

2020 FIRST CONSULTATION

1 July – 31 August 2020


Compiled comments for Draft Specification: Annex to ISPM 38 (Design and use of systems approaches for phytosanitary certification of seeds) (2018-009))

Summary of Comments

Name	Summary of Comments
COSAVE Σ	Validado por el Comité Directivo del COSAVE
EPPO Σ	Comments submitted on behalf of EPPO countries
European Union	Comments submitted by the European Commission on behalf of the European Union and its 27 Member States.
International Seed Federation	The international seed industry supports the development of an annex to ISPM 38 as it provides a harmonized framework for developing and implementing systems approaches for seeds for sowing as well as guidance to NPPOs on the recognition and audit of such systems. Global acceptance of systems approaches as an alternative to current consignment-by-consignment requirements of seed will significantly improve the ability of NPPOs and the seed industry to deliver seed to farmers when and where it is needed.
Singapore	Agreed with the proposed.
South Africa	we are in support of this draft

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

FAO sequential number	Para	Text	T	Comment
1	G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (151) Argentina (1 Sep 2020 12:15 AM) We support comments submitted by COSAVE on this Specification
2	G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (150) Saint Kitts And Nevis (31 Aug 2020 10:10 PM) Agree with the need for additional guidance for NPPOs on this topic.
3	G	(General Comment)	C	<i>Category : TECHNICAL</i> (129) Peru (31 Aug 2020 8:38 PM) Peru agrees with COSAVE's comments
4	G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (124) European Union (31 Aug 2020 8:18 PM) The Specification should first of all be aiming at protecting plant health and supporting NPPOs in their work. This should be done in a way that

				trade is facilitated. It needs to be very carefully worded to make sure that NPPOs will still have the choice to include or not the option of systems approaches for seeds in their phytosanitary import requirements.
5	G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (122) EPPO (31 Aug 2020 5:22 PM) The Specification should first of all be aiming at protecting plant health and supporting NPPOs in their work. This should be done in a way that trade is facilitated. It needs to be very carefully worded to make sure that NPPOs will still have the choice to include or not the option of systems approaches for seeds in their phytosanitary import requirements.
6	G	(General Comment)	C	<i>Category : TECHNICAL</i> (109) Brazil (31 Aug 2020 3:30 PM) Brazil supports COSAVE's comments
7	G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (100) Canada (31 Aug 2020 11:55 AM) Canada supports the draft specification. Substantive, technical and editorial comments are presented for consideration.
8	G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (98) Zambia (31 Aug 2020 5:12 AM) No objection to the development of an annex to ISPM 38
9	G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (88) New Zealand (31 Aug 2020 12:52 AM) Potential implementation issue. IPPC should consider developing guidance materials on implementation of a systems approach at a multilateral level as an alternative to the current consignment-by-consignment process for phytosanitary certification for seed; or through commodity based standards.
10	G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (86) NEPPPO (30 Aug 2020 8:21 AM) No comment
11	G	(General Comment)	C	<i>Category : SUBSTANTIVE</i>  Mexico (85) Mexico (29 Aug 2020 8:38 PM) No comments from Mexico. Mexico supports the specification in its current format.
12	G	(General Comment)	C	<i>Category : TECHNICAL</i> (46) Kenya (27 Aug 2020 12:22 PM) No comment, Kenya in agreement with the standard
13	G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (45) South Africa (27 Aug 2020 8:44 AM) We are supportive of the proposed draft specification from the IPPC to develop a Systems Approach Annex for ISPM 38 that will offer an alternative to the current consignment-by-consignment process for the phytosanitary certification for seeds.

				<p>we further are supportive of the recognition of industry pest management practices as one of the building blocks of the systems approach. Seed companies already have many procedures in place to prevent infection/infestation of seeds with seed-transmitted pests during the production process. Implementation of a systems approach will leverage these industry practices.</p> <p>A harmonized framework is very important for the international movement of seeds and the seed industry is pleased that it has been specifically referenced as an essential element of the Scope and Purpose of the draft specification.</p>
14	G	(General Comment)		<p>C <i>Category : SUBSTANTIVE</i> (29) International Seed Federation (25 Aug 2020 2:46 PM) We support the inclusion of a person in the EWG who is “knowledgeable in operational industry seed-quality management, including seed production, processing and testing” and would ask that this person be nominated by the seed industry via the International Seed Federation (ISF). As a result of daily involvement in trade and seed production, an industry expert is best placed to provide extensive knowledge about the import and export of seeds and its challenges. Participation of a seed industry participant was very valuable for both parties during the development of ISPM 38 and we would ask that this collaboration continue as part of this process.</p>
15	G	(General Comment)		<p>C <i>Category : TECHNICAL</i> (28) International Seed Federation (25 Aug 2020 2:46 PM) Under point (8) of the Tasks section, we would encourage the Expert Working Group (EWG) to provide specific guidance on the process for implementing a multilateral systems approach for seeds</p>
16	G	(General Comment)		<p>C <i>Category : TECHNICAL</i> (27) International Seed Federation (25 Aug 2020 2:45 PM) Under point (6) of the Tasks section, we recommend that the description of the stated procedure will allow for the inclusion of existing Quality Management Systems adopted by the seed industry.</p>
17	G	(General Comment)		<p>C <i>Category : SUBSTANTIVE</i> (26) International Seed Federation (25 Aug 2020 2:45 PM) Under point (4) of the Tasks section, we would like to suggest rephrasing this to read ‘Examine how existing seed production practices contribute to the mitigation of pest risks and lead to a systems approach that delivers an alternative to consignment-by-consignment certification’</p>
18	G	(General Comment)		<p>C <i>Category : TECHNICAL</i> (25) International Seed Federation (25 Aug 2020 2:44 PM) Under point (3) of the Tasks section, we would like to suggest that documents directly related to seed production and quality systems in seed production from different regions in the world are used as the source of reference, such as Good Seed and Plant Practices (GSPP), the</p>

				Regulatory Framework for Seed Health (ReFreSH) of the United States Department of Agriculture, and the Disease Prevention Program (DPP).
19	G	(General Comment)	C	<i>Category : TECHNICAL</i> (24) International Seed Federation (25 Aug 2020 2:43 PM) The Scope section states that the annex will apply to seed moving in trade or as breeders lots. We would suggest that the annex should cover all international movement of seed for sowing (including for sale, production, trialling, bulk-up, breeding, R&D etc)
20	G	(General Comment)	C	<i>Category : TECHNICAL</i> (23) International Seed Federation (25 Aug 2020 2:41 PM) In the Reason for the Annex to the Standard section, we would suggest amending the second sentence to read: 'A systems approach could incorporate industry practices that contribute to a reduction in the pest risk associated with seed.
21	G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (22) International Seed Federation (25 Aug 2020 2:41 PM) We would like to point out that for seed companies, a multilateral Systems Approach is required, as compared with existing Systems Approaches used for fruits and vegetables based on ISPM14, which are via bilateral agreements between countries. Bilateral approaches are not harmonized, which in turn does not facilitate re-export activities (a significant aspect of the international movement of seed). The seed industry wants to promote the development and adoption of a multilateral systems approach and would like to have this point taken into consideration.
22	G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (21) International Seed Federation (25 Aug 2020 2:40 PM) Industry is supportive of the recognition of industry pest management practices as one of the building blocks of the systems approach. Seed companies already have many procedures in place to prevent infection/infestation of seeds with seed-transmitted pests during the production process. Implementation of a systems approach will leverage these industry practices.
23	G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (20) International Seed Federation (25 Aug 2020 2:39 PM) A harmonized framework is very important for the international movement of seeds and the seed industry is pleased that it has been specifically referenced as an essential element of the Scope and Purpose of the draft specification.
24	G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (19) International Seed Federation (25 Aug 2020 2:38 PM) The seed industry acknowledge the recognition from the IPPC Secretariat of the challenges that the seed industry faces in the current phytosanitary system. Differences in seed laws and regulations hamper easy movement of seed between countries.

