



## 2020 SECOND CONSULTATION

1 July – 30 September 2020

### Compiled comments for Draft PT: Cold treatment of *Bactrocera tryoni* on *Prunus avium*, *Prunus salicina* and *Prunus persica* (2017-022B)

#### 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 ISPM.

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> <b>(33) Guyana (30 Sep 2020 10:05 PM)</b> Guyana has no reservation regarding the draft document at this point.	<b>NOTED</b>
2	G	(General Comment)	C	<i>Category : TECHNICAL</i> <b>(32) Peru (30 Sep 2020 4:56 PM)</b> Peru agrees with COSAVE's comments.	See response to comment No. 11 (COSAVE).
3	G	(General Comment)	C	<i>Category : TECHNICAL</i> <b>(31) Australia (30 Sep 2020 12:59 PM)</b> Australia has reviewed this phytosanitary treatment and is supportive of this treatment and the respective text.	<b>NOTED</b>
4	G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> <b>(30) Brazil (29 Sep 2020 10:31 PM)</b> Brazil supports COSAVE's general comment.	See response to comment No. 11 (COSAVE).
5	G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> <b>(29) Costa Rica (29 Sep 2020 8:33 PM)</b> No comment	<b>NOTED</b>
6	G	(General Comment)	C	<i>Category : TECHNICAL</i> <b>(26) Paraguay (29 Sep 2020 3:29 PM)</b> Paraguay agrees with Cosave's comments	See response to comment No. 11 (COSAVE).
7	G	(General Comment)	C	<i>Category : TECHNICAL</i> <b>(25) Slovenia (29 Sep 2020 1:59 PM)</b> Slovenia would like to formally endorse the EPPO comments submitted via the IPPC Online Comment System.	See response to comment No. 19, 32 (EPPO).

8	G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i>  <b>(24) Argentina (29 Sep 2020 1:48 PM)</b>          We fully support comments provided by COSAVE to this draft</p>	See response to comment No. 11 (COSAVE).
9	G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i>  <b>(23) OIRSA (28 Sep 2020 7:15 PM)</b>          No momentous comments for this document.</p>	<b>NOTED</b>
10	G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i>  <b>(22) Barbados (28 Sep 2020 6:27 PM)</b>          Barbados approves of this draft ISPM.</p>	<b>NOTED</b>
11	G	(General Comment)	C	<p><i>Category : TECHNICAL</i>  <b>(20) COSAVE (28 Sep 2020 1:53 AM)</b>          We noted the TPPT response to our comment submitted during the first consultation regarding mentioning cultivars in Section "other relevant information". However, we suggest do not include cultivars to avoid confusion when implementing treatment schedule.</p> <p>According to ISPM 28, a requirement for varietal testing should be based on evidence that the varietal differences affect treatment efficacy, and data should be provided to support the requirement. However, the information provided on cultivars in this draft does not show evidence about differences among cultivar treatments but it only mentions general information on which cultivars the treatments were performed. On the other hand, detailed information of cultivars used in developing treatment schedules can be found in the references listed in "References" section.</p> <p>Tomamos nota de la respuesta del PTTF a nuestro comentario presentado durante la primera consulta con respecto a la mención de cultivares en la Sección "otra información relevante". Sin embargo, sugerimos no incluir cultivares para evitar confusiones al implementar el protocolo de tratamiento .</p> <p>De acuerdo con la NIMF 28, el requisito de pruebas varietales debe basarse en evidencia de que las diferencias varietales afectan la eficacia del tratamiento, y se deben proporcionar datos para respaldar el requisito. Sin embargo, la información sobre los cultivares que se detallan en este borrador, no ofrece evidencia de diferencias entre los tratamientos entre cultivares sino que sólo se trata de información general sobre los cuales se realizaron los ensayos. Por otro lado, la información detallada de los cultivares utilizados en el desarrollo de los protocolos de tratamiento se puede consultar en las referencias listadas en la sección "Referencias".</p>	<p><b>CONSIDERED BUT NOT INCORPORATED</b></p> <p>Consistent with the adopted PTs. It provides information on the varieties tested for the development of the PT and is not intended to show the difference in effect between the tested varieties or that it cannot be applied to other varieties.</p>
12	G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i>  <b>(18) Mexico (26 Sep 2020 5:44 AM)</b>          Mexico supports the DRAFT ANNEX TO ISPM 28: Cold treatment for Bactrocera tryoni on Prunus avium, Prunus salicina and Prunus persica (2017-022B)</p>	<b>NOTED</b>
13	G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i>  <b>(8) China (23 Sep 2020 8:31 AM)</b>          The treatment efficacy of cold treatment should be based the mortality of the most tolerant stage of target pest.</p>	<b>CONSIDERED BUT NOT INCORPORATED</b>

