

2020 FIRST CONSULTATION

1 July – 30 September 2020

Compiled comments for Draft ISPM Audit in the phytosanitary context (2015-014)

Summary of comments

Name	Summary
Bahrain	comments completed
Cuba	Se asumen los comentarios aceptados en el Taller Regional para América Latina.
European Union	The comments have been introduced by the European Commission on behalf of the European Union and its Member States.
OIRSA	Revisión Completada
Saint Vincent and The Grenadines	Surprise audit should not apply from country to country. It would be helpful if templates are developed as annexes for example fruits and vegetables. Audits are usually costly and countries with limited resources would be disadvantaged.
Singapore	Singapore is supportive of this ISPM with exception of our comments for better clarity.
South Africa	This standard provides a framework for an audit process. This will be very useful to ensure consistency in the process.
Viet Nam	Viet Nam would like to have some comments

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

FAO sequential number	Para	Text	T	Comment
1	G	(General Comment)	C	Antigua and Barbuda Antigua and Barbuda agrees with the comments from the 2020 IPPC Virtual Regional Workshop in the Caribbean (September 1-3, 2020). <i>Category : SUBSTANTIVE</i>
2	G	(General Comment)	C	Guyana Guyana agrees with the comments submitted by the CAHFSA at the recently concluded IPPC Regional Workshop for the Caribbean. <i>Category : SUBSTANTIVE</i>
3	G	(General Comment)	C	Panama There are several translations mistakes within the Spanish version of the draft that should be revised. <i>Category : TRANSLATION</i>
4	G	(General Comment)	C	Panama Although it is not proposed to delete section 2, the terms "system audit" and "verification audit" do not seem relevant to differentiate such terms because the ISPM does not provide specific guidance for each of them. <i>Category : SUBSTANTIVE</i>

5	G	(General Comment)	C	<p>Panama The disaggregated circumstances to determine whether the audits are carried out are very broad and provide guidance for conducting internal audits; however, these circumstances, according to the standard, could be applied to conduct audits in the exporting country. This creates some concern because it will allow the justification for NPPOs to want to carry out audits more frequently than required, and making them essential for the establishment of phytosanitary requirements, since it includes aspects such as a new import route, the operation of a installation, which could lead to the fact that each time a new installation wants to export an audit is necessary, for the approval of the installation. By not differentiating between internal audits and those carried out in the exporting country, it allows both audits to be carried out periodically or not periodically. This could get out of control. <i>Category : SUBSTANTIVE</i></p>
6	G	(General Comment)	C	<p>Peru Peru agrees with COSAVE 's comments. <i>Category : TECHNICAL</i></p>
7	G	(General Comment)	C	<p>Mexico Mexico supports the draft ISPM on Audit in the phytosanitary context (2015-014), although it is not proposed to delete section 2, the terms "system audit" and "verification audit" do not seem relevant to differentiate such terms because the ISPM does not provide specific guidance for each of them. Also, there are several translations mistakes within the Spanish version of the draft that should be revised. The general criteria that an Entity must meet in order to homologate with the NPPO should be established in the Standard <i>Category : SUBSTANTIVE</i></p>
8	G	(General Comment)	C	<p>Australia Request the steward of this ISPM and that of the Authorisation ISPM to consider the need for a definition of the term "Audit", taking both ISPMs into consideration, when both are adopted. <i>Category : TECHNICAL</i></p>
9	G	(General Comment)	C	<p>Australia Australia is supportive of this ISPM and considers, at this stage, the text of this draft ISPM for Audit in the phytosanitary context (Audit standard) is clear and does not require amendment. We note the EWG was instructed to draft this ISPM on the basis that the Draft ISPM on Requirements for NPPO if authorizing entities to perform phytosanitary actions (Authorisation standard) was in train to be adopted at CPM15 and issues addressed in the Authorisation standard should not overlap or be contradicted in the Audit draft. Due to the delay in adoption of the Authorisation standard, some elements of the Audit standard are more difficult to review and comment on in isolation and some of the terminology that was taken from the Authorisation standard is less understood. Australia looks forward to reviewing the next version of this Audit standard noting that, if the Authorisation standard is not adopted, relevant topics from that standard will need to be reflected directly in the text of this Audit standard. The Australian Seed Federation has also indicated support for this standard and the support it may provide to harmonisation of audit practices. <i>Category : SUBSTANTIVE</i></p>
10	G	(General Comment)	C	<p>Brazil Brazil supports COSAVE's comments and suggestions. <i>Category : SUBSTANTIVE</i></p>
11	G	(General Comment)	C	<p>Barbados This is an important reference document and is generally well written. However training will be needed to provide the NPPOs of small countries (SIDS) with the ability to perform this function. In addition to the comments here, Barbados also agrees with the submissions from the proceedings of the Regional Workshop. <i>Category : SUBSTANTIVE</i></p>
12	G	(General Comment)	C	<p>Costa Rica There are several errors in the translation from English to Spanish, so it is recommended to review the draft standard in a general way, in the corresponding instance.</p>

				Translate in the Spanish standard "facility" as "instalación" o "instalaciones" and not as "centro" <i>Category : TRANSLATION</i>
13	G	(General Comment)	C	Costa Rica Costa Rica according to Uruguay's comments: it is not proposed to delete section 2, the terms "system audit" and "verification audit" do not seem relevant to differentiate such terms because the ISPM does not provide specific guidance for each of them. <i>Category : TECHNICAL</i>
14	G	(General Comment)	C	Canada Canada supports the Draft ISPM Audit in the phytosanitary context (2015-014). Substantive, technical and editorial comments are presented for consideration and incorporation. <i>Category : SUBSTANTIVE</i>
15	G	(General Comment)	C	Paraguay Paraguay agrees with Cosave's comments <i>Category : TECHNICAL</i>
16	G	(General Comment)	C	European Union This draft standard would greatly benefit from a comparison with ISO 19011:2018 Guidelines for auditing management systems to verify which elements of this guidance are useful for audits in the phytosanitary context and are currently missing in this draft ISPM. <i>Category : TECHNICAL</i>
17	G	(General Comment)	C	European Union An NPPO auditing in the territory of another NPPO is quite a different situation than when an NPPO performs an audit in its own territory. This is recognized in task 3 of the specification for this draft ISPM. Task 3 is to describe the various purposes, scopes and potential triggers for performing audits, differentiating between audits by an NPPO in its own territory and system audits carried out by an NPPO in the territory of another NPPO. However, in the draft ISPM this differentiation is done only for the responsibilities of the NPPO in Section 4.2. (paragraphs 81 to 84). This is insufficient to reflect the differences between these audits and does not fully address the elements described in task 3. Therefore, a separate section is needed to describe these aspects for audits carried out by an NPPO in the territory of another NPPO. This separate section should cover at least the following elements: <ul style="list-style-type: none"> - purpose of the audit; - only system audits (as described in task 3) - the triggers; - the responsibilities of the NPPOs (e.g. specifying which NPPO is responsible for which elements of the logistics); - this audit cannot be unannounced; - cooperation with the NPPO of the territory; - these audits should not be permanent; - it should be in line with the elements of section 5.1.5.1. of ISPM 20; - the financial arrangements (according to task 5 this should only be in the draft ISPM for audits not on the NPPO's own territory); - not using authorized entities for these audits. <i>Category : SUBSTANTIVE</i>
18	G	(General Comment)	C	Argentina We fully support comments provided by COSAVE to this draft <i>Category : SUBSTANTIVE</i>
19	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>
20	G	(General Comment)	C	COSAVE The draft provides guidelines to conduct audits in the phytosanitary context in general, without differentiating specific

				<p>guidance for audits conducted by an NPPO in its own territory from those conducted in the territory of another NPPO. Circumstances that may trigger an audit described in section 3 are too broad and create some concern because according to the Scope they are applicable both for internal or external audits. Some of these circumstances could be used by an NPPO as a justification to conduct audits more frequently than required. For instance, the inclusion of changes in the operations of a facility or each time a new facility is registered to export could lead to the situation that an audit in the exporting country is necessary for the approval of each change or registered facility. We suggest the steward to consider this comment when revising the draft and introduce some text to improve clarity, as appropriate.</p> <p>El borrador proporciona lineamientos en general para realizar auditorías en el contexto fitosanitario sin diferenciar orientación específica para auditorías realizadas por una ONPF en su territorio de las auditorías realizadas en el territorio de otra ONPF. Las circunstancias que pueden dar origen a una auditoría, descritas en la Sección 3, son muy amplias generando cierta preocupación ya que de acuerdo al Ámbito son aplicables tanto a las auditorías internas como a las externas. alguna de esas circunstancias las podría usar una ONPF para justificar la realización de auditorías con mayor frecuencia de lo necesario. Por ejemplo, la inclusión de cambios en la operativa de una instalación o cada vez que se registra una nueva instalación para exportar, podría justificar la realización de una auditoría en el país exportador para aprobar los cambios o el registro de la instalación. Sugerimos al orientador que considere este comentario cuando revise el borrador e incluya texto para clarificar este aspecto si lo considera apropiado.</p> <p><i>Category : TECHNICAL</i></p>
21	G	(General Comment)	C	<p>COSAVE</p> <p>Although it is not proposed to delete section 2, the terms "system audit" and "verification audit" do not seem relevant to differentiate such terms because the ISPM does not provide specific guidance for each of them.</p> <p>Si bien no se propone la eliminación de la sección 2, no parece relevante diferenciar los términos "system audit" and "verification audit" debido a que la NIMF no brinda orientación específica para cada uno de ellos.</p> <p><i>Category : TECHNICAL</i></p>
22	G	(General Comment)	C	<p>OIRSA</p> <p>Although it is not proposed to delete section 2, the terms "system audit" and "verification audit" do not seem relevant to differentiate such terms because the ISPM does not provide specific guidance for each of them.</p> <p><i>Category : TECHNICAL</i></p>
23	G	(General Comment)	C	<p>Japan</p> <p>1.</p> <p>It is unclear whether "an NPPO" in the draft ISPM refers to importing NPPO or exporting NPPO. We suggest to specify importing or exporting NPPO in the draft ISPM where possible.</p> <p><i>Category : SUBSTANTIVE</i></p>
24	G	(General Comment)	C	<p>PPPO</p> <p>"This standard was drafted (with the understanding by the EWG) that the Authorisation Standard had been through two rounds of country consultation and was to be proposed to the CPM 15 for adoption. If the Authorisation Standard is not to be adopted, significant text will need to be included in this draft Audit Standard, to ensure coverage of the issues that the Authorisation Standard was to address"</p> <p><i>Category : SUBSTANTIVE</i></p>
25	G	(General Comment)	C	<p>PPPO</p> <p>We suggest keep consistency when use the term audit, currently "audit", "audits", "the audit", "auditing" etc are being used throughout the text.</p> <p><i>Category : EDITORIAL</i></p>
26	G	(General Comment)	C	<p>PPPO</p> <p>A common theme throughout this document is the ambiguity of many NPPO statements. It is not clear whether NPPO refers to exporting or importing country, or both. We suggest specify importing or exporting NPPO where possible.</p>

				<i>Category : EDITORIAL</i>
27	G	(General Comment)	C	<p>PPPO Potential implementation issue.</p> <p>Guidance on language would be useful. E.g. The audit should be conducted in a language as agreed at the time of notification of intent to do the audit. The provision of translation services should be mutually agreed. <i>Category : SUBSTANTIVE</i></p>
28	G	(General Comment)	C	<p>Caribbean Agricultural Health and Food Safety Agency Jamaica supports the timely drafting of this standard, however, a checklist as a guidance document could be added to assist countries in the implementation of the standard. We also recognize that developing countries will need support as it relates to training. <i>Category : SUBSTANTIVE</i></p>
29	G	(General Comment)	C	<p>Caribbean Agricultural Health and Food Safety Agency 1. Audit guidance tools, standard operating procedures must be clearly articulated. Check lists must also be developed. 2. Auditor training will be required. Transparency and accountability for decisions taken 3. Legal or regulatory framework necessary to support authorization of entities other than the NPPO to perform audits, etc. <i>Category : SUBSTANTIVE</i></p>
30	G	(General Comment)	C	<p>Caribbean Agricultural Health and Food Safety Agency Upon review the Cayman Islands is in agreement with the content of the proposed Draft ISPM on Audits. <i>Category : SUBSTANTIVE</i></p>
31	G	(General Comment)	C	<p>Caribbean Agricultural Health and Food Safety Agency NPPO Grenada supports the adoption of this draft ISPM, as it clearly sets out the framework for undertaking review of its plant health systems <i>Category : SUBSTANTIVE</i></p>
32	G	(General Comment)	C	<p>Caribbean Agricultural Health and Food Safety Agency Suriname accepts the draft standard. <i>Category : SUBSTANTIVE</i></p>
33	G	(General Comment)	C	<p>Caribbean Agricultural Health and Food Safety Agency Audits are necessary in the phytosanitary context. However, for NPPOs conducting an audit in an export country, issues such as the provision of information, records, facilities, personnel etc may arise. The country of export may be financially constrained to meet financial obligations of the audit or is this cost to be borne by the NPPO in importing country? <i>Category : TECHNICAL</i></p>
34	G	(General Comment)	C	<p>Caribbean Agricultural Health and Food Safety Agency This is an important reference document and is generally well written. However training will be needed to provide the NPPOs of small countries (SIDS) with the ability to perform this function. <i>Category : EDITORIAL</i></p>
35	G	(General Comment)	C	<p>Japan 2. There are similar meaning terms in this draft ISPM such as "purpose" and "objectives", "findings" and "observations", and "conformity" and "compliance". If there is no difference in the meaning of the terms, they should be unified. <i>Category : SUBSTANTIVE</i></p>
36	G	(General Comment)	C	<p>Japan 3. The relationship between "verification procedure" and "audit" (para 29) The terms "verification procedure" and "audit" are used in many parts of the existing ISPMs, but both terms are used as the</p>

				same objectives in some cases. So countries may be confused about how "audit" or "verification procedure" will be applied to their phytosanitary context. It should be clarified in the scope that "audit" is one method of verification procedures in the phytosanitary context. <i>Category : SUBSTANTIVE</i>
37	G	(General Comment)	C	Japan 4. The difference between a system audit and a verification audit (para 56, 57)(Potential implementation issues) The difference in the definition and explanation between a system audit and a verification audit is not clear. Both types need a clear definition and explanation in the ISPM because each type has different purpose. This is because the requirements for each type are not clearly described in the draft ISPM separately for each type. For example, - What kind of cases will be dealt with by each type, - How to implement each type and - What requirements need to be included in each type. However, these information may be better to be provided in an implementation material of ISPM. Implementation material may be necessary to be developed as soon as the ISPM is approved to implement audit programme in the phytosanitary context. <i>Category : SUBSTANTIVE</i>
38	G	(General Comment)	C	China It is recommended that this standard be redrafted. 1. The new draft should focus on the audit conducted by the NPPO of an importing country to an exporting country. And the audit conducted in the own territory of an NPPO can be suggested to refer to the one conducted to another country, no need to write in detail. 2. Key elements of the audit framework need to be specified so that users of the standards can understand the specific content that needs to be audited. 3. The qualification requirements and audit boundaries of authorized entities should be clarified. Explanation: 1. This standard covers audits conducted by the NPPO in its own territory, or with and in the territory of another NPPO, and audits conducted by authorized entities. The combination of these three kinds of audit makes this standard confusing. The NPPO responsibility for exporting country audit is too general, while that for domestic audit is very detailed. In international trade, the main concern is the audit of the importing country to the exporting country. The audits within their own territory belongs to the category of sovereignty of each country, should not be interfered too much. Different countries have their own practices due to different national conditions. 2. Although the audit systems are different in each country, the key elements of the audit framework should be specified and unified to avoid conflicts between nations. 3. As the standards of authorizing the entities to conduct audits have not been adopted, the responsibilities of the authorized entities should be specified. <i>Category : SUBSTANTIVE</i>
39	G	(General Comment)	C	Uruguay The draft provides guidelines to conduct audits in the phytosanitary context in general, without differentiating specific guidance for audits conducted by an NPPO in its own territory from those conducted in the territory of another NPPO. Circumstances that may trigger an audit described in section 3 are too broad and create some concern because according to the Scope they are applicable both for internal or external audits. Some of these circumstances could be used by an NPPO as a justification to conduct audits more frequently than required. For instance, the inclusion of changes in the operations of a facility or each time a new facility is registered to export could lead to the situation that an audit in the exporting country is necessary for the approval of each change or registered facility. We suggest the steward to consider this comment when revising the draft and introduce some text to improve clarity, as appropriate.

				<p>El borrador proporciona lineamientos en general para realizar auditorías en el contexto fitosanitario sin diferenciar orientación específica para auditorías realizadas por una ONPF en su territorio de las auditorías realizadas en el territorio de otra ONPF. Las circunstancias que pueden dar origen a una auditoría, descritas en la Sección 3, son muy amplias generando cierta preocupación ya que de acuerdo al Ámbito son aplicables tanto a las auditorías internas como a las externas. alguna de esas circunstancias las podría usar una ONPF para justificar la realización de auditorías con mayor frecuencia de lo necesario. Por ejemplo, la inclusión de cambios en la operativa de una instalación o cada vez que se registra una nueva instalación para exportar, podría justificar la realización de una auditoría en el país exportador para aprobar los cambios o el registro de la instalación. Sugerimos al orientador que considere este comentario cuando revise el borrador e incluya texto para clarificar este aspecto si lo considera apropiado.</p> <p><i>Category : TECHNICAL</i></p>
40	G	(General Comment)	C	<p>Thailand</p> <p>1. This standard should be outlined based on "General requirements for auditing" and "Specific requirements for 3 categories of auditing" including</p> <ol style="list-style-type: none"> 1) auditing of NPPO itself 2) auditing of authorized entities by authorizing NPPO 3) auditing in exporting country by NPPO of importing country <p>This is because some requirements could be generally considered for all categories of auditing. However, some requirements such as section of trigger, responsibilities of NPPO, conflict of interest, financial arrangements and settlement of disputes may be differently considered for each category. So, relevant information should be firstly classified and then placed under the respective category.</p> <p>2. The principles in ISPM 1 should be recognized and referred in this draft standard.</p> <p>3. A guide to understanding the requirements for auditing in phytosanitary context should be developed to facilitate the implementation of this standard.</p> <p><i>Category : SUBSTANTIVE</i></p>
41	G	(General Comment)	C	<p>EPPO</p> <p>This draft standard would greatly benefit from a comparison with ISO 19011:2018 Guidelines for auditing management systems to verify which elements of this guidance are useful for audits in the phytosanitary context and are currently missing in this draft ISPM.</p> <p><i>Category : TECHNICAL</i></p>
42	G	(General Comment)	C	<p>EPPO</p> <p>An NPPO auditing in the territory of another NPPO is quite a different situation than when an NPPO performs an audit in its own territory. This is recognized in task 3 of the specification for this draft ISPM. Task 3 is to describe the various purposes, scopes and potential triggers for performing audits, differentiating between audits by an NPPO in its own territory and system audits carried out by an NPPO in the territory of another NPPO. However, in the draft ISPM this differentiation is done only for the responsibilities of the NPPO in Section 4.2. (paragraphs 81 to 84). This is insufficient to reflect the differences between these audits and does not fully address the elements described in task 3. Therefore, a separate section is needed to describe these aspects for audits carried out by an NPPO in the territory of another NPPO. This separate section should cover at least the following elements:</p> <ul style="list-style-type: none"> - purpose of the audit; - only system audits (as described in task 3) - the triggers; - the responsibilities of the NPPOs (e.g. specifying which NPPO is responsible for which elements of the logistics); - this audit cannot be unannounced; - cooperation with the NPPO of the territory; - these audits should not be permanent; - it should be in line with the elements of section 5.1.5.1. of ISPM 20; - the financial arrangements (according to task 5 this should only be in the draft ISPM for audits not on the NPPO's

				own territory); - not using authorized entities for these audits. <i>Category : SUBSTANTIVE</i>
43	G	(General Comment)	C	IPPC Regional Workshop Africa Malawi, We support the draft ISPM <i>Category : SUBSTANTIVE</i>
44	G	(General Comment)	C	IPPC Regional Workshop Africa We support the draft ISPM <i>Category : SUBSTANTIVE</i>
45	G	(General Comment)	C	IPPC Regional Workshop Africa This standard provides a framework for an audit process. This will be very useful to ensure consistency in the process. <i>Category : SUBSTANTIVE</i>
46	G	(General Comment)	C	United States of America Overall, this draft is very well written and straightforward. One important feature is that auditing would be announced except in cases of complaints or accidental releases of quarantine pests. Another important feature is that it includes a provision for auditing NPPO systems as well. <i>Category : SUBSTANTIVE</i>
47	G	(General Comment)	C	Qatar We have to take into consideration draft ISPM: Authorization of entities to perform phytosanitary actions, that didn't adopted yet <i>Category : SUBSTANTIVE</i>
48	G	(General Comment)	C	Costa Rica Las circunstancias desglosadas para determinar si se realiza las auditorias son muy amplias y dan una orientación para realizar las auditorias internas, sin embargo, estas circunstancias, de acuerdo a la norma, podría aplicarse para realizar las auditorias en el país exportador. Esto crea cierta preocupación por cuanto permitirá la justificación para que las ONPF quieran realizar con más frecuente de lo requerido las auditorias, y haciéndolas indispensables para el establecimiento de requisitos fitosanitarios, ya que se incluye aspectos como una nueva vía de importación, el funcionamiento de una instalación lo que podría llevar a que cada vez que una nueva instalación quiera exportar es necesaria la auditoría, para la aprobación de la instalación. Al no realizar la diferenciación entre las auditorias internas y las que se realizan en el país exportado, permite para ambas hacer auditorias de forma periódica o no periódica. Esto podría salirse de control. Las responsabilidades de la ONPF desglosada está dirigidas más hacia cuando la ONPF a decidido autorizar a una entidad para realizar las auditorias y no a la responsabilidades de cuando la ONPF se audita a si misma. <i>Category : SUBSTANTIVE</i>
49	G	(General Comment)	C	Uruguay Although it is not proposed to delete section 2, the terms "system audit" and "verification audit" do not seem relevant to differentiate such terms because the ISPM does not provide specific guidance for each of them. Si bien no se propone la eliminación de la sección 2, no parece relevante diferenciar los términos "system audit" and "verification audit" debido a que la NIMF no brinda orientación específica para cada uno de ellos. <i>Category : TECHNICAL</i>
50	G	(General Comment)	C	South Africa This standard provides a framework for an audit process. This will be very useful to ensure consistency in the process. <i>Category : SUBSTANTIVE</i>
51	G	(General Comment)	C	Venezuela La parte técnica del Organismo Fitosanitario de Venezuela, al analizar el proyecto de NIMF: auditoría en el contexto fitosanitario, concluyo estar de acuerdo con lo planteado por el Grupo de trabajo de expertos (GTE), ya que lo planteado en esta norma garantiza un proceso de transparencia en todos los procesos de importación y exportación del ámbito fitosanitario. <i>Category : TECHNICAL</i>

52	G	(General Comment)	C	OIRSA Las circunstancias desglosadas para determinar si se realiza las auditorías son muy amplias y dan una orientación para realizar las auditorías internas, sin embargo, estas circunstancias, de acuerdo a la norma, podría aplicarse para realizar las auditorías en el país exportador. Esto crea cierta preocupación por cuanto permitirá la justificación para que las ONPF quieran realizar con más frecuente de lo requerido las auditorías, y haciéndolas indispensables para el establecimiento de requisitos fitosanitarios, ya que se incluye aspectos como una nueva vía de importación, el funcionamiento de una instalación lo que podría llevar a que cada vez que una nueva instalación quiera exportar es necesaria la auditoría, para la aprobación de la instalación. Al no realizar la diferenciación entre las auditorías internas y las que se realizan en el país exportador, permite para ambas hacer auditorías de forma periódica o no periódica. Esto podría salirse de control. <i>Category : SUBSTANTIVE</i>
53	G	(General Comment)	C	OIRSA Si bien no se propone la eliminación de la sección 2, no parece relevante diferenciar los términos "system audit" and "verification audit" debido a que la NIMF no brinda orientación específica para cada uno de ellos. <i>Category : TECHNICAL</i>
54	2	DRAFT ISPM: Audit in the phytosanitary context (2015-014)	C	Viet Nam Viet Nam would like to recommend that this draft standard be redrafted because audit systems are different in each country, the key elements of the audit framework should be specified and unified. On the other hand, there is no definition of "phytosanitary context" in ISPM 5. <i>Category : EDITORIAL</i>
55	2	DRAFT ISPM: Audit in the phytosanitary context (2015-014)	C	Nepal We have no comments on the Draft ISPM <i>Category : EDITORIAL</i>
56	2	DRAFT ISPM: Audit in the phytosanitary Phytosanitary context (2015-014)	P	Ghana <i>Category : EDITORIAL</i>
Scope				
57	28	Scope	C	Costa Rica Costa Rica according to Cosave 's comments: Spanish version should be revised because it is not consistent with English. The Spanish version says "This standard regulates the audits ...", and ISPMs do not regulate they provide guidance <i>Category : TRANSLATION</i>
58	29	Audit in the phytosanitary context is a systematic examination of a process to determine whether it conforms with the phytosanitary	P	Costa Rica this is a definition, according to the standards this is not part of the scope. <i>Category : TECHNICAL</i>

		<p>requirements set by a national plant protection organization (NPPO). This standard covers audits in the phytosanitary context conducted by the NPPO in its own territory, or with and in the territory of another NPPO, and audits conducted by entities that have been authorized by the NPPO to conduct audits on its behalf in its territory.</p>		
59	29	<p>Audit in the phytosanitary context is a systematic examination <u>evaluation</u> of a process <u>or a system</u> to determine whether it conforms with the <u>phytosanitary requirements level of control and assure the quality of the processes</u> set by a national plant protection</p>	P	<p>European Union The objective of audits usually goes beyond that of examinations. The relevance for the system and its continuous improvement is missing here. The proposed changes add some additional clarity and are a good basis for helping to ensure the intention of audits is understood. <i>Category : SUBSTANTIVE</i></p>