25	G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i> (18) International Seed Federation (25 Aug 2020 2:37 PM) The seed industry is supportive of the proposed draft specification from the IPPC to develop a Systems Approach Annex for ISPM 38 that will offer an alternative to the current consignment-by-consignment process for the phytosanitary certification for seeds.</p>
26	G	(General Comment)	C	<p><i>Category : TECHNICAL</i> (3) Venezuela (18 Aug 2020 12:36 AM) La parte técnica del Organismo Fitosanitario de Venezuela, al analizar el proyecto de NIMF: normas para medidas fitosanitarias para productos, concluyo estar de acuerdo con lo planteado por el Grupo de debate sobre normas</p>
27	1	DRAFT SPECIFICATION FOR ISPM: Annex <i>Design and use of systems approaches for phytosanitary certification of seeds (2018-009) to ISPM 38</i>	C	<p><i>Category : SUBSTANTIVE</i> (1) Malawi (9 Aug 2020 1:44 PM) We support this draft specification: Annex to ISPM 38 (International movement of seeds) (2018-009) as it will facilitate safe movement of seeds</p>
28	24	Reason for the annex to the standard	C	<p><i>Category : TECHNICAL</i> (31) International Seed Federation (25 Aug 2020 2:49 PM) In the Reason for the Annex to the Standard section, we would suggest amending the second sentence to read: 'A systems approach could incorporate industry practices that contribute to a reduction in the pest risk associated with seed.'</p>
29	25	As they seek to implement ISPM 38, national plant protection organizations (NPPOs) and the worldwide seed industry are currently exploring the use of systems approaches to manage the pest risk associated with the international movement of seed. A systems approach could include standardized industry practices and quality systems that contribute to a reduction in the pest risk associated with seeds. Quality systems that are approved by NPPOs could comprise systems approaches and be an efficient alternative to consignment-by-consignment phytosanitary certification of seeds. An annex to ISPM 38 could provide a harmonized framework for developing systems approaches and provide guidance to NPPOs on recognition and audit of systems. Despite strenuous efforts over several decades by NPPOs and industry bodies to harmonize phytosanitary import requirements and encourage regional and international seed trade, there are still considerable differences in seed laws and regulations. These differences prevent seed from moving easily between countries. The global market for seeds, worth more than USD 60 billion in 2017, is disrupted on a daily basis by seed lots being stopped at a border.	P	<p><i>Category : SUBSTANTIVE</i> (149) Canada (31 Aug 2020 10:08 PM) Moved from "Purpose" section to reflect the comment provided below in the same section for removal of the text.</p>

30	25	As they seek to implement ISPM 38, national plant protection organizations (NPPOs) and the worldwide seed industry are currently exploring the use of systems approaches to manage the pest risk associated with the international movement of seed. A systems approach could include standardized industry practices and quality systems that contribute to a reduction in the pest risk associated with seeds. Quality systems that are approved by NPPOs could comprise systems approaches and be an efficient alternative to consignment-by-consignment phytosanitary certification of seeds. An annex to ISPM 38 could provide a harmonized framework for developing systems approaches and provide guidance to NPPOs on recognition and audit of such systems.	P <i>Category : EDITORIAL</i> (127) European Union (31 Aug 2020 8:32 PM) More precise wording.
31	25	As they seek to implement ISPM 38, national plant protection organizations (NPPOs) and the worldwide seed industry are currently exploring the use of systems approaches to manage the pest risk associated with the international movement of seed. A systems approach could include incorporate standardized industry practices and quality systems that contribute to a reduction in the pest risk associated with seeds. Quality systems that are approved by NPPOs could comprise systems approaches and be an efficient alternative to consignment-by-consignment phytosanitary certification of seeds. An annex to ISPM 38 could provide a harmonized framework for developing systems approaches and provide guidance to NPPOs on recognition and audit of systems.	P <i>Category : EDITORIAL</i> (126) European Union (31 Aug 2020 8:31 PM) More precise wording.
32	25	As they seek to implement ISPM 38, national plant protection organizations (NPPOs) and the worldwide seed industry are currently exploring the use of systems approaches to manage the pest risk associated with the international movement of seed. A systems approach could include standardized industry practices and quality systems that contribute to a reduction in the pest risk associated with seeds. Quality systems Systems approaches that are approved by NPPOs could comprise systems approaches and be an efficient alternative to consignment by consignment harmonised option for the phytosanitary certification of seeds. An annex to ISPM 38 could provide a harmonized framework for developing systems approaches and provide guidance to NPPOs on recognition and audit of systems.	P <i>Category : SUBSTANTIVE</i> (125) European Union (31 Aug 2020 8:29 PM) We understand from the definition of "systems approach" in ISPM 5 that a system approach integrates different measures, at least two acting independently, with cumulative effect as a pest risk management option. We see the focus of an annex to ISPM 38 in the assessment and arrangement of equivalent risk reduction measures. This may include industry practices. We also suggest to delete "developing" because this annex should provide the framework for systems approaches not guidance for developing systems approaches.
33	25	As they seek to implement ISPM 38, national plant protection organizations (NPPOs) and the worldwide seed industry are currently exploring the use of systems approaches to manage the pest risk associated with the international movement of seed. A systems approach could include standardized incorporate industry practices and quality systems that contribute to a reduction in the pest	P <i>Category : EDITORIAL</i> (110) Eppo (31 Aug 2020 5:22 PM) We understand from the definition of "systems approach" in ISPM 5 that a system approach integrates different measures, at least two acting independently, with cumulative effect as a pest risk management option. We see the focus of an annex to ISPM 38 in the