			<p>1. Cold treatment should apply to achieve pest mortality in treatment objective in ISPM 42, all the PTs adopted after April of 2018 should be consensus as its requirements.</p> <p>2. The pest mortality is the key standard for temperature treatment according the outline of requirements and requirements in ISPM 42. The measure of treatment efficacy for eggs and larvae in the drafts of 2017-022A, 2017-022B, 2017-023A, 2017-023B is not comply with the requirements. Even though those words like “kill” and “failure to pupariate” are used in the revision drafts, the endpoint for efficacy is preventing pupation in fact.</p> <p>3.The TPPT response of “failure to pupariate ” is accepted in ISPM 28 PT24, PT25, PT26, PT30 and PT31, but the PTs had published before the adoption of ISPM 42. It can not be the cases for the new PTs of temperature treatment. The endpoint of “failure to pupariate” have been accepted in the published PTs (PT24, PT25, PT26, PT30 and PT31), as the TPPT explained, but all these TPs endorsed before the adoption of ISPM 42, then, this cannot be regard as the reason for the inconsistency with the new criteria for temperature treatment.</p> <p>4. Preventing successful development or inability to reproduce is only applied to irradiation treatment. The endpoint standard is also one of obstacles for using irradiation treatment. So as to facility the application of this standards, failure to pupariate should not be used in cold treatments.</p> <p>5. The annex of ISPM 28 is important as the guideline of the technology for phytosanitary treatment. once failure to pupariate is accepted as endpoint for cold treatment, is meaning failure to pupariate can be used in the other researches of cold treatment? The ISPM 28 and its annexes have an important guiding role in the development of phytosanitary treatment technology. If the prevention of pupation can be regarded as the criteria for judging the effect of cold treatment, there will be a lot of research to follow this criterion in the future, which will be difficult to apply in practice. If exceptions are still allowed, is the prevention of fruit fly emergence acceptable as a criterion for determining the effect of cold treatment?</p>	<p>Based on the comments on the first consultation of 2019, we revised the draft PT and made it consistent with the adopted PTs. The purpose of ISPM42 is to smoothly operate the PTs adopted under ISPM28, and the intended purpose of the Annexes to ISPM28 has not changed before and after the adoption of the ISPM42. The endpoint, failure to pupariate, has been recognized by international experts as a valid outcome to be used in efficacy trials of a treatment and is a way to measure mortality (see 2020-02 TPPT report <sup>1</sup>) The outcome, however, of any cold treatment as stated must be larvae mortality (“to result in the mortality of eggs and larvae of <i>Bactrocera tryoni</i> at the stated efficacy”). Therefore any presence of live larvae found during import inspection may be regarded as a failure of treatment in line with ISPM42.</p>
14	G	(General Comment)	<p>C</p> <p><i>Category : TECHNICAL</i> <b>(7) Uruguay (22 Sep 2020 5:19 PM)</b> We noted the TPPT response to our comment submitted during the first consultation regarding mentioning cultivars in Section “other relevant information”. However, we suggest do not include cultivars to avoid</p>	<p><b>CONSIDERED BUT NOT INCORPORATED</b></p> <p>Consistent with the adopted PTs.</p>

<sup>1</sup> 2020-02 TPPT Virtual Meeting Report: <https://www.ippc.int/en/publications/88293/>