		<p>organization (NPPO)(NPPO) and to determine whether it conforms with the phytosanitary requirements. This standard covers audits in the phytosanitary context conducted by the NPPO in its own territory, or with and in the territory of another NPPO, and audits conducted by entities that have been authorized by the NPPO to conduct audits on its behalf in its territory. <u>This standard focuses only on specific phytosanitary aspects of audits. For general aspects of audits other sources of information are available.</u></p>		
60	29	<p>Audit in the phytosanitary context is a systematic examination of a process to</p>	C	<p>COSAVE Spanish version should be revised because it is not consistent with English. The Spanish version says "This standard regulates the audits ...", and ISPMs do not regulate they provide guidance</p> <p>La versión en español debe revisarse porque no es consistente con el inglés. La versión en español dice "Esta norma regula las auditorías ...", y las NIMFs no regulan, proporcionan orientación.</p> <p>Category : TRANSLATION</p>

		determine whether it conforms with the phytosanitary requirements set by a national plant protection organization (NPPO). This standard covers audits in the phytosanitary context conducted by the NPPO in its own territory, or with and in the territory of another NPPO, and audits conducted by entities that have been authorized by the NPPO to conduct audits on its behalf in its territory.		
61	29	Audit in the phytosanitary context is a systematic examination of a process to determine whether it conforms with the phytosanitary requirements set by a national plant protection organization (NPPO). This	P	<p>COSAVE</p> <p>The scope of an ISPM should be a short statement that delineates what is covered by the standard, the concept of audit should not be described in the scope. Deleted sentences moved to section "Background".</p> <p>El alcance de una NIMF debe ser una declaración breve que delimite lo que cubre la norma; el concepto de auditoría no debe describirse en el alcance. Las oraciones eliminadas se movieron a la sección "Fondo"</p> <p>Category : <i>TECHNICAL</i></p>

		standard covers audits in the phytosanitary context conducted by the NPPO in its own territory, or with and in the territory of another NPPO, and audits conducted by entities that have been authorized by the NPPO to conduct audits on its behalf in its territory.		
62	29	Audit in the phytosanitary context is a systematic examination of a process to determine whether it conforms with the phytosanitary requirements set by a national plant protection organization (NPPO). This standard covers audits in the phytosanitary context conducted by the NPPO in its own territory, or with and in the territory of another	P	OIRSA The scope of an ISPM should be a short statement that delineates what is covered by the standard, the concept of audit should not be described in the scope. Deleted sentences moved to section "Background". Category : <i>TECHNICAL</i>

		NPPO, and audits conducted by entities that have been authorized by the NPPO to conduct audits on its behalf in its territory.		
63	29	Audit in the phytosanitary context is a systematic examination of a process to determine whether it conforms with the phytosanitary requirements set by a national plant protection organization (NPPO). This standard covers audits in the phytosanitary context conducted by the NPPO in its own territory, or with and in the territory of another NPPO, and audits conducted by entities that have been authorized by the NPPO to conduct audits on its behalf in its territory.	C	<p>OIRSA Spanish version should be revised because it is not consistent with English. The Spanish version says "This standard regulates the audits ...", and ISPMs do not regulate they provide guidance</p> <p>La versión en español debe revisarse porque no es consistente con el inglés. La versión en español dice "Esta norma regula las auditorías ...", y las NIMFs no regulan, proporcionan orientación. <i>Category : TRANSLATION</i></p>

64	29	<p>Audit in the phytosanitary context is a systematic examination of a process to determine whether it conforms with the phytosanitary requirements set by a national plant protection organization (NPPO). This standard covers audits in the phytosanitary context conducted by the NPPO in its own territory, or with and in the territory of another NPPO, and audits conducted by entities that have been authorized by the NPPO to conduct audits on its behalf in its territory. <u>The intention of the audit process, whether it is performed on an aspect of the plant export or import system, is to ensure that activities are</u></p>	P	<p>Samoa</p> <p><i>Category : EDITORIAL</i></p>
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		<u>undertaken in accordance with NPPO standards, and to determine whether individuals or organizations (domestic or overseas) are meeting phytosanitary requirements imposed through legislation, standards and agreements and, in some instances, international standards.</u>		
65	29	Audit in the phytosanitary context is a systematic <u>and objective</u> examination of a process <u>or system</u> to determine whether it the process or system conforms with the phytosanitary requirements set by a national plant protection organization (NPPO). This standard covers audits in the phytosanitary	P	<p>PPPO</p> <p>The definition of audit is targeted towards phytosanitary requirements, which narrows the wider meaning of an audit. However, as with all audits, it should not exclude the necessary incorporation of objectivity and system, as even phytosanitary measures operate under systems as well as processes. Note, the reference to systems is made in 41 and 46 so it makes sense to include it in the definition.</p> <p>Category : <i>EDITORIAL</i></p>

		context conducted by the NPPO in its own territory, or with and in the territory of another NPPO, and audits conducted by entities that have been authorized by the NPPO to conduct audits on its behalf in its territory.		
66	29	Audit <u>is a documented process and one of verification procedures</u> . Audit in the phytosanitary context is a systematic examination of a process to determine whether it conforms with the phytosanitary requirements set by a national plant protection organization (NPPO). This standard covers audits in the phytosanitary context conducted by the NPPO in its own territory, or with and in the	P	Japan See general comment 3. Add a sentence to clarify the scope of audit more. <i>Category : SUBSTANTIVE</i>

		territory of another NPPO, and audits conducted by entities that have been authorized by the NPPO to conduct audits on its behalf in its territory.		
67	29	Audit in the phytosanitary context is a systematic examination of a process to determine whether it conforms with the phytosanitary requirements set by a national plant protection organization (NPPO). This standard covers audits in the phytosanitary context conducted by the NPPO in its own territory, or with and in the territory of another NPPO, and audits conducted by entities that have been authorized by the NPPO to conduct audits on	P	<p>Uruguay</p> <p>The scope of an ISPM should be a short statement that delineates what is covered by the standard, the concept of audit should not be described in the scope. Deleted sentences moved to section "Background".</p> <p>El alcance de una NIMF debe ser una declaración breve que delimite lo que cubre la norma; el concepto de auditoría no debe describirse en el alcance. Las oraciones eliminadas se movieron a la sección "Antecedentes"</p> <p><i>Category : TECHNICAL</i></p>

		its behalf in its territory.		
68	29	Audit in the phytosanitary context is a systematic examination of a process to determine whether it conforms with the phytosanitary requirements set by a national plant protection organization (NPPO). This standard covers audits in the phytosanitary context conducted by the NPPO in its own territory, or with and in the territory of another NPPO, and audits conducted by entities that have been authorized by the NPPO to conduct audits on its behalf in its territory.	P	Thailand The first sentence in the scope is a meaning of "audits in the phytosanitary context", so it may inappropriately placed under section of scope. We would like to suggest to move this sentence to the section of Background. <i>Category : SUBSTANTIVE</i>
69	29	Audit in the phytosanitary context is a systematic examination <i>evaluation</i> of a	P	EPPO The objective of audits usually goes beyond that of examinations. The relevance for the system and its continuous improvement is missing here. The proposed changes add some additional clarity and are a good basis for helping to ensure the intention of audits is understood. <i>Category : SUBSTANTIVE</i>

		<p>process <u>or system</u> to determine <u>whether it conforms with the phytosanitary requirements level of control and assure the quality of the processes</u> set by a national plant protection organization <u>(NPPO)(NPPO) and to determine whether it conforms with the phytosanitary requirements</u>. This standard covers audits in the phytosanitary context conducted by the NPPO in its own territory, <u>or with and in the territory of another NPPO, and</u> audits conducted by entities that have been authorized by the NPPO to conduct audits on its behalf in its territory.</p>		
70	29	<p>Audit in the phytosanitary context is a systematic examination of a</p>	C	<p>IPPC Regional Workshop Africa It is important that findings of audit in terms gaps, proposed changes should be discussed with the audited NPPO for improvement Category : <i>SUBSTANTIVE</i></p>

		process to determine whether it conforms with the phytosanitary requirements set by a national plant protection organization (NPPO). This standard covers audits in the phytosanitary context conducted by the NPPO in its own territory, or with and in the territory of another NPPO, and audits conducted by entities that have been authorized by the NPPO to conduct audits on its behalf in its territory.		
71	29	Audit in the phytosanitary context is a systematic examination of a process to determine whether it conforms with the phytosanitary requirements set by a national plant protection organization	C	IPPC Regional Workshop Africa Entities may also conduct audits in the territory of another NPPO, on behalf of the NPPO. Especially where expertise lies outside the NPPO <i>Category : SUBSTANTIVE</i>

		(NPPO). This standard covers audits in the phytosanitary context conducted by the NPPO in its own territory, or with and in the territory of another NPPO, and audits conducted by entities that have been authorized by the NPPO to conduct audits on its behalf in its territory.		
72	29	Audit in the phytosanitary context is a systematic examination of a process to determine whether it conforms with the phytosanitary requirements set by a national plant protection organization (NPPO). This standard covers audits in the phytosanitary context conducted by the NPPO in its own territory, or with and in the	C	IPPC Regional Workshop Africa Suggest removal as it pertains to be a definition which can be add to Definitions <i>Category : SUBSTANTIVE</i>

		territory of another NPPO, and audits conducted by entities that have been authorized by the NPPO to conduct audits on its behalf in its territory.		
73	29	Audit in the phytosanitary context is a systematic examination of a process to determine whether it conforms with the phytosanitary requirements set by a national plant protection organization (NPPO). This standard covers audits in the phytosanitary context conducted by the NPPO in its own territory, or with and in the territory of another NPPO, and audits conducted by entities that have been authorized by the NPPO to conduct audits on	C	United States of America First sentence, "process" - Would "operation" be a more appropriate word? Do we audit the method, production practices? <i>Category : TECHNICAL</i>

		its behalf in its territory.		
74	29	Audit in the phytosanitary context is a systematic examination of a process to determine whether it conforms with the phytosanitary requirements set by a national plant protection organization (NPPO). This standard covers audits in the phytosanitary context conducted by the NPPO in its own territory, or with and in the territory of another NPPO, and audits conducted by entities that have been authorized by the NPPO to conduct audits on its behalf in its territory.	C	<p>Uruguay Spanish version should be revised because it is not consistent with English. The Spanish version says "This standard regulates the audits ...", and ISPMs do not regulate they provide guidance.</p> <p>La versión en español debe revisarse porque no es consistente con el inglés. La versión en español dice "Esta norma regula las auditorías ...", y las NIMFs no regulan, proporcionan orientación. <i>Category : TRANSLATION</i></p>
75	29	Audit in the phytosanitary context is a systematic examination of a process to	C	<p>South Africa Entities may also conduct audits in the territory of another NPPO, on behalf of the NPPO. Especially where expertise lies outside the NPPO <i>Category : SUBSTANTIVE</i></p>

		determine whether it conforms with the phytosanitary requirements set by a national plant protection organization (NPPO). This standard covers audits in the phytosanitary context conducted by the NPPO in its own territory, or with and in the territory of another NPPO, and audits conducted by entities that have been authorized by the NPPO to conduct audits on its behalf in its territory.		
76	29	Audit in the phytosanitary context is a systematic examination of a process to determine whether it conforms with the phytosanitary requirements set by a national plant protection organization (NPPO). This	C	South Africa Suggest removal as it pertains to be a definition which can be add to, Definitions <i>Category : SUBSTANTIVE</i>

		standard covers audits in the phytosanitary context conducted by the NPPO in its own territory, or with and in the territory of another NPPO, and audits conducted by entities that have been authorized by the NPPO to conduct audits on its behalf in its territory.		
77	29	La auditoría en el contexto fitosanitario es el examen sistemático de un proceso para determinar si cumple los requisitos fitosanitarios establecidos por una organización nacional de protección fitosanitaria (ONPF). La presente norma regula las auditorías en el contexto fitosanitario realizadas por la ONPF en su propio territorio o con otra	C	CA No existe claridad sobre quien recibe las auditorias <i>Category : SUBSTANTIVE</i>

		ONPF y en el territorio de esta, y las auditorías realizadas por entidades a las que la ONPF haya autorizado para realizar auditorías en su nombre y en su territorio.		
78	29	L'audit dans le contexte phytosanitaire consiste à examiner un processus d'une manière systématique en vue <u>de</u> déterminer si celui-ci est conforme aux exigences phytosanitaires fixées par l'organisation nationale de la protection des végétaux (ONPV). La présente norme couvre les audits menés par l'ONPV dans le contexte phytosanitaire sur son propre territoire ou avec une autre ONPV sur le territoire de celle-ci, et les audits menés par des entités	P	IPPC Regional Workshop Africa <i>Category : EDITORIAL</i>

		autorisées par l'ONPV à mener des audits en son nom sur son territoire.		
References				
79	31	The present standard refers to ISPMs . ISPMs are available on the International Phytosanitary Portal (IPP) at .	C	IPPC Regional Workshop Africa Write out the abbreviation at first. <i>Category : EDITORIAL</i>
80	31	The present standard refers to ISPMs. ISPMs are available on the International Phytosanitary Portal (IPP) at at .	P	Egypt <i>Category : EDITORIAL</i>
Definitions				
81	33	Definitions of phytosanitary terms used in this standard can be found in ISPM 5 (<i>Glossary of phytosanitary terms</i>).	C	South Africa write out the abbreviation at first. <i>Category : EDITORIAL</i>
Outline of Requirements				
82	35	The standard describes the purpose and procedures for audit activities in the phytosanitary context. This	P	European Union Because the audit report is an important element, it should be included in the outline. <i>Category : SUBSTANTIVE</i>

		includes the circumstances that may trigger an audit and audit , the criteria and procedures for planning, preparing for and performing audits audits and reporting . The elements to be considered depend on the type of audit and its purpose, scope and objectives.		
83	35	The standard describes the purpose and procedures for audit activities in the phytosanitary context. This includes the circumstances that may trigger an audit and the criteria and procedures for planning, preparing for and performing audits. The elements to be considered depend on the type of audit and its purpose, scope and objectives.	C	OIRSA In the spanish version, the word disputes its changed by the word controversy. Its important to maintain the correlation with the words in all the languages. <i>Category : TECHNICAL</i>

84	35	The standard describes the purpose and procedures for audit activities in the phytosanitary context. This includes the circumstances that may trigger an audit and the criteria and procedures for planning, preparing for and for , performing audits, and reporting on them . The elements to be considered depend on the type of audit and its purpose, scope and objectives.	P	<p>PPPO</p> <p>An essential part of the audit 'process' is reporting on the results of the audit in a structured and meaningful way. This should be described, even in broad terms, in the document.</p> <p><i>Category : TECHNICAL</i></p>
85	35	The standard describes the purpose and procedures for audit activities in the phytosanitary context. This includes the circumstances that may trigger an audit and audit , the criteria and procedures for planning, preparing for and performing audits audits and	P	<p>EPPO</p> <p>Because the audit report is an important element, it should be included in the outline.</p> <p><i>Category : SUBSTANTIVE</i></p>

		reporting. The elements to be considered depend on the type of audit and its purpose, scope and objectives.		
86	35	La norma describe el propósito y los procedimientos de las actividades de auditoría en el contexto fitosanitario. Ello comprende las circunstancias que pueden dar lugar a una auditoría y los criterios y procedimientos para la planificación, preparación y realización de las auditorías. Los elementos que habrán de considerarse dependen del tipo de auditoría y de su propósito, su ámbito y sus objetivos.	P	Costa Rica Consistencia con la norma en inglés Category : <i>TRANSLATION</i>
87	36	This standard also provides guidance on selecting auditors, establishing audit frequencies, settling	P	United States of America Consider this grammar change Category : <i>EDITORIAL</i>

		disputes over audit findings, and agreeing to financial arrangements between the parties involved. The roles and responsibilities of the parties involved in audits are also described.		
88	36	Esta norma también proporciona orientación relativa a la selección de los auditores, el establecimiento de las frecuencias de auditoría, la resolución de controversias sobre los resultados de la auditoría y el acuerdo de disposiciones financieras entre las partes implicadas involucradas . Asimismo, se describen las funciones y responsabilidades de las partes que intervienen en las auditorías.	P	Costa Rica termino más utilizado <i>Category : TRANSLATION</i>
Background				

89	37	BACKGROUND	C	Viet Nam Viet Nam would like to recommend this draft should be focus on cases where there has been an audit of the whole system to comply with IPPC <i>Category : EDITORIAL</i>
90	38	National plant protection organizations (NPPO) have a number of obligations and responsibilities under the IPPC, such as surveillance, inspections, establishment of phytosanitary import requirements, phytosanitary certification, conduct or supervision of treatments, conduct of pest risk analysis, and training of staff. To help them fulfil these obligations effectively, NPPOs are increasingly using audits to provide confidence that phytosanitary systems and procedures achieve their objectives.	P	Canada <i>Category : EDITORIAL</i>
91	38	National plant protection	P	European Union Acronym already used in [29].

		<p>organizations NPPOs have a number of obligations and responsibilities under the IPPC, such as surveillance, inspections, establishment of phytosanitary import requirements, phytosanitary certification, conduct or supervision of treatments, conduct of pest risk analysis, and training of staff. To help them fulfil these obligations effectively, NPPOs are increasingly using audits to provide confidence that phytosanitary systems and procedures achieve their objectives.</p>		<p>Category : EDITORIAL</p>
92	38	<p>National plant protection organizations have a number of obligations and responsibilities under the IPPC,</p>	P	<p>European Union See general comment. Point 5.1.5.1. of ISPM No. 20 is applicable. Audits in the territory of another NPPO should not be a permanent measure. Category : SUBSTANTIVE</p>

		such as surveillance, inspections, establishment of phytosanitary import requirements, phytosanitary certification, conduct or supervision of treatments, conduct of pest risk analysis, and training of staff. To help them fulfil these obligations effectively, NPPOs are increasingly using audits in their own territory to provide confidence that phytosanitary systems and procedures achieve their objectives.		
93	38	National plant protection organizations have a number of obligations and responsibilities under the IPPC, such as surveillance, inspections, establishment of phytosanitary	P	<p>COSAVE For consistency with Art. IV of IPPC. Article IV describe responsibilities of NPPOs.</p> <p>Para mantener coherencia con el art. IV de la CIPF. El Artículo IV describe las responsabilidades de las ONPF. <i>Category : TECHNICAL</i></p>

		import requirements, phytosanitary certification, conduct or supervision of treatments, conduct of pest risk analysis, and training of staff. To help them fulfil these obligations responsibilities effectively, NPPOs are increasingly using audits to provide confidence that phytosanitary systems and procedures achieve their objectives.		
94	38	National plant protection organizations have a number of obligations and responsibilities under the IPPC, such as surveillance, inspections, establishment of phytosanitary import requirements, phytosanitary certification, conduct or	P	OIRSA For consistency with Art. IV of IPPC. Article IV describe responsibilities of NPPOs <i>Category : TECHNICAL</i>

		supervision of treatments, conduct of pest risk analysis, and training of staff. To help them fulfil these obligations <u>responsibilities</u> effectively, NPPOs are increasingly using audits to provide confidence that phytosanitary systems and procedures achieve their objectives.		
95	38	National plant protection organizations have a number of obligations and responsibilities under the IPPC, such as surveillance, inspections, establishment of phytosanitary import requirements, phytosanitary certification, conduct or supervision of treatments, conduct of pest risk analysis, and training of staff. To	P	Samoa <i>Category : EDITORIAL</i>

		help them fulfil these obligations effectively, NPPOs are increasingly using audits to provide confidence that phytosanitary systems and procedures achieve their objectives.		
96	38	National plant protection organizations have a number of obligations and responsibilities under the IPPC, such as surveillance, inspections, establishment of phytosanitary import requirements, phytosanitary certification, conduct or supervision of treatments, conduct of pest risk analysis, and training of staff. To help them fulfil these obligations effectively, NPPOs are increasingly using audits to provide confidence	C	<p>PPPO</p> <p>In order to use consistent tense, suggest first paragraph could read: ..."such as surveillance, inspections, establishment of phytosanitary import requirements, phytosanitary certification, conducting or supervising treatments, conducting pest risk analysis, and training of staff".</p> <p><i>Category : EDITORIAL</i></p>

		that phytosanitary systems and procedures achieve their objectives.		
97	38	National plant protection organizations have a number of obligations and responsibilities under the IPPC, such as surveillance, inspections, establishment of phytosanitary import requirements, phytosanitary certification, conduct or supervision of treatments, conduct of pest risk analysis, and training of staff. To help them fulfil these obligations effectively, NPPOs are increasingly using audits to provide confidence that phytosanitary systems and procedures achieve their objectives.	P	PPPO Deletion of "of" and propose a new paragraph. <i>Category : SUBSTANTIVE</i>
98	38	National plant protection	P	Japan

		<p>organizations <u>NPPOs</u> have a number of obligations and responsibilities under the IPPC, such as surveillance, inspections, establishment of phytosanitary import requirements, phytosanitary certification, conduct or supervision of treatments, conduct of pest risk analysis, and training of staff. To help them fulfil these obligations effectively, NPPOs are increasingly using audits to provide confidence that phytosanitary systems and procedures achieve their objectives.</p>		<p>Category : <i>EDITORIAL</i></p>
99	38	<p><u>National plant protection organizations</u> <u>NPPOs</u> have a number of obligations and responsibilities</p>	P	<p>EPPO See general comment. Point 5.1.5.1. of ISPM No. 20 is applicable. Audits in the territory of another NPPO should be no permanent measure.</p> <p>Acronym already used in [29]. Category : <i>EDITORIAL</i></p>

		under the IPPC, such as surveillance, inspections, establishment of phytosanitary import requirements, phytosanitary certification, conduct or supervision of treatments, conduct of pest risk analysis, and training of staff. To help them fulfil these obligations effectively, NPPOs are increasingly using audits <u>in their own territory</u> to provide confidence that phytosanitary systems and procedures achieve their objectives.		
100	38	National plant protection organizations have a number of obligations and responsibilities under the IPPC, such as surveillance, inspections, establishment of	C	IPPC Regional Workshop Africa Obligations include reporting as well <i>Category : SUBSTANTIVE</i>

		phytosanitary import requirements, phytosanitary certification, conduct or supervision of treatments, conduct of pest risk analysis, and training of staff. To help them fulfil these obligations effectively, NPPOs are increasingly using audits to provide confidence that phytosanitary systems and procedures achieve their objectives.		
101	38	National plant protection organizations have a number of obligations and responsibilities under the IPPC, such as surveillance, inspections, establishment of phytosanitary import requirements, phytosanitary certification, conduct or	C	United States of America With the emerging emphasis on the use of the systems approach as a phytosanitary measure, it might be worthwhile to reference it in this paragraph; perhaps as phytosanitary certification (field inspection, testing, treatments, systems approaches). <i>Category : TECHNICAL</i>

		supervision of treatments, conduct of pest risk analysis, and training of staff. To help them fulfil these obligations effectively, NPPOs are increasingly using audits to provide confidence that phytosanitary systems and procedures achieve their objectives.		
102	38	National plant protection organizations have a number of obligations and responsibilities under the <u>IPPCInternational Plant Protection Convention (IPPC)</u> , such as surveillance, inspections, establishment of phytosanitary import requirements, phytosanitary certification, conduct or supervision of treatments, conduct of pest risk	P	Costa Rica Consistencia con la norma en español Category : TRANSLATION

		analysis, and training of staff. To help them fulfil these obligations effectively, NPPOs are increasingly using audits to provide confidence that phytosanitary systems and procedures achieve their objectives.		
103	38	National plant protection organizations have a number of obligations and responsibilities under the IPPC, such as surveillance, inspections, establishment of phytosanitary import requirements, phytosanitary certification, conduct or supervision of treatments, conduct of pest risk analysis, and training of staff. To help them fulfil these obligations <u>responsibilities</u> effectively, NPPOs	P	<p>Uruguay For consistency with Art. IV of IPPC. Article IV describe responsibilities of NPPOs.</p> <p>Para mantener coherencia con el art. IV de la CIPF. El Artículo IV describe las responsabilidades de las ONPF.</p> <p>Category : <i>TECHNICAL</i></p>

		are increasingly using audits to provide confidence that phytosanitary systems and procedures achieve their objectives.		
104	38	National plant protection organizations have a number of obligations and responsibilities under the IPPC, such as surveillance, inspections, establishment of phytosanitary import requirements, phytosanitary certification, conduct or supervision of treatments, conduct of pest risk analysis, and training of staff. To help them fulfil these obligations effectively, NPPOs are increasingly using audits to provide confidence that phytosanitary systems and	C	South Africa Obligations include reporting as well Category : <i>EDITORIAL</i>

		procedures achieve their objectives.		
105	38	<p>Las ONPF tienen una serie de obligaciones y responsabilidades en el marco de la Convención Internacional de Protección Fitosanitaria (CIPF), como la vigilancia, las inspecciones, el establecimiento de requisitos fitosanitarios de importación, la certificación fitosanitaria, la realización o supervisión de tratamientos, la realización de análisis de riesgos de plagas y la capacitación del personal. Para que puedan cumplir sus obligaciones <u>obligaciones de manera eficaz</u>, las ONPF cada vez se están valiendo más de las auditorías para infundir confianza en que los sistemas y procedimientos</p>	P	<p>Costa Rica Consistencia con la norma en inglés Category : <i>TRANSLATION</i></p>

		fitosanitarios logran sus objetivos.		
106	39	Audits are referenced in many adopted ISPMs. This standard aims to provide <u>standardized</u> guidance to NPPOs, to <u>ensure-standarize</u> a common approach to audits in the phytosanitary context.	P	COSAVE It is enough with mentioning just guidance. Move it to a more appropriate place in the sentence. Basta con mencionar solo una guía. Moverlo a un lugar más apropiado en la oración. Category : <i>TECHNICAL</i>
107	39	Audits are referenced in many adopted ISPMs. This standard aims to provide <u>standardized</u> guidance to NPPOs, to ensure <u>standarize</u> a common approach to audits in the phytosanitary context.	P	OIRSA It is enough with mentioning just guidance. Move it to a more appropriate place in the sentence. Category : <i>TECHNICAL</i>
108	39	Audits are referenced in many adopted ISPMs. This standard aims to provide <u>standardized</u> guidance to NPPOs, to <u>ensure-standarize</u> a common approach to audits in the phytosanitary context.	P	Uruguay It is enough with mentioning just guidance. Move it to a more appropriate place in the sentence. Basta con mencionar solo una guía. Moverlo a un lugar más apropiado en la oración. Category : <i>TECHNICAL</i>