		<p>risk associated with seeds. Quality systems <u>Systems approaches</u> that are approved by NPPOs could comprise systems approaches and be an efficient alternative to consignment by consignment harmonised option for the phytosanitary certification of seeds. An annex to ISPM 38 could provide a harmonized framework for developing systems approaches and provide guidance to NPPOs on recognition and audit of such systems.</p>	<p>assessment and arrangement of equivalent risk reduction measures. This may include industry practices. At the moment we don't see an alternative to phytosanitary certificates for each consignment in international trade.</p> <p>We also suggest to delete "developing" because this annex should provide the framework for systems approaches not guidance for developing systems approaches.</p> <p>More appropriate wording</p>
34	25	<p>As they seek to implement ISPM 38, national plant protection organizations (NPPOs) and the worldwide seed industry are currently exploring the use of systems approaches to manage the pest risk associated with the international movement of seed. A systems approach could include standardized industry practices and quality systems that contribute to a reduction in the pest risk associated with seeds. Quality systems that are approved by NPPOs could comprise systems approaches and be an efficient alternative to consignment-by-consignment phytosanitary certification of seeds. An annex to ISPM 38 could provide a harmonized framework for developing systems approaches and provide guidance to NPPOs on recognition and audit of systems.</p>	<p>P <i>Category : EDITORIAL</i> (67) Australia (28 Aug 2020 12:13 AM) Suggest the word 'efficient' is removed. A qualitative assessment of the efficacy of the systems approaches can await the Expert Working Group's deliberations.</p>
35	25	<p>As they seek to implement ISPM 38, national plant protection organizations (NPPOs) and the worldwide seed industry are currently exploring the use of systems approaches to manage the pest risk associated with the international movement of seed. A systems approach could include standardized industry pest management practices and quality systems used in the seed industry that contribute to a reduction in the <u>effective management of the</u> pest risk associated with seeds. Quality. The practices and quality systems that are approved by NPPOs could comprise systems approaches and be an efficient alternative to consignment by consignment phytosanitary certification of seeds <u>approaches</u>. An annex to ISPM 38 could provide a harmonized framework for developing systems approaches and provide guidance to NPPOs on recognition and audit of systems.</p>	<p>P <i>Category : SUBSTANTIVE</i> (47) Japan (27 Aug 2020 2:33 PM) Since the words "industry practices" in the second sentence has a wide meaning, it should be clearly stated as "pest management practices used in the seed industry". A systems approach shown in the Annex is a phytosanitary measure, so it should clarify that only industry practice approved by NPPO can be one of the measures as a component of a systems approach.</p> <p>Delete "and be an efficient alternative to consignment-by-consignment phytosanitary certification of seeds. " in the 3rd sentence. A systems approach (could include standardized industry practices and quality systems) is not necessarily the only measure for an efficient alternative to "consignment-by-consignment phytosanitary certification of seeds." General phytosanitary measures (i.e. inspection, testing and treatment) are also measures for an efficient alternative to "consignment-by-consignment phytosanitary certification of seeds.", so the information are misleading expressions.</p>
36	25	<p>As they seek to implement ISPM 38, national plant protection organizations (NPPOs) and the worldwide seed industry are currently exploring the use of systems approaches to manage the pest risk associated with the international movement of seed. A systems approach could include standardized industry</p>	<p>P <i>Category : TECHNICAL</i> (59) COSAVE (27 Aug 2020 7:03 PM) Quality systems are the industry management processes, usually under ISO, and refer to the seed production processes. These systems from the industry could be the basis to design a systems approach. In this way, seed lots exported from one place of production under a particular</p>

		practices and quality systems that contribute to a reduction in the pest risk associated with seeds. Quality systems that are approved by NPPOs could comprise be the basis for the design of systems approaches and be an efficient alternative to consignment-by-consignment phytosanitary certification of seeds. An annex to ISPM 38 could provide a harmonized framework for developing systems approaches and provide guidance to NPPOs on recognition and audit of <u>quality</u> systems.	<p>quality system could comply with phytosanitary import requirements, if these quality systems are the basis for the systems approach. Quality systems will not be approved by NPPOs, NPPOs could authorize to integrate measures comprised in these quality systems in a SA. Certification is always consignment by consignment, even to state that the consignment is certified under the systems approach.</p> <p>Los sistemas de calidad son los procesos de gestión de la industria, generalmente bajo ISO, y se refieren a los procesos de producción de semillas. Estos sistemas de la industria podrían ser la base para diseñar un enfoque de sistemas. De esta manera, los lotes de semillas exportados desde un lugar de producción bajo un sistema de calidad particular podrían cumplir con los requisitos fitosanitarios de importación, si estos sistemas de calidad son la base del enfoque de sistemas. Los sistemas de calidad no serán aprobados por las ONPF. Las ONPF podrían autorizar a integrar las medidas comprendidas en estos sistemas de calidad en un System Approach.</p>
37	25	As they seek to implement ISPM 38, national plant protection organizations (NPPOs) and the worldwide seed industry are currently exploring the use of systems approaches to manage the pest risk associated with the international movement of seed. A systems approach could include standardized industry practices and quality systems that contribute to a reduction in the pest risk associated with seeds. Quality systems that are approved by NPPOs could comprise be the basis for the design of systems approaches and be an efficient alternative to consignment-by-consignment phytosanitary certification of seeds. An annex to ISPM 38 could provide a harmonized framework for developing systems approaches and provide guidance to NPPOs on recognition and audit of <u>quality</u> systems.	<p>P</p> <p><i>Category : TECHNICAL</i> (54) Uruguay (27 Aug 2020 5:42 PM) Quality systems are the industry management processes, usually under ISO, and refer to the seed production processes. These systems from the industry could be the basis to design a systems approach. In this way, seed lots exported from one place of production under a particular quality system could comply with phytosanitary import requirements, if these quality systems are the basis for the systems approach. Quality systems will not be approved by NPPOs, NPPOs could authorize to integrate measures comprised in these quality systems in a SA.</p>
38	25	As they seek to implement ISPM 38, national plant protection organizations (NPPOs) and the worldwide seed industry are currently exploring the use of systems approaches to manage the pest risk associated with the international movement of seed. A systems approach could include standardized industry practices and quality systems that contribute to a reduction in the pest risk associated with seeds. Quality systems that are approved by NPPOs could <u>comprise</u> systems approaches and be an efficient alternative to consignment-by-consignment phytosanitary certification of seeds. An annex to ISPM 38 could provide a harmonized framework for developing systems approaches and provide guidance to NPPOs on recognition and audit of systems.	<p>C</p> <p><i>Category : EDITORIAL</i> (38) South Africa (27 Aug 2020 8:30 AM) Suggest using the word "consist" instead of "comprise" in order to achieve greater clarity and focus</p>

39	25	As they seek to implement ISPM 38, national plant protection organizations (NPPOs) and the worldwide seed industry are currently exploring the use of systems approaches to manage the pest risk associated with the international movement of seed. A systems approach could include standardized industry practices and quality systems that contribute to a reduction in the pest risk associated with seeds. Quality systems that are approved by NPPOs could comprise systems approaches and be an efficient alternative to consignment-by-consignment phytosanitary certification of seeds. An annex to ISPM 38 could provide a harmonized framework for developing systems approaches and provide guidance to NPPOs on recognition and audit of systems.	C	<p>Category : EDITORIAL</p> <p>(37) South Africa (27 Aug 2020 8:27 AM)</p> <p>Reccomend the use of capital letters</p>
40	25	As they seek to implement ISPM 38, national plant protection organizations (NPPOs) and the worldwide seed industry are currently exploring the use of systems approaches to manage the pest risk associated with the international movement of seed. A systems approach could include standardized industry practices and quality systems that contribute to a reduction in the pest risk associated with seeds. Quality <u>management</u> systems that are <u>approved</u> <u>recognized</u> by NPPOs could comprise systems approaches and be an efficient alternative to consignment-by-consignment phytosanitary certification of seeds. An annex to ISPM 38 could provide a harmonized framework for developing systems approaches and provide guidance to NPPOs on recognition and audit of systems.	P	<p>Category : SUBSTANTIVE</p> <p>(5) United States of America (24 Aug 2020 4:53 PM)</p> <p>1) Delete "and quality systems" - It is more appropriate language for an NPPO to recognize an existing system than to approve a quality management system</p> <p>2) "Quality management systems" - Quality system, quality assurance, quality management system, etc., are used. We proposed a global change in the document to Quality Management System because this is the term used by the industry who will be major stakeholders in such programs.</p> <p>3) We suggest amending the second sentence to read: 'A systems approach could incorporate industry practices that contribute to a reduction in the pest risk associated with seed'.</p>
41	25	As they seek to implement ISPM 38, national plant protection organizations (NPPOs) and the worldwide seed industry are currently exploring the use of systems approaches to manage the pest risk associated with the international movement of seed. A systems approach could include standardized incorporate industry practices and quality systems that contribute to a reduction in the pest risk associated with seeds. Quality systems that are approved by NPPOs could comprise systems approaches and be an efficient alternative to consignment-by-consignment phytosanitary certification of seeds. An annex to ISPM 38 could provide a harmonized framework for developing systems approaches and provide guidance to NPPOs on recognition and audit of systems.	P	<p>Category : EDITORIAL</p> <p>(4) United States of America (24 Aug 2020 4:49 PM)</p> <p>More appropriate wording</p>
42	26	Scope	C	<p>Category : TECHNICAL</p> <p>(32) International Seed Federation (25 Aug 2020 2:55 PM)</p> <p>The Scope section states that the annex will apply to seed moving in trade or as breeders lots. We would suggest that the annex should cover all international movement of seed for sowing (including for sale, production, trialling, bulk-up, breeding, R&D etc).</p>