				<p>confusion when implementing treatment schedule.</p> <p>According to ISPM 28, a requirement for varietal testing should be based on evidence that the varietal differences affect treatment efficacy, and data should be provided to support the requirement. However, the information provided on cultivars in this draft does not show evidence about differences among cultivar treatments but it only mentions general information on which cultivars the treatments were performed. On the other hand, detailed information of cultivars used in developing treatment schedules can be found in the references listed in "References" section.</p> <p>Tomamos nota de la respuesta del PTF a nuestro comentario presentado durante la primera consulta con respecto a la mención de cultivares en la Sección "otra información relevante". Sin embargo, sugerimos no incluir cultivares para evitar confusiones al implementar el protocolo de tratamiento .</p> <p>De acuerdo con la NIMF 28, el requisito de pruebas varietales debe basarse en evidencia de que las diferencias varietales afectan la eficacia del tratamiento, y se deben proporcionar datos para respaldar el requisito. Sin embargo, la información sobre los cultivares que se detallan en este borrador, no ofrece evidencia de diferencias entre los tratamientos entre cultivares sino que sólo se trata de información general sobre los cuales se realizaron los ensayos. Por otro lado, la información detallada de los cultivares utilizados en el desarrollo de los protocolos de tratamiento se puede consultar en las referencias listadas en la sección "Referencias".</p>	<p>It provides information on the varieties tested for the development of the PT and is not intended to show the difference in effect between the tested varieties or that it cannot be applied to other varieties.</p>
15	G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i>  <b>(3) Qatar (9 Sep 2020 9:44 AM)</b>                      we don't have any comment</p>	<b>NOTED</b>
16	G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i>  <b>(2) Thailand (2 Sep 2020 10:37 AM)</b>                      Thailand has no objection on the proposed draft Cold treatment for <i>Bactrocera tryoni</i> on <i>Prunus avium</i>, <i>Prunus salicina</i> and <i>Prunus persica</i>.</p>	<b>NOTED</b>
17	1	<b>DRAFT ANNEX TO ISPM 28: Cold treatment for <i>Bactrocera tryoni</i> on <i>Prunus avium</i>, <i>Prunus salicina</i> and <i>Prunus persica</i> (2017-022B)</b>	C	<p><i>Category : EDITORIAL</i>  <b>(21) Nepal (28 Sep 2020 7:43 AM)</b>                      We have no comments on Draft Annex to ISPM 28</p>	<b>NOTED</b>
18	13	2018-05 <a href="#">SC Standards Committee (SC)</a> added topic <i>Cold treatment of stone fruit against Bactrocera tryoni</i> (2017-022B) to the TPPT work programme with priority 1.	P	<p><i>Category : EDITORIAL</i>  <b>(27) European Union (29 Sep 2020 5:21 PM)</b>                      Acronym to be developed for its first use.</p>	<b>INCORPORATED</b>  Revised the draft PT.

19	13	2018-05 <a href="#">SC Standards Committee (SC)</a> added topic <i>Cold treatment of stone fruit against Bactrocera tryoni</i> (2017-022B) to the TPPT work programme with priority 1.	P	<i>Category : EDITORIAL</i> <b>(5) Eppo (15 Sep 2020 1:33 PM)</b> Acronym to be developed for its first use.	<b>INCORPORATED</b>  Revised the draft PT.
20	41	<b>Schedule 2: 3 °C or below for 14 continuous days</b>	C	<i>Category : TECHNICAL</i> <b>(4) Botswana (15 Sep 2020 12:03 PM)</b> check the durations for the two schedules because they are the same.	<b>CONSIDERED BUT NOT INCORPORATED</b> Both schedules (1°C 14 days and 3°C 14days) will be applied to Prunus persica and the efficacy level is different between two schedules; 1°C 14days (99.9928%) > 3°C 14days (99.9917%).
21	45	For both schedules, the fruit must reach the treatment temperature before treatment exposure time commences. The fruit core temperature should be monitored and <del>recorded</del> <a href="#">recorded in intervals</a> , and the temperature should not exceed the stated level throughout the duration of the treatment. <a href="#">The treatment should be repeated if failed to record the scheduled temperature for certain time.</a>	P	<i>Category : TECHNICAL</i> <b>(1) Egypt (28 Aug 2020 5:50 PM)</b>	<b>CONSIDERED BUT NOT INCORPORATED</b>  Bilateral agreements can be used to determine where the fruit core temperature is measured, the temperature recording interval, and what to do if the temperature exceeds the stated level.
22	49	<a href="#">Schedules 1 and 2 were based on the work of NSW DPI (2008, 2012) and developed using failure to pupariate as the measure of mortality.</a>	C	<i>Category : SUBSTANTIVE</i> <b>(19) PPPO (27 Sep 2020 11:28 PM)</b> Quarantine agencies need to know if live larvae are possible after the cold treatment. Inspectors are unlikely to encounter live larvae but in the unlikely situation that this is encountered, should this be considered as a treatment failure? The statistics provided give high confidence that no larvae would be able to pupate. Failure to pupariate is an accurate method to measure mortality but it is likely to be too delayed for decision making at the border.	<b>CONSIDERED BUT NOT INCORPORATED</b> The endpoint, failure to pupariate, has been recognized by international experts as a valid outcome to be used in efficacy trials of a treatment and is a way to measure mortality (see 2020-02 TPPT report) The outcome, however, of any cold treatment as stated must be larvae mortality ("to result in the mortality of eggs and larvae of Bactrocera tryoni at the stated efficacy"). Therefore, any presence of live larvae found during import inspection may be regarded as a failure of treatment in line with ISPM42

