



2020 SECOND CONSULTATION

1 July – 30 September 2020

Compiled comments for Draft PT: Irradiation treatment for *Bactrocera dorsalis* (2017-015)

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
Singapore	Singapore is supportive of this treatment.

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

FAO sequential number	Para	Text	T	Comment	SC Responses
1	G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (30) Guyana (30 Sep 2020 10:03 PM) Guyana has no reservation regarding the draft document at this point.	NOTED
2	G	(General Comment)	C	<i>Category : TECHNICAL</i> (29) Australia (30 Sep 2020 12:58 PM) Australia has reviewed this phytosanitary treatment and is supportive of this treatment and the respective text.	NOTED
3	G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (28) Costa Rica (29 Sep 2020 8:31 PM) No comment	NOTED
4	G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (25) European Union (29 Sep 2020 5:01 PM) The comments by the EU are provided without prejudice to the European Union food safety legislation imposing limitations on the acceptance of irradiated goods.	NOTED
5	G	(General Comment)	C	<i>Category : TECHNICAL</i> (24) Paraguay (29 Sep 2020 3:27 PM) Paraguay agrees with Cosave's comments	NOTED

6	G	(General Comment)	C	<i>Category : TECHNICAL</i> (23) Slovenia (29 Sep 2020 1:57 PM) Slovenia would like to formally endorse the EPPC comments submitted via the IPPC Online Comment System.	NOTED
7	G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (22) Argentina (29 Sep 2020 1:41 PM) We have no comments on this phytosanitary treatment	NOTED
8	G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (21) OIRSA (28 Sep 2020 7:14 PM) No momentous comments for this document.	NOTED
9	G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (20) Barbados (28 Sep 2020 6:23 PM) Barbados has no changes to make to this draft ISPM.	NOTED
10	G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (18) Mexico (26 Sep 2020 5:36 AM) I support the document as it is and I have no comments	NOTED
11	G	(General Comment)	C	<i>Category : TECHNICAL</i> (15) Uruguay (22 Sep 2020 5:15 PM) We agree with this document as it is	NOTED
12	G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (9) Qatar (9 Sep 2020 9:40 AM) we don't have any comment	NOTED
13	G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (8) Malawi (5 Sep 2020 1:42 PM) We agree with draft annex	NOTED
14	G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (7) Thailand (2 Sep 2020 10:33 AM) Thailand has no objection on the proposed draft Irradiation treatment for <i>Bactrocera dorsalis</i> .	NOTED
15	G	(General Comment)	C	<i>Category : EDITORIAL</i> (6) Singapore (1 Sep 2020 5:48 AM) Singapore is supportive of this treatment.	NOTED
16	G	(General Comment)	C	<i>Category : TECHNICAL</i> (4) Kenya (27 Aug 2020 1:38 PM) No Comment. Kenya is in agreement with the Standard	NOTED
17	G	(General Comment)	C	<i>Category : TECHNICAL</i> (3) South Africa (27 Aug 2020 11:48 AM) This Annex stipulates species-specific dose for <i>B. dorsalis</i> at 116 Gy, which is lower than the dose required according to the	NOTED

				USDA treatment manual (150Gy). Lower dosages makes irradiation treatment more feasible.	
18	G	(General Comment)	C	<i>Category : TECHNICAL</i> (1) Venezuela (18 Aug 2020 12:44 AM) La parte técnica del Organismo Fitosanitario de Venezuela, al analizar el proyecto de NIMF: normas para medidas fitosanitarias para productos, concluyo estar de acuerdo con lo planteado por el Grupo de debate sobre normas	NOTED
19	1	DRAFT ANNEX TO ISPM 28: Irradiation treatment for <i>Bactrocera dorsalis</i> (2017-015)	C	<i>Category : EDITORIAL</i> (19) Nepal (28 Sep 2020 8:12 AM) We have no comments on the draft annex	NOTED
20	14	2018-05 SC-Standards Committee (SC) added the topic <i>Irradiation treatment for oriental fruit fly Bactrocera dorsalis on all fresh commodities</i> (2017-015) to the TPPT work programme with priority 3.	P	<i>Category : EDITORIAL</i> (26) European Union (29 Sep 2020 5:02 PM) Acronym to be developed for its first use.	INCORPORATED
21	14	2018-05 SC-Standards Committee (SC) added the topic <i>Irradiation treatment for oriental fruit fly Bactrocera dorsalis on all fresh commodities</i> (2017-015) to the TPPT work programme with priority 3.	P	<i>Category : EDITORIAL</i> (11) EPP0 (15 Sep 2020 1:24 PM) Acronym to be developed for its first use.	INCORPORATED
22	36	Minimum absorbed dose of 116 Gy to prevent the emergence of adults of <i>Bactrocera dorsalis</i> .	C	<i>Category : EDITORIAL</i> (5) Egypt (28 Aug 2020 5:13 PM) This line of information needs a reference to refer to for reliability	CONSIDERED BUT NOT INCOPORATED The reference to the research study that the TPPT based its evaluation on in is provided in "Other Relevant Information" This is standard practice on all Annexes that have been developed for ISPM 28 to date.
23	37	There is 95% confidence that the treatment according to this schedule prevents emergence of the adult stage of not less than 99.9963% of eggs and larvae of <i>Bactrocera dorsalis</i> .	C	<i>Category : TECHNICAL</i> (2) South Africa (27 Aug 2020 11:46 AM) suggestion that this should be at Probit 9 level – 99.9968%	CONSIDERED BUT NOT INCOPORATED There is no international standard for minimum efficacy rates for fruit fly treatment schedules. The TPPT does not refer to Probit estimates nor stipulate a