109	39	Audits are referenced in many adopted ISPMs. This standard aims to provide standardized guidance to NPPOs, to ensure <u>to adoption of</u> a common approach to audits in the phytosanitary context.	P	Costa Rica in the Spanish version the word "adoption" is included, so it must be consistent in both versions, it is included in the English version or "adoption" is eliminated from the Spanish version, since it indicates that this standard ensures the adopting a common approach creates more responsibility in the application of the standards. <i>Category : SUBSTANTIVE</i>
110	39	Las auditorías se mencionan en muchas NIMF adoptadas. El propósito de la presente norma es proporcionar orientación unificada a las ONPF, a fin de garantizar la adopción de un planteamiento <u>enfoque</u> común en las auditorías en el contexto fitosanitario.	P	Costa Rica En la versión en inglés la palabra "adopción" no se incluye, por lo que se debe ser coherentes en ambas versiones se incluye en la versión en inglés o eliminar "adopción" de esta versión ya que indicar que esta norma asegura la adopción de un enfoque común crea más responsabilidad. <i>Category : SUBSTANTIVE</i>
111	40	<u>Audit in the phytosanitary context is a systematic examination of a phytosanitary system or procedure to determine</u>	P	COSAVE Text moved from scope. Texto movido desde el alcance <i>Category : TECHNICAL</i>

		whether it conforms with the requirements set by an NPPO. Unlike supervision, an audit does not involve continuous observation and direction of activities, but provides an assessment of a specific phytosanitary system or procedure at a given time.		
112	40	Unlike supervision, or monitoring , an audit does not involve continuous observation and direction of activities, but provides an assessment of a specific phytosanitary system or procedure at a given time.	P	Samoa <i>Category : EDITORIAL</i>
113	40	Unlike supervision, an audit does not involve continuous observation and direction of activities, but provides an assessment of a specific	P	China According to [57], in addition to assess specific phytosanitary systems or procedures, audits can be a review of particular elements, such as new import pathways or new export programmes. <i>Category : SUBSTANTIVE</i>

		phytosanitary system or system. procedure at a given time or element.		
114	40	<u>Audit in the phytosanitary context is a systematic examination of a phytosanitary system or procedure to determine whether it conforms with the requirements set by an NPPO.</u> Unlike supervision, an audit does not involve continuous observation and direction of activities, but provides an assessment of a specific phytosanitary system or procedure at a given time.	P	Uruguay Text moved from Scope Texto movido desde Alcance Category : <i>TECHNICAL</i>
115	41	Audit is a documented process to gain assurance and trust in <u>determine whether</u> phytosanitary systems and procedures <u>procedures conform to the requirements set by</u>	P	Panama To clarify the purpose of audits in the phytosanitary context. Category : <i>TECHNICAL</i>

		<p>an NPPO. Objective evidence is collected on whether the outcomes of the the phytosanitary system or procedure, including associated activities, conform with the relevant requirements of the NPPO and whether these requirements are implemented effectively to achieve phytosanitary objectives.</p>		
116	41	<p>Audit is a documented process to gain assurance and trust in phytosanitary systems and procedures. Objective evidence is collected on whether the outcomes of the system or procedure, including associated activities, procedure conform with the relevant requirements of the NPPO and whether</p>	P	<p>European Union Unclear what is meant with the "associated activities", please delete or specify. <i>Category : TECHNICAL</i></p>

		these requirements are implemented effectively to achieve phytosanitary objectives.		
117	41	Audit is a documented process to <u>gain assurance and trust in determine whether</u> phytosanitary systems and <u>procedures</u> <u>procedures conform to the requirements set by an NPPO</u> . Objective evidence is collected on whether the outcomes of the <u>phytosanitary</u> system or procedure, including associated activities, conform with the relevant requirements of the NPPO and whether these requirements are implemented effectively to achieve phytosanitary objectives.	P	<p>COSAVE To clarify the purpose of audits in the phytosanitary context.</p> <p>Para clarificar el propósito de las auditorías en el contexto fitosanitario. <i>Category : TECHNICAL</i></p>
118	41	Audit is a documented process to gain assurance	C	<p>OIRSA In the spanish version, the word evidence its changed by the word data. Its important to maintain the correlation with the words in all the languages. <i>Category : TRANSLATION</i></p>

		and trust in phytosanitary systems and procedures. Objective evidence is collected on whether the outcomes of the system or procedure, including associated activities, conform with the relevant requirements of the NPPO and whether these requirements are implemented effectively to achieve phytosanitary objectives.		
119	41	Audit is a documented process to gain assurance and trust in phytosanitary systems and procedures. Objective evidence is collected on whether the outcomes of the system or procedure, including associated activities, conform with the relevant requirements of the	P	OIRSA To clarify the purpose of audits in the phytosanitary context. <i>Category : TECHNICAL</i>

		<p>NPPO and whether these requirements are implemented effectively to achieve phytosanitary objectives. Audit is a documented process to gain assurance and trust in determine whether phytosanitary systems and procedures conform to the requirements set by an NPPO. Objective evidence is collected on whether the outcomes of the phytosanitary system or procedure, including associated activities, conform with the relevant requirements of the NPPO and whether these requirements are implemented effectively to achieve phytosanitary objectives.</p>		
120	41	<p>Audit <u>An audit</u> is a documented process to gain assurance and trust in assess conformance of phytosanitary systems and procedures <u>procedures</u> against <u>phytosanitary requirements, or identify issues</u></p>	P	<p>PPPO Re-word to define what an audit is for in the phytosanitary context. Category : <i>TECHNICAL</i></p>

		<p><u>relating to non-conformance.</u></p> <p>Objective evidence is collected on whether the outcomes of the system or procedure, including associated activities, conform with the relevant requirements of the NPPO and whether these requirements are implemented effectively to achieve phytosanitary objectives.</p>		
121	41	<p>Audit is a documented process to gain assurance and trust in phytosanitary systems and procedures.</p> <p>Objective evidence is collected collect on whether the outcomes of the system or procedure, including associated activities, conform with the relevant requirements of the NPPO and whether these requirements</p>	P	<p>China</p> <p>The results of an audit can be positive or negative. It doesn't necessarily increase trust. For example, the audit of importing country to exporting country may cause importing country to stop importing certain commodity.</p> <p>Category : <i>SUBSTANTIVE</i></p>

		are implemented effectively to achieve phytosanitary objectives.		
122	41	Audit is a documented process to gain assurance and trust in phytosanitary systems and procedures. Objective evidence is collected on whether the outcomes of the system or procedure, including associated activities, procedure conform with the relevant requirements of the NPPO and whether these requirements are implemented effectively to achieve phytosanitary objectives.	P	EPPO Unclear what is meant with the "associated activities", please delete or specify <i>Category : TECHNICAL</i>
123	41	Audit is a documented process to gain assurance and trust in <u>verify</u> phytosanitary systems and procedures. Objective evidence	P	United States of America Consider different wording, such as "verify"; "trust" is subjective. See US comment in paragraph 174-176. Establish, verify are used elsewhere in this document. We propose using wording used already in this document. <i>Category : TECHNICAL</i>

		is collected on whether the outcomes of the system or procedure, including associated activities, conform with the relevant requirements of the NPPO and whether these requirements are implemented effectively to achieve phytosanitary objectives.		
124	41	Audit is a documented process to gain assurance and trust in <u>determine whether</u> phytosanitary systems and procedures <u>procedures conform to the requirements set by an NPPO</u> . Objective evidence is collected on whether the outcomes of the <u>phytosanitary</u> system or procedure, including associated activities, conform with the relevant requirements of the	P	<p>Uruguay To clarify the purpose of audits in the phytosanitary context.</p> <p>Para clarificar el propósito de las auditorías en el contexto fitosanitario. <i>Category : TECHNICAL</i></p>

		NPPO and whether these requirements are implemented effectively to achieve phytosanitary objectives.		
125	41	Audit is a documented process to gain assurance and trust in phytosanitary systems and procedures. Objective evidence is collected on whether the outcomes of the system or procedure, including associated activities, conform with the relevant requirements of the NPPO and whether these requirements are implemented effectively to achieve phytosanitary objectives.	C	South Africa Clarity is requested on what "Objective evidence" refers to in this context. <i>Category : SUBSTANTIVE</i>
126	41	Audit is a documented process to gain assurance and trust in phytosanitary systems and procedures.	C	South Africa This seems to be a contradictory statement. <i>Category : EDITORIAL</i>

		Objective evidence is collected on whether the outcomes of the system or procedure, including associated activities, conform with the relevant requirements of the NPPO and whether these requirements are implemented effectively to achieve phytosanitary objectives.		
127	41	La auditoría es un proceso documentado que permite adquirir seguridad y confianza en los sistemas y procedimientos fitosanitarios. Se recopilan datos <u>objetivos-evidencias</u> <u>objetivas</u> sobre si los resultados del sistema o procedimiento, incluidas las actividades asociadas, cumplen los requisitos pertinentes de la ONPF y si estos	P	Costa Rica Término mejor utilizado en el contexto de las auditorías. <i>Category : TRANSLATION</i>

		requisitos se aplican de forma efectiva eficaz para lograr los objetivos fitosanitarios.		
IMPACTS ON BIODIVERSITY AND THE ENVIRONMENT				
128	43	Conducting audits in the phytosanitary context helps to ensure the effectiveness of phytosanitary systems and procedures, thereby reducing the risk of the introduction and spread of quarantine regulated pests. This protects plant health, which in turn reduces negative environmental impacts and benefits biodiversity.	P	European Union Because of the phytosanitary treatments used against regulated non-quarantine pests, in consistency with recently adopted ISPMs. <i>Category : SUBSTANTIVE</i>
129	43	Conducting audits in the phytosanitary context helps to ensure the effectiveness of phytosanitary systems and procedures, thereby reducing the risk of the introduction and spread of	P	EPPO Because of the phytosanitary treatments used against regulated non-quarantine pests, in consistency with recently adopted ISPMs. <i>Category : SUBSTANTIVE</i>

		quarantine regulated pests. This protects plant health, which in turn reduces negative environmental impacts and benefits biodiversity.		
130	43	Conducting audits in the phytosanitary context helps to ensure the effectiveness of phytosanitary systems and procedures, thereby reducing the risk of the introduction and spread of quarantine pests. This protects plant health, which in turn reduces negative environmental impacts and benefits biodiversity.	C	IPPC Regional Workshop Africa agree Category : <i>SUBSTANTIVE</i>
Requirements				
131	44	REQUIREMENTS	C	United States of America General - The document freely uses "verify" as an action for systems and procedures, but rarely (the exception being paragraph 46) links to conformity with the requirement. In every instance where verify is used, conformity (or compliance) must be linked to the requirement. Example: Section 1. Purpose of the Audit, paragraph 48 – verify the conformity of its own systems and procedures (its "own" systems is a tautology) Category : <i>TECHNICAL</i>

1. Purpose of Audit				
132	45	1. Purpose of Audit	C	<p>Viet Nam Viet Nam would like to support for specification the purpose of the audit because the phytosanitary procedures and rules of all member countries are required to comply with the IPPC, and the SPS Agreement, cannot audit the whole system, after audit which countries will comply with regulations. Another hand, auditing should only be conducted when the exporting country breaches the non-compliance with the specific item, or changes in the situation or the importing country changes in Adding specify the case of audit (Not clear why audit? or Audit for what?) <i>Category : EDITORIAL</i></p>
133	45	1. Purpose of <u>An</u> Audit	P	<p>PPPO <i>Category : EDITORIAL</i></p>
134	46	<p>Audits should objectively evaluate whether specific phytosanitary systems and procedures conform with the phytosanitary requirements set by an NPPO. Audits should provide an opportunity to identify findings, including nonconformities and observations on the effectiveness of the systems and procedures being audited.</p>	P	<p>European Union This sentence has no added value for this draft ISPM. <i>Category : SUBSTANTIVE</i></p>
135	46	<p>Audits should objectively evaluate whether specific phytosanitary systems and procedures conform with the phytosanitary</p>	P	<p>COSAVE To avoid confusion with phytosanitary import requirements. NPPOs may set other requirements to be audited. Para evitar confusiones con los requisitos fitosanitarios de importación. Las ONPFs pueden establecer otros requisitos para ser auditados. <i>Category : TECHNICAL</i></p>

		requirements set by an NPPO. Audits should provide an opportunity to identify findings, including nonconformities and observations on the effectiveness of the systems and procedures being audited.		
136	46	Audits should objectively evaluate whether specific phytosanitary systems and procedures conform with the phytosanitary requirements set by an NPPO. Audits should provide an opportunity to identify findings, including nonconformities and observations on the effectiveness of the systems and procedures being audited.	C	OIRSA In the spanish version, the word "Specially" is added before "including nonconformities". Its important to maintain the correlation with the words in all the languages, so it shouldnt be added. <i>Category : EDITORIAL</i>
137	46	Audits should objectively evaluate whether specific phytosanitary systems and procedures conform	P	OIRSA To avoid confusion with phytosanitary import requirements. NPPOs may set other requirements to be audited. <i>Category : TECHNICAL</i>

		with the phytosanitary requirements set by an NPPO. Audits should provide an opportunity to identify findings, including nonconformities and observations on the effectiveness of the systems and procedures being audited.		
138	46	Audits should objectively evaluate whether specific phytosanitary systems and procedures conform with the phytosanitary requirements set by an NPPO. Audits should provide an opportunity to identify findings , including nonconformities and observations on the effectiveness of the systems and procedures being audited.	P	China More concise <i>Category : EDITORIAL</i>
139	46	Audits should objectively evaluate whether specific phytosanitary	P	EPPO This sentence has no added value for this draft ISPM. <i>Category : SUBSTANTIVE</i>

		systems and procedures conform with the phytosanitary requirements set by an NPPO. Audits should provide an opportunity to identify findings, including nonconformities and observations on the effectiveness of the systems and procedures being audited.		
140	46	Audits should objectively evaluate whether specific phytosanitary systems and procedures conform with the phytosanitary requirements set by an NPPO. Audits should provide an opportunity to identify findings, including nonconformities and observations on the effectiveness of the systems and procedures being audited.	C	IPPC Regional Workshop Africa agree <i>Category : SUBSTANTIVE</i>

141	46	Audits should objectively evaluate whether specific phytosanitary systems and procedures conform with the phytosanitary requirements set by an NPPO. Audits should provide an opportunity to identify findings, including nonconformities and observations on the effectiveness of the systems and procedures being audited.	C	IPPC Regional Workshop Africa It is important that findings of audit in terms gaps, proposed changes should be discussed with the audited NPPO for improvement Category : <i>SUBSTANTIVE</i>
142	46	Audits should objectively evaluate whether specific phytosanitary systems and procedures conform with the phytosanitary requirements set by an NPPO. Audits should provide an opportunity to identify findings, including nonconformities and observations on the effectiveness of the systems and	C	IPPC Regional Workshop Africa Audits should also be able to identify risks and recommend improvements Category : <i>SUBSTANTIVE</i>

		procedures being audited.		
143	46	Audits should objectively evaluate whether specific phytosanitary systems and procedures conform with the phytosanitary requirements set by an NPPO. Audits should provide an opportunity to identify findings, including nonconformities and observations on the effectiveness of the phytosanitary systems and procedures being audited.	P	United States of America To be relevant to the phytosanitary context. <i>Category : TECHNICAL</i>
144	46	Audits should objectively evaluate whether specific phytosanitary systems and procedures conform with the phytosanitary requirements set by an NPPO. Audits should provide an opportunity to identify findings, including nonconformities	P	Uruguay To avoid confusion with phytosanitary import requirements. NPPOs may set other requirements to be audited. Para evitar confusiones con los requisitos fitosanitarios de importación. Las ONPFs pueden establecer otros requisitos para ser auditados. <i>Category : TECHNICAL</i>

		and observations on the effectiveness of the systems and procedures being audited.		
145	46	Audits should objectively evaluate whether specific phytosanitary systems and procedures conform with the phytosanitary requirements set by an NPPO. Audits should provide an opportunity to identify findings, including nonconformities and observations on the effectiveness of the systems and procedures being audited.	C	Malawi Audits findings have to presented, propose solution and discuss way forward for the improvement if there are any gaps . We support the draft Category : <i>SUBSTANTIVE</i>
146	46	Audits should objectively evaluate whether specific phytosanitary systems and procedures conform with the phytosanitary requirements set by an NPPO. Audits should provide an opportunity to identify findings,	C	South Africa Audits should also be able to identify risks and recommend improvements Category : <i>TECHNICAL</i>

		including nonconformities and observations on the effectiveness of the systems and procedures being audited.		
147	46	Las auditorías deberían evaluar de forma objetiva si determinados sistemas y procedimientos fitosanitarios cumplen los requisitos fitosanitarios establecidos por una ONPF. Asimismo, deberían ofrecer oportunidades de obtener <u>información</u> <u>identificar hallazgos</u> , en <u>especial-incluidas</u> no conformidades y observaciones sobre la eficacia de los sistemas y procedimientos que se estén auditando.	P	Costa Rica Coherencia con la versión en inglés <i>Category : TRANSLATION</i>
148	47	<u>An NPPO may conduct an audit in the phytosanitary context to:</u>	C	Viet Nam Viet Nam would like to support paragraphs from 47 to 53 may remove to Section 4.2 "Responsibilities of the NPPO" <i>Category : EDITORIAL</i>
149	48	verify its own systems and	P	COSAVE Text added to simplify paragraph 50.

		procedures procedures- verify the systems and procedures of another NPPO.		Se agregó el texto para simplificar el párrafo 50. <i>Category : TECHNICAL</i>
150	48	verify its own systems and procedures	P	OIRSA Text added to simplify paragraph 50. <i>Category : EDITORIAL</i>
151	48	verify the conformity of its own systems and procedures	P	United States of America See US comment in paragraph 44 <i>Category : TECHNICAL</i>
152	48	verify its own systems and procedures - verify the systems and procedures of another NPPO.	P	Uruguay Text added to simplify paragraph 50. Se agregó el texto para simplificar el párrafo 50. <i>Category : TECHNICAL</i>
153	48	verify its own systems and procedures	C	South Africa This should also be done independently so there is no bias and compared <i>Category : SUBSTANTIVE</i>
154	49	verify the systems and procedures of authorized authorized, accredited or approved entities.	P	Mexico To include all kind of entities <i>Category : SUBSTANTIVE</i>
155	49	verify the systems and procedures of authorized entities .	C	Canada This is the first mention of the term "authorized entities". With the pause in the adoption of the draft ISPM on authorization, it will be valuable to explain and provide context to the term "authorized entity". The text from the draft authorization is presented for consideration and incorporation. "An NPPO decides whether to use authorization of entities to perform phytosanitary actions. Authorization may be used by NPPOs to authorize entities to perform specific phytosanitary actions, to audit other authorized entities, or to supervise phytosanitary actions. Examples of phytosanitary actions that an NPPO may decide to authorize an entity to perform include monitoring, sampling, inspection, testing, surveillance, treatment, post-entry quarantine and destruction." <i>Category : SUBSTANTIVE</i>
156	49	verify the systems and procedures of entities that have	P	European Union To improve clarity. <i>Category : TECHNICAL</i>

		been authorized entitiesby the NPPO to conduct audits on its behalf.		
157	49	verify the systems and procedures of authorized entities. - to verify the systems and procedures of the NPPO of the exporting country	P	Caribbean Agricultural Health and Food Safety Agency Also a reason for the NPPO might conduct an audit <i>Category : SUBSTANTIVE</i>
158	49	verify the systems and procedures of entities that have been authorized entitiesby the NPPO to conduct audits on its behalf.	P	EPPO To improve clarity. <i>Category : SUBSTANTIVE</i>
159	49	verify the systems and procedures of authorized entities.	C	IPPC Regional Workshop Africa agree <i>Category : SUBSTANTIVE</i>
160	49	verify the systems and procedures of authorized entities.	C	IPPC Regional Workshop Africa This should also be done independently so there is no bias <i>Category : SUBSTANTIVE</i>
161	50	In addition, the NPPO of an importing country may conduct an audit to verify the systems and procedures of the NPPO of an exporting country.	C	Viet Nam Viet Nam would like to support paragraphs from 47 to 53 may remove to Section 4.2 "Responsibilities of the NPPO" <i>Category : EDITORIAL</i>
162	50	In addition, the NPPO of an importing country	P	COSAVE Simplified and moved after paragraph 48. Simplificado y movido después del párrafo 48 <i>Category : TECHNICAL</i>

		may conduct an audit to verify the systems and procedures of the NPPO of an exporting country.		
163	50	In addition, the NPPO of an importing country may conduct an audit to verify the systems and procedures of the NPPO of an exporting country <u>country in agreement with the exporting NPPO.</u> <u>The arrangement of such audit should be agreed by the exporting and importing NPPOs in accordance with this ISPM.</u>	P	PPPO To emphasize an audit between to members should be mutually agreed and follow the ISPM. <i>Category : TECHNICAL</i>
164	50	In addition, the NPPO of an importing country may conduct an audit to verify the systems and procedures of the NPPO of an exporting country.	P	Caribbean Agricultural Health and Food Safety Agency Suggest including this sentence as a third bullet representing another reason to conduct an audit <i>Category : SUBSTANTIVE</i>
165	50	In addition, the NPPO of an importing country may conduct an	C	Caribbean Agricultural Health and Food Safety Agency This is another reason to conduct audits. <i>Category : SUBSTANTIVE</i>

		audit to verify the systems and procedures of the NPPO of an exporting country.		
166	50	In addition, the NPPO of an importing country may conduct an audit to verify the systems and procedures of the NPPO of an exporting country.	C	Caribbean Agricultural Health and Food Safety Agency Jamaica is recommending that this becomes another bullet under point 47 and should read- to verify the systems and procedures of the NPPO of an exporting country. <i>Category : SUBSTANTIVE</i>
167	50	In addition, the NPPO of an importing country may conduct an audit to verify the systems and procedures of the NPPO of an exporting country.	C	Caribbean Agricultural Health and Food Safety Agency Suggest including this sentence as third bullet as this is also a reason the NPPO might conduct an audit <i>Category : SUBSTANTIVE</i>
168	50	In addition, the NPPO of an importing country may conduct an audit to verify the systems and procedures of the NPPO of an exporting country.	C	IPPC Regional Workshop Africa very important <i>Category : SUBSTANTIVE</i>
169	50	In addition, the NPPO of an importing country may conduct an audit to verify the systems and	C	Jamaica Jamaica is recommending that this becomes another bullet under point 47 and should read to verify the systems and procedures of the NPPO of an exporting country. <i>Category : SUBSTANTIVE</i>

		procedures of the NPPO of an exporting country.		
170	50	In addition, the NPPO of an importing country may conduct an audit to verify the systems and procedures of the NPPO of an exporting country.	P	Uruguay Simplified and moved after paragraph 48. Simplificado y movido después del párrafo 48 Category : <i>TECHNICAL</i>
171	51	An NPPO may also decide to authorize an entity to conduct an audit on its behalf to verify the systems and procedures of:	C	Viet Nam Viet Nam would like to support paragraphs from 47 to 53 may remove to Section 4.2 "Responsibilities of the NPPO" Category : <i>EDITORIAL</i>
172	51	An NPPO may also decide to authorize an entity <u>authorized by an NPPO</u> to conduct an audit on its behalf <u>may conduct an audit in the phytosanitary context</u> to verify the systems and procedures of of <u>entities authorized to perform phytosanitary actions in its territory.</u>	P	COSAVE 1) For consistency with paragraph 47. In addition there will be an ISPM on authorization of entities providing that NPPO can authorize entities to conduct audits. 2) Paragraph 52 unified as a consequence of comments in paragraph 53. 1) Para mantener la coherencia con el párrafo 47. Además, habrá una NIMF sobre la autorización de entidades siempre que la ONPF pueda autorizar a las entidades a realizar auditorías. 2) Párrafo 52 unificado como consecuencia de los comentarios en el párrafo 53. Category : <i>TECHNICAL</i>
173	51	An NPPO may also decide to authorize an entity to conduct	P	OIRSA 1) For consistency with paragraph 47. In addition there will be an ISPM on authorization of entities providing that NPPO can authorize entities to conduct audits. 2) Paragraph 52 unified as a consequence of comments in paragraph 53.

