  Better wording.</p>
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	<p>risks, can experience delays in clearance and release as they need to be fully unpacked to <del>verify whether they pose a pest risk</del><u>be inspected</u>.</p> <p>Damaged infrastructure may prevent the application of treatments to mitigate pest risks identified, and normal procedures to manage the risk associated with diversion from intended use may be similarly impacted. Re-export may not be an option either, leaving the NPPO to deal with the pest risk.</p>	
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27	<p>It can be difficult to manage pest risk effectively during an emergency situation. Authorities may demand that relief supplies are cleared without inspection by the NPPO and provided to those in need, even when it is clear that they would, under normal risk-based clearance processes, <u>be assessed to</u> pose a pest risk that would require a treatment to address it, or would otherwise be re-exported or destroyed. Mixed consignments in shipping or air containers, which have a range of goods and pose various pest risks, can experience delays in clearance and release as they need to be fully unpacked to verify whether they pose a pest risk. Damaged infrastructure may prevent the application of treatments to mitigate pest risks identified, and normal procedures to manage the risk associated with diversion from intended use may be similarly impacted. Re-export may not be an option either, leaving the NPPO to deal with the pest risk.</p>	<p>Category : EDITORIAL  <b>EPPO</b>                  Clearer.</p>
28	<p>National plant protection organizations acknowledge and appreciate the aid from other countries and international organizations. However, to</p>	<p>Category : EDITORIAL  <b>EPPO</b>                  For consistency.</p>

	help minimize any unintended phytosanitary consequences of such aid, this Commission on Phytosanitary Measures (CPM) recommendation is intended to provide clear guidance to donor and recipient countries on the effective management of pest risk associated with commonly provided food and other <del>supplies</del> humanitarian aid.	
28	National plant protection organizations acknowledge and appreciate the aid from other countries and international organizations. However, to help minimize any unintended phytosanitary consequences of such aid, this Commission on Phytosanitary Measures (CPM) recommendation is intended to provide clear guidance <del>to donor and recipient countries</del> on the effective management of pest risk associated with commonly provided food and other supplies.	<i>Category : EDITORIAL</i> <b>EPPO</b> This is covered by the following section 'Addressed to' but if this text is to be retained it needs to mirror what is included in this section.
28	<del>National plant protection organizations</del> <u>NPPOs</u> acknowledge and appreciate the aid from other countries and international organizations. However, to help minimize any unintended phytosanitary consequences of such aid, this Commission on Phytosanitary Measures (CPM) recommendation is intended to provide clear guidance to donor and recipient countries on the effective management of pest risk associated with commonly provided food and other supplies.	<i>Category : EDITORIAL</i> <b>EPPO</b> Acronym already used in [26] and [27].
30	Contracting parties, donor agencies and organizations, food aid agencies, regional plant protection organizations, individuals, non-governmental organizations, <u>forwarding agencies</u> , customs <del>and forwarding and other relevant government agencies</del> <u>and defence agencies</u> .	<i>Category : EDITORIAL</i> <b>EPPO</b> Customs are government agencies. Defence agencies are other 'relevant government agencies.'
32	The Commission notes that countries receiving food and other humanitarian aid may be exposed to pests that, unless managed appropriately, may become established and have an impact on the economy, environment and communities long after recovery from the emergency situation. Commonly provided aid includes food (fresh and processed plant products), water, building materials, planting materials (seeds, plants for planting), <u>vehicles, machinery and equipment, and personnel effects of</u> support personnel (e.g. volunteers), <del>vehicles, machinery and equipment</del> .	<i>Category : SUBSTANTIVE</i> <b>EPPO</b> Precision given (see [181]) and more logical order.
32	The Commission notes that countries receiving food and other humanitarian aid may be exposed to pests that, unless managed appropriately, may become established and have an impact on the	<i>Category : TECHNICAL</i> <b>EPPO</b> According to ISPM 5, fruits and vegetables are "plants" and seeds are "plants for planting".