					minimum efficacy rates for treatment approval. Every treatment schedule is reviewed and approved on a case-by-case basis.
24	39	This treatment should not be applied to fruits and vegetables stored in modified atmospheres because modified atmospheres may affect the treatment efficacy.	C	<p><i>Category : SUBSTANTIVE</i> (16) China (23 Sep 2020 8:17 AM) Revise this sentence to allow the irradiation using on commodity in MAP; Add reference : Zhan G., Zhao J., Ma F., Liu B., Zhong Y., Song Z., Zhao Q., Chen N. and Ma C. Radioprotective Effects on Late Third-Instar <i>Bactrocera dorsalis</i> (Diptera: Tephritidae) Larvae in Low-Oxygen Atmospheres. <i>Insects</i> 2020, 11, 526; doi:10.3390/insects11080526 Modified atmospheres packaging (MAP) may affect irradiation treatment efficacy. This effect was studied in the added references, which can be used for treatment efficacy evaluation.</p>	<p>CONSIDERED BUT NOT INCORPORATED</p> <p>This issue was reviewed by the TPPT and the Standards Committee agreed to propose the removal of the statement to the Commission on Phytosanitary Measures (CPM).</p> <p>The issue is still under review by the CPM.</p>
25	39	This treatment should not be applied to fruits and vegetables stored in modified atmospheres because modified atmospheres may affect the treatment efficacy.	P	<p><i>Category : TECHNICAL</i> (14) Japan (18 Sep 2020 12:32 PM) According to the report on the TPPT meeting in July 2019, TPPT members concluded that no difference in survival of four Tephritid fruit fly species was found whether stored in low oxygen before and during irradiation or not. The TPPT invited the SC to consider the study on the effects of low oxygen on irradiation efficacy and the recommendation of the TPPT to remove the restriction form irradiation PTs for Tephritidae fruit flies.</p>	<p>CONSIDERED BUT NOT INCORPORATED</p> <p>(see Steward's Response in 24)</p>
26	41	Because irradiation may not result in outright mortality, inspectors may encounter live but non-viable <i>Bactrocera dorsalis</i> (larvae (eggs or larvae or puparia)) during the inspection process. This does not imply a failure of the treatment.	P	<p><i>Category : SUBSTANTIVE</i> (17) China (23 Sep 2020 8:18 AM) The eggs can be fined during inspection.</p>	INCORPORATED
27	44	Extrapolation of treatment efficacy to all fruits and vegetables 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. These include studies on the following pests and hosts: <i>Anastrepha fraterculus</i> (<i>Eugenia uvalha</i> , <i>Malus pumila</i> and <i>Mangifera indica</i>); <i>A. ludens</i> (<i>Citrus paradisi</i> , <i>Citrus sinensis</i> , <i>M. indica</i> and	P	<p><i>Category : EDITORIAL</i> (27) European Union (29 Sep 2020 5:03 PM) 1. Full name because first time this species is mentioned. 2. A comma is missing for Hallman between 2004b and 2013.</p>	INCORPORATED