43	27	The proposed annex should apply to any seeds moving internationally in trade or as breeder lots internationally. The annex should provide a general framework of risk management measures, including existing pest management practices used in the seed industry in combination with quality assurance systems, that incorporates defined audit and verification procedures for consistent implementation of the system. The annex should also define a harmonized system for NPPOs to accredit compliance with the systems approach. This accreditation could be recognized by NPPOs as the basis for phytosanitary certification and would provide an alternative to the existing certification of seeds.	P <i>Category : TECHNICAL</i> (130) European Union (31 Aug 2020 8:38 PM) This might be too restrictive and unclear. We propose to delete 'in trade or as breeder lot'. In this way it is clear that it is all seeds moving internationally, countries can then still make exceptions for small lots.
44	27	The proposed annex should apply to any seeds moving internationally in trade or as breeder lots. The annex should provide a general framework of risk management measures, including existing pest management practices used in the seed industry in combination with quality assurance systems, that incorporates defined audit and verification procedures for consistent implementation of the system. The annex should also define a harmonized system for NPPOs to accredit compliance with the systems approach. This accreditation could be recognized by NPPOs as the basis for phytosanitary certification and would provide an alternative to the existing certification of seeds.	P <i>Category : SUBSTANTIVE</i> (128) European Union (31 Aug 2020 8:35 PM) We do not think it would be possible to develop a bespoke accreditation process which could be agreed by all CPs. This was already difficult for ISPM 15 and in this case even more due to the numerous seed/pest combinations and the multiple production processes which the industry uses. In case this deletion would not be accepted, we propose to modify the last sentence as follows: "This accreditation could be recognized by NPPOs as an additional alternative option for phytosanitary certification of seeds." In addition, we would have a question in relation to the statement 'The annex should also define a harmonized system for NPPOs to accredit': How would this fit with the draft ISPM on Audit?
45	27	The proposed annex should apply to any seeds moving internationally in trade or as breeder lots. The annex should provide a general framework of risk management measures, including existing pest management practices used in the seed industry in combination with quality assurance systems, that incorporates defined audit and verification procedures for consistent implementation of the system. The annex should also define a harmonized system for NPPOs to accredit compliance with the systems approach. This accreditation could be recognized by NPPOs as the basis for phytosanitary certification and would provide an alternative to the existing certification of seeds. <u>The proposed annex should apply to any seeds moving internationally. The annex should provide a general framework of risk management measures, including existing pest management practices used in the seed industry in combination with quality assurance systems, that incorporates defined audit and verification procedures for consistent implementation of the system.</u>	P <i>Category : SUBSTANTIVE</i> (112) Eppo (31 Aug 2020 5:22 PM) We propose to delete 'in trade or as breeder lots' as this might be too restrictive and unclear. In this way it is clear that it is all seeds moving internationally, countries can then still make exceptions for small lots. We suggest deliting the last sentence as we do not think it would be possible to develop a bespoke accreditation process which could be agreed by all CPs. This was already difficult for ISPM 15 and in this case even more due to the numerous seed/pest combinations and the multiple production processes which the industry uses. In case this deletion would not be accepted, we propose to modify the last sentence as follows: "This accreditation could be recognized by NPPOs as an additional alternative option for phytosanitary certification of seeds."

46	27	The proposed annex should apply to any seeds moving internationally in trade or as breeder lots. The annex should provide a general framework of risk management measures, including existing pest management practices used in the seed industry in combination with quality assurance systems, that incorporates defined audit and verification procedures for consistent implementation of the system. The annex should also define a harmonized system for NPPOs to accredit compliance with the systems approach. This accreditation could be recognized by NPPOs as the basis for phytosanitary certification and would provide an alternative to the existing certification of seeds.	C <i>Category : SUBSTANTIVE</i> (111) EPPO (31 Aug 2020 5:22 PM) We have a question in relation to the statement 'The annex should also define a harmonized system for NPPOs to accredit': How would this fit with the draft ISPM on Audit?
47	27	The proposed annex should apply to any seeds moving internationally in trade or as breeder lots. The annex should provide a general framework of systems approaches for phytosanitary certification of seeds . A systems approach requires the integration of different measures, at least two of which act independently, with a cumulative effect. It could include, as individual components of risk management measures, including existing pest management practices used in the seed industry in combination with quality assurance systems, that incorporates defined audit and verification procedures for consistent implementation of the system. The annex should also define a harmonized system for NPPOs to accredit compliance with the systems approach. This accreditation could be recognized by NPPOs as the basis for phytosanitary certification and would provide an alternative to the existing certification of seeds.	P <i>Category : SUBSTANTIVE</i> (48) Japan (27 Aug 2020 2:34 PM) It should clarify about the relationship between industry practices and a component measure of a systems approach. systems approach (ISPM5) A pest risk management option that integrates different measures, at least two of which act independently, with cumulative effect
48	27	The proposed annex should apply to any seeds moving internationally in trade or as breeder lots, <u>noting the risks profile will be different for these two end uses</u> . The annex should provide a general framework of risk management measures, including existing pest management practices used in the seed industry in combination with quality assurance systems, that incorporates defined audit and verification procedures for consistent implementation of the system. The annex should also define a harmonized system for NPPOs to accredit compliance with the systems approach. This accreditation could be recognized by NPPOs as the basis for phytosanitary certification and would provide an alternative to the existing certification of seeds.	P <i>Category : TECHNICAL</i> (68) Australia (28 Aug 2020 12:14 AM) (Suggest addition of these words) Commercial and breeders' seed production will have different risk profiles and production practices and so will need to be addressed separately in this Annex.
49	27	The proposed annex should apply to any seeds moving internationally with different purposes (e.g. in trade or as breeder lots) . The annex should provide a general framework of for systems approaches which integrate different pest risk management measures, including existing pest management	P <i>Category : TECHNICAL</i> (60) COSAVE (27 Aug 2020 7:03 PM) 1) It would be a framework for the implementation of measures rather than being a framework of measures by itself. 2) Consistency with ISPM 38. This is an Annex to this ISPM, therefore all purposes of import