		an audit on its behalf to verify the systems and procedures of: An NPPO may also decide to authorize an entity authorized by an NPPO to conduct an audit on its behalf may conduct an audit in the phytosanitary context to verify the systems and procedures of: of entities authorized to perform phytosanitary actions in its territory.		<i>Category : TECHNICAL</i>
174	51	An NPPO may also decide to authorize an entity to conduct an audit on its behalf to verify the systems and procedures of:	C	Ukraine We suggest deleting this paragraph <i>Category : TECHNICAL</i>
175	51	An NPPO may also decide to authorize an entity to conduct an audit on its behalf to verify the systems and procedures of:	C	IPPC Regional Workshop Africa agree <i>Category : SUBSTANTIVE</i>
176	51	An NPPO may also decide to authorize an entity <u>authorized by an NPPO</u> to conduct an audit on its behalf <u>may conduct an audit in the phytosanitary context</u> to verify the	P	Uruguay 1) For consistency with paragraph 47. In addition there will be an ISPM on authorization of entities providing that NPPO can authorize entities to conduct audits. 2) Paragraph 52 unified as a consequence of comments in paragraph 53. 1) Para mantener la coherencia con el párrafo 47. Además, habrá una NIMF sobre la autorización de entidades siempre que la ONPF pueda autorizar a las entidades a realizar auditorías. 2) Párrafo 52 unificado como consecuencia de los comentarios en el párrafo 53. <i>Category : TECHNICAL</i>

		systems and procedures of of <u>entities authorized to perform phytosanitary actions in its territory</u>		
177	52	entities <u>accredited, approved, authorized and certified</u> to perform phytosanitary actions in its territory	P	Mexico <i>Category : SUBSTANTIVE</i>
178	52	<u>entities authorized to perform phytosanitary actions in its territory</u>	C	Viet Nam Viet Nam would like to support paragraphs from 47 to 53 may remove to Section 4.2 "Responsibilities of the NPPO" <i>Category : EDITORIAL</i>
179	52	<u>entities authorized to perform phytosanitary actions in its territory</u>	P	COSAVE It was integrated into paragraph 51. Se unificó en párrafo 51 <i>Category : TECHNICAL</i>
180	52	<u>entities authorized to perform phytosanitary actions in its territory</u>	P	OIRSA It was integrated into paragraph 51. <i>Category : TECHNICAL</i>
181	52	<u>entities authorized to perform phytosanitary actions in its territory</u>	P	Uruguay It was integrated in paragraph 51 Se integró en el párrafo 51 <i>Category : TECHNICAL</i>
182	53	<u>entities participating in the</u>	C	Viet Nam Viet Nam would like to support paragraphs from 47 to 53 may remove to Section 4.2 "Responsibilities of the NPPO" <i>Category : EDITORIAL</i>

		system of the exporting country.		
183	53	entities participating in the system of the exporting country.	P	Canada According to the Scope, entities will be authorized by NPPO to conduct audit only in its territory. <i>Category : SUBSTANTIVE</i>
184	53	entities participating in the system of the exporting country.	P	European Union It is sufficiently covered by the first point. Only an NPPO should be authorized to conduct audit in the territory of another NPPO. Consistency with [29], [81] and [101]. If this comment is incorporated, please merge [51] and [52]. If this comment is not incorporated, in [53] replace "system" with "phytosanitary system" for consistency with the rest of the standard. <i>Category : TECHNICAL</i>
185	53	entities participating in the system of the exporting country.	P	COSAVE Entities authorized to conduct audits should not audit systems in others countries. Las entidades autorizadas para realizar auditorías no deben auditar sistemas en otros países. <i>Category : TECHNICAL</i>
186	53	entities participating in the system of the exporting country.	P	China To increase the mutual trust between the importing and the exporting country and ensure the trade security, it is not appropriate for authorized entities to conduct the audit. This is particularly important for developing countries, especially those where the authorization related supporting management is still immature. <i>Category : SUBSTANTIVE</i>
187	53	entities participating in the system of the exporting country.	P	Uruguay Entities authorized to conduct audits should not audit systems in other countries. Las entidades autorizadas para realizar auditorías no deben auditar sistemas en otros países. <i>Category : TECHNICAL</i>
188	53	entities participating in the phytosanitary system of the exporting country.	P	Thailand To be consistency <i>Category : EDITORIAL</i>
189	53	entities participating in the system of the exporting country.	P	EPPO It is sufficiently covered by the first point. Only an NPPO should be authorized to conduct audit in the territory of another NPPO. Consistency with [29], [81] and [101]. If this comment is incorporated, please merge [51] and [52]. If this comment is not incorporated, in [53] replace "system" with "phytosanitary system" for consistency with the rest of the standard. <i>Category : TECHNICAL</i>
2. Types of Audit				
190	55	The main types of audit in the phytosanitary context are system	P	United States of America Both of Systems and Verification audit are for verification purposes. We propose to use "monitoring" audit instead of "Verification" (global change for steward). The meaning of the term monitoring in ISPM 5 is also consistent with the description with this concept described herein. We propose that the TPG experts investigate how the proposed term or another term could be translated into other languages.

		audits and <u>verification monitoring</u> audits.		<i>Category : TECHNICAL</i>
191	56	A system audit is a comprehensive review of a <u>phytosanitary</u> system or procedure to assess its effectiveness and conformity with established phytosanitary requirements. The scope of a system audit may include an entire system from production to export to, <u>export or</u> a system of a particular entity, or particular processes and procedures relevant to a phytosanitary system.	P	Costa Rica If a "system audit" also includes a particular process, then there would be no difference with a "verification audit" (aimed at "particular elements of a system or procedure"). Therefore the last part of the sentence should be removed <i>Category : TECHNICAL</i>
192	56	A system audit is a comprehensive review of a system or procedure to assess its effectiveness and conformity with established phytosanitary <u>requirements</u> procedures . The scope of a system audit may	P	European Union 1. 'procedures': more appropriate term in the context of audit. This applies to other sections of the draft. 2. 'the': better English. <i>Category : EDITORIAL</i>

		include an entire system from production to export, a-the system of a particular entity, or particular processes and procedures relevant to a phytosanitary system.		
193	56	A system audit is a comprehensive review of a system or procedure to assess its effectiveness and conformity with established phytosanitary requirements. The scope of a system audit may include an entire system from production to export, export or a system of a particular entity, or particular processes and procedures relevant to a phytosanitary system.	P	European Union The definitions of system audit and verification audit are not clear, because the difference between both audit types is not clear. <i>Category : SUBSTANTIVE</i>
194	56	A system audit is a comprehensive review of a system or procedure to assess its effectiveness and	P	COSAVE If a "system audit" also includes a particular process, then there would be no difference with a "verification audit" (aimed at "particular elements of a system or procedure"). Therefore the last part of the sentence should be removed. Si una "auditaría del sistema" también incluye un proceso en particular, entonces no habría diferencia con una "auditaría de verificación" (dirigida a "elementos particulares de un sistema o procedimiento"). Por tanto, debería eliminarse la última parte de la oración. <i>Category : TECHNICAL</i>

		<p>conformity with established phytosanitary requirements. The scope of a system audit may include an entire system from production to export, a system of a particular entity, or particular processes and procedures relevant to a phytosanitary system. audit is a comprehensive review of a phytosanitary system or procedure to assess its effectiveness and conformity with established phytosanitary requirements. The scope of a system audit may include an entire system from production to export, or a system of a particular entity.</p>		
195	56	<p>A system audit is a comprehensive review of a system or procedure to assess its effectiveness and</p>	P	<p>OIRSA If a "system audit" also includes a particular process, then there would be no difference with a "verification audit" (aimed at "particular elements of a system or procedure"). Therefore the last part of the sentence should be removed. <i>Category : TECHNICAL</i></p>

		<p>conformity with established phytosanitary requirements. The scope of a system audit may include an entire system from production to export, a system of a particular entity, or particular processes and procedures relevant to a phytosanitary system. A system audit is a comprehensive review of a phytosanitary system or procedure to assess its effectiveness and conformity with established phytosanitary requirements. The scope of a system audit may include an entire system from production to export, export or a system of a particular entity, or particular processes and procedures relevant to a phytosanitary system.</p>		
196	56	<p>A system audit is a comprehensive review of a phytosanitary system or procedure to assess its effectiveness and</p>	P	<p>Uruguay If a "system audit" also includes a particular process, then there would be no difference with a "verification audit" (aimed at "particular elements of a system or procedure"). Therefore, the last part of the sentence should be removed.</p> <p>Si una "auditaría del sistema" también incluye un proceso en particular, entonces no habría diferencia con una "auditaría de verificación" (dirigida a "elementos particulares de un sistema o procedimiento"). Por tanto, debería eliminarse la última parte de la oración. <i>Category : TECHNICAL</i></p>

		conformity with established phytosanitary requirements. The scope of a system audit may include an entire system from production to export, export or a system of a particular entity, or particular processes and procedures relevant to a phytosanitary system.		
197	56	A system audit is a comprehensive review of a an <u>entire</u> system or procedure to assess its effectiveness and conformity with established phytosanitary requirements. <u>It is conducted to determine if the system or procedure is designed to achieve its objectives and if the auditee has sufficient capability to implement the system or procedures. In general, it may be</u>	P	<p>Japan</p> <p>To differentiate system audit and verification audit.</p> <p>Add the information about the timing for conducting this type of audit. This type is a comprehensive review of an entire system or procedure, so in general, it may be done initially before authorizing an entity or a new process.</p> <p>Category : <i>SUBSTANTIVE</i></p>

		<p><u>done initially before authorizing an entity or a new process, or it may be done where necessary.</u> The scope of a system audit may include an entire system from production to export, a system of a particular entity, or particular processes and procedures relevant to a phytosanitary system.</p>		
198	56	<p>A system audit is a comprehensive review of a system or procedure to assess its effectiveness and conformity with established phytosanitary <u>requirementsprocedures</u>. The scope of a system audit may include an entire system from production to export, a<u>the</u> system of a particular entity, or particular processes and procedures relevant</p>	P	<p>EPPO More appropriate term in the context of audit. This applies to other sections of the draft. <i>Category : EDITORIAL</i></p>

		to a phytosanitary system.		
199	56	A system audit is a comprehensive review of a system or procedure to assess its effectiveness and conformity with established phytosanitary requirements. The scope of a system audit may include an entire system from production to export, export or a system of a particular entity, or particular processes and procedures relevant to a phytosanitary system.	P	EPPO The definitions of system audit and verification audit are not clear, because the difference between both audit types is not clear. <i>Category : SUBSTANTIVE</i>
200	56	A system audit is a comprehensive review of a system or procedure to assess its effectiveness and conformity with established phytosanitary requirements. The scope of a system audit may include an entire system from production to	C	IPPC Regional Workshop Africa agree <i>Category : SUBSTANTIVE</i>

		export, a system of a particular entity, or particular processes and procedures relevant to a phytosanitary system.		
201	56	A system audit is a comprehensive review of a system or procedure to assess its effectiveness and conformity with established phytosanitary requirements. The scope of a system audit may include <u>includes</u> an entire system from production to export, <u>or</u> a system of a particular entity <u>entity</u> (e.g. <u>laboratory</u> , or <u>particular processes and procedures relevant to a phytosanitary system</u> <u>facility</u>).	P	United States of America added to avoid confusion when compared to the audit described in para 57. <i>Category : TECHNICAL</i>
202	56	Se entiende por <u>Una auditoría de sistema</u> es un examen exhaustivo de un sistema o procedimiento, a fin de evaluar que sea	P	Costa Rica Consistencia con la traducción en la versión al inglés <i>Category : TRANSLATION</i>

		eficaz y que cumpla los requisitos fitosanitarios establecidos. El ámbito de las auditorías de sistema podrá abarcar sistemas enteros-completos desde la producción hasta la exportación, sistemas de una entidad en particular o determinados procesos y procedimientos que revistan interés para un sistema fitosanitario.		
203	57	A verification audit is a comprehensive review of particular elements of a system or procedure to indicate its effectiveness and conformity with established phytosanitary requirements. It may be conducted periodically (at either regular or random intervals) or non-periodically	P	Costa Rica Both types of audits may be conducted periodically or non-periodically as provided in section 6. We suggest to delete to avoid redundancy with section 6 <i>Category : TECHNICAL</i>

		(as a result of certain triggers).		
204	57	A verification audit is a comprehensive review of particular elements of a system or procedure to indicate <u>assess</u> its effectiveness and conformity with established phytosanitary requirements <u>procedures</u> . It may be conducted periodically (at either regular or random intervals) or non-periodically (as a result of certain triggers).	P	European Union Better wording, consistency with [56]. <i>Category : EDITORIAL</i>
205	57	A verification audit is a comprehensive review of particular elements of a system or procedure to indicate its effectiveness and conformity with established phytosanitary requirements. It may be conducted periodically (at either regular or random intervals)	P	COSAVE 1) For consistency and to avoid confusion with phytosanitary import requirements. 2) Both types of audits may be conducted periodically or non-periodically as provided in section 6. We suggest to delete to avoid redundancy with section 6 1) Por consistencia y para evitar confusiones con los requisitos fitosanitarios de importación. 2) Ambos tipos de auditorías se pueden realizar de forma periódica o no periódica según lo dispuesto en la sección 6. Sugerimos eliminar para evitar la redundancia con la sección 6 <i>Category : TECHNICAL</i>

		or non-periodically (as a result of certain triggers). <u>verification audit is a comprehensive review of particular elements of a phytosanitary system or procedure to indicate its effectiveness and conformity with established requirements.</u>		
206	57	A verification audit is a comprehensive review of particular elements of a <u>phytosanitary</u> system or procedure to indicate its effectiveness and conformity with established phytosanitary requirements. It may be conducted periodically (at either regular or random intervals) or non-periodically (as a result of certain triggers).	P	OIRSA 1) For consistency and to avoid confusion with phytosanitary import requirements. 2) Both types of audits may be conducted periodically or non-periodically as provided in section 6. We suggest to delete to avoid redundancy with section 6 <i>Category : TECHNICAL</i>
207	57	A verification audit is a comprehensive	P	PPPO Adding a new paragraph on relationship of systems and verification audits, further discussing the scope of a verification audit and how it supports the systems audit. <i>Category : TECHNICAL</i>

		review of particular elements of a system or procedure to indicate its effectiveness and conformity with established phytosanitary requirements. It may be conducted periodically (at either regular or random intervals) or non-periodically (as a result of certain triggers). <u>Verification audit(s) may be complementary to a systems audit. The scope of a verification audit may include specified operational components which could support the desired outcomes.</u>		
208	57	A verification audit is a comprehensive <u>focused</u> review of particular elements of a <u>an entire</u> system or procedure <u>through especially reviewing its particular elements</u>	P	Japan To differentiate system audit and verification audit. A verification audit is a focused review of an entire system or procedure through reviewing particular elements of the system or procedure. <i>Category : SUBSTANTIVE</i>

		to indicate its effectiveness and conformity with established phytosanitary requirements. It <u>is conducted to determine if the system or procedure is properly being implemented and maintained.</u> It may be conducted periodically (at either regular or random intervals) or non-periodically (as a result of certain triggers).		
209	57	A verification audit is a comprehensive review of particular elements of a system or procedure to <u>indicate-assess</u> its effectiveness and conformity with established phytosanitary <u>requirementsprocedures</u> . It may be conducted periodically (at either regular or random intervals) or non-periodically	P	EPPO Better wording, consistency with [56]. <i>Category : EDITORIAL</i>

		(as a result of certain triggers).		
210	57	A verification audit is a comprehensive review of particular elements of a system or procedure to indicate its effectiveness and conformity with established phytosanitary requirements. It may be conducted periodically (at either regular or random intervals) or non-periodically (as a result of certain triggers).	C	IPPC Regional Workshop Africa agree <i>Category : SUBSTANTIVE</i>
211	57	A verification monitoring audit is a comprehensive review of particular elements of a system or procedure to indicate its effectiveness and conformity with established phytosanitary requirements. It may be conducted <u>periodically (at either periodically, at regular or random intervals)</u>	P	United States of America See US comments in paragraph 55. For last sentence, change made because redundant. <i>Category : TECHNICAL</i>

		<u>intervals), or non-periodically (as-as a result of certain triggers)triggers.</u>		
212	57	A verification audit is a comprehensive review of particular elements of a <u>phytosanitary</u> system or procedure to indicate its effectiveness and conformity with established <u>phytosanitary</u> requirements. It may be conducted periodically (at either regular or random intervals) or non-periodically (as a result of certain triggers).	P	<p>Uruguay</p> <p>1) For consistency and to avoid confusion with phytosanitary import requirements. 2) Both types of audits may be conducted periodically or nonperiodically as provided in section 6. We suggest to delete to avoid redundancy with section 6</p> <p>1) Por consistencia y para evitar confusiones con los requisitos fitosanitarios de importación. 2) Ambos tipos de auditoría se pueden realizar de forma periódica o no periódica según lo dispuesto en la sección 6. Sugerimos eliminar para evitar la redundancia con la sección 6</p> <p><i>Category : TECHNICAL</i></p>
213	57	Se entiende por Una auditoría de verificación <u>es</u> el examen exhaustivo de determinados elementos de un sistema o procedimiento, a fin de indicar si es eficaz y si cumple los requisitos fitosanitarios establecidos. Podrá realizarse de forma	P	<p>Costa Rica</p> <p>Consistencia con la traducción en la versión en inglés</p> <p><i>Category : TRANSLATION</i></p>

		periódica (a intervalos regulares o aleatorios) o no periódica (como resultado de ciertas circunstancias determinantes).		
3. Triggers				
214	58	3. Triggers	C	Viet Nam Viet Nam would like to support this Section move to Section 1. Purpose of audit, because the purpose should be included in the list of cases where audit is required <i>Category : EDITORIAL</i>
215	58	3. Triggers Reasons to initiate an audit	P	Caribbean Agricultural Health and Food Safety Agency <i>Category : SUBSTANTIVE</i>
216	58	3. Triggers	C	Caribbean Agricultural Health and Food Safety Agency The word Triggers is ambiguous . Suuggest re-naming the title to say "Reasons to Initiate an Audit <i>Category : SUBSTANTIVE</i>
217	58	3. Triggers Initiation	P	Thailand A term "initiation" is suggested to replace a term "trigger". <i>Category : EDITORIAL</i>
218	58	3. Triggers	C	IPPC Regional Workshop Africa propose to be reasons for audit <i>Category : SUBSTANTIVE</i>
219	58	3. Triggers	C	Costa Rica See general comment <i>Category : TECHNICAL</i>
220	58	3. Triggers Circumstances that may determine the performance of audits	P	Costa Rica Term more used in other standards and consistency with the translation in the Spanish version <i>Category : TECHNICAL</i>
221	58	3. Triggers	C	Jamaica Propose that Trigger be changed to Reasons to initiate an audit <i>Category : SUBSTANTIVE</i>

222	59	The following are examples of circumstances that may trigger an audit in the phytosanitary context :	P	European Union More precise wording and consistency with the title of the draft ISPM. <i>Category : EDITORIAL</i>
223	59	The following are examples of circumstances that may trigger an audit:	C	Caribbean Agricultural Health and Food Safety Agency Proposal to replace the word trigger with initiate. <i>Category : SUBSTANTIVE</i>
224	59	The following are examples of circumstances that may trigger an audit in the phytosanitary context :	P	EPPO More precise wording and consistency with the title of the draft ISPM. <i>Category : EDITORIAL</i>
225	59	The following are examples of circumstances that may trigger an audit:	C	Jamaica Propose replacing the word trigger where initiate appears. <i>Category : SUBSTANTIVE</i>
226	60	scheduling of routine audits to verify ongoing conformity with phytosanitary system requirements and procedures	P	European Union 1) More precise wording (e.g. see [38], [40] or [46]). 2) Consistency with the change proposed in [56] and [57]. <i>Category : EDITORIAL</i>
227	60	-Verification of scheduling of routine audits to verify ongoing conformity with system	P	Caribbean Agricultural Health and Food Safety Agency <i>Category : SUBSTANTIVE</i>

		requirements <u>requirements require ments in routine scheduling of audits</u>		
228	60	scheduling of routine audits to verify ongoing conformity with system requirements	C	Caribbean Agricultural Health and Food Safety Agency Propose rewording- to verify or verification of ongoing conformity with system requirements in routine scheduling of audits. <i>Category : SUBSTANTIVE</i>
229	60	scheduling of routine audits to verify ongoing conformity with <u>phytosanitary</u> system requirements <u>procedures</u>	P	EPPO 1) More precise wording (e.g. see [38], [40] or [46]). 2) Consistency with the change proposed in [56] and [57]. <i>Category : EDITORIAL</i>
230	60	scheduling of routine audits to verify ongoing conformity with system requirements	C	Jamaica Propose rewording - to verify or verification of ongoing conformity with system requirements in routine scheduling of audits <i>Category : SUBSTANTIVE</i>
231	61	changes to conditions (e.g. production practices, pest status, management systems or operations of a facility) in an exporting country	P	Costa Rica To keep the circumstance more general. As worded only refers to audits conducted in the exporting country. <i>Category : TECHNICAL</i>
232	61	changes to conditions (e.g. production practices, pest status, management systems or	P	European Union To prevent any misunderstanding: changes to an export system do not mean that the audit of the export system is conducted by the importing country. <i>Category : TECHNICAL</i>

		operations of a facility) in an exporting country export system		
233	61	changes to conditions (e.g. production practices, pest status, management systems or operations of a facility) in an exporting country	P	COSAVE To keep the circumstance more general. As worded only refers to audits conducted in the exporting country. Para mantener la circunstancia más general. Tal como está redactado, solo se refiere a las auditorías realizadas en el país exportador. <i>Category : TECHNICAL</i>
234	61	changes to conditions (e.g. production practices, pest status, management systems or operations of a facility) in an exporting country	P	OIRSA To keep the circumstance more general. As worded only refers to audits conducted in the exporting country. <i>Category : TECHNICAL</i>
235	61	changes to conditions (e.g. production practices, pest status, management systems or operations of a facility) in an exporting country	P	China If the pest status changed in importing countries, it may also need audit to the phytosanitary measures. <i>Category : SUBSTANTIVE</i>
236	61	changes to conditions (e.g. production practices, pest status, management systems or operations of a	P	EPPO To prevent any misunderstanding: changes to an export system do not mean that the audit of the export system is conducted by the importing country. <i>Category : TECHNICAL</i>

		facility) in an exporting country export system		
237	61	changes to conditions (e.g. production practices, pest status, management systems or operations of a facility)-facility, change in manpower) in an exporting country	P	Singapore Singapore noted that the examples are not exhaustive but suggest the addition of "change in manpower" which is a common trigger for verification audit to be included. <i>Category : SUBSTANTIVE</i>
238	61	changes to conditions (e.g. production practices, pest status, management systems or operations of a facility) in an exporting country	P	Uruguay To keep the circumstance more general. As worded only refers to audits conducted in the exporting country. Para mantener la circunstancia más general. Tal como está redactado, solo se refiere a las auditorías realizadas en el país exportador. <i>Category : TECHNICAL</i>
239	61	los cambios en las condiciones (por ejemplo, en las prácticas de producción, la condición de una plaga, los sistemas de gestión o las operaciones de un centro)-una instalación) en un país exportador;	P	Costa Rica Termino más apropiado y utilizado en otras NIMF <i>Category : TRANSLATION</i>
240	62	changes to phytosanitary import	P	European Union [61] is about changes in exporting systems and [62] about changes in importing systems (e.g. change in a point of entry or a post-entry quarantine station).

		requirements, management systems or operation of a facility <u>facility in an import system.</u>		<i>Category : SUBSTANTIVE</i>
241	62	changes to phytosanitary import requirements; management systems or operation of a facility	P	COSAVE To avoid redundancy. Para evitar redundancia. <i>Category : TECHNICAL</i>
242	62	changes to phytosanitary import requirements, management systems or operation of a facility	P	OIRSA To avoid redundancy. <i>Category : TECHNICAL</i>
243	62	changes to phytosanitary import requirements, management systems or operation of a facility <u>facility in an import system.</u>	P	EPPO [61] is about changes in exporting systems and [62] about changes in importing systems (e.g. change in a point of entry or a post-entry quarantine station). <i>Category : SUBSTANTIVE</i>
244	62	changes to phytosanitary import requirements; management systems or	P	Uruguay To avoid redundancy Para evitar redundancia <i>Category : TECHNICAL</i>

		operation of a facility		
245	63	a new import pathway	C	Ukraine suggest adding (New: country, subject of regulation from that country or emergence of a focus of a quarantine organism in the country of export or re-export) <i>Category : SUBSTANTIVE</i>
246	65	notifications of non-compliance from the NPPO of an importing country (e.g. detection of a regulated pest in an imported consignment)	C	South Africa Suggest addition of the sentence: " By the importing country (e.g. after the detection of a regulated pest in an imported consignment)" in order to differentiate between possible audits of importing or exporting countries" <i>Category : SUBSTANTIVE</i>
247	66	nonconformity detected or observations made that may compromise the phytosanitary systemsuspected	P	European Union More complete. <i>Category : SUBSTANTIVE</i>
248	66	nonconformity detected or observations made that may compromise the phytosanitary systemsuspected	P	EPPO More complete. <i>Category : SUBSTANTIVE</i>
249	66	nonconformity detected or observations made that may compromise the phytosanitary system	P	United States of America If an observation is made, a nonconformity would have occurred. <i>Category : TECHNICAL</i>

250	68	new requests for participation in the phytosanitary system	C	IPPC Regional Workshop Africa agree to the above <i>Category : SUBSTANTIVE</i>
251	69	complaints	C	Mexico In this case, the NPPO must act under the regulations of its country by issuing authority and not auditing documents. <i>Category : SUBSTANTIVE</i>
252	69	complaints	P	COSAVE It is too broad and ambiguous. Es demasiado amplio y ambiguo. <i>Category : TECHNICAL</i>
253	69	complaints	P	OIRSA It is too broad and ambiguous. <i>Category : TECHNICAL</i>
254	69	complaints	P	PPPO proposal to delete unless there is a specific technical issue that has been identified in this document. <i>Category : TECHNICAL</i>
255	69	complaints	C	PPPO proposal to delete unless there is a specific technical issue that has been identified in this document. <i>Category : TECHNICAL</i>
256	69	complaints	C	PPPO this is very vague... aren't non-compliance and nonconformities that are reported already complaints? <i>Category : EDITORIAL</i>
257	69	complaints	C	Thailand We would like to request an explanation on the scope of complaints in the context of phytosanitary activities. In addition, a new section of "Complaint" should be added to guide NPPO to manage the complaint when it occurs. <i>Category : SUBSTANTIVE</i>
258	69	complaints	C	United States of America What does this mean? Please explain. <i>Category : TECHNICAL</i>
259	69	complaints	P	Uruguay It is too broad and ambiguous. Es demasiado amplio y ambiguo. <i>Category : TECHNICAL</i>
4. Roles and Responsibilities				
260	70	4. Roles and Responsibilities	P	European Union Please see comment on [71]. <i>Category : SUBSTANTIVE</i>
261	70	4. Roles and Responsibilities	P	EPPO Please see comment on [71]. <i>Category : SUBSTANTIVE</i>
4.1 Roles				
262	71	4.1 Roles	C	European Union This whole section is not needed, these terms need not be defined. <i>Category : SUBSTANTIVE</i>