		<p>artificial diet), <i>A. obliqua</i> (<i>Averrhoa carambola</i>, <i>C. sinensis</i> and <i>Psidium guajaba</i>); <i>A. suspensa</i> (<i>A. carambola</i>, <i>C. paradisi</i> and <i>M. indica</i>), <i>Bactrocera tryoni</i> (<i>C. sinensis</i>, <i>Solanum lycopersicum</i>, <i>M. pumila</i>, <i>M. indica</i>, <i>Persea americana</i> and <i>Prunus avium</i>), <i>Pseudococcus jackbeardsleyi</i> (<i>Cucurbita</i> sp. and <i>Solanum tuberosum</i>), <i>Tribolium confusum</i> (<i>Triticum aestivum</i>, <i>Hordeum vulgare</i> and <i>Zea mays</i>), <i>Cydia pomonella</i> (<i>Malus domestica</i> and artificial diet) and <i>Grapholita molesta</i> (<i>M. pumila</i> and artificial diet) (Bustos <i>et al.</i>, 2004; Gould and von Windeguth, 1991; Hallman, 2004a, 2004b-2004b, 2013; Hallman and Martinez, 2001; Hallman <i>et al.</i>, 2010; Jessup <i>et al.</i>, 1992; Mansour, 2003; Tuncbilek and Kansu, 1966; von Windeguth, 1986; von Windeguth and Ismail, 1987; Zhan <i>et al.</i>, 2016). It is recognized, however, that treatment efficacy has not been tested for all potential fruit and vegetable hosts of the target pest. If evidence becomes available to show that the extrapolation of the treatment to cover all hosts of this pest is incorrect, the treatment will be reviewed.</p>		
28	44	<p>Extrapolation of treatment efficacy to all fruits and vegetables 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. These include studies on the following pests and hosts: <i>Anastrepha fraterculus</i> (<i>Eugenia uvalha</i>, <i>Malus pumila</i> and <i>Mangifera indica</i>); <i>A. ludens</i> (<i>Citrus paradisi</i>, <i>Citrus sinensis</i>, <i>M. indica</i> and artificial diet), <i>A. obliqua</i> (<i>Averrhoa carambola</i>, <i>C. sinensis</i> and <i>Psidium guajaba</i>); <i>A. suspensa</i> (<i>A. carambola</i>, <i>C. paradisi</i> and <i>M. indica</i>), <i>Bactrocera tryoni</i> (<i>C. sinensis</i>, <i>Solanum lycopersicum</i>, <i>M. pumila</i>, <i>M. indica</i>, <i>Persea americana</i> and <i>Prunus avium</i>), <i>Pseudococcus jackbeardsleyi</i> (<i>Cucurbita</i> sp. and <i>Solanum tuberosum</i>), <i>Tribolium confusum</i> (<i>Triticum aestivum</i>, <i>Hordeum vulgare</i> and <i>Zea mays</i>), <i>Cydia pomonella</i> (<i>Malus domestica</i> and artificial diet) and <i>Grapholita molesta</i> (<i>M. pumila</i> and artificial diet) (Bustos <i>et al.</i>, 2004; Gould and von Windeguth, 1991; Hallman, 2004a, 2004b-2004b, 2013; Hallman and Martinez, 2001; Hallman <i>et al.</i>, 2010; Jessup <i>et al.</i>, 1992; Mansour, 2003; Tuncbilek and Kansu, 1966; von Windeguth, 1986; von Windeguth and Ismail, 1987; Zhan <i>et al.</i>, 2016). It is recognized, however, that treatment efficacy has not been tested for all potential fruit and vegetable hosts of the target pest. If evidence becomes available to show that the extrapolation of the treatment to cover all hosts of this pest is incorrect,</p>	<p>P <i>Category : EDITORIAL</i> (12) EPP0 (15 Sep 2020 1:24 PM) A comma is missing for Hallman between 2004b and 2013. Full name because first time this species is mentioned.</p>	<p>INCORPORATED</p>

		the treatment will be reviewed.			
29	44	Extrapolation of treatment efficacy to all fruits and vegetables 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. These include studies on the following pests and hosts: <i>Anastrepha fraterculus</i> (<i>Eugenia uvalha</i> , <i>Malus pumila</i> and <i>Mangifera indica</i>); <i>A. ludens</i> (<i>Citrus paradisi</i> , <i>Citrus sinensis</i> , <i>M. indica</i> and artificial diet), <i>A. obliqua</i> (<i>Averrhoa carambola</i> , <i>C. sinensis</i> and <i>Psidium guajaba</i>); <i>A. suspensa</i> (<i>A. carambola</i> , <i>C. paradisi</i> and <i>M. indica</i>), <i>Bactrocera tryoni</i> (<i>C. sinensis</i> , <i>Solanum lycopersicum</i> , <i>M. pumila</i> , <i>M. indica</i> , <i>Persea americana</i> and <i>Prunus avium</i>), <i>Pseudococcus jackbeardsleyi</i> (<i>Cucurbita</i> sp. and <i>Solanum tuberosum</i>), <i>Tribolium confusum</i> (<i>Triticum aestivum</i> , <i>Hordeum vulgare</i> and <i>Zea mays</i>), <i>Cydia pomonella</i> (<i>M. domestica</i> and artificial diet) and <i>Grapholita molesta</i> (<i>M. pumila</i> and artificial diet) (Bustos <i>et al.</i> , 2004; Gould and von Windeguth, 1991; Hallman, 2004a, 2004b 2013; Hallman and Martinez, 2001; Hallman <i>et al.</i> , 2010; Jessup <i>et al.</i> , 1992; Mansour, 2003; Tuncbilek and Kansu, 1966; von Windeguth, 1986; von Windeguth and Ismail, 1987; Zhan <i>et al.</i> , 2016). It is recognized, however, that treatment efficacy has not been tested for all potential fruit and vegetable hosts of the target pest. If evidence becomes available to show that the extrapolation of the treatment to cover all hosts of this pest is incorrect, the treatment will be reviewed.	C	Category : SUBSTANTIVE (10) Botswana (15 Sep 2020 11:45 AM) Agreed	NOTED
30	60	Zhan, G.P., Shao, Y., Yu, Q., Xu, L., Liu, B., Wang, Y.J. & Wang, Q.L. 2016.	P	Category : EDITORIAL (13) Eppo (15 Sep 2020 1:24 PM) Typo.	NOTED