		practices used in the seed industry in combination with quality assurance systems, that incorporates defined audit and verification procedures for consistent implementation of the system. The annex should also define a harmonized system for NPPOs to accredit compliance with authorize relevant seed production processes within the systems approach. This accreditation could be recognized authorization by NPPOs as the basis for phytosanitary certification and would provide an alternative to the existing <u>phytosanitary certification of seeds</u> .		mentioned in ISPM 38 should be of application of this annex. 3) Systems approach is an option for pest risk management that integrates different measures. 4) The NPPO should verify compliance with the SA. it is not clear what accredit compliance with SA does mean. What is intended is that NPPOs authorize seed companies to develop the processes within a SA. 1) Sería un marco para la implementación de medidas en lugar de ser un marco de medidas por sí mismo. 2) Coherencia con la NIMF 38. Este es un anexo de esta NIMF, por lo tanto, todos los fines de importación mencionados en la NIMF 38 deben ser de aplicación de este anexo. 3) El enfoque de sistemas es una opción para el manejo del riesgo de plagas que integra diferentes medidas. 4) La ONPF debe verificar el cumplimiento con el SA. No está claro qué significa el cumplimiento de la acreditación con SA. Lo que se pretende es que las ONPF autoricen a las empresas semilleras a desarrollar los procesos dentro de una SA.
50	27	The proposed annex should apply to any seeds moving internationally <u>with different purposes (e. g. in trade or as breeder lots)</u> . The annex should provide a general framework of for systems approaches which integrates different pest risk management measures, including existing pest management practices used in the seed industry in combination with quality assurance systems, that incorporates defined audit and verification procedures for consistent implementation of the system. The annex should also define a harmonized system for NPPOs to accredit compliance with authorize relevant seed production processes within the systems approach. This accreditation could be recognized authorization by NPPOs as the basis for phytosanitary certification and would provide an alternative to the existing <u>phytosanitary certification of seeds</u> .	P	<i>Category : TECHNICAL</i> (55) Uruguay (27 Aug 2020 5:49 PM) 1) Consistency with ISPM 38. This is an Annex to this ISPM, therefore all purposes of import mentioned in ISPM 38 should be of application of this annex. 2) It would be a framework for the implementation of measures rather than being a framework of measures by itself. 3) Systems approach is an option for pest risk management that integrates different measures. 4) The NPPO should verify compliance with the SA. it is not clear what accredit compliance with SA does mean. What is intended is that NPPOs authorize seed companies to develop the processes within a SA.
51	27	<u>The proposed annex should apply to any seeds moving internationally in trade or as breeder lots. The annex should provide a general framework of risk management measures, including existing pest management practices used in the seed industry in combination with quality assurance systems, that incorporates defined audit and verification procedures for consistent implementation of the system. The annex should also define a harmonized system for NPPOs to accredit compliance with the systems approach. This accreditation could be recognized by NPPOs as the basis for phytosanitary certification and would provide an alternative to the existing certification of seeds.</u>	C	<i>Category : SUBSTANTIVE</i> (39) South Africa (27 Aug 2020 8:32 AM) suggestion that the annex should cover all international movement of seed for sowing (including for sale, production, trialing, bulk-up, breeding, R&D
52	27	The proposed annex should apply to any seeds moving internationally in trade or as breeder lots (including for sale, production, trialing, bulk-up, breeding,	P	<i>Category : EDITORIAL</i> (6) United States of America (24 Aug 2020 4:58 PM)

		etc.). The annex should provide a general <u>harmonized framework of risk management measures for systems approaches</u> , including existing pest management practices used in the seed industry in combination with quality <u>assurance-management</u> systems, that incorporates defined audit and verification procedures for consistent implementation of the system. The annex should also define a harmonized system for NPPOs to <u>accredit-authorize</u> compliance with the systems approach. This <u>accreditation-authorization</u> could be recognized by NPPOs as the basis for phytosanitary certification and would provide an alternative to the existing <u>phytosanitary</u> certification of seeds.		<p>1) First sentence - To provide clearer examples</p> <p>2) Change to "for systems approaches" - The purpose of the annex is to provide a framework for systems approaches as specific risk management measure</p> <p>3) "Quality management system" - see US comment in paragraph 25 on global change</p> <p>4) change to "authorize" - Appropriate/consistent terminology with other ISPMs</p> <p>5) addition of "phytosanitary" - to clarify</p>
53	29	Despite strenuous efforts over several decades by NPPOs and industry bodies to harmonize phytosanitary import requirements and encourage regional and international seed trade, there are still considerable differences in seed laws and regulations. These differences prevent seed from moving easily between countries. The global market for seeds, worth more than USD 60 billion in 2017, is disrupted on a daily basis by seed lots being stopped at a border. This annex will provide an opportunity to harmonize phytosanitary import requirements for seeds and will offer an alternative option for recognizing measures that minimize the pest risk associated with seeds in international trade.	C	<p>Category : <i>SUBSTANTIVE</i></p> <p>(148) Canada (31 Aug 2020 10:07 PM)</p> <p>Moved to "Reason" section.</p>
54	29	Despite strenuous efforts over several decades by NPPOs and industry bodies to harmonize phytosanitary import requirements and encourage regional and international seed trade, there are still considerable differences in seed laws and regulations. These differences prevent <u>seed-seeds</u> from moving easily between countries. The global market for seeds, worth more than USD 60 billion in 2017, is disrupted on a daily basis by seed lots being stopped at a border. This annex will provide an opportunity to harmonize phytosanitary import requirements for seeds and will offer an alternative option for recognizing measures that minimize the pest risk associated with seeds in international trade.	P	<p>Category : <i>TECHNICAL</i></p> <p>(138) European Union (31 Aug 2020 8:57 PM)</p> <p>"Seeds" in plural, for consistency with the rest of the specification and with ISPM 5, which defines "seeds" as a commodity.</p>
55	29	<u>This annex will provide an opportunity to harmonize phytosanitary import requirements for seeds and will offer an alternative option for recognizing measures that minimize the pest risk associated with seeds in international trade.</u> Despite strenuous efforts over several decades by NPPOs and industry bodies to harmonize phytosanitary import requirements and encourage regional and international seed trade, there are still considerable differences in seed laws and regulations. These differences prevent seed from moving easily between	P	<p>Category : <i>TECHNICAL</i></p> <p>(131) European Union (31 Aug 2020 8:39 PM)</p> <p>As noted in the general comment, the Specification should first of all be aiming at protecting plant health and supporting NPPOs in their work.</p>

		countries. The global market for seeds, worth more than USD 60 billion in 2017, is disrupted on a daily basis by seed lots being stopped at a border. This annex will provide an opportunity to harmonize phytosanitary import requirements for seeds and will offer an alternative option for recognizing measures that minimize the pest risk associated with seeds in international trade.	
56	29	Despite strenuous efforts over several decades by NPPOs and industry bodies to harmonize phytosanitary import requirements and encourage regional and international seed trade, there are still considerable differences in seed laws and regulations. These differences prevent seed from moving easily between countries. The global market for seeds, worth more than USD 60 billion in 2017, is disrupted on a daily basis by seed lots being stopped at a border. This annex will provide an opportunity to harmonize phytosanitary import requirements for seeds and will offer aby offering an <u>additional</u> alternative option for recognizing measures that minimize minimizing the pest risk associated with seeds in international trade.	P <i>Category : TECHNICAL</i> (132) European Union (31 Aug 2020 8:42 PM) It should be clear, that the new activities provide new and additional options and that existing practices are not just replaced.
57	29	This annex will provide an opportunity to harmonize phytosanitary import requirements for seeds by offering an additional alternative option for minimizing the pest risk associated with seeds in international trade. Despite strenuous efforts over several decades by NPPOs and industry bodies to harmonize phytosanitary import requirements and encourage regional and international seed trade, there are still considerable differences in seed laws and regulations. These differences prevent seed from moving easily between countries. The global market for seeds, worth more than USD 60 billion in 2017, is disrupted on a daily basis by seed lots being stopped at a border. This annex will provide an opportunity to harmonize phytosanitary import requirements for seeds and will offer an alternative option for recognizing measures that minimize the pest risk associated with seeds in international trade.	P <i>Category : TECHNICAL</i> (113) EPPO (31 Aug 2020 5:22 PM) As noted in the general comment, the Specification should first of all be aiming at protecting plant health and supporting NPPOs in their work. Then, it should be clear, that the new activities provide new and additional options and that existing practices are not just replaced
58	29	Despite strenuous efforts over several decades by NPPOs and industry bodies to harmonize phytosanitary import requirements and encourage regional and international seed trade, there are still considerable differences in seed laws and regulations. These differences prevent seed from moving easily between countries. The global market for seeds, worth more than USD 60 billion in 2017, is disrupted on a daily basis by seed lots being stopped at a border. This annex will provide an opportunity to harmonize phytosanitary import	C <i>Category : SUBSTANTIVE</i> (101) Canada (31 Aug 2020 11:59 AM) These three sentences do not fit under the Purpose. It is more of a reason and the rationale for the development of the annex. Suggest moving under the Reason section.