263	71	4.1 Roles	C	EPPO This whole section is not needed, these terms do not need to be defined. <i>Category : SUBSTANTIVE</i>
264	72	The audit process involves two parties: an auditor and an auditee. The auditor may be either an NPPO or its authorized entity. The sections below describe the responsibilities of both parties. In the context of this standard, the term “auditor” may refer to an individual person, a group of people representing an organization, or an organization authorized to conduct an audit. Likewise, the term “auditee” may refer to an individual person, a group of people representing an organization, or an organization being audited.	P	European Union We do not believe these terms (auditor and auditee) need to be defined as both are commonly understood and this standard is not looking to use them in anyway other than their common usage. <i>Category : SUBSTANTIVE</i>
265	72	The audit process involves two parties: an auditor and an auditee. The auditor may be either an NPPO or	P	COSAVE To simplify because both terms “auditor” and “auditee” may refer to an individual person, a group of people representing an organization or an organization. Para simplificar, los términos "auditor" y "auditado" pueden referirse a una persona individual, un grupo de personas que representan a una organización o una organización. <i>Category : EDITORIAL</i>

		its authorized entity. The sections below describe the responsibilities of both parties. In the context of this standard, the term “auditor” may refer to an individual person both, a group of people representing an organization, or an organization authorized to conduct an audit. Likewise, the term “auditee” “auditor” and “auditee” may refer to an individual person, a group of people representing an organization, or an organization being audited.		
266	72	The audit process involves two parties: an auditor and an auditee. The auditor may be either an NPPO or its authorized entity. The sections below describe the responsibilities of both parties. In the context of this	P	OIRSA To simplify because both terms “auditor” and “auditee” may refer to an individual person, a group of people representing an organization or an organization. <i>Category : TECHNICAL</i>

		standard, both the term “ auditor ” may refer to an individual person, a group of people representing an organization, or an organization authorized to conduct an audit. Likewise, the term “auditee” may refer to an individual person, a group of people representing an organization, or an organization being audited organization.		
267	72	The audit process involves two parties: an auditor and an auditee. The auditor may be either an NPPO or its authorized entity. The sections below describe the responsibilities of both parties. In the context of this standard, the term “auditor” may refer to an individual person, a group of people representing an organization, or	P	China The “auditee” should not be an individual person. An individual person can’t represent a quarantine system, procedure or element, and there has been no audit of an individual in practice. <i>Category : SUBSTANTIVE</i>

		an organization authorized to conduct an audit. Likewise, the term “auditee” may refer to an individual person , a group of people representing an organization, or an organization being audited.		
268	72	The audit process involves two parties: an auditor and an auditee. The auditor may be either an NPPO or its authorized entity . The sections below describe the responsibilities of both parties. In the context of this standard, the term “auditor” may refer to an individual person, a group of people representing an organization, or an organization authorized to conduct an audit. Likewise, the term “auditee” may refer to an individual person, a group of people representing an organization, or	P	China Move the relevant content to “Responsibilities of the auditor” to make the text more coherent. <i>Category : EDITORIAL</i>

		an organization being audited.		
269	72	The audit process involves two parties: an auditor and an auditee. The auditor may be either an NPPO or its authorized entity. The sections below describe the responsibilities of both parties. In the context of this standard, the term “auditor” may refer to an individual person, a group of people representing an organization, or an organization authorized to conduct an audit. Likewise, the term “auditee” may refer to an individual person, a group of people representing an organization, or an organization being audited.	C	<p>China</p> <p>The qualification of an authorized entity should be described.</p> <p>According to the international practices, the qualification of an authorized entity should be Regulated.</p> <p><i>Category : SUBSTANTIVE</i></p>
270	72	The audit process involves two parties: an auditor and an auditee. The auditor may be either an NPPO or its authorized	P	<p>Uruguay</p> <p>To simplify because both terms “auditor” and “auditee” may refer to an individual person, a group of people representing an organization or an organization.</p> <p>Para simplificar, los términos "auditor" y "auditado" pueden referirse a una persona individual, un grupo de personas que representan a una organización o una organización</p> <p><i>Category : TECHNICAL</i></p>

		entity. The sections below describe the responsibilities of both parties. In the context of this standard, the term <u>terms</u> “auditor” and “auditee” may refer to an individual person, a group of people representing an organization, or an organization authorized to conduct an audit. Likewise, the term “auditee” may refer to an individual person, a group of people representing an organization, or an organization being audited.		
271	72	The audit process involves two parties: an auditor and an auditee. The auditor may be either an NPPO or its authorized entity. The sections below describe the responsibilities of both parties. In the context of this standard, the term “auditor” may refer to an individual	P	EPPO We do not believe these terms (auditor and auditee) need to be defined as both are commonly understood and this standard is not looking to use them in anyway other than their common usage. <i>Category : SUBSTANTIVE</i>

		<p>person, a group of people representing an organization, or an organization authorized to conduct an audit. Likewise, the term “auditee” may refer to an individual person, a group of people representing an organization, or an organization being audited.</p>		
272	72	<p>The audit process involves two parties: an auditor and an auditee. The auditor may be either an NPPO or its authorized entity. The sections below describe the responsibilities of both parties. In the context of this standard, the term “auditor” may refer to an individual person, a group of people representing an organization, or an organization authorized to conduct an audit. Likewise, the term “auditee” may refer to an individual</p>	C	<p>IPPC Regional Workshop Africa in agreement Category : <i>SUBSTANTIVE</i></p>

		person, a group of people representing an organization, or an organization being audited.		
273	72	The audit process involves two parties: an auditor and an auditee. The auditor may be either an NPPO or its authorized entity. The sections below describe the responsibilities of both parties. In the context of this standard, the term “auditor” may refer to an individual person, a group of people representing an organization, or an <u>organization entity</u> authorized to conduct an audit. Likewise, the term “auditee” may refer to an individual person, a group of people representing an organization, or an organization being audited.	P	Singapore Singapore proposed replacement of organisation with "entity" for consistency with the usage of entity in the remaining document as referring to an external unit authorised to conduct the audit for the NPPO. <i>Category : EDITORIAL</i>
4.2 Responsibilities of the NPPO				
274	73	4.2 Responsibilities of the NPPO	C	IPPC Regional Workshop Africa agree to the responsibilities <i>Category : SUBSTANTIVE</i>

275	75	establish an audit framework and requirements for the audit process	C	China The key factors of the audit framework should be listed and described in this standard. Though the audit systems differ from countries, to avoid conflict, the key factors of the audit framework should be regulated. <i>Category : SUBSTANTIVE</i>
276	76	ensure that an appropriate legal framework is in place if deciding to authorize entities to conduct audits on its behalf and for subsequently maintaining oversight of their action	C	Mexico The general criteria that an Entity must meet in order to homologate with the NPPO should be established in the Standard <i>Category : SUBSTANTIVE</i>
277	76	ensure that an appropriate legal framework is in place if deciding to authorize entities to conduct audits on its behalf and for subsequently maintaining oversight of their action	C	Ukraine suggest deleting <i>Category : SUBSTANTIVE</i>
278	76	<u>choose a suitable auditor</u> , ensure that an appropriate legal framework is in place if deciding to authorize entities to conduct audits on its behalf and for subsequently maintaining oversight of their action	P	China Selecting suitable auditors is an important responsibility of NPPO. <i>Category : SUBSTANTIVE</i>

279	76	ensure that an appropriate legal and technical framework is in place if deciding to authorize entities to conduct audits on its behalf and for subsequently maintaining oversight of their action	P	United States of America Framework should be technically based <i>Category : TECHNICAL</i>
280	77	develop contingency plans for continuity of action in the event that an authorized entity is no longer able to conduct audit activities	C	Mexico The Standard should consider the criteria by which ONPF will be governed in order to develop contingency plans. <i>Category : SUBSTANTIVE</i>
281	77	develop contingency plans for continuity of action in the event that an authorized entity is no longer able to conduct audit activities activities suggest deleting	P	Ukraine <i>Category : SUBSTANTIVE</i>
282	78	identify costs and ensure that appropriate financial arrangements are in place to meet these costs	P	Canada Provides better clarity and qualifies the financial arrangement. <i>Category : EDITORIAL</i>

283	78	identify costs and ensure that financial arrangements are in place to meet these costs, <u>if appropriate</u>	P	United States of America Costs may not always be associated with auditing <i>Category : SUBSTANTIVE</i>
284	79	<u>ensure if appropriate, request</u> that the auditee identifies and <u>implements</u> <u>implements</u> <u>corrective actions</u> , within a time frame agreed with the NPPO, <u>corrective actions</u> , to address <u>any</u> nonconformities <u>that have been</u> <u>when</u> identified	P	Canada The NPPO does not requests but ensures. The proposed change provides better structure and clarity to the sentence. <i>Category : SUBSTANTIVE</i>
285	79	<u>review the audit report and</u> if appropriate, request that the auditee identifies and implements, within a time frame agreed with the NPPO, corrective actions to address any nonconformities that have been identified	P	China Review the audit report and deal with the nonconformities is an important duty of NPPO. <i>Category : SUBSTANTIVE</i>
286	79	<u>if appropriate, request verify</u> that <u>the auditee identifies and implements, within a time frame agreed</u>	P	United States of America If you are asking them to take a corrective action, "if appropriate" isn't correct here. <i>Category : TECHNICAL</i>

		with the NPPO, corrective actions to address any identified nonconformities that have been identified-corrected in the time frame agreed		
287	80	take necessary actions, which may include revocation of authorization of an entity or suspension of participation in the phytosanitary system, when a critical nonconformity has been identified or when identified nonconformities have not been addressed.	P	European Union An NPPO should have the possibility to decide to revoke or suspend the authorization of an entity in the case of an identified critical nonconformity. Category : <i>SUBSTANTIVE</i>
288	80	take necessary actions, which may include revocation of authorization of an entity or suspension of participation in the phytosanitary system, when identified nonconformities have not been addressed.	P	China Add a paragraph about "assess the audit activity." NPPO should assess the audit activity to ensure the audit effectiveness. Category : <i>SUBSTANTIVE</i>

289	80	take necessary actions, which may include revocation of authorization of an entity or suspension of participation in the phytosanitary system, when identified nonconformities have not been addressed.- <u>ensure that both auditor from NPPO itself and from authorized entities have appropriate competency to perform audit in phytosanitary context- develop a guide to verify and determine any complaints related to audit performance based on transparent and non-discriminate judgement.</u>	P	Thailand We would like to propose to add 2 new bullets on competency of auditor and management of complaints. Category : <i>SUBSTANTIVE</i>
290	80	take necessary actions, which may include revocation of authorization of an entity or suspension of participation in the phytosanitary	P	EPPO An NPPO should have the possibility to decide to revoke or suspend the authorization of an entity in the case of an identified critical nonconformity. Category : <i>SUBSTANTIVE</i>

		system, when <u>a critical nonconformity has been identified or when identified</u> nonconformities have not been addressed.		
291	80	take necessary actions, which may include revocation of authorization of an entity or suspension of participation in the phytosanitary system, when identified nonconformities have not been addressed.	C	IPPC Regional Workshop Africa Perhaps also consider any inputs for improvement in the system <i>Category : SUBSTANTIVE</i>
292	80	take necessary actions, which may include revocation of authorization of an entity or suspension of participation in the phytosanitary system, when identified nonconformities have not been addressed <u>as stipulated in the contract.</u>	P	United States of America The way the section is currently written, limits the NPPO to revoke or suspend an entity only after allowing a period for correction of non-conformity. This is not always the case. There are situations where suspension/revocation occurs immediately, such as misusing their facility. <i>Category : TECHNICAL</i>
293	80	take necessary actions, which may	P	Singapore Singapore proposed the addition of a new bullet point for the NPPO to consider to establish guidelines and the penalty

		include revocation of authorization of an entity or suspension of participation in the phytosanitary system, when identified nonconformities have not been addressed.(New bullet point) - establish guideline to identify nonconformities and the corresponding corrective actions or penalty in relation to the phytosanitary system.		structure that can be made known to the authorised entity for audit. Both NPPO and authorised entity will then have a reference point of the possible NCs, respective corrective actions and penalty structure for each NC to be consistent in the audit. <i>Category : SUBSTANTIVE</i>
294	80	take necessary actions, which may include revocation of authorization of an entity or suspension of participation in the phytosanitary system, when identified nonconformities have not been addressedaddressed satisfactorily.	P	Singapore Singapore suggest the addition of word - "satisfactorily" at the end to reiterate that the nonconformities need to be satisfactorily addressed to prevent recurrence instead. From our audit experience, auditees may suggest corrective actions to address the NCs but some may lead to recurrence and hence there is a need for the auditee to observe if the proposed corrective actions would be effective to avoid recurrence and hence to address the NCs satisfactorily. A corrective action proposed can be piece-meal to address the audit point but this may not addressed the NC. The inclusion of "satisfactorily" will instill the responsibility of the auditee to ensure that the NCs are addressed appropriately with the right corrective actions. <i>Category : SUBSTANTIVE</i>
295	80	take necessary actions, which may	C	South Africa Perhaps also consider any inputs for improvement in the system

		include revocation of authorization of an entity or suspension of participation in the phytosanitary system, when identified nonconformities have not been addressed.		<i>Category : SUBSTANTIVE</i>
296	81	An The NPPO of the importing country conducting audits in the territory of an exporting country should:	P	Canada For clarity <i>Category : TECHNICAL</i>
297	81	An NPPO conducting audits in the territory of an exporting country should:	C	China The responsibilities of NPPO in the audits in its own territory should also be considered in the audits in the territory of an exporting country. The responsibilities of the NPPO in the audits in the territory of an exporting country are too general compared with the audits in its own territory. <i>Category : SUBSTANTIVE</i>
298	81	An NPPO of importing country conducting audits in the territory of an exporting country should:	P	China More definite <i>Category : EDITORIAL</i>
299	83	reach an agreement, with the NPPO of the exporting country, to conduct the audit, this agreement , including the financial	P	Canada Better clarity <i>Category : EDITORIAL</i>

		arrangements for the audit		
300	83	reach an agreement , agreement with the NPPO of the exporting country , country to conduct the audit, this agreement including the financial arrangements for the audit	P	European Union Improvement. <i>Category : EDITORIAL</i>
301	83	reach an agreement, with the NPPO of the exporting country, to conduct the audit, this agreement including the financial arrangements for the audit	P	PPPO <i>Category : EDITORIAL</i>
302	83	reach an agreement, with the NPPO of the exporting country, to conduct the audit, this agreement including should include the financial arrangements for the audit	P	Caribbean Agricultural Health and Food Safety Agency For clarity <i>Category : EDITORIAL</i>
303	83	reach an agreement, with the NPPO of the exporting country, to conduct	C	Caribbean Agricultural Health and Food Safety Agency replace including with should include. <i>Category : EDITORIAL</i>

		the audit, this agreement including the financial arrangements for the audit		
304	83	reach an agreement, with the NPPO of the exporting country, to conduct the audit, this agreement including the financial arrangements for the audit	P	China Add three new paragraphs after [83] about “choose a suitable auditor”, “review the audit report” and “assess the audit activity” Choose a suitable auditor, review the audit report and assess the audit activity are important duties of NPPO. Category : <i>SUBSTANTIVE</i>
305	83	reach an agreement , agreement with the NPPO of the exporting country , country to conduct the audit , this agreement-audit including the financial arrangements for the audit	P	EPPO Improvement Category : <i>EDITORIAL</i>
306	83	reach an agreement, with the NPPO of the exporting country, to conduct the audit, this agreement including the financial arrangements for the audit	C	United States of America Not sure what is meant here, seems to have grammar issue Category : <i>EDITORIAL</i>

307	83	reach an agreement, with the NPPO of the exporting country, to conduct the audit, this agreement including audit and the financial arrangements arrangement for the audit.	P	Singapore Singapore proposed revised sentence for better clarity and sentence structure. <i>Category : EDITORIAL</i>
308	83	reach an agreement, with the NPPO of the exporting country, to conduct the audit, this agreement including the financial arrangements for the audit	C	Jamaica replace including in sentence 2 with should include. <i>Category : SUBSTANTIVE</i>
309	84	when nonconformities are identified, agree with the NPPO of the exporting country what corrective measures are required <u>required within a given time frame.</u>	P	European Union Precision given. <i>Category : TECHNICAL</i>
310	84	when nonconformities are identified, agree with the NPPO of the exporting country what corrective measures	P	PPPO To align with section 4.4 (last bullet) which refers to agreeing a time for addressing nonconformities. <i>Category : TECHNICAL</i>

		are required <u>required</u> <u>and time-frames for</u> <u>addressing the</u> <u>corrective actions.</u>		
311	84	when nonconformities are identified, agree with the NPPO of the exporting country what corrective measures are required <u>required</u> <u>within an agreed</u> <u>timframe</u>	P	Caribbean Agricultural Health and Food Safety Agency Should be timebound <i>Category : SUBSTANTIVE</i>
312	84	when nonconformities are identified, agree with the NPPO of the exporting country what corrective measures are required.	C	Caribbean Agricultural Health and Food Safety Agency The time frame for these measures must be identified <i>Category : SUBSTANTIVE</i>
313	84	when nonconformities are identified, agree <u>communicate</u> with the NPPO of the exporting country what corrective measures are required.	P	China The NPPO of the exporting country may not agree with the corrective measures, the NPPO conducting audits should try to communicate with them to reach an agreement. <i>Category : EDITORIAL</i>
314	84	when nonconformities are identified, agree with the NPPO of the exporting country what	P	Thailand To be consistency <i>Category : EDITORIAL</i>

		corrective measures <u>actions</u> are required.		
315	84	when nonconformities are identified, agree with the NPPO of the exporting country what corrective measures are required <u>required within a given time frame.</u>	P	EPPO Precision given. <i>Category : TECHNICAL</i>
316	84	when nonconformities are identified, agree with the NPPO of the exporting country what corrective measures are required.	C	IPPC Regional Workshop Africa Perhaps also consider any inputs for improvement in the system <i>Category : SUBSTANTIVE</i>
317	84	when nonconformities are identified, agree with the NPPO of the exporting country what corrective measures are required.- <u>Provide the audit report to the NPPO of the exporting country, within the period agreed between both during the audit</u>	P	Costa Rica Include new vineta It is essential for the NPPO of the exporting country to be aware of the results of the audit carried out in its territory by the NPPO of the importing country. Sometimes this does not occur, it only indicates that it is not fulfilled and the product cannot be exported, or it takes a long time to respond and during that time exports cannot be carried out or the implementation of corrective actions is delayed in case of the identification of nonconformities <i>Category : SUBSTANTIVE</i>
318	84	when nonconformities are identified, agree	C	South Africa Perhaps also consider any inputs for improvement in the system <i>Category : SUBSTANTIVE</i>

		with the NPPO of the exporting country what corrective measures are required.		
319	84	cuando se detecten no conformidades, acordar con la ONPF del país exportador las medidas correctivas necesarias.- Proveer el informe de la auditoria a la ONPF del país exportador, en el plazo acordado entre ambas durante la auditoria	P	Costa Rica Incluir nueva viñeta. Es fundamental para la ONPF del país exportador tener conocimiento del resultado de la auditoria que se lleva a cabo en su territorio por la ONPF del país importador. En ocasiones esto no se da, solamente se indica que no se cumple y el producto no se puede exportar, o se tardan mucho tiempo en responder y durante ese tiempo las exportaciones no se pueden realizar o se retrasa la implementación de las acciones correctivas en caso de la identificación de no conformidades <i>Category : SUBSTANTIVE</i>
4.3 Responsibilities of the auditor				
320	85	4.3 Responsibilities of the-an auditor	P	European Union Better. <i>Category : EDITORIAL</i>
321	85	4.3 Responsibilities of the-an auditor	P	EPPO Better. <i>Category : EDITORIAL</i>
322	85	4.3 Responsibilities of the auditor	C	IPPC Regional Workshop Africa agree <i>Category : SUBSTANTIVE</i>
323	86	The following are general responsibilities of the -an auditor that	P	European Union Better. <i>Category : EDITORIAL</i>

		should apply, regardless of whether the auditor is an NPPO or an authorized entity. The auditor should:		
324	86	The following are general responsibilities of the auditor that should apply, regardless of whether the auditor is an NPPO or an authorized entity. The auditor should:	C	PPPO Proposal to include additional text for clarification. <i>Category : SUBSTANTIVE</i>
325	86	The following are general responsibilities of the auditor that should apply, regardless of whether the auditor is an NPPO or an authorized entity. The auditor should:	C	PPPO is this "should" or "may"? the section below suggests not all these may be applicable and thus "should" is confusing <i>Category : EDITORIAL</i>
326	86	The following are general responsibilities of the auditor that should apply, regardless of whether the auditor is an NPPO or an authorized entity. The auditor should:	C	Caribbean Agricultural Health and Food Safety Agency Should the auditor (when not the NPPO) also ensure that financial arrangements are in place to meet the cost of the audit? <i>Category : SUBSTANTIVE</i>
327	86	The auditor may be either an NPPO or its	P	China To make the whole text in the same format.

		authorized entity . The following are general responsibilities of the auditor that should apply, regardless of whether the auditor is an NPPO or an authorized entity. The auditor should:		<i>Category : EDITORIAL</i>
328	86	The following are general responsibilities of the an auditor that should apply, regardless of whether the auditor is an NPPO or an authorized entity. The auditor should:	P	EPPO Better. <i>Category : EDITORIAL</i>
329	87	develop, implement and maintain an audit programme if within the NPPO has established an audit framework framework established by NPPO.	P	Panama the NPPO should establish an audit framework, therefore the audit programme should be within the audit framework. <i>Category : TECHNICAL</i>
330	87	develop, implement and maintain an audit programme if the NPPO has established an audit framework	P	European Union These words are not needed, because the establishment of an audit framework by the NPPO is mandatory (see [75]). <i>Category : TECHNICAL</i>
331	87	develop, implement and maintain an	P	COSAVE As per paragraph 74 the NPPO should establish an audit framework, therefore the audit programme should be within the audit

		audit programme if <u>within the NPPO</u> has established an audit framework <u>framework</u> established by NPPO.		framework. Según el párrafo 74, la ONPF debería establecer un marco de auditoría, por lo tanto, el programa de auditoría debería estar dentro del marco de auditoría. <i>Category : TECHNICAL</i>
332	87	develop, implement and maintain an audit programme if the NPPO has established an audit framework <u>program me</u>	P	China This sentence has nothing to do with the responsibilities of the auditor. <i>Category : EDITORIAL</i>
333	87	develop, implement and maintain an audit programme if the NPPO has established an audit framework <u>program me</u>	P	EPPO These words are not needed, because the establishment of an audit framework by the NPPO is mandatory (see [75]). <i>Category : TECHNICAL</i>
334	87	develop, implement and maintain an audit programme if the NPPO has established an audit framework	C	United States of America It is not the auditor's responsibility to develop the programs and standards for the program, they often just use the check list. They simply do check the work done and submit the report. <i>Category : TECHNICAL</i>
335	87	develop, implement and maintain an audit programme if <u>within the NPPO</u> has framework established an audit framework <u>by the NPPO</u>	P	Uruguay As per paragraph 74 the NPPO should establish an audit framework, therefore the audit programm should be within the audit framework. Según el párrafo 74, la ONPF debería establecer un marco de auditoría, por lo tanto, el programa de auditoría debería estar dentro del marco de auditoría. <i>Category : TECHNICAL</i>
336	88	identify the purpose, scope and objectives of each	P	European Union This is a simplification of the English. <i>Category : EDITORIAL</i>

		audit within the programme audit		
337	88	identify the purpose, scope and objectives of each audit within the programme	P	EPPO This is a simplification of the English. <i>Category : EDITORIAL</i>
338	89	identify audit criteria for assessment of conformity to be used	P	European Union This is a simplification of the English. <i>Category : EDITORIAL</i>
339	89	identify audit criteria for assessment of conformity to be used	P	EPPO This is a simplification of the English. <i>Category : EDITORIAL</i>
340	90	initiate, conduct and conclude audits of agreed systems and procedures , using identified agreed criteria	P	European Union This is a simplification of the English. <i>Category : EDITORIAL</i>
341	90	initiate, conduct and conclude audits of agreed systems and procedures , using identified agreed criteria	P	EPPO This is a simplification of the English. <i>Category : EDITORIAL</i>
342	91	prepare and finalize audit reports and provide these to the auditee or (in the case of an auditor who is an authorized entity) both the auditee	P	Panama Consider that the NPPO must be fully aware of all audit reports issued by authorized entities. The NPPO must guarantee the confidentiality of this information. <i>Category : SUBSTANTIVE</i>

		and, where appropriate, the NPPO		
343	91	prepare and finalize audit reports and provide these to the auditee or (in the case of an auditor who is an authorized entity) both the auditee and, where appropriate, and the NPPO	P	Costa Rica Consider that the NPPO must be fully aware of all audit reports issued by authorized entities. The NPPO must guarantee the confidentiality of this information. <i>Category : TECHNICAL</i>
344	91	prepare and finalize audit reports and provide these to the auditee or (in the case of an auditor who is an authorized entity) or both the auditee and, where appropriate, the NPPO, when the auditor is an entity authorized to conduct audits.	P	Canada Provides better clarity <i>Category : EDITORIAL</i>
345	91	prepare and finalize audit reports and provide these in a timely manner to the auditee or (in both the case of auditee and NPPO (when an auditor who is an authorized entity)	P	Caribbean Agricultural Health and Food Safety Agency Suggested re-wording for better clarity <i>Category : EDITORIAL</i>

		both the auditee and, where appropriate, the NPPO entity).		
346	91	prepare and finalize audit reports and provide these to the auditee or (in the case of an auditor who is an authorized entity) both the auditee and, where appropriate, the NPPO	C	Caribbean Agricultural Health and Food Safety Agency prepare and finalize audit reports and provide these to the auditee or both the auditee and NPPO (when an auditor is an authorized entity) Suggested rewording for better clarity <i>Category : SUBSTANTIVE</i>
347	91	prepare and finalize audit reports and provide these to the auditee or (in the case of an auditor who is an authorized entity) both the auditee and, where appropriate, the NPPO	C	Caribbean Agricultural Health and Food Safety Agency in a timely manner <i>Category : SUBSTANTIVE</i>
348	91	prepare and finalize audit reports and provide these to the auditee or (in the case of an auditor who is an authorized entity) both the auditee and, where appropriate, the NPPO	P	Bahrain <i>Category : SUBSTANTIVE</i>