23	51	for <i>PrunusP. persica</i> : 41 820.	P	Category : EDITORIAL (17) China (23 Sep 2020 8:34 AM) consistent with para. [57][58][59]	INCORPORATED
24	53	for <i>PrunusP. avium</i> : 89 322	P	Category : EDITORIAL (14) China (23 Sep 2020 8:33 AM) consistent with para. [57][58][59]	INCORPORATED
25	53	for <i>P. avium</i> : 89 322.	P	Category : EDITORIAL (10) China (23 Sep 2020 8:32 AM) consistent with para. [51][55][58]	CONSIDERED BUT NOT INCORPORATED Consistent with PT22, PT23.
26	54	for <i>PrunusP. salicina</i> : 64 226	P	Category : EDITORIAL (15) China (23 Sep 2020 8:34 AM) consistent with para. [57][58][59]	INCORPORATED
27	54	for <i>P. salicina</i> : 64 226.	P	Category : EDITORIAL (11) China (23 Sep 2020 8:33 AM) consistent with para. [51][55][58]	CONSIDERED BUT NOT INCORPORATED Consistent with PT22, PT23.
28	55	for <i>PrunusP. persica</i> : 35 987.	P	Category : EDITORIAL (16) China (23 Sep 2020 8:34 AM) consistent with para. [57][58][59]	INCORPORATED
29	57	<i>Prunus avium</i> (cherry) (cultivar ‘Sweetheart’) .	P	Category : EDITORIAL (12) China (23 Sep 2020 8:33 AM) consistent with para. [51][55][58]	CONSIDERED BUT NOT INCORPORATED Consistent with PT22, PT23.
30	59	<i>Prunus persica</i> var. <i>nectarina</i> (nectarine) (cultivar ‘Arctic <del>Snow</del> ’) <a href="#">Snow</a> ’).	P	Category : EDITORIAL (28) European Union (29 Sep 2020 5:22 PM) Typo: missing dot.	INCORPORATED
31	59	<i>Prunus persica</i> var. <i>nectarina</i> (nectarine) (cultivar ‘Arctic <del>Snow</del> ’) <a href="#">Snow</a> ’).	P	Category : EDITORIAL (13) China (23 Sep 2020 8:33 AM) consistent with para. [51][55][58]	INCORPORATED
32	59	<i>Prunus persica</i> var. <i>nectarina</i> (nectarine) (cultivar ‘Arctic <del>Snow</del> ’) <a href="#">Snow</a> ’).	P	Category : EDITORIAL (6) Eppo (15 Sep 2020 1:33 PM) Typo: missing dot.	INCORPORATED
33	66	<a href="#">Vendramin E., Pea G., Dondini L., Pacheco I., Dettori MT., Gazza L., Scalabrin S., Strozzi F., Tartarini S., Bassi D., Verde I., Rossini L. 2014. A Unique Mutation in a MYB Gene Cosegregates with the Nectarine Phenotype in Peach. PLoS One March 2014 9(3): e90574., doi: 10.1371/journal.pone.0090574. Verde I., Rossini L.” should be changed into “Verde I. &amp; Rossini L.”. “PloS One March 2014 9(3); e90574” should be changed into</a>	P	Category : EDITORIAL (9) China (23 Sep 2020 8:32 AM) Reference literature is written mistakenly	INCORPORATED

		<a href="#">"PLoS One, 9(3): e90574.", and deleting "doi: 10.1371/journal.pone.0090574</a>			
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