	economy, environment and communities long after recovery from the emergency situation. Commonly provided aid includes food (fresh and processed <u>plants and</u> plant products), water, building materials, planting materials ( <del>seeds,</del> <u>seeds and other</u> plants for planting), support personnel (e.g. volunteers), vehicles, machinery and equipment.	
32	The Commission notes that countries receiving food and other humanitarian aid may be exposed to <u>the entry of</u> pests that, unless managed appropriately, may become established <u>in their territory</u> and have an impact on the economy, environment and communities long after recovery from the emergency situation. Commonly provided aid includes food (fresh and processed plant products), water, building materials, planting materials (seeds, plants for planting), support personnel (e.g. volunteers), vehicles, machinery and equipment.	<i>Category : TECHNICAL</i> <b>EPPO</b> More precise wording.
34	<i>develop and maintain</i> an emergency response plan and <i>undertake</i> preparedness activities to reduce the risk of introduction of regulated pests with food and other humanitarian aid <del>that may be provided to them</del> in the event of an emergency or disaster	<i>Category : EDITORIAL</i> <b>EPPO</b> Useless words and "to them" does not refer to anything.
36	<i>use</i> the guidance available in adopted <del>ISPMs</del> <u>International Standards for Phytosanitary Measures</u> (e.g. ISPM 32 ( <i>Categorization of commodities according to their pest risk</i> )) along with the general guidance in Appendices 1, 2 and 3 to identify measures that could be applied to food and other aid to prevent the international movement of pests that may be associated with them	<i>Category : EDITORIAL</i> <b>EPPO</b> First time this acronym is used.
38	<i>encourage</i> <del>the</del> pre-dispatch treatment, treatment during transit or pre-clearance of <del>food, other aid</del> <u>food</u> and <del>personnel</del> <u>other humanitarian aid</u> to expedite clearance	<i>Category : EDITORIAL</i> <b>EPPO</b> Simplification for better understanding (please see comment in [32]). Also you can't really apply a pre-dispatch treatment to somebody!
38	<i>encourage</i> the pre-dispatch treatment, treatment during transit or pre-clearance of food, other aid and personnel to expedite <del>clearance</del> <u>clearance in the receiving country</u> .	<i>Category : EDITORIAL</i> <b>EPPO</b> For better clarity.
39	<i>establish</i> mechanisms for providing information to potential donors, aid agencies, importers and exporters to reduce the <del>movement, in an emergency,</del> <u>movement</u> of goods posing a pest <del>risk</del> <u>risk during emergencies</u> .	<i>Category : EDITORIAL</i> <b>EPPO</b> Clearer.



44	<b>COMMODITY</b>	<i>Category : EDITORIAL</i> <b>EPPO</b> Please put the different commodities in a logical order before publication.
47	<b>EXAMPLES OF RISK MANAGEMENT OPTIONS OR MEASURES TO ADDRESS RISK</b>	<i>Category : TECHNICAL</i> <b>EPPO</b> It is not an exhaustive list.
48	<b>ADDITIONAL INFORMATION</b>	<i>Category : EDITORIAL</i> <b>EPPO</b> Don't limit to ISPMs also need to consider what IPPC manuals and guidance materials are available.
51	Nil <del>— if fit for purpose—</del>	<i>Category : EDITORIAL</i> <b>EPPO</b> Not sure what this means or is being implied. Ditto for its inclusion elsewhere.
59	Cement <del>components or its components</del> , except sand and gravel	<i>Category : EDITORIAL</i> <b>EPPO</b> More precise.
61	Nil <del>— if in clean packaging</del>	<i>Category : EDITORIAL</i> <b>EPPO</b> They won't always be in nice clean packaging. Often this type of material is moved in large, open aggregate bags. Could also be deleted as it is covered by the row on construction materials ([99]).
67	Methods <u>of commercial processing listed</u> in Annex 1 of ISPM 32	<i>Category : TECHNICAL</i> <b>EPPO</b> Precision given.
71	Nil <del>— if clean and new—, and stored correctly away from contaminating sources (e.g. dirty tents)</del>	<i>Category : EDITORIAL</i> <b>EPPO</b> Heading into hitchhiker territory which would extend the scope of the IPPC. The Convention on Biological Diversity (CBD) is in charge of the invasive alien species which are not pests according the IPPC.
72	Absence of soil and <del>other contaminants contaminating pests on tarpaulin and tents including poles, pegs and bags</del>	<i>Category : TECHNICAL</i> <b>EPPO</b> For clarity and please see ISPM 5.
74	<del>New</del> clothes	<i>Category : EDITORIAL</i> <b>EPPO</b> Include used clothing if clean. Used clothing is a common form of humanitarian aid. If washed/cleaned, it will pose the same level of risk as new clothes.