349	91	prepare and finalize audit reports and provide these to the auditee or (in the case of an auditor who is an authorized entity) both the auditee and, where appropriate, the NPPO	C	Bahrain Remove "where appropriate" to make it necessary to provide reports to NPPO also in case of an auditor who is an authorized entity. <i>Category : SUBSTANTIVE</i>
350	91	preparar y ultimar informes de auditoría y remitirlos al auditado <u>auditado, a la ONPF</u> o (en-en el caso de que el auditor sea una entidad autorizada) <u>autorizada</u> tanto al auditor como; <u>cuando proceda, como</u> a la ONPF;	P	Costa Rica si se está auditando un sistema o proceso de la ONPF o que la ONPF autorizó a auditar, la ONPF siempre debe tener conocimiento del resultado <i>Category : TECHNICAL</i>
351	92	provide sufficient human resources, with the required training and competence to conduct the audits	C	United States of America This should be specified in the agreement who is responsible for resources etc. <i>Category : TECHNICAL</i>
352	93	be free of any conflict of interest, maintaining impartiality and independence from the entities it <u>auditsbeing audited</u>	P	European Union This is a simplification of the English. <i>Category : EDITORIAL</i>

353	93	be free of any conflict of interest, maintaining impartiality and independence from the entities it audits	P	China This sentence has nothing to do with the responsibilities of the auditor and there is another paragraph about it below. <i>Category : EDITORIAL</i>
354	93	be free of any conflict of interest, maintaining impartiality and independence from the entities it auditsbeing audited	P	EPPO This is a simplification of the English. <i>Category : EDITORIAL</i>
355	93	be free of any conflict of interest, maintaining impartiality and independence from the entities it audits	C	United States of America The language should be more strengthened regarding conflict of interests. <i>Category : TECHNICAL</i>
356	93	estar exento de ningún cualquier conflicto de interés y mantener la imparcialidad y la independencia con respecto a las entidades a las que audita;	P	CA Para dar claridad <i>Category : SUBSTANTIVE</i>
357	94	provide the opportunity for the auditee to respond to to the findings of the report (e.g. to support the findings or dissent from them)	P	European Union Typo: a space to be deleted. <i>Category : EDITORIAL</i>
358	94	provide the opportunity for the	P	European Union This is a simplification of the English plus the addition of a new concept.

		auditee to respond to to the findings of the report <u>before it is finalised and published</u> (e.g. to support the findings or dissent from disagree with them)		<i>Category : TECHNICAL</i>
359	94	provide the opportunity for the auditee to respond to to the findings of the report <u>before it is finalised and published</u> (e.g. to support the findings or dissent from disagree with them)	P	EPPO This is a simplification of the English plus the addition of a new concept. <i>Category : TECHNICAL</i>
360	94	provide the opportunity for the auditee to respond to to the findings of the report (e.g. to support the findings or dissent from them)	P	United States of America Extra space <i>Category : EDITORIAL</i>
361	95	maintain confidentiality of information gained through the audit audit (see <u>section 8</u>).	P	PPPO To refer to section '8. Confidentiality' of the draft standard which goes into more details about exactly what confidentiality involves. Important for authorised entities as they need to share information with NPPO which authorises them. <i>Category : TECHNICAL</i>
4.3.1 Specific responsibilities of entities authorized to conduct an audit				
362	96	4.3.1 Specific responsibilities of entities	P	China More concise. <i>Category : EDITORIAL</i>

		authorized to conduct an audit		
363	97	The entity authorized to conduct an <u>Entities conducting audit on behalf of an NPPO, as an authorised entity should also meet the relevant requirements following requirements, in addition to those set out in section 4.3 and should in addition:</u> <u>3</u>	P	PPPO Replace line 97 with the suggested sentence <i>Category : SUBSTANTIVE</i>
364	97	The entity authorized to conduct an audit should meet the <u>relevant requirements</u> set out in section 4.3 and should in addition:	C	PPPO if 4.3 are "requirements" that auditors "should" do, these specific responsibilities can be combined into one section of just responsibilities of auditor <i>Category : EDITORIAL</i>
365	99	immediately notify the authorizing NPPO of any critical nonconformities <u>nonconformities as defined in section 13.</u>	P	PPPO <i>Category : EDITORIAL</i>
366	99	immediately notify the authorizing NPPO of any	P	Japan Not only critical nonconformities but also other nonconformities should be informed to the NPPO. Whether a nonconformity is critical or other should be decided by NPPO as stated in paragraph 176. <i>Category : SUBSTANTIVE</i>

		critical nonconformities.		
367	99	immediately notify the authorizing NPPO of any critical nonconformities.	C	IPPC Regional Workshop Africa agree <i>Category : SUBSTANTIVE</i>
4.4 Responsibilities of the auditee				
368	101	The auditee may be an NPPO auditing itself, an NPPO of an exporting country audited by the NPPO of the importing country, an entity authorized by an NPPO, or any other participant in the phytosanitary system that is being audited. The auditee should:	P	European Union Unnecessary to try and define/describe. <i>Category : TECHNICAL</i>
369	101	The auditee may be an NPPO auditing itself, an NPPO of an exporting country audited by the NPPO of the importing country, an entity authorized by an NPPON NPPO to perform phytosanitary actions, or any other participant in the phytosanitary system that is being	P	COSAVE For consistency and clarification. Por consistencia y aclaración. <i>Category : TECHNICAL</i>

		audited. The auditee should:—;		
370	101	The auditee may be be: an NPPO auditing itself;—; an NPPO of an exporting country audited by the NPPO of the importing country;—; an entity authorized by an NPPO, or or: any other participant in the phytosanitary system that is being audited. The auditee should:	P	PPPO As this is originally a complex, long list, we suggest a bullet point list for clarity. <i>Category : EDITORIAL</i>
371	101	The auditee may be an NPPO auditing itself NPPO, an NPPO of an exporting country audited by the NPPO of the importing country, an entity authorized by an NPPO, or any other participant in the phytosanitary system that is being audited. The auditee should:	P	China Easier to understand. <i>Category : EDITORIAL</i>
372	101	The auditee may be an NPPO auditing itself, an NPPO of an exporting country audited by	P	EPPO Unnecessary to try and define/describe <i>Category : TECHNICAL</i>

		the NPPO of the importing country, an entity authorized by an NPPO, or any other participant in the phytosanitary system that is being audited. The auditee should:		
373	101	The auditee may be an NPPO auditing itself, an NPPO of an exporting country audited by the NPPO of the importing country, an entity authorized by an NPPO, or any other participant in the phytosanitary system that is being audited. The auditee should <u>should be required to</u> :	P	United States of America we recommend using the phrase auditee "should be required to" vs. just the word "should". <i>Category : SUBSTANTIVE</i>
374	101	The auditee may be an NPPO auditing itself, an NPPO of an exporting country audited by the NPPO of the importing country, an entity authorized by an NPPO <u>NPPO to perform phytosanitary actions</u> , or any other participant in the phytosanitary	P	Uruguay For consistency and clarification. Por consistencia y aclaración. <i>Category : TECHNICAL</i>

		system that is being audited. The auditee should:		
375	103	provide access to information, facilities, records and personnel as required <u>required for the specific audit/audits.</u>	P	PPPO addition of text <i>Category : EDITORIAL</i>
376	104	facilitate , as appropriate, the logistics associated with visits by the auditor to the auditee	C	Mexico To define the scope of the facilitates, with the aim of avoiding conflict of interest <i>Category : SUBSTANTIVE</i>
377	104	facilitate , <u>facilitate</u> as appropriate, <u>within the country of the auditee the</u> logistics associated with visits by the auditor to the auditee	P	European Union It should be made clearer that this does not refer to arrival in or departure from the country, where the audit takes place. May better be included in the separate section, see general comment. <i>Category : TECHNICAL</i>
378	104	facilitate, as appropriate, <u>within the country of the auditee, the</u> logistics associated with visits by the auditor to the auditee	P	EPPO It should be made clearer that this does not refer to arrival in or departure from the country, where the audit takes place. May better be included in the separate section, see general comment. <i>Category : TECHNICAL</i>
379	105	take action on audit findings, noting observations and addressing nonconformities	C	Mexico Define time limit, to be harmonious and in the field of transparency and impartiality, for example; minimum, maximum, calendar or working days, etc. Legal basis). <i>Category : SUBSTANTIVE</i>

		within the agreed time.		
380	105	take action on audit findings, noting observations and addressing nonconformities within the agreed time.	C	Mexico Define in what type of document such observations would be made, and the language in which they will be established, for example: fact record (actas), specific format, chek-list, etc.) <i>Category : SUBSTANTIVE</i>
381	105	take action on audit findings, noting observations and <u>addressing identifies and implements corrective actions to address</u> nonconformities within the agreed time.	P	Canada To align with fifth bullet (para 79) under section 4.2. <i>Category : TECHNICAL</i>
382	105	<u>draw up and deliver an action on plan according to</u> audit findings, noting observations and addressing nonconformities within the agreed time.	P	European Union Please see comment in [171]: It is not up to the auditor to indicate the corrective actions to be taken. It is up to the auditee, on the basis of the nonconformities and the risks involved as specified by the auditor, to propose an action plan (for example at the draft audit report stage) which will then be reviewed by the auditor (for example when the auditee has given its feedback for the drafting of the final audit report). The proposed associated timelines are included in this action plan by the auditee. <i>Category : SUBSTANTIVE</i>
383	105	<u>take draw up and deliver an action on plan according to</u> audit findings, noting observations and addressing nonconformities within the agreed time.	P	EPPO Please see comment in [171]: It is not up to the auditor to indicate the corrective actions to be taken. It is up to the auditee, on the basis of the nonconformities and the risks involved as specified by the auditor, to propose an action plan (for example at the draft audit report stage) which will then be reviewed by the auditor (for example when the auditee has given its feedback for the drafting of the final audit report). The proposed associated timelines are included in this action plan by the auditee. <i>Category : SUBSTANTIVE</i>

384	105	take action on audit findings, noting observations and addressing nonconformities within the agreed time.	C	IPPC Regional Workshop Africa Agree <i>Category : SUBSTANTIVE</i>
5. Selection of Auditors				
385	106	5. Selection of Auditors	C	Viet Nam Viet Nam would like to support to remove this section to Section "Responsibilities of the NPPO" <i>Category : EDITORIAL</i>
386	107	Auditors should be selected based on a combination of knowledge, training and experience relevant to the scope of the audit.	C	Mexico Define how such selection would be made to ensure transparency and impartiality, for example: by public and/or internal call, choice of a stock of technical experts, sweepstakes, etc., by which documentation would such experience be demonstrated?). As well as defining who would be responsible for such selection, to avoid conflict of interest, ensuring that the candidate masters the native language of the auditee. <i>Category : SUBSTANTIVE</i>
387	107	Auditors should be selected based on a combination of knowledge, training and experience relevant to the scope of the audit. <u>Auditors should be no less than 2 people.</u>	P	China Ensure the objectivity and impartiality of audit. <i>Category : SUBSTANTIVE</i>
388	108	An auditor should have knowledge of the auditing methodology and gathering of objective evidence. Where technical expertise is required, a relevant technical expert	C	Mexico If the previous point is well defined, the technical expert, could fulfill the function of the auditor, otherwise the powers and / or functions of each must be legally defined, since within the activities where the intervention of a Technical expert, currently, the expert cannot address anyone, or make observations or recommendations, other than the commissioner, and this in turn transmits the corresponding to the interested party, in this case to the auditee.) <i>Category : SUBSTANTIVE</i>

		may accompany or assist the auditor.		
389	108	An auditor should have knowledge of the auditing methodology and gathering of objective evidence. Where technical expertise is required, a relevant technical expert may accompany <u>be part of the auditing team</u> or assist the auditor.	P	Canada For clarity Category : <i>TECHNICAL</i>
390	108	An auditor should have knowledge of the auditing methodology and gathering of plant quarantine, as well as how to gather objective evidence. Where technical expertise is required, a relevant technical expert may accompany or assist the auditor.	P	China The auditor is responsible for the audit in the phytosanitary context, so the professional knowledge of plant quarantine is required. Category : <i>SUBSTANTIVE</i>
391	108	An auditor should have knowledge of the auditing methodology and gathering of objective evidence. Where <u>additional</u> technical expertise	P	United States of America For clarity Category : <i>TECHNICAL</i>

		is required, a relevant technical expert may accompany or assist the auditor.		
392	108	Los auditores deberían conocer la metodología de las auditorías y de la recopilación de información <u>evidencia</u> objetiva. Cuando se necesiten conocimientos técnicos, un experto técnico en la materia de que se trate podrá acompañar o asistir al auditor.	P	Costa Rica termino utilizado en auditorias y consistencia con la traducción al inglés <i>Category : TRANSLATION</i>
393	109	To meet the requirement for impartiality (see section 7), any conflict of interest between the auditor and auditee should also be considered in during <u>the evaluationselection process</u> .	P	European Union This is a simplification of the English. <i>Category : EDITORIAL</i>
394	109	To meet the requirement for impartiality (see section 7), any conflict of interest between the auditor	P	EPPO This is a simplification of the English. <i>Category : EDITORIAL</i>

		and auditee should also be considered in-during the evaluation-selection process		
395	109	To meet the requirement for impartiality (see section 7), any conflict of interest between the auditor and auditee should also be considered in the evaluation.	C	IPPC Regional Workshop Africa Agree <i>Category : SUBSTANTIVE</i>
6. Frequency of Audit				
396	110	6. Frequency of Audit	C	United States of America Needs an article, propose "the" or "an" before "audit", throughout the document, as a global check. <i>Category : EDITORIAL</i>
397	111	Audit may be conducted periodically or non-periodically. National plant protection organizations NPPOs should determine the frequency of audits of the system or procedure being audited when they set up an audit programme, and review this-it as appropriate. The audit frequency may be influenced by:	P	European Union 1. Delete as it is covered in para 57. 2. Acronym already used in [29]. 3. Better wording. <i>Category : EDITORIAL</i>

398	111	Audit may be conducted periodically or non-periodically. National plant protection organizations NPPOs should determine the frequency of audits of the <u>phytosanitary</u> system or procedure being audited when they set up an audit programme, and review this as appropriate. The audit frequency may be influenced by:	P	COSAVE For consistency. Por consistencia. <i>Category : TECHNICAL</i>
399	111	Audit <u>An audit (or Audits)</u> may be conducted periodically or non-periodically. National plant protection organizations should determine the frequency of audits of the system or procedure being audited when they set up an audit programme, and review this as appropriate. The audit frequency	P	PPPO grammar For clarity, we suggest removing a part of the sentence we find redundant. <i>Category : EDITORIAL</i>

		may be influenced by:		
400	111	Audit may be conducted periodically or non-periodically. National plant protection organizations should determine the frequency of audits of the system or procedure being audited when they set up an audit programme, and review this as appropriate. The audit frequency may be influenced by:	P	China This sentence describes the responsibility of NPPO, and has been stated in other part. <i>Category : EDITORIAL</i>
401	111	Audit may be conducted periodically or non-periodically. National plant protection organizations <u>NPPOs</u> should determine the frequency of audits of the system or procedure being audited when they set up an audit programme, and review this as appropriate. The	P	Japan <i>Category : EDITORIAL</i>

		audit frequency may be influenced by:		
402	111	<p>Audit may be conducted periodically or non-periodically.</p> <p>National plant protection organizations should determine the frequency of audits of the system or procedure being audited when they set up an audit programme, and review this <u>it</u> as appropriate. The audit frequency may be influenced by:</p>	P	<p>EPPO</p> <p>1) Delete as it is covered in para 57. 2) Better wording. 3) Acronym already used in [29]. Category : <i>EDITORIAL</i></p>
403	111	<p>Audit may be conducted periodically or non-periodically <u>periodically</u>. National plant protection organizations should determine the frequency of audits of the system or procedure being audited when they set up an audit programme, and review this as appropriate. The</p>	P	<p>United States of America</p> <p>Conflicts with above in paragraph 57. "It may be conducted periodically, at regular or random intervals, or as a result of certain triggers." Category : <i>TECHNICAL</i></p>

		audit frequency may be influenced by:		
404	111	Audit The audit may be conducted periodically or non-periodically. National plant protection organizations should determine the frequency of audits of the system or procedure being audited when they set up an audit programme, and review this as appropriate. The audit frequency may be influenced by:	P	United States of America See US comment in paragraph 110 <i>Category : EDITORIAL</i>
405	111	Audit may be conducted periodically or non-periodically. National plant protection organizations <u>NPPOs</u> should determine the frequency of audits of the <u>phytosanitary</u> system or procedure being audited when they set up an audit programme, and review this as	P	Uruguay For consistency Por consistencia <i>Category : TECHNICAL</i>

		appropriate. The audit frequency may be influenced by:		
406	111	Audit may be conducted periodically or non-periodically. National plant protection organizations should determine the frequency of audits of the system or procedure being audited when they set up an audit programme, and review this as appropriate. The audit frequency may be influenced by:	C	South Africa Addition of "An" before the word "Audit" <i>Category : EDITORIAL</i>
407	112	triggers identified in section 3 of this standard 3	P	Canada <i>Category : EDITORIAL</i>
408	112	triggers identified in section 3 of this standard	P	COSAVE For consistency. Por consistencia. <i>Category : EDITORIAL</i>
409	112	triggers identified in section 3 of this standard	P	Uruguay For consistency Por consistencia <i>Category : EDITORIAL</i>
410	113	the pest -risk associated with relevant pests or pathways	P	PPPO <i>Category : EDITORIAL</i>

411	113	el riesgo de plagas asociado a las plagas o vías que hagan al caso relevantes ;	P	Costa Rica termino mejor empleado <i>Category : TRANSLATION</i>
412	115	whether an established quality management system is in place that has been shown to reduce pest risk	P	Costa Rica The established quality management systems refers to the system or procedure being audited, that are those that reduce pest risk. <i>Category : TECHNICAL</i>
413	115	whether an established <u>quality management system documented procedure</u> is in place that has been shown to reduce pest risk	P	Canada During the discussion on draft ISPM on authorization, it was identified that the use of "quality management system" is unclear and causes confusion. It was agreed that "documented procedures" would be used instead. <i>Category : SUBSTANTIVE</i>
414	115	whether an established quality management system is in place that has been shown to reduce pest risk	P	COSAVE The established quality management systems refers to the system or procedure being audited, that are those that reduce pest risk. Los sistemas de gestión de calidad establecidos se refieren al sistema o procedimiento que se audita, que son los que reducen el riesgo de plagas. <i>Category : TECHNICAL</i>
415	115	whether an established quality management system is in place that has been shown to reduce pest risk	C	IPPC Regional Workshop Africa Agree <i>Category : SUBSTANTIVE</i>
416	115	whether an established quality management system is in place that has been shown to	P	Uruguay The established quality management systems refers to the system or procedure being audited, that are those that reduce pest risk. Los sistemas de gestión de calidad establecidos se refieren al sistema o procedimiento que se audita, que son los que reducen el riesgo de plagas. <i>Category : TECHNICAL</i>

		reduce pest risk place.		
417	116	seasonality in relation to phytosanitary activities. - <u>Emergency phytosanitary issues that can lead to changes in a system, procedure or elements.</u>	P	China Add a new article. Special audit should be done when emergency phytosanitary issues or new phytosanitary activities occur. <i>Category : SUBSTANTIVE</i>
418	116	seasonality in relation to phytosanitary activities.	C	China Adjust Article [116] forward to Article [113], the others adjust accordingly. Season has relatively greater influence on audit of phytosanitary activities. <i>Category : EDITORIAL</i>
419	116	seasonality in relation to phytosanitary activities, <u>if appropriate.</u>	P	United States of America This would not always be required <i>Category : TECHNICAL</i>
420	116	seasonality in relation to phytosanitary activities. <u>(new bullet point) - resources eg manpower resources of the audit team</u>	P	Singapore Singapore proposed new addition bullet point from a practical consideration. The frequency of the audit will definitely be affected by the manpower resources i.e insufficient auditors. <i>Category : SUBSTANTIVE</i>
7. Conflicts of Interest				
421	117	7. Conflicts of Interest	C	Mexico Avoiding conflicts of interest should be an obligation of the authority that sends the auditor, establishing the locks in this standard <i>Category : SUBSTANTIVE</i>
422	118	In order to maintain the integrity of the audit system, the	C	European Union 'The parties concerned should develop guidance on this matter, as appropriate.' : This seems open ended! The standard could include guidance on avoiding/managing conflicts of interest. However, we believe that an IC publication to give more guidance on this subject would be more appropriate.

		auditor should be impartial. The auditor should verify the absence of potential, perceived or actual conflict of interest. The auditee should declare any possible conflicts of interest relating to the auditor of which they are aware. The parties concerned should develop guidance on this matter, as appropriate.		<i>Category : EDITORIAL</i>
423	118	In order to maintain the integrity of the audit system, the auditor should be impartial. The auditor should verify the absence of potential, perceived or actual conflict of interest. The auditee should declare any possible conflicts of interest relating to the auditor of which they are aware. The parties concerned should develop guidance on this	P	<p>COSAVE</p> <p>Redundant, the parties concerned are parties involved in the audit process (auditor and auditee).</p> <p>Redundante, las partes involucradas son partes involucradas en el proceso de auditaría (auditor y auditado).</p> <p><i>Category : TECHNICAL</i></p>

		matter, as appropriate.		
424	118	In order to maintain the integrity of the audit system, the auditor should be impartial. The auditor should verify the absence of potential, perceived or actual conflict of interest. The auditee should declare any possible conflicts of interest relating to the auditor of which they are aware. The parties concerned should develop guidance on this matter, as appropriate.	P	OIRSA Redundant, the parties concerned are parties involved in the audit process (auditor and auditee). <i>Category : TECHNICAL</i>
425	118	In order to maintain the integrity of the audit system, the auditor <u>NPPO</u> should be impartial. The auditor <u>NPPO</u> should verify <u>identify and manage</u> the absence of potential, perceived or actual conflict of interest. The auditee should declare any possible conflicts of interest	P	PPPO This is a confusing sentence, since it is in the requirements, there may not always be an absence of conflicts of interests so the original sentence can create a "paradox" especially since an NPPO can audit itself as mentioned above. We suggest changes to better handle cases with conflicts of interest. NZ submitted a paper on management of conflicts of interest to the CPM15. replace the auditor with the NPPO <i>Category : EDITORIAL</i>

		relating to the auditor of which they are aware. The parties concerned should develop guidance on this matter, as appropriate.		
426	118	In order to maintain the integrity of the audit system, the auditor should be impartial. The auditor should verify the absence of potential, perceived or actual conflict of interest. The auditee should declare any possible conflicts of interest relating to the auditor of which they are aware. The parties concerned should develop guidance on this matter, as appropriate. If Auditors is entities authorized by NPPO, the auditee has the right to choose which entities authorized to audit, and has the right to reject the entities authorized	P	China Protect the rights of the auditee and avoid conflicts of interest. <i>Category : SUBSTANTIVE</i>

		<u>that does not meet the audit conditions if there are reasonable reasons”.</u>		
427	118	In order to maintain the integrity of the audit system, the auditor should be impartial. The auditor should verify the absence of potential, perceived or actual conflict of interest. <u>The Both the auditor and the auditee should declare any possible conflicts that there is no conflict of interest relating to the auditor of which they are aware audit.</u> The parties concerned should develop guidance on this matter, as appropriate.	P	China Both the auditor and auditee have the responsibility to make conflict declaration. As for the conflict of interest, the auditor is assigned by the NPPO who proposes the audit, the auditee may know less about the auditor and it is difficult to detect and avoid the potential conflicts of interest. It is unreasonable that only the auditee to make a declaration of no conflict of interest. <i>Category : SUBSTANTIVE</i>
428	118	In order to maintain the integrity of the audit system, the auditor should be impartial. The auditor should verify the absence of potential, perceived or actual	P	China “the parties concerned” is used repeatedly in this standard, and is not well-defined. This will lead to problems in the audit process. <i>Category : SUBSTANTIVE</i>

		<p>conflict of interest. The auditee should declare any possible conflicts of interest relating to the auditor of which they are aware. The parties concerned <u>NPPOs of the auditor and auditee</u> should develop guidance on this matter, as appropriate.</p>		
429	118	<p>In order to maintain the integrity of the audit system, the auditor should be impartial. The auditor should verify the absence of potential, perceived or actual conflict of interest. The auditee should declare any possible conflicts of interest relating to the auditor of which they are aware. The parties concerned should develop guidance on this matter, as appropriate.</p>	C	<p>IPPC Regional Workshop Africa Agree Category : <i>SUBSTANTIVE</i></p>
430	118	<p><u>The parties concerned should develop guidance</u></p>	P	<p>United States of America In order to maintain the integrity of the audit, it should remain impartial, and this should be the first sentence, moved from the end. Category : <i>TECHNICAL</i></p>