		requirements for seeds and will offer an alternative option for recognizing measures that minimize the pest risk associated with seeds in international trade.		
59	29	Despite strenuous efforts over several decades by NPPOs and industry bodies to harmonize phytosanitary import requirements and encourage regional and international seed trade, there are still considerable differences in seed laws and regulations. These differences prevent seed from moving easily between countries. The global market for seeds, worth more than USD 60 billion in 2017, is disrupted on a daily basis by seed lots being stopped at a border. This annex will provide an opportunity to harmonize phytosanitary import requirements for seeds and will offer an alternative option for recognizing measures that minimize the pest risk associated with seeds in international trade.	C	<i>Category : SUBSTANTIVE</i> (70) Australia (28 Aug 2020 12:17 AM) This sentence should be referenced or be deleted if not supported by a reference.
60	29	Despite strenuous efforts over several decades by NPPOs and industry bodies to harmonize phytosanitary import requirements and encourage regional and international seed trade, there are still considerable differences in seed laws and regulations. These differences prevent seed from moving easily between countries. The global market for seeds, worth more than USD 60 billion in 2017, is disrupted on a daily basis by seed lots being stopped at a border. This annex will provide an opportunity to harmonize phytosanitary import requirements for seeds and will offer an alternative option for recognizing measures that minimize the pest risk associated with seeds in international trade.	P	<i>Category : TECHNICAL</i> (69) Australia (28 Aug 2020 12:16 AM) Proposed deletion as this is not considered correct
61	29	Despite strenuous efforts over several decades by NPPOs and industry bodies to harmonize phytosanitary import requirements and encourage regional and international seed trade, there are still considerable differences in seed laws and regulations. These Reducing these differences prevent seed from moving easily <u>could facilitate the movement of seeds</u> between countries. The global market for seeds, worth more than USD 60 billion in 2017, is disrupted on a daily basis by seed lots being stopped at a border. This annex will provide an <u>opportunity to harmonize phytosanitary import requirements for seeds and will offer an alternative option for pest risk management</u> recognizing measures that minimize the pest risk associated with seeds in international trade.	P	<i>Category : TECHNICAL</i> (61) COSAVE (27 Aug 2020 7:03 PM) The aim is to facilitate moving of seeds by the improvement of harmonization. The purpose is not to harmonize phytosanitary import requirements, it is to provide an alternative option, recognizing measures in the seed industry that could be integrated in the SA. El objetivo es facilitar el intercambio de semillas mejorando la armonización. El propósito no es armonizar los requisitos fitosanitarios de importación, es brindar una opción alternativa, reconociendo medidas en la industria de semillas que podrían integrarse en el SA.
62	29	Despite strenuous efforts over several decades by NPPOs and industry bodies to harmonize phytosanitary import requirements and encourage regional and international seed trade, there are still considerable differences in seed laws and	P	<i>Category : TECHNICAL</i> (56) Uruguay (27 Aug 2020 6:01 PM) 1) The aim is to facilitate movement of seeds by the improvement of harmonization. 2) This is a way to express the lack of harmonization,

		regulations. These Reducing these differences prevent seed from moving easily could facilitate the movement of seeds between countries. The global market for seeds, worth more than USD 60 billion in 2017, is disrupted on a daily basis by seed lots being stopped at a border. This annex will provide an opportunity to harmonize phytosanitary import requirements for seeds and will offer an alternative option for pest risk management recognizing measures that minimize the pest risk associated with seeds in international trade.		which is already mentioned before in the same paragraph. Furthermore, part of this "disruption" may be technically justified as a consequence of non-compliance with phytosanitary import requirements. 3) The purpose is not to harmonize phytosanitary import requirements, it is to provide an alternative option, the SA, recognizing measures in the seed industry that could be integrated in the SA.
63	29	Despite strenuous efforts over several decades by NPPOs and industry bodies to harmonize phytosanitary import requirements and encourage regional and international seed trade, there are still considerable differences in seed laws and regulations. These differences prevent seed from moving easily between countries. The global market for seeds, worth more than USD 60 billion in 2017, is disrupted on a daily basis by seed lots being stopped at a border. This annex will provide an opportunity to harmonize phytosanitary import requirements for seeds and will offer an alternative option for recognizing measures that minimize the pest risk associated with seeds in international trade.	C	<i>Category : SUBSTANTIVE</i> (40) South Africa (27 Aug 2020 8:34 AM) A multilateral Systems Approach is required, as compared with existing Systems Approaches used for fruits and vegetables based on ISPM14, which are via bilateral agreements between countries. Bilateral approaches are not harmonized, which in turn does not facilitate re-export activities (a significant aspect of the international movement of seed). The seed industry wants to promote the development and adoption of a multilateral systems approach and would like to have this point taken into consideration.
64	29	Despite strenuous efforts over several decades by NPPOs and industry bodies to harmonize phytosanitary import requirements and encourage regional and international seed trade, there are still considerable differences in seed laws and regulations. These differences prevent seed from moving easily between countries. The global market for seeds, worth more than USD 60 billion in 2017, is disrupted on a daily basis by seed lots being stopped at a border. This annex will provide an opportunity to harmonize phytosanitary import requirements for seeds and will offer an alternative option for recognizing measures that minimize the pest risk associated with seeds in international trade. Differences in import requirements currently implemented by NPPOs can present significant complications in the movement of seed between countries, particularly in re-export situations. This annex will provide harmonized guidance for an alternative to consignment-by-consignment option for phytosanitary certification of seeds by multilaterally recognizing existing industry measures that minimize the pest risk and including them into systems approaches.	P	<i>Category : SUBSTANTIVE</i> (7) United States of America (24 Aug 2020 5:01 PM) We propose to reword the purpose to reflect the common goal for NPPOs and seed companies having the same objective of being able to safely move seed. Both NPPOs and seed companies need practical solutions to mitigate risk without unduly impeding movement. The best way to accomplish this will be through the multilateral implementation of systems approaches that take into account risk reduction due to already existing quality management systems in seed industry.
65	30	Tasks	C	<i>Category : TECHNICAL</i> (87) Myanmar (30 Aug 2020 6:44 PM) Agree that minimize the pest risk associated for International seeds trading.
66	32	Consider existing relevant standards (e.g. ISPM 14, ISPM 36 , ISPM 38, NAPPO (2014)).	P	<i>Category : TECHNICAL</i> (133) European Union (31 Aug 2020 8:45 PM) ISPM 36 'Integrated measures for plants for planting' was originally