76	Nil – if clean <del>and</del> <u>or</u> new	<b>EPPO</b> If washed/cleaned, used clothes will pose the same level of risk as new clothes.
77	Clean <del>and</del> <u>or</u> in clean packaging	<b>EPPO</b> If washed/cleaned, used clothes will pose the same level of risk as new clothes.
79	<del>Roasted bean (coffee)</del>	<i>Category : EDITORIAL</i> <b>EPPO</b> Why only if fresh? Roasting is in annex 1 to ISPM 32. Are roast coffee beans commonly provided as food aid? It is also covered by the row for 'processed foods'. We imagine by 'fresh' the intention is to avoid the risk of contamination with hitchhiker pests or storage pests.
80	<del>Human consumption</del>	<i>Category : EDITORIAL</i> <b>EPPO</b> See comment on [79].
81	<del>Nil – if fresh</del>	<i>Category : EDITORIAL</i> <b>EPPO</b> See comment on [79].
84	Reagents for rapid field tests	<i>Category : EDITORIAL</i> <b>EPPO</b> QUESTION - Not sure what these are, but if only for human use (as indicated) would it not be covered under medical and sanitary supplies ([54]).
90	<del>Use in temporary</del> <u>Temporary</u> housing	<i>Category : EDITORIAL</i> <b>EPPO</b> Useless words.
99	Construction materials (e.g. metal roofing) and polyvinyl chloride (PVC) fixtures	<i>Category : EDITORIAL</i> <b>EPPO</b> QUESTION: Why has cement been included separately earlier in the table ([59])?
111	<b>APPENDIX 2: Examples of commodities or materials provided as food or <u>humanitarian</u> other aid that are capable of being infested with regulated pests</b>	<i>Category : EDITORIAL</i> <b>EPPO</b> For consistency.
112	<b>COMMODITY</b>	<i>Category : EDITORIAL</i> <b>EPPO</b> Please put the different commodities in a logical order before publication.
115	<b><u>EXAMPLES OF</u> PEST RISK MANAGEMENT OPTIONS OR PHYTOSANITARY MEASURES</b>	<i>Category : TECHNICAL</i> <b>EPPO</b> It is not an exhaustive list.

116	<b>ADDITIONAL INFORMATION</b>	<i>Category : EDITORIAL</i> <b>EPPO</b> Do not limit to ISPMs also need to consider what IPPC manuals and guidance materials are available.
120	Adopted treatments under ISPM 28; sourced from pest free areas; pre-clearance; found free of visible damage, defects or <del>disease</del> <u>pests</u>	<i>Category : EDITORIAL</i> <b>EPPO</b> For consistency with ISPM 5 and rest of Recommendation.
120	<del>Adopted treatments</del> <u>Treatments adopted</u> under ISPM 28; sourced from pest free areas; pre-clearance; found free of visible damage, defects or disease	<i>Category : EDITORIAL</i> <b>EPPO</b> Better wording.
124	Soil-borne pests; <del>propagative material; contaminating pests; propagative plant material (e.g. seeds) and animal diseases</del> <u>contaminating pests</u>	<i>Category : SUBSTANTIVE</i> <b>EPPO</b> 1) For better clarity. 2) Appendix 2 is about pest risk, and Appendix 3 about risks for human and animal health.
128	Debris removal; <del>construction</del> <u>construction; distribution of aid; movement of personal; military protection</u>	<i>Category : EDITORIAL</i> <b>EPPO</b> More complete.
129	<del>Pests associated with soil</del> <u>Soil-borne pests; contaminating propagative material and other contaminants</u> <u>contaminating pests</u>	<i>Category : TECHNICAL</i> <b>EPPO</b> For better clarity, like in [124].
130	Methods <u>listed</u> in ISPM 41; pre-dispatch cleaning and inspection	<i>Category : EDITORIAL</i> <b>EPPO</b> Clearer.
135	Sourced from pest free areas; bark removal; <del>kiln drying; application of effective fumigation or preservative treatment</del> <u>appropriate treatments described in Appendix 2 to use of the timber</u> <u>ISPM 39</u>	<i>Category : SUBSTANTIVE</i> <b>EPPO</b> More appropriate, in consistency with [136].
136	ISPM 39 ( <i>International movement of wood</i> ). <del>Some preservatives are toxic and should not be used where they impact human health.</del>	<i>Category : SUBSTANTIVE</i> <b>EPPO</b> Not relevant for Appendix 2 which is about regulated pests.
137	Processed <del>foods</del> <u>foods</u> such as those listed in Annex 2 to ISPM 32	<i>Category : TECHNICAL</i> <b>EPPO</b> Precision given (by opposition to processed foods listed in [64])