		<p>on possible conflicts of interest or impartiality related to the audit.</p> <p>In order to maintain the integrity of the audit system, the auditor should be impartial. The auditor should verify the absence of potential, perceived or actual conflict of interest. The auditee should declare any possible conflicts of interest relating to the auditor of which they are aware. The parties concerned should develop guidance on this matter, as appropriate.</p>		
431	118	<p>In order to maintain the integrity of the audit system, the auditor should be impartial. The auditor should verify the absence of potential, perceived or actual conflict of interest. The auditee should declare any possible conflicts of interest</p>	P	<p>Uruguay Redundant, the parties concerned are parties involved in the audit process (auditor and auditee).</p> <p>Redundante, las partes involucradas son partes involucradas en el proceso de auditoría (auditor y auditado). Category : <i>TECHNICAL</i></p>

		relating to the auditor of which they are aware. The parties concerned should develop guidance on this matter, as appropriate.		
8. Confidentiality				
432	120	The parties concerned should consider and manage confidentiality in order to maintain the integrity of the audit system and private and commercially sensitive information. They should develop guidance on this matter, as appropriate.	P	COSAVE Redundant, the parties concerned are parties involved in the audit process (auditor and auditee). Redundante, las partes involucradas son partes involucradas en el proceso de auditoría (auditor y auditado). Category : <i>TECHNICAL</i>
433	120	The parties concerned should consider and manage confidentiality <u>and private and commercially sensitive information</u> in order to maintain the integrity of the audit system and private and	P	PPPO Management of confidentiality and integrity are two topics worth further guidance Category : <i>SUBSTANTIVE</i>

		commercially sensitive informationsystem. They should develop guidance on this matter, as appropriate.		
434	120	The parties concerned should consider and manage confidentiality in order to maintain the integrity of the audit system and private and commercially sensitive information. They should develop guidance on this matter, as appropriate.	C	EPPO 'The parties concerned should develop guidance on this matter, as appropriate.' - This seems open ended! The standard could include guidance on avoiding/managing conflicts of interest. However, we believe that an IC publication to give more guidance on this subject would be more appropriate. <i>Category : TECHNICAL</i>
435	120	The parties concerned should consider and manage confidentiality in order to maintain the integrity of the audit system and private and commercially sensitive information. They should develop guidance on this	P	Uruguay Redundant, the parties concerned are parties involved in the audit process (auditor and auditee). Redundante, las partes involucradas son partes involucradas en el proceso de auditoría (auditor y auditado). <i>Category : TECHNICAL</i>

		matter, as appropriate.		
436	121	Before the commencement of <u>an</u> audit, parties should be made aware of intended and possible disclosure of information gathered during the audit, including the report. <u>Additionally, the parties should consider and establish proprietary guidelines for information, documents and reports when NPPO's engage authorized entities to conduct audits. T.</u>	P	Caribbean Agricultural Health and Food Safety Agency Suggest that an additional paragraph be included on proprietary guidelines to ensure that information obtained from the audit is the ownership of the NPPO and auditee. Add proprietary so that ownership is addressed <i>Category : SUBSTANTIVE</i>
437	121	Before the commencement of audit, parties should be made aware of intended and possible disclosure of information gathered during the audit, including the report.	C	IPPC Regional Workshop Africa Agree <i>Category : SUBSTANTIVE</i>
438	121	Before the commencement of <u>the</u> audit, parties	P	United States of America See US comment in paragraph 110 <i>Category : EDITORIAL</i>

		should be made aware of intended and possible disclosure of information gathered during the audit, including the report.		
9. Financial Arrangements				
439	122	9. Financial Arrangements	C	Jamaica Seek clarification as to the obligation of the NPPO. <i>Category : SUBSTANTIVE</i>
440	123	Financial arrangements should be discussed and agreed upon by the parties concerned before commencement of the audit.	P	Mexico ADD TEXT: As well as the specific use or items of the expenses to be considered, preventing them from being rachitic or excessive. <i>Category : SUBSTANTIVE</i>
441	123	Financial arrangements should be discussed and agreed upon by the parties concerned before commencement of the audit.	P	COSAVE Redundant, the parties concerned are parties involved in the audit process (auditor and auditee). Redundante, las partes involucradas son partes involucradas en el proceso de auditoría (auditor y auditado). <i>Category : TECHNICAL</i>
442	123	Financial arrangements should be discussed <u>in advance</u> and agreed upon by the parties concerned before commencement of the audit.	P	Samoa <i>Category : EDITORIAL</i>

443	123	Financial arrangements should be discussed <u>in advance</u> and agreed upon by the parties concerned before commencement of the audit.	P	PPPO addition of "in advance" into text <i>Category : EDITORIAL</i>
444	123	Financial arrangements should be discussed and agreed upon by the parties concerned <u>NPPO and its authorized entities, or NPPOs of the auditor and auditee</u> before commencement of the audit.	P	China "the parties concerned" is used repeatedly in this standard, and is not well-defined. This will lead to problems in the audit process. For domestic audit, the NPPO and authorized entities should clarify the cost issue. For the audit of the exporting country, it should be decided by both NPPOs. <i>Category : SUBSTANTIVE</i>
445	123	Financial arrangements should be discussed and agreed upon by the parties concerned before commencement of the audit.	C	IPPC Regional Workshop Africa Agree <i>Category : SUBSTANTIVE</i>
446	123	Financial arrangements should be discussed and agreed upon by the parties concerned before commencement of the audit.	P	United States of America FAO/IPPC follows British English, so this is not needed? Editor will need to check. <i>Category : EDITORIAL</i>

447	123	Financial arrangements should be discussed and agreed upon by the parties concerned before commencement of the audit.	P	Uruguay Redundant, the parties concerned are parties involved in the audit process (auditor and auditee). Redundante, las partes involucradas son partes involucradas en el proceso de auditoría (auditor y auditado). <i>Category : TECHNICAL</i>
10. Settlement of Disputes				
448	124	10. Settlement of Disputes	C	Viet Nam Viet Nam would like to support to remove this section to Section "Responsibilities of the NPPO" <i>Category : EDITORIAL</i>
449	125	The process for settlement of disputes should be established in advance of audits, as part of establishing the audit framework, <u>with the corresponding legal implications (non-conformity, complaints, penalties, fines, etc.)</u> .	P	Mexico To improve text <i>Category : SUBSTANTIVE</i>
450	125	The process for settlement of disputes should be established in advance of audits, as part of establishing the audit framework.	C	Canada Should this be "programme"? <i>Category : TECHNICAL</i>
451	125	The process for settlement of	P	Japan The process for settlement of disputes is not always necessary as any dispute does not arise in many cases. <i>Category : SUBSTANTIVE</i>

		disputes should <u>may</u> be established in advance of audits, as part of establishing the audit framework.		
452	125	The process for settlement of disputes should be established in advance of audits, as part of establishing the audit framework.	C	United States of America "Establish" is in this sentence twice. Consider alternative wording. <i>Category : EDITORIAL</i>
453	126	If parties do not agree that the intended methodology was followed, or with findings or conclusions of the audit, they should consult among themselves as soon as possible with a view to resolving during the dispute audit	P	Mexico <i>Category : SUBSTANTIVE</i>
454	126	If parties do not agree that the intended methodology was followed, or with findings or conclusions of the audit, they should consult among themselves as soon	P	United States of America Unnecessary <i>Category : SUBSTANTIVE</i>

		as possible with a view to resolving the dispute possible.		
455	126	If parties do not agree that the intended methodology was followed, or with findings or conclusions of the audit, they should consult among themselves as soon as possible with a view to resolving the dispute.	C	United States of America It is not clear who is consulting among themselves. Is it between the auditor and auditee? <i>Category : SUBSTANTIVE</i>
456	127	If the dispute is still not resolved after this consultation, disputing parties should refer to the agreed dispute settlement process.	C	IPPC Regional Workshop Africa Agree <i>Category : SUBSTANTIVE</i>
11. Steps in the Audit Process				
457	129	The audit methodology may differ depending on the purpose, scope and objectives of the audit. It may entail review of documents, interviews, meetings, site visits or a combination of these. The following are steps in the audit process.	C	IPPC Regional Workshop Africa agree <i>Category : SUBSTANTIVE</i>
458	129	The audit methodology may differ depending on	C	United States of America Should it say these are the required steps or the most common steps? <i>Category : SUBSTANTIVE</i>

		the purpose, scope and objectives of the audit. It may entail review of documents, interviews, meetings, site visits or a combination of these. The following are steps in the audit process.		
11.1 Planning				
459	132	defining and agreeing on the purpose, scope (entire system <u>(system audit or specific elements of the system)</u> <u>monitoring audit</u>) and objectives of the audit	P	United States of America see US comments on paragraph 57 <i>Category : TECHNICAL</i>
460	134	identifying the auditor or auditors <u>auditor</u> and the auditee or auditees <u>auditee</u>	P	PPPO Plurals are covered under 4.1 and do not require repeating <i>Category : EDITORIAL</i>
461	134	identifying the auditor or auditors and the auditee or auditees-auditees <u>determine the audit process and schedule</u>	P	China Determining the audit process and schedule is an important part of the plan. <i>Category : SUBSTANTIVE</i>
462	135	Where appropriate, planning may also include recognition <u>consideration</u> of existing equivalent	P	European Union There is no need to recognise other systems, 'consideration' seems more appropriate. <i>Category : SUBSTANTIVE</i>

		audit systems or other systems developed by NPPOs or industry.		
463	135	Where appropriate, planning may also include recognition <u>consideration</u> of existing equivalent audit systems or other systems developed by NPPOs or industry.	P	EPPO There is no need to recognise other systems, 'consideration' seems more appropriate. <i>Category : SUBSTANTIVE</i>
464	135	Where appropriate, planning may also include recognition of existing equivalent audit systems or other systems developed by NPPOs or industry.	C	IPPC Regional Workshop Africa Agree <i>Category : SUBSTANTIVE</i>
465	135	Where appropriate, planning may also include recognition of existing equivalent audit systems or other systems developed by NPPOs or industry.	C	United States of America Perhaps more information on existing audit systems and systems developed by industry be included in the section on "types of audit" <i>Category : TECHNICAL</i>
466	135	Where appropriate, planning may also include recognition of existing equivalent audit systems or other systems developed	C	United States of America Is this paragraph a part of the list? This is not clear. <i>Category : EDITORIAL</i>

		by NPPOs or industry.		
11.1.1 Scheduling of audits				
467	136	11.1.1 <u>Scheduling-Announcement of audits</u> <u>of audits</u> <u>scheduling</u>	P	China More suitable. <i>Category : EDITORIAL</i>
468	137	The scheduling of periodic audits (i.e. the date and time of the audit performance step (section 11.3)) should be announced before the performance of the audit, with an advance equal to or greater than the agreed minimum notice. Non-periodic audits should be scheduled by an NPPO or an authorized entity. The scheduling of an audit may be unannounced in some situations (e.g. nonconformities, complaints).	C	Panama The text indicates that the corresponding deadlines when disputes arise are seen in the closing phase. It is important for the parties to know prior to the beginning of the audit the time in which they would be formally receiving the audit report. That this time is opportune for the parties, since as of its delivery the "follow-up" phase would begin if the need to adopt corrective measures is determined. <i>Category : SUBSTANTIVE</i>
469	137	The scheduling of periodic audits (i.e. the date and time of the audit	C	Mexico Delete "or an authorized entity", as the NPPO is responsible <i>Category : SUBSTANTIVE</i>

		<p>performance step (section 11.3)) should be announced before the performance of the audit, with an advance equal to or greater than the agreed minimum notice. Non-periodic audits should be scheduled by an NPPO or an authorized entity. The scheduling of an audit may be unannounced in some situations (e.g. nonconformities, complaints).</p>		
470	137	<p>The scheduling of periodic audits (i.e. the date and time of the audit performance step (section 11.3)) should be announced before the performance of the audit, with an advance equal to or greater than the agreed minimum notice. Non-periodic audits should be scheduled by an NPPO or an</p>	C	<p>Mexico It should be defined what the minimum timeframe will be <i>Category : SUBSTANTIVE</i></p>

		authorized entity. The scheduling of an audit may be unannounced in some situations (e.g. nonconformities, complaints).		
471	137	The scheduling of periodic audits (i.e. the date and time of the audit performance step (section 11.3)) should be announced before the performance of the audit, with an advance equal to or greater than the agreed minimum notice. Non-periodic audits <u>Audits</u> should be scheduled by an NPPO or an authorized entity. The scheduling of an audit may be unannounced in some situations (e.g. nonconformities, complaints).	P	Costa Rica 1)This is valid for both types of audits periodic and non-periodic.2) It does not apply for audits performed by an NPPO to another NPPO. So it should be deleted to avoid misunderstandings <i>Category : TECHNICAL</i>
472	137	The scheduling of periodic audits (i.e. the date and time of the audit	P	European Union Unannounced visits in case of nonconformities or complaints are more for a control than an audit. Moreover, how can the preparation step be carried out without informing the auditee, nor how can the documents necessary for this phase be retrieved? However, it is possible to play on the advance notice period. The method developed in the following section confirms this.

		performance step (section 11.3)) should be announced before the performance of the audit, with an advance equal to or greater than the agreed minimum notice. Non-periodic audits should be scheduled by an NPPO or an authorized entity. The scheduling of an audit may be unannounced in some situations <u>(e.g. situations, nonconformities, complaints)</u> .		<i>Category : SUBSTANTIVE</i>
473	137	The scheduling of periodic audits (i.e. the date and time of the audit performance step (section 11.3)) should be announced before the performance of the audit, with an advance equal to or greater than <u>respecting</u> the agreed minimum notice. Non-periodic audits should be scheduled	P	European Union 1. Simplification of the English. 2. Clearer. <i>Category : EDITORIAL</i>

		by an NPPO or an authorized entity entity as a result of certain triggers (See section 3). The scheduling of an audit may be unannounced in some situations (e.g. nonconformities, complaints).		
474	137	The scheduling of periodic audits (i.e. the date and time of the audit performance step (section 11.3)) should be announced before the performance of the audit, with an advance equal to or greater than the agreed minimum notice. Non-periodic audits Audits should be scheduled by an NPPO or an authorized entity. The scheduling of an audit may be unannounced in some situations (e.g.	P	COSAVE 1) This is valid for both types of audits periodic and non-periodic. 2) It does not apply for audits performed by an NPPO to another NPPO. So it should be deleted to avoid misunderstandings. 1) Es válido para ambos tipos de auditorías, periódicas y no periódicas. 2) No se aplica a las auditorías realizadas por una ONPF a otra ONPF. Por lo tanto, debe eliminarse para evitar malentendidos. <i>Category : TECHNICAL</i>

		nonconformities, complaints).		
475	137	<p>The scheduling of periodic audits (i.e. the date and time of the audit performance step (section 11.3)) should be announced before the performance of the audit, with an advance equal to or greater than the agreed minimum notice. Non-periodic audits should be scheduled by an NPPO or an authorized entity. The scheduling of an audit may be unannounced in some situations (e.g. nonconformities, complaints).</p> <p><u>The scheduling of periodic audits (i.e. the date and time of the audit performance step (section 11.3)) should be announced before the performance of the audit, with an advance equal to or greater than the agreed minimum notice. Non-periodic audits should be scheduled by an</u></p>	P	<p>OIRSA</p> <p>1) This is valid for both types of audits periodic and non-periodic. 2) It does not apply for audits performed by an NPPO to another NPPO. So it should be deleted to avoid misunderstandings.</p> <p>Category : <i>TECHNICAL</i></p>

		<u>NPPO or an authorized entity. The scheduling of an audit may be unannounced in some situations (e.g. nonconformities, complaints).</u>		
476	137	The scheduling of periodic audits (i.e. the date and time of the audit performance step (section 11.3)) should be announced before the performance of the audit, with an advance equal to or greater than the agreed minimum notice. Non-periodic audits should be scheduled by an NPPO or an authorized entity. The scheduling of an audit may be unannounced in some situations (e.g. nonconformities, complaints). For periodic audits, the auditor and auditee should agree the minimum notification period required prior to performing an audit (see section 11.3), and the auditee should be notified accordingly.	P	PPPO Suggestion of new wording. Some jargon clouds the message of this sentence. Specifically, "performance" and "advance" as they haven't been described. <i>Category : EDITORIAL</i>

		<u>The auditor should also supply the auditee with an audit schedule. The audit schedule may also serve as prior notification.</u>		
477	137	<p>The scheduling of periodic audits (i.e. the date and time of the audit performance step (section 11.3)) should be announced before the performance of the audit, with an advance equal to or greater than audit respecting the agreed minimum notice. Non-periodic audits should be scheduled by an NPPO or an authorized entity <u>entity as a result of certain triggers (section 3)</u>. The scheduling of an audit may be unannounced in some situations <u>situations (e.g. situations, noneonformities, complaints)</u>.</p>	P	<p>EPPO Clearer</p> <p>Simplification of the English.</p> <p>Unannounced visits in case of nonconformities or complaints are more for a control than an audit. Moreover, how can the preparation step be carried out without informing the auditee, nor how can the documents necessary for this phase be retrieved? However, it is possible to play on the advance notice period. The method developed in the following section confirms this. <i>Category : SUBSTANTIVE</i></p>
478	137	The scheduling of periodic audits (i.e. the date and time of	C	<p>IPPC Regional Workshop Africa Agree <i>Category : SUBSTANTIVE</i></p>

		the audit performance step (section 11.3)) should be announced before the performance of the audit, with an advance equal to or greater than the agreed minimum notice. Non-periodic audits should be scheduled by an NPPO or an authorized entity. The scheduling of an audit may be unannounced in some situations (e.g. nonconformities, complaints).		
479	137	The scheduling of periodic audits (i.e. the date and time of the audit performance step (section 11.3)) should be announced before the performance of the audit, with an advance equal to or greater than the agreed minimum notice. Non-periodic audits should be scheduled	P	United States of America To clarify the paragraph Category : <i>TECHNICAL</i>

		<p>by an NPPO or an authorized entity. The scheduling of an audit may be unannounced in some situations (e.g. nonconformities, complaints). Audits should be scheduled by an NPPO or an authorized entity in advance (i.e. the date and time of the audit performance step (section 11.3)). The scheduling of an audit may be unannounced in some situations (e.g. nonconformities).</p>		
480	137	<p>The scheduling of periodic audits (i.e. the date and time of the audit performance step (section 11.3)) should be announced before the performance of the audit, with an advance equal to or greater than the agreed minimum notice. Non-periodic audits Audits should be scheduled by an NPPO or an authorized entity. The scheduling of an audit may be unannounced in</p>	P	<p>Uruguay 1) This is valid for both types of audits periodic and non-periodic. 2) It does not apply for audits performed by an NPPO to another NPPO. So it should be deleted to avoid misunderstandings.</p> <p>1) Es válido para ambos tipos de auditorías, periódicas y no periódicas. 2) No se aplica a las auditorías realizadas por una ONPF a otra ONPF. Por lo tanto, debe eliminarse para evitar malentendidos. Category : <i>TECHNICAL</i></p>

		some situations (e.g. nonconformities, complaints).		
11.2 Preparation				
481	140	gathering and reviewing relevant information, such as manuals, procedures, work plans, notifications of non-compliance, records, pre-audit questionnaire, relevant standards, agreements and previous audit reports reports and report on corrective actions implemented to address non-conformities	P	Canada One of the key consideration while preparing for an audit. <i>Category : SUBSTANTIVE</i>
482	141	preparing audit tools, such as checklists, reference materials, equipment and list of possible questions to ask, to facilitate the gathering of evidence in support of the audit	P	PPPO Suggest deletion for consistency reason. Justification is given at the end of this sentence and only this sentence out of the 5 points given. It is inconsistent and if justification must be given, can probably be explained after the points are given. We do not think justification is required in this situation. <i>Category : EDITORIAL</i>
483	141	preparing audit tools, such as checklists, reference materials,	P	United States of America Removed because redundant <i>Category : EDITORIAL</i>

		equipment and list of possible questions to ask questions, to facilitate the gathering of evidence in support of the audit		
484	142	communicating with participants (which may include notifying auditees for announced audits)-auditees) and confirming their availability, finalizing logistics arrangements and agreeing to the language in which the audit will be conducted	P	Costa Rica Audits should be announced as per previous comment. <i>Category : TECHNICAL</i>
485	142	communicating with participants (which may include notifying auditees for announced audits)-auditees) and confirming their availability, finalizing logistics arrangements and agreeing to the language in which the audit will be conducted	P	COSAVE Audits should be announced as per previous comment. Las auditorias deben anunciarse según el comentario anterior. <i>Category : TECHNICAL</i>
486	142	communicating with participants	P	Uruguay Audits should be announced as per previous comment.

		(which may include notifying auditees for announced audits)-auditees) and confirming their availability, finalizing logistics arrangements and agreeing to the language in which the audit will be conducted		Las auditorias deben anunciarse según el comentario anterior. <i>Category : TECHNICAL</i>
487	144	confirming the roles and responsibilities of the participants during the audit, such as the principal contact persons for each party, the lead auditor, audit team members, observers and technical experts <u>experts and observers.</u>	P	European Union For a more logical order. <i>Category : EDITORIAL</i>
488	144	confirming the roles and responsibilities of the participants during the audit, such as the principal contact persons for each party, the lead auditor, audit team members, observers and technical expert <u>experts and observers.</u>	P	EPPO More logical order. <i>Category : TECHNICAL</i>

489	144	confirming the roles and responsibilities of the participants during the audit, such as the principal contact persons for each party, the lead auditor, audit team members, observers and technical experts.	C	IPPC Regional Workshop Africa Agree <i>Category : SUBSTANTIVE</i>
11.3 Performance				
490	145	11.3 Performance Undertaking an Audit	P	European Union Better wording. Clearer. <i>Category : EDITORIAL</i>
491	145	11.3 Performance Undertaking an Audit	P	EPPO Better wording. Clearer. <i>Category : EDITORIAL</i>
492	146	The performance step of the audit should include the following three stages. Depending on the scope of the audit, the combination of elements within each stage may vary. There are three stages involved in conducting an audit and the activities which take place during each stage will differ depending on	P	European Union To improve clarity and simplification of the English. <i>Category : EDITORIAL</i>

		the type of audit and what is being audited. The three stages are set out below along with examples of activities which may be needed.		
493	146	The performance step of the audit should include the following three stages. Depending on the scope of the audit, the combination of elements within each stage may vary. There are three stages involved in conducting an audit and the activities which take place during each stage will differ depending on the type of audit and what is being audited. The three stages are set out below along with examples of activities which may be needed	P	EPPO To improve clarity and simplification of the English. <i>Category : EDITORIAL</i>
11.3.1 Commencement stage				
494	147	11.3.1 Commencement stage	P	European Union Better wording. Clearer. <i>Category : EDITORIAL</i>
495	147	11.3.1 Initiation	P	EPPO Better wording. Clearer. <i>Category : EDITORIAL</i>

496	148	The activities in this stage-Activities may include the following elements include:	P	European Union Brevity. Category : <i>EDITORIAL</i>
497	148	The activities in this stage-Activities may include the following elements :	P	EPPO Brevity Category : <i>EDITORIAL</i>
498	155	informing participants about legal requirements for confidentiality and data protection.	C	IPPC Regional Workshop Africa Agree Category : <i>SUBSTANTIVE</i>
499	155	informing participants about legal requirements for confidentiality and data protection . protection (including photo documentation of the audit.	P	United States of America This is a common practice to ask permission where the info can be confidential. Category : <i>TECHNICAL</i>
11.3.2 Evaluation stage				
500	156	11.3.2 on Evaluation stageperforming and evaluation	P	EPPO Better wording. Clearer. Category : <i>TECHNICAL</i>
501	157	The activities in this stage-Activities may include the following elements include:	P	EPPO Brevity Category : <i>EDITORIAL</i>
502	160	assessing records from procedures (e.g. technical and	C	Ukraine availability of conditions to ensure the effectiveness of phytosanitary systems and procedures Category : <i>SUBSTANTIVE</i>

		administrative records, inspection records, treatment records, testing results, corrective actions log)		
503	161	verifying if facilities, instruments, machinery and equipment comply with their relevant specifications and with the phytosanitary requirements set by the NPPO.	P	European Union Please see [46]. <i>Category : SUBSTANTIVE</i>
504	161	verifying if facilities, instruments, machinery and equipment comply with their relevant specifications and with the phytosanitary requirements set by the NPPO.	P	EPPO Please see [46]. <i>Category : SUBSTANTIVE</i>
505	164	identifying and informing the auditee of any nonconformities during the audit and immediately informing the NPPO of any critical nonconformities.	P	Canada For clarity <i>Category : TECHNICAL</i>

		specifically in cases where audits are conducted by authorized entities..		
506	164	identifying and informing the auditee of any nonconformities during the audit and immediately informing the NPPO of any critical nonconformities.	P	Japan Not only critical nonconformities but also other nonconformities should be informed to the NPPO. Whether a nonconformity is critical or other should be decided by NPPO as stated in paragraph 176. <i>Category : SUBSTANTIVE</i>
507	164	identifying and informing the auditee of any nonconformities findings during the audit and immediately informing the NPPO of any critical nonconformities.	P	Thailand A term "finding" is suggested to replace a term "nonconformities". <i>Category : SUBSTANTIVE</i>
508	164	identifying and informing the auditee of any nonconformities during the audit and immediately informing the NPPO of any critical nonconformities.	C	United States of America Regarding "immediately" - The time should be specified in the agreement, otherwise no clarity. <i>Category : TECHNICAL</i>
11.3.3 Closure stage				