				also foreseen as a systems approach for plants for planting (excluding seeds). Although the term systems approach is missing, it might be interesting to consider.
67	32	Consider existing relevant standards (e.g. ISPM 14, ISPM 36 , ISPM 38, NAPPO (2014)).	P	<i>Category : TECHNICAL</i> (114) EPPO (31 Aug 2020 5:22 PM) ISPM 36 „Integrated measures for plants for planting“ was originally also foreseen as a systems approach for plants for planting (excluding seeds). Although the term systems approach is missing, it might be interesting to consider.
68	32	Consider existing relevant standards (e.g. ISPM 14, ISPM 38, NAPPO (2014) RSPM 40).	P	<i>Category : EDITORIAL</i> (102) Canada (31 Aug 2020 12:01 PM) This is the correct reference
69	32	Consider existing relevant standards (e.g. ISPM 14, ISPM 24 , ISPM 31 , ISPM 38 , NAPPO (2014)).	P	<i>Category : TECHNICAL</i> (71) Australia (28 Aug 2020 12:19 AM) (Suggest inclusion of ISPMs 24 and 31 here and include in reference section) ISPM 24 provides guidelines for the determination/recognition of equivalence of measures; ISPM 31 on sampling of consignments will add further guidance.
70	32	Consider existing relevant standards (e.g. ISPM 14, ISPM 38, NAPPO (2014) RSPM 40 of NAPPO).	P	<i>Category : EDITORIAL</i> (80) China (28 Aug 2020 10:56 AM) To be consistent with ISPM.
71	32	Consider existing relevant standards (e.g. ISPM 14, ISPM 38, NAPPO (2014) RSPMs 40 (2014) and 41 (2018)).	P	<i>Category : EDITORIAL</i> (8) United States of America (24 Aug 2020 5:02 PM) We understand that "NAPPO (2014)" is IPPC Style, but we want to be explicitly clear that NAPPO RSPMs 40 and 41 are what we want the EWG to consider, so are suggesting this change for clarity.
72	32	Consider existing relevant standards (e.g. ISPM 14, ISPM 38, NAPPO (2014)).	C	<i>Category : TECHNICAL</i> (2) Nepal (16 Aug 2020 7:41 AM) ISPM 38 has provisioned that "In the case of tree seeds, phytosanitary measures are often applied only at the time of harvest." is it sufficient for the systems approach for seed production or not?
73	33	Review existing phytosanitary import requirements from different countries for importation of seeds and harmonized regional guidance, if such is available, in relation with proven seed-borne or seed-transmitted pests .	P	<i>Category : SUBSTANTIVE</i> (135) European Union (31 Aug 2020 8:50 PM) Part of this task could be to review the correlation between phytosanitary import requirements and proven seed-borne or seed-transmitted pests like described in ISTA reference pest list (please see the reference to "seed-borne or seed-transmitted pests" in task (4)).
74	33	Review existing suitable phytosanitary import requirements from different countries for importation of seeds and harmonized regional guidance, guidance if such is available available for importation and identify suitable seed species and pest risk management measures .	P	<i>Category : SUBSTANTIVE</i> (134) European Union (31 Aug 2020 8:48 PM) The focus should be on few seed species for which there is a good hope that a systems approach can be identified. We think that it is not appropriate to review all existing phytosanitary requirements from different countries, without clarification which crops [pests /countries] should be chosen.

75	33	Review existing suitable phytosanitary import requirements from different countries for importation of seeds and harmonized regional guidance, if such is available <u>available for importation, in relation with proven seed-borne or seed-transmitted pests, and identify suitable seed species and pest risk management measures.</u>	P	<p>Category : <i>SUBSTANTIVE</i> (115) EPPO (31 Aug 2020 5:22 PM) The focus should be on few seed species for which there is a good hope that a systems approach can be identified. We think that it is not appropriate to review all existing phytosanitary requirements from different countries, without clarification which crops [pests /countries] should be chosen. May be part of this task could be to review the correlation between phytosanitary import requirements and proven seed-borne or seed-transmitted pests like described in ISTA reference pest list (please see the reference to "seed-borne or seed-transmitted pests" in task (4)).</p>
76	33	Review existing phytosanitary import requirements from different countries for importation of <u>different kinds of</u> seeds and harmonized regional guidance, if such is available.	P	<p>Category : <i>SUBSTANTIVE</i> (82) China (28 Aug 2020 10:59 AM) Phytosanitary import requirements from different countries for different kinds of seeds are completely different. Reviewing phytosanitary import requirements for different kinds of seeds may be more scientific for developing the seed system approach.</p>
77	33	Consider Review existing phytosanitary import requirements from different countries for importation of seeds and harmonized regional guidance, if such is available <u>that could be integrated in a systems approach.</u>	P	<p>Category : <i>TECHNICAL</i> (62) COSAVE (27 Aug 2020 7:03 PM) The purpose of the annex is to provide guidance for systems approach.</p>
78	33	Consider Review existing phytosanitary import requirements measures from different countries for importation of seeds and harmonized regional guidance, if such is available <u>that could be integrated in a systems approach.</u>	P	<p>Category : <i>TECHNICAL</i> (57) Uruguay (27 Aug 2020 6:10 PM) The purpose of the annex is to provide guidance for systems approach</p>
79	34	Review existing systems approaches and quality management systems for <u>seed seeds</u> (e.g. <i>The guide to seed quality management</i> (ASTA, n.d.), Good Seed and Plant Practices (GSPP), the Regulatory Framework for Seed Health (ReFreSH) of the United States Department of Agriculture, the Disease Prevention Program (DPP) and other commodity sectors (e.g. the Biosecure Hazard Analysis and Critical Control Point (HACCP) approach, the Systems Approach for Nursery Certification (SANC) of the National Plant Board (covering 50 U.S. states, Puerto Rico and Guam)).	P	<p>Category : <i>TECHNICAL</i> (139) European Union (31 Aug 2020 8:58 PM) "Seeds" in plural, for consistency with the rest of the specification and with ISPM 5, which defines "seeds" as a commodity.</p>
80	34	Review existing systems approaches and quality management systems for seed (e.g. <i>The guide to seed quality management</i> (ASTA, n.d.), Good Seed and Plant Practices (GSPP), the Regulatory Framework for Seed Health (ReFreSH) of the United States Department of Agriculture, the Disease Prevention Program (DPP) and <u>if needed</u> other commodity sectors <u>(relevant document from outside seed production, e.g. the Biosecure Hazard Analysis and Critical Control Point (HACCP) approach, the Systems Approach for Nursery Certification (SANC) of the National Plant Board (covering 50 U.S. states, Puerto Rico and Guam))</u> .	P	<p>Category : <i>SUBSTANTIVE</i> (137) European Union (31 Aug 2020 8:55 PM) This might be a range of documents that is too extensive. For the specific purpose of developing this Annex, the documents that are directly related to seed production and quality systems related to seed production from various regions in the world is likely to provide sufficient background.</p>