138	Human <u>or animal</u> consumption	<i>Category : SUBSTANTIVE</i> <b>EPPO</b> What about end use as animal feed (e.g. food granulates for cattle).
139	<del>Reinfestation (e.g. by storage pests)Crop production pests; or processing is insufficient to address the pest risk (methods in Annex 2 of ISPM 32)storage pests</del>	<i>Category : TECHNICAL</i> <b>EPPO</b> More relevant for the column "Associated pest risk", please also see comment in [137].
140	Methods in Annex 1 of ISPM 32; <u>pre-clearance</u>	<i>Category : SUBSTANTIVE</i> <b>EPPO</b> Like in [117].
140	Methods <u>of commercial processing listed</u> in Annex 1 of ISPM 32	<i>Category : TECHNICAL</i> <b>EPPO</b> Precision given.
143	Human <u>or animal</u> consumption	<i>Category : SUBSTANTIVE</i> <b>EPPO</b> What about end use as animal fodder (whether it's e.g.grain, hay).
144	Stored product pests (e.g. <i>Trogoderma granarium-granarium</i> <del>Everts</del> (khapra beetle), <i>Prostephanus truncatus</i> ( <del>Horn</del> )-(larger grain borer))	<i>Category : EDITORIAL</i> <b>EPPO</b> Precision not needed in this context.
148	e.g. Secure transport of food and other aid; <del>animal crates; packaging for vehicles</del>	<i>Category : EDITORIAL</i> <b>EPPO</b> Useless.
150	<del>Approved treatment or</del> <u>Treatments adopted under ISPM 15 compliant15</u>	<i>Category : SUBSTANTIVE</i> <b>EPPO</b> ISPM 15 is the preferred reference because it is an international standard.
155	Sourced from pre-approved, accredited sources, soil removed; treatment with pesticides or other physical treatments, <del>although difficult to achieve 100 percent mitigation; complete risk can be ascertained through pest risk assessment</del>	<i>Category : SUBSTANTIVE</i> <b>EPPO</b> Not relevant in the context of this CPM recommendation.
155	Sourced from pre-approved, accredited sources, soil removed; treatment with pesticides or <del>other</del> physical treatments, although difficult to achieve 100 percent mitigation; complete risk can be ascertained through pest risk assessment	<i>Category : TECHNICAL</i> <b>EPPO</b> Pesticides are not physical treatments.
162	<del>Used clothing and shoes or used clothing material</del>	<i>Category : EDITORIAL</i> <b>EPPO</b> If washed/cleaned it will pose the same level of risk as new clothes (in Appendix 1).

163	<del>Human use</del>	<i>Category : EDITORIAL</i> <b>EPPO</b> Proposed deleted line.
164	Contaminating pests (e.g. <i>Wasmannia auropunctata</i> <del>(Roger)</del> (little fire ant); <del>beetles</del> ); soil	<i>Category : EDITORIAL</i> <b>EPPO</b> 1) Precision not needed in this context. 2) Beetles is not needed.
167	<del>Regulated living modified organism products</del>	<i>Category : SUBSTANTIVE</i> <b>EPPO</b> There is not need to distinguish living modified organisms from the other regulated pests in Appendix 2 (please see Annex 3 (Determining the potential for a living modified organism to be a pest) to ISPM 11 (Pest risk analysis for quarantine pests)). No real guidance is given.
168	<del>Human consumption</del>	<i>Category : SUBSTANTIVE</i> <b>EPPO</b> See comment on [167].
169	<del>Subject to the laws of the receiving country</del>	<i>Category : SUBSTANTIVE</i> <b>EPPO</b> See comment on [167].
171	Used bedding (e.g. mattresses, <del>sleeping bags, blankets, pillows, cots</del> )	<i>Category : TECHNICAL</i> <b>EPPO</b> If washed/cleaned it will pose the same level of risk as new (in Appendix 1).
173	Contaminating pests (e.g. <i>Wasmannia auropunctata</i> <del>(Roger)</del> (little fire ant); <del>beetles</del> )	<i>Category : EDITORIAL</i> <b>EPPO</b> 1) Precision not needed in this context. 2) Beetle is not needed.
178	<del>Pests associated with soil</del> <u>Soil-borne pests; propagative material</u> ; contaminating <del>pests</del> <u>propagative material</u> and <del>animal diseases</del> <u>contaminating pests</u>	<i>Category : SUBSTANTIVE</i> <b>EPPO</b> Please see comment in [124].
183	<del>Pests associated with soil and other contaminants</del> <u>Contaminating pests</u>	<i>Category : TECHNICAL</i> <b>EPPO</b> More relevant.
186	<del>Live animals where there is a risk of contamination with plant pests</del>	<i>Category : SUBSTANTIVE</i> <b>EPPO</b> Applying phytosanitary controls to live animals?! Is this really relevant? Examples would be needed if kept, but useless if no guidance is given.