509	165	11.3.3 Closure stage	C	Mexico In the Spanish version appear: Closing phase and Report. Maintain in Spanish "Closure stage" only. <i>Category : SUBSTANTIVE</i>
510	165	11.3.3 Closure stage and reporting	P	European Union This section could be combined with 12. so that the final step is closure and reporting. <i>Category : EDITORIAL</i>
511	165	11.3.3 Closure stage and reporting	P	EPPO This section could be combined with 12. so that the final step is closure and reporting. <i>Category : EDITORIAL</i>
512	166	The activities in this stage may include <u>Activities of the following elements</u> <u>closure may include:</u>	P	European Union Brevity and add 'closure' due to the suggested merging. <i>Category : EDITORIAL</i>
513	166	The activities in this stage may include <u>of the following elements</u> <u>closure may include:</u>	P	EPPO Brevity and add 'closure' due to the suggested merging. <i>Category : EDITORIAL</i>
514	169	reviewing the next steps, such as drafting the audit report and commenting on the draft audit report, and the discussion on corresponding timelines <u>for implementation of corrective actions when nonconformities have been identified, and</u> in situations where dispute occurs, attempting to	P	Canada Discussion on timelines for implementation of corrective actions is an important element to be covered under the closure stage. <i>Category : TECHNICAL</i>

		resolve the dispute (See section 10).		
515	169	reviewing agreeing the next steps, such as drafting the audit report-report- agreeing the deadlines for discussion and commenting on resolution of disagreements over the draft audit report, and the corresponding timelines in situations where resolving dispute occurs, attempting to resolve the dispute (See section 10).	P	European Union This indent is not sufficiently clear, we are suggesting rewording and creation of two separate indents. <i>Category : EDITORIAL</i>
516	169	reviewing the next steps, such as drafting the audit report and commenting on the draft audit report, and the corresponding timelines in situations where dispute occurs, attempting to resolve the dispute (See section 10).	C	Ukraine During the audit, photo and video recording can be used <i>Category : SUBSTANTIVE</i>
517	169	reviewing - agreeing the next	P	EPPO This indent is not sufficiently clear, we are suggesting rewording and creation of two separate indents.

		steps, such as drafting the audit report report,- agreeing the deadlines for discussion and commenting on resolution of disagreements over the draft audit report, and the corresponding timelines in situations where resolving dispute occurs, attempting to resolve the dispute (See section 10).		<i>Category : TECHNICAL</i>
518	169	reviewing the next steps, such as drafting the audit report and commenting on the draft audit report, and the corresponding timelines in situations where dispute occurs, attempting to resolve the dispute (See section 10).	C	IPPC Regional Workshop Africa Agreed <i>Category : SUBSTANTIVE</i>
519	169	reviewing the next steps, such as drafting the audit report and commenting on the	P	United States of America Should be lower case <i>Category : EDITORIAL</i>

		draft audit report, and the corresponding timelines in situations where dispute occurs, attempting to resolve the dispute (See (see section 10).		
520	169	reviewing the next steps, such as drafting the audit report and commenting on the draft audit report, and the corresponding timelines in situations where dispute occurs, attempting to resolve the dispute (See section 10).- <u>Agree on the deadline for the presentation of the final report of the audit</u>	P	Costa Rica In line with what is indicated in the section on responsibilities, it is considered that it must be indicated since it is an important aspect to know the result of the audit within a certain period <i>Category : SUBSTANTIVE</i>
521	169	examinar las siguientes etapas, como la redacción del informe de auditoría y la formulación de comentarios al proyecto de informe de auditoría, y los	P	Costa Rica En línea con lo indicado en el apartado de responsabilidades, se considera que debe indicar ya que es un aspecto importante conocer en un plazo determinado el resultado de la auditoría <i>Category : SUBSTANTIVE</i>

		plazos correspondientes cuando surja una controversia, y tratar de resolverla (véase la Sección 10).- Acordar el plazo para la presentación del informe final de la auditoria		
12. Reporting				
522	170	12. Reporting	C	Viet Nam Viet Nam would like to support that the report should be sent to each party for comments and discussion, this section must work bilaterally between the two NPPOs of the exporting and importing countries. What are recommendations that will give each other? <i>Category : EDITORIAL</i>
523	170	12. Reporting	P	European Union It is proposed to be combined with 11.3.3 so that the final step is closure and reporting, see paragraph 165. <i>Category : EDITORIAL</i>
524	170	12. Reporting	P	EPPO It is proposed to be combined with 11.3.3 so that the final step is closure and reporting, see paragraph 165. <i>Category : TECHNICAL</i>
525	171	The audit report should include the scope, purpose, objectives and findings (observations, nonconformities) of the audit. The report should also draw conclusions based on analysis of the findings. If nonconformities are identified, these conclusions should include the need for corrective actions	C	Panama The types of Non-Conformities are defined, but not the observations. It is important that guidance is also provided on this; since the observations can be aimed at informing about opportunities for improvement, the risks detected in the processes that may become future non-conformities, or any other detail that has been observed by the auditor and it seems relevant to record. <i>Category : SUBSTANTIVE</i>

		and the timelines for implementation of these corrective actions. In addition, the audit report may provide useful feedback on phytosanitary regulations or requirements.		
526	171	The audit report should include the scope, purpose, objectives and findings (observations, nonconformities) of the audit. The report should also draw conclusions based on analysis of the findings. If nonconformities are identified, these conclusions should include the need for <u>and identification of</u> corrective actions and the timelines for implementation of these corrective actions. In addition, the audit report may provide useful feedback on phytosanitary regulations or requirements.	P	Barbados The report should not only state that corrective actions are necessary without identifying possible solutions. <i>Category : SUBSTANTIVE</i>

527	171	The audit report should include the scope, purpose, objectives and findings (observations, nonconformities) of the audit. The report should also draw conclusions based on analysis of the findings. If nonconformities are identified, these conclusions should include the need for corrective actions and the timelines for implementation of these corrective actions. In addition, the audit report may provide useful feedback on phytosanitary regulations or requirements.	C	<p>Canada</p> <p>Observation is mentioned in the same context as nonconformity. It would be valuable to briefly describe what an observation is and how it differs from nonconformity.</p> <p><i>Category : SUBSTANTIVE</i></p>
528	171	The audit report should include the scope, purpose, objectives and findings (observations, nonconformities) of the audit. The report should also draw conclusions based on analysis of	P	<p>European Union</p> <p>The "areas for improvement" may also be indicated. These areas for improvement are provisions identified by the auditor that comply with the reference framework but which could be adjusted, developed or simplified to meet or exceed the objectives. Including in the audit report the possibility of identifying areas for improvement would be proactive and would strengthen the continuous improvement process, beyond strict nonconformities.</p> <p><i>Category : SUBSTANTIVE</i></p>

		the findings. If nonconformities are identified, these conclusions should include the need for corrective actions and the timelines for implementation of these corrective actions. In addition, the audit report may provide suggestions for improving the phytosanitary system or procedure and its effectiveness, highlight goods practice, as well as provide useful feedback on phytosanitary regulations or requirements.		
529	171	The audit report should include the scope, purpose, objectives and findings (observations, nonconformities) of the audit. The report should also draw conclusions based on analysis of the findings. If nonconformities are identified, these	P	European Union It is not up to the auditor to indicate the corrective actions to be taken. It is up to the auditee, on the basis of the nonconformities and the risks involved as specified by the auditor, to propose an action plan (for example at the draft audit report stage) which will then be reviewed by the auditor (for example when the auditee has given its feedback for the drafting of the final audit report). The proposed associated timelines are included in this action plan by the auditee. Please also see comment in [105], Section 4.4 (Responsibility of the auditee). <i>Category : SUBSTANTIVE</i>

		conclusions should include the need for corrective actions and the assessment by the auditor of the action plan proposed by the auditee (including of the proposed timelines for implementation of these corrective actions) . In addition, the audit report may provide useful feedback on phytosanitary regulations or requirements.		
530	171	The audit report should include the scope, purpose, objectives and findings (observations, nonconformities) of the audit. The report should also draw conclusions based on analysis of the findings. If nonconformities are identified, these conclusions should include the need for and identification of corrective actions and the timelines	P	Caribbean Agricultural Health and Food Safety Agency The report must should not only state that corrective actions are necessary without identifying possible solutions. Category : <i>SUBSTANTIVE</i>

		for implementation of these corrective actions. In addition, the audit report may provide useful feedback on phytosanitary regulations or requirements.		
531	171	<p>The audit report should include the scope, purpose, objectives and findings (observations, nonconformities) of the audit. The report should also draw conclusions based on analysis of the findings. If nonconformities are identified, these conclusions should include the need for corrective actions and the assessment by the auditor of the action plan proposed by the auditee (including of the proposed timelines for implementation of these corrective actionsactions). In addition, the audit report may provide</p>	P	<p>EPPO</p> <p>It is not up to the auditor to indicate the corrective actions to be taken. It is up to the auditee, on the basis of the nonconformities and the risks involved as specified by the auditor, to propose an action plan (for example at the draft audit report stage) which will then be reviewed by the auditor (for example when the auditee has given its feedback for the drafting of the final audit report). The proposed associated timelines are included in this action plan by the auditee. Please also see comment in [105], Section 4.4 (Responsibility of the auditee).</p> <p>The "areas for improvement" may also be indicated. These areas for improvement are provisions identified by the auditor that comply with the reference framework but which could be adjusted, developed or simplified to meet or exceed the objectives. Including in the audit report the possibility of identifying areas for improvement would be proactive and would strengthen the continuous improvement process, beyond strict nonconformities.</p> <p><i>Category : SUBSTANTIVE</i></p>

		<u>suggestions for improving the phytosanitary system or procedure and its effectiveness, highlight goods practice, as well as provide</u> useful feedback on phytosanitary regulations or requirements.		
532	171	The audit report should include the scope, purpose, objectives and findings (observations, nonconformities) of the audit. The report should also draw conclusions based on analysis of the findings. If nonconformities are identified, these conclusions should include the need for corrective actions and the timelines for implementation of these corrective actions. In addition, the audit report may provide useful feedback on phytosanitary	P	Costa Rica The report should contain the entire result of the audit and not limit it only to non-conformities, audits are carried out to determine conformities and non-conformities and establish a program to correct non-conformities and may also include improvement actions <i>Category : SUBSTANTIVE</i>

		regulations or requirements.		
533	171	<p>En el informe de auditoría deberían figurar el ámbito, el propósito, los objetivos y los resultados <u>hallazgos</u> (observaciones, no conformidades) de la auditoría. Asimismo, se deberían recoger las conclusiones extraídas a partir del análisis de los resultados. Si se hubieran detectado no conformidades, estas conclusiones deberían incluir la necesidad de adoptar medidas correctivas y los plazos para la aplicación de dichas medidas. Asimismo, el informe de auditoría podrá proporcionar observaciones útiles sobre los reglamentos o requisitos fitosanitarios.</p>	P	<p>Costa Rica Termino utilizado en auditorias Category : TRANSLATION</p>
534	171	En el informe de auditoría deberían	P	<p>Costa Rica El informe debería contener todo el resultado de la auditoria y no limitarlo solo a las no conformidades, las auditorias se</p>

		<p>figurar el ámbito, el propósito, los objetivos y los resultados (observaciones, no conformidades) de la auditoría. Asimismo, se deberían recoger las conclusiones extraídas a partir del análisis de los resultados. Si se hubieran detectado no conformidades, estas conclusiones deberían incluir la necesidad de adoptar medidas correctivas y los plazos para la aplicación de dichas medidas. Asimismo, el informe de auditoría podrá proporcionar observaciones útiles sobre los reglamentos o requisitos fitosanitarios.</p>		<p>realizan para determinar conformidades y no conformidades y establecer un programa para subsanar las no conformidades y también puede incluir acciones de mejora <i>Category : SUBSTANTIVE</i></p>
535	172	<p>Before finalizing the audit report and providing it to the auditee, additional information (e.g. comments,</p>	P	<p>European Union To be more complete. <i>Category : SUBSTANTIVE</i></p>

		implemented corrective actions) received from auditees should be considered. Details of any disputes should be clearly described in the report.		
536	172	Before finalizing the audit report and providing it to the auditee, additional information (e.g. comments, implemented corrective actions) received from auditees should be considered. Details of any disputes should be clearly described in the report.	P	EPPO To be more complete. <i>Category : SUBSTANTIVE</i>
537	172	Before finalizing the audit report and providing it to the auditee, additional information (e.g. comments, implemented corrective actions) received from auditees should be considered.	C	IPPC Regional Workshop Africa Agree <i>Category : SUBSTANTIVE</i>
538	172	Before finalizing the audit report and providing it to the	P	Costa Rica consistency with what is indicated in the responsibilities <i>Category : SUBSTANTIVE</i>

		auditee auditee and the NPPQ, additional information (e.g. comments, implemented corrective actions) received from auditees should be considered.		
539	172	Antes de terminar el informe de auditoría y remitirlo al auditee auditeado y a la ONPF, debería considerarse otra información (como comentarios, medidas correctivas aplicadas) que este haya remitido.	P	Costa Rica reiterar lo indicado en las responsabilidades <i>Category : SUBSTANTIVE</i>
13. Types of Nonconformity				
540	173	13. Types of Nonconformity	C	PPPO Are these already defined in ISMP 5? <i>Category : SUBSTANTIVE</i>
541	174	Nonconformities should be recorded, along with supporting evidence. Nonconformities may be considered as critical nonconformities or other nonconformitiesnon	P	China More accurate and appropriate. <i>Category : EDITORIAL</i>

		<u>critical nonconformity.</u>		
542	174	Nonconformities should be recorded, along with supporting evidence. Nonconformities may be considered as critical nonconformities or other nonconformities.	C	United States of America There are several versions of wording for non-conformance now being used in addition to critical and other used here; These terms should be harmonized, or at a minimum the differences between them should be noted. Also, rather than the words "integrity" and "trust", one might consider "efficiency" and "compromise" which are less subjective. <i>Category : TECHNICAL</i>
543	174	Nonconformities should be recorded, along with supporting evidence. Nonconformities may be considered as critical nonconformities <u>critical, major</u> or other nonconformities <u>minor.</u>	P	Singapore Singapore proposed the consideration of different levels of nonconformities as this is being practiced during a typical audit. The clear definition of the different nonconformities guides the responses and attitude of the auditees. Eg a critical NC may lead to immediate suspension due to the severity of the impact on the system while a minor NC may not warrant this response. <i>Category : SUBSTANTIVE</i>
544	175	"Critical nonconformity" is a nonconformity that immediately impacts the integrity of and trust in the NPPO's phytosanitary system or its elements and that requires a rapid corrective action to	P	Panama Created by merging other changes together <i>Category : SUBSTANTIVE</i>

		be identified and implemented.		
545	175	“Critical nonconformity” is a nonconformity that immediately impacts the integrity of and trust in the NPPO’s phytosanitary system or its elements and that requires a rapid corrective action to be identified and implemented.	P	Costa Rica It is not a question of trust but of the operation of the system. <i>Category : SUBSTANTIVE</i>
546	175	<u>A</u> “ Critical-critical nonconformity” is a nonconformity that immediately impacts the integrity of and trust in the NPPO’s phytosanitary system or its elements and that requires a rapid corrective action to be identified and implemented.	P	European Union Better English. <i>Category : EDITORIAL</i>
547	175	“Critical nonconformity” is a nonconformity that immediately impacts the integrity of and trust in the NPPO’s phytosanitary	P	COSAVE In terms of an ISPM, it’s not a matter of trust but functioning of the system. En términos de una NIMF, no es una cuestión de confianza sino del funcionamiento del sistema. <i>Category : SUBSTANTIVE</i>

		system or its elements and that requires a rapid corrective action to be identified and implemented.		
548	175	“ “Major Critical nonconformity” is a nonconformity that immediately impacts the integrity of and trust in the NPPO’s phytosanitary system or its elements and that requires a rapid corrective action to be identified and implemented.	P	Thailand The term "Major nonconformity", which has been defined in ISO 17021-1, is widely used and recognized. These terms could be used in this draft standard without the need to define another term. <i>Category : SUBSTANTIVE</i>
549	175	“ A “cCritical-critical nonconformity” is a nonconformity that immediately impacts the integrity of and trust in the NPPO’s phytosanitary system or its elements and that requires a rapid corrective action to be identified and implemented.	P	EPPO Better English. <i>Category : EDITORIAL</i>
550	175	“Critical nonconformity” is a nonconformity that immediately	P	United States of America We propose a better explanation <i>Category : TECHNICAL</i>

		<u>impacts</u> <u>compromises</u> the integrity of and <u>trust in of</u> the NPPO's phytosanitary system or its elements and that requires a rapid corrective action to be identified and implemented.		
551	175	“Critical nonconformity” is a nonconformity that immediately impacts the integrity of and trust in the NPPO's phytosanitary system or its elements and that requires a rapid corrective action to be identified and implemented.	P	Uruguay In terms of an ISPM, it's not a matter of trust but functioning of the system. En términos de una NIMF, no es una cuestión de confianza sino del funcionamiento del sistema. <i>Category : SUBSTANTIVE</i>
552	175	Se denomina “no conformidad crítica” a es una no conformidad que afecta inmediatamente a la integridad y la confianza del sistema fitosanitario de la ONPF o de sus elementos y a la confianza que	P	Costa Rica Coherencia con la traducción al inglés <i>Category : TRANSLATION</i>

		inspiran, y que requiere la determinación y ejecución de una medida correctiva rápida.		
553	175	Se denomina “no conformidad crítica” a una no conformidad que afecta inmediatamente a la integridad del sistema fitosanitario de la ONPF o de sus elementos elementos y a la confianza que inspiran, y que requiere la determinación y ejecución de una medida correctiva rápida.	P	CA No es una cuestión de confianza, sino al funcionamiento del sistema de acuerdo con las NIMF <i>Category : SUBSTANTIVE</i>
554	176	An “ Other other nonconformity” is a nonconformity that does not directly or immediately impact the integrity of and trust in the NPPO’s phytosanitary system or its elements and that is therefore not considered a critical nonconformity by the NPPO. Other	P	European Union 1. Better English. 2. Clearer. <i>Category : EDITORIAL</i>

		nonconformity requires corrective actions to be taken within a specified time frame.		
555	176	“Other nonconformity” is a nonconformity that does not directly or immediately impact the integrity of and trust in the NPPO’s phytosanitary system or its elements and is not considered a critical nonconformity by the <u>auditing</u> NPPO. Other nonconformity requires corrective actions to be taken within a specified time frame.	P	PPPO More descriptive <i>Category : EDITORIAL</i>
556	176	“ “Noncritical Other nonconformity” is a nonconformity that does not directly or immediately impact the integrity of and trust in the NPPO’s phytosanitary system or its elements and is not considered a critical nonconformity by the NPPO. Other nonconformity	P	China More accurate and appropriate. <i>Category : EDITORIAL</i>

		requires corrective actions to be taken within a specified time frame.		
557	176	<p>““MinorOther nonconformity” is a nonconformity that does not directly or immediately impact the integrity of and trust in the NPPO’s phytosanitary system or its elements and is not considered a critical nonconformity by the NPPO. Other nonconformity requires corrective actions to be taken within a specified time frame.</p>	P	<p>Thailand The term "Minor nonconformity", which has been defined in ISO 17021-1, is widely used and recognized. These terms could be used in this draft standard without the need to define another term. <i>Category : SUBSTANTIVE</i></p>
558	176	<p>“An “oOther ther nonconformity” is a nonconformity that does not directly or immediately impact the integrity of and trust in the NPPO’s phytosanitary system or its elements and <u>that</u> is <u>therefore</u> not considered a critical nonconformity by the NPPO. Other nonconformity requires corrective</p>	P	<p>EPPO Clearer. Better English. <i>Category : EDITORIAL</i></p>

		actions to be taken within a specified time frame.		
559	176	“Other nonconformity” is a nonconformity that does not directly or immediately impact the integrity of and trust in the NPPO’s phytosanitary system or its elements and is not considered a critical nonconformity by the NPPO. Other nonconformity requires corrective actions to be taken within a specified time frame.	C	IPPC Regional Workshop Africa Agree <i>Category : SUBSTANTIVE</i>
560	176	“ Non-critical Other nonconformity” is a nonconformity that does not directly or immediately impact the integrity of and trust in the NPPO’s phytosanitary system or its elements and is not considered a critical nonconformity by the NPPO. Other <u>Non-critical</u> nonconformity requires corrective actions to be taken	P	United States of America We propose a better explanation <i>Category : TECHNICAL</i>

		within a specified time frame.		
561	176	Se consideran “otras no conformidades” conformidades” son las no conformidades que no afectan de forma directa o inmediata a la integridad ni la confianza del sistema fitosanitario de la ONPF o de sus elementos ni a la confianza que inspiran, y que la ONPF no es considera como no conformidades críticas críticas por la ONPF . Las otras no conformidades requieren que se adopten medidas correctivas en un plazo determinado.	P	Costa Rica Coherencia con la traducción al inglés Category : <i>TRANSLATION</i>
14. Follow-Up				
562	177	14. Follow-Up Follow-Up of Non-Conformance	P	United States of America The intention of the section is not clear as written. Suggest changing the “Follow-up” to “Follow-up of non-conformance” Category : <i>TECHNICAL</i>
563	178	Follow-up should take place if the audit report identifies that corrective actions	P	COSAVE Bullets described bellow do not provide any additional guidance. Follow up should be taken to verify if corrective actions were implented and if they were effective. Las viñetas que se describen a continuación no proporcionan ninguna orientación adicional. Se debe realizar un seguimiento para verificar si se implementaron acciones correctivas y si fueron efectivas Category : <i>TECHNICAL</i>

		are needed. These corrective actions should be implemented within the timelines identified in the report and their effectiveness verified by any combination of the following:		
564	178	Follow-up should take place if the audit report identifies that corrective actions are needed. These corrective actions should be implemented within the timelines identified in the report and their effectiveness verified by any combination of the following: verified.	P	<p>Uruguay Bullets described below do not provide any additional guidance. Follow up should be taken to verify if corrective actions were implemented and if they were effective.</p> <p>Las viñetas que se describen a continuación no proporcionan ninguna orientación adicional. Se debe realizar un seguimiento para verificar si se implementaron acciones correctivas y si fueron efectivas <i>Category : TECHNICAL</i></p>
565	179	assessment of the evidence provided	P	<p>COSAVE As per comment in paragraph 178.</p> <p>Según el comentario del párrafo 178. <i>Category : TECHNICAL</i></p>
566	179	assessment of the evidence provided	P	<p>Uruguay As per comment in paragraph 178</p> <p>Según el comentario del párrafo 178 <i>Category : TECHNICAL</i></p>
567	180	follow-up verification audit	P	<p>COSAVE As per comment in paragraph 178.</p> <p>Según el comentario del párrafo 178.</p>

				<i>Category : TECHNICAL</i>
568	180	follow-up verification monitoring audit	P	United States of America See US comments in paragraph 57 <i>Category : TECHNICAL</i>
569	180	follow-up verification audit	P	Uruguay As per comment in paragraph 178 Según el comentario del parrafo 178 <i>Category : TECHNICAL</i>
570	181	follow-up system audit.	P	COSAVE As per comment in paragraph 178. Según el comentario del párrafo 178. <i>Category : TECHNICAL</i>
571	181	follow-up system audit.	C	IPPC Regional Workshop Africa Agree <i>Category : SUBSTANTIVE</i>
572	181	follow-up system audit.	P	Uruguay As per comment in paragraph 178 Según el comentario del parrafo 178 <i>Category : TECHNICAL</i>
573	182	Potential implementation issues	C	PPPO Guidance would be helpful on the following issues: - language - depth of an audit - conflict of interest - confidentiality <i>Category : SUBSTANTIVE</i>
574	182	Potential implementation issues	C	United States of America The implementation guide would be needed to help up an auditing systems. Particularly relevant to developing countries. Issue with having the availability of auditors globally. <i>Category : TECHNICAL</i>
575	182	Potential implementation issues	C	Jamaica Overall, we are seeking clarification on the overlap of the draft audit standard and the draft ISPM: Requirements for National Plant Protection Organization entities to perform Phytosanitary actions. If there is an overlap, we are proposing a referencing the said standard in the draft audit standard. <i>Category : SUBSTANTIVE</i>
576	183	This section is not part of the standard. The Standards Committee in May 2016 requested the Secretariat to gather information on any	P	Samoa <i>Category : SUBSTANTIVE</i>

		potential implementation issues related to this draft. Please provide details of potential implementation issues and proposals on how to address them.- <u>Lack of trained personnel to confidently conduct thorough audits-Appropriate entities other than the NPPO may not exist- NPPOs may not have the legal or regulatory framework necessary to support authorization of entities other than the NPPO to perform audits</u>		
577	183	This section is not part of the standard. The Standards Committee in May 2016 requested the Secretariat to gather information on any potential implementation issues related to this draft. Please provide details of	P	PPPO addition of examples of potential issues <i>Category : SUBSTANTIVE</i>

		potential implementation issues and proposals on how to address them. <u>Examples of Potential Implementation Issues- Lack of trained personnel to confidently conduct thorough audits- Appropriate entities other than the NPPO may not exist- NPPOs may not have the legal or regulatory framework necessary to support authorization of entities other than the NPPO to perform audits</u>		
578	183	This section is not part of the standard. The Standards Committee in May 2016 requested the Secretariat to gather information on any potential implementation issues related to this draft. Please provide details of potential	C	Caribbean Agricultural Health and Food Safety Agency <ol style="list-style-type: none"> 1. Financial constraints in conducting the audit - Source assistance and secure funding 2. Accessing reliable information where the audits are conducted in the exporting country- reporting protocols available and records/data 3. Auditing authorized entities eg fumigation companies/ ISPM 15 operators – issues in terms of the recording system adopted by these entities and the reliability of the information - check lists developed and Strict penalties if the criteria is not met. 4. There must be a pool of dedicated and well trained staff to choose from within the NPPO - resources (human/financial), capacity building <i>Category : SUBSTANTIVE</i>

		implementation issues and proposals on how to address them.		
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