194	<del>Cleaning; fumigation; pre-clearance</del> Treatments described in Appendix 2 to ISPM 39 and treatments adopted under ISPM 15.	Category : SUBSTANTIVE <b>EPPO</b> More relevant in consistency with [193], [135] and [150].
195	<del>-ISPM 39 (International movement of wood) and ISPM 15 (Regulation of wood packaging material in international trade)</del>	Category : SUBSTANTIVE <b>EPPO</b> More relevant in consistency with [193], [136] and [151].
198	Stored product pests (e.g. <i>Trogoderma granarium</i> Everts (khapra beetle); <del>other contamination</del> contaminating pests	Category : TECHNICAL <b>EPPO</b> Stored product pests are not contaminating pests.
198	Stored product pests (e.g. <i>Trogoderma granarium-granarium</i> Everts_(khapra beetle); other contamination	Category : EDITORIAL <b>EPPO</b> Precision not needed in this context.
203	Used tents may <del>become contaminated; clean and new tents may become be</del> contaminated during storage if mixed with used ones or other source of contamination by pests	Category : SUBSTANTIVE <b>EPPO</b> Simplification.
204	Cleaning and fumigation if necessary; <del>tents, including poles and pegs,</del> found free of soil and other <del>contaminants on tents including poles and pegs</del> contaminants	Category : EDITORIAL <b>EPPO</b> Easier to read.
206	<del>"Note: Some risks not associated with plants are included in the above table for completeness."</del>	Category : SUBSTANTIVE <b>EPPO</b> To be deleted because Appendix 2 is dedicated to pest risk and Appendix 3 to risk to human and animal health.  Furthermore, it is not appropriate for CPM to adopt a recommendation with includes areas beyond the competence of the IPPC. It makes no difference that this is only an Appendix.  If this comment is not incorporated, please put [206] immediately after [111] (title of the Appendix) for better understanding.
216	<b>APPENDIX 3: Examples of commodities or materials provided as food or other aid that are capable of <u>causing posing a risk to human or animal health</u></b>	Category : SUBSTANTIVE <b>EPPO</b>  We propose to delete whole Appendix 3 because it is beyond the competence of the IPPC. OIE and CODEX are more appropriate vehicles for control of these risks.  This could be an endless list; why not include plant protection products handed out without any training or with labeling only in a foreign language, timber of poor quality used for construction; dangerous machinery used without safety precautions, prescription of medicines handed out without doctors prescription or consultation etc.?

		<p>This Appendix is not relevant in this CPM recommendation and it does not really gives useful guidance.</p> <p>However, if Appendix 3 is kept, it is suggested to amend the title putting 'posing a risk to human or animal health' instead of 'causing harm'.</p>
222	Plant products that may contain or be contaminated with <u>human or</u> animal health risk materials	<p><i>Category : SUBSTANTIVE</i>  <b>Eppo</b>  In the case deletion of Appendix 3 is not accepted:  Consistency with [223].</p>
223	Human <u>and animal</u> consumption	<p><i>Category : SUBSTANTIVE</i>  <b>Eppo</b>  In the case deletion of Appendix 3 is not accepted:  Consistency with [222].</p>
224	<del>Animal</del> <u>Human and animal</u> diseases	<p><i>Category : SUBSTANTIVE</i>  <b>Eppo</b>  In the case deletion of Appendix 3 is not accepted:  Consistency with [223].</p>
225	Sourced from <u>pest disease</u> free <u>areas/zones</u> ; properly vacuum packed and labelled	<p><i>Category : TECHNICAL</i>  <b>Eppo</b>  In the case deletion of Appendix 3 is not accepted:  Term used for animal diseases.</p>
227	<del>All expired</del> <u>Expired</u> processed food products of plant and animal origin	<p><i>Category : EDITORIAL</i>  <b>Eppo</b>  In the case deletion of Appendix 3 is not accepted:  Better wording.</p>
229	Human health risks; <del>storage pests</del>	<p><i>Category : SUBSTANTIVE</i>  <b>Eppo</b>  In the case deletion of Appendix 3 is not accepted:  Not relevant in Appendix 3 but in Appendix 2.</p>
230	Products <del>are</del> fit for purpose	<p><i>Category : EDITORIAL</i>  <b>Eppo</b>  In the case deletion of Appendix 3 is not accepted:  Consistency with the wording used in the Appendix 1.</p>
232	“ <i>Note: Some risks not associated with plants are included in the above table for completeness.</i> ”	<p><i>Category : EDITORIAL</i>  <b>Eppo</b>  In the case deletion of Appendix 3 is not accepted:</p>

		To be put immediately after [216] (title of the Appendix) for a better understanding.
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