81	34	Review relevant existing systems approaches practices used by the seed industry and quality identify their contribution to pest risk management systems for seed (e.g. <i>The guide to seed quality management</i> (ASTA, n.d.), Good Seed and Plant Practices (GSPP), the Regulatory Framework for Seed Health (ReFreSH) of the United States Department of Agriculture, the Disease Prevention Program (DPP)) and other commodity sectors (e.g. the Biosecure Hazard Analysis and Critical Control Point (HACCP) approach, the Systems Approach for Nursery Certification (SANC) of the National Plant Board (covering 50 U.S. states, Puerto Rico and Guam)).	P <i>Category : SUBSTANTIVE</i> (136) European Union (31 Aug 2020 8:53 PM) This task should go beyond reviewing and should also include an evaluation of their contribution to pest risk management.
82	34	Review relevant existing systems approaches practices used by the seed industry and quality identify their contribution to pest risk management systems for seed (e.g. <i>The guide to seed quality management</i> (ASTA, n.d.), Good Seed and Plant Practices (GSPP), the Regulatory Framework for Seed Health (ReFreSH) of the United States Department of Agriculture, the Disease Prevention Program (DPP)) and if needed other commodity sectors (relevant documents from outside seed production.g. the Biosecure Hazard Analysis and Critical Control Point (HACCP) approach, the Systems Approach for Nursery Certification (SANC) of the National Plant Board (covering 50 U.S. states, Puerto Rico and Guam)).	P <i>Category : SUBSTANTIVE</i> (116) EPP0 (31 Aug 2020 5:22 PM) This task should go beyond reviewing and should also include an evaluation of their contribution to pest risk management. This might be a range of documents that is too extensive. For the specific purpose of developing this Annex, the documents that are directly related to seed production and quality systems related to seed production from various regions in the world is likely to provide sufficient background.
83	34	Review existing systems approaches and quality management systems for seed (e.g. <i>The guide to seed quality management</i> (ASTA, n.d.), Good Seed and Plant Practices (GSPP), the Regulatory Framework for Seed Health (ReFreSH) of the United States Department of Agriculture, the Disease Prevention Program (DPP)) and other commodity sectors (e.g. the Biosecure Hazard Analysis and Critical Control Point (HACCP) approach, the Systems Approach for Nursery Certification (SANC) of the National Plant Board (covering 50 U.S. states, Puerto Rico and Guam)).	C <i>Category : TECHNICAL</i> (89) New Zealand (31 Aug 2020 12:54 AM) We recommend one addition to Task 3 to reference documents related to seed production and quality systems from different regions of the world. No change to the rest of the wording of Task 3 – i.e. we are happy with retaining reference to ASTA's guide and references from other commodity sectors. ASTA is a seed trade association comprising over 700 seed companies, and the world's largest. Given that ASTA guide is intended to serve as a reference document for seed companies developing individual quality management practices and operating procedures it has potential to inform systems approach requirements in the ISPM 38 Annex.
84	34	Consider Review existing systems approaches and quality management systems for seed (e.g. <i>The guide to seed quality management</i> (ASTA, n.d.), Good Seed and Plant Practices (GSPP), the Regulatory Framework for Seed Health (ReFreSH) of the United States Department of Agriculture, the Disease Prevention Program (DPP)) and other commodity sectors (e.g. the Biosecure Hazard Analysis and Critical Control Point (HACCP) approach, the Systems	P <i>Category : TECHNICAL</i> (63) COSAVE (27 Aug 2020 7:03 PM) The EWG is not going to review those documents from the private sector. However they should take them into account when preparing the draft of annex. Any other regulation provided to or by the EWG could be considered. El grupo de expertos no va a revisar esos documentos que son del

		Approach for Nursery Certification (SANC) of the National Plant Board (covering 50 U.S. states, Puerto Rico and Guam)Guam)) and any other similar document available.		sector privado. Sin embargo deben tenerlos en cuenta cuando preparen el borrador del anexo. Se podría considerar cualquier otra regulación proporcionada o por el EWG.
85	34	Consider Review existing systems approaches and quality management systems for seed (e.g. <i>The guide to seed quality management</i> (ASTA, n.d.), Good Seed and Plant Practices (GSPP), the Regulatory Framework for Seed Health (ReFreSH) of the United States Department of Agriculture, the Disease Prevention Program (DPP)) and other commodity sectors (e.g. the Biosecure Hazard Analysis and Critical Control Point (HACCP) approach, the Systems Approach for Nursery Certification (SANC) of the National Plant Board (covering 50 U.S. states, Puerto Rico and Guam)Guam)) and any other relevant document available.	P	Category : TECHNICAL (58) Uruguay (27 Aug 2020 6:12 PM) The EWG is not going to review those documents that are from the private sector. However, they should take them into account when preparing the draft of the annex. Any other regulation provided to or by the EWG could be considered.
86	34	Review existing systems approaches and quality management systems for seed (e.g. <i>The guide to seed quality management</i> (ASTA, n.d.), Good Seed and Plant Practices (GSPP), the Regulatory Framework for Seed Health (ReFreSH) of the United States Department of Agriculture, the Disease Prevention Program (DPP)) and other commodity sectors (e.g. the Biosecure Hazard Analysis and Critical Control Point (HACCP) approach, the Systems Approach for Nursery Certification (SANC) of the National Plant Board (covering 50 U.S. states, Puerto Rico and Guam)Guam)) and <u>The International Union for the Protection of New Varieties of Plants (UPOV).</u>	P	Category : TECHNICAL (52) Egypt (27 Aug 2020 3:11 PM)
87	34	Review existing systems approaches and quality management systems for seed (e.g. <i>The guide to seed quality management</i> (ASTA, n.d.), Good Seed and Plant Practices (GSPP), the Regulatory Framework for Seed Health (ReFreSH) of the United States Department of Agriculture, the Disease Prevention Program (DPP)) and other commodity sectors (e.g. the Biosecure Hazard Analysis and Critical Control Point (HACCP) approach, the Systems Approach for Nursery Certification (SANC) of the National Plant Board (covering 50 U.S. states, Puerto Rico and Guam)Guam)) and <u>OECD Schemes for the Varietal Certification of Seed.</u>	P	Category : TECHNICAL (51) Egypt (27 Aug 2020 3:09 PM)
88	34	Review existing systems approaches and quality management systems for seed (e.g. <i>The guide to seed quality management</i> (ASTA, n.d.), Good Seed and Plant Practices (GSPP), the Regulatory Framework for Seed Health (ReFreSH) of the United States Department of Agriculture, the Disease Prevention Program (DPP)) and other commodity sectors (e.g. the Biosecure Hazard Analysis and Critical Control Point (HACCP) approach, the Systems Approach for Nursery	C	Category : TECHNICAL (41) South Africa (27 Aug 2020 8:36 AM) Suggestion to use documents directly related to seed production and quality systems in seed production from different regions in the world as the source of reference, and not from other commodity sectors

		Certification (SANC) of the National Plant Board (covering 50 U.S. states, Puerto Rico and Guam).		
89	34	Review existing systems approaches and quality management systems for seed (e.g. <i>The guide to seed quality management</i> (ASTA, n.d.), Good Seed and Plant Practices (GSPP), the Regulatory Framework for Seed Health (ReFreSH) of the United States Department of Agriculture, the Disease Prevention Program (DPP)) and other commodity sectors (e.g. the Biosecure Hazard Analysis and Critical Control Point (HACCP) approach, the Systems Approach for Nursery Certification (SANC) of the National Plant Board (covering 50 U.S. states, Puerto Rico and Guam)).	C	<i>Category : TECHNICAL</i> (33) International Seed Federation (25 Aug 2020 2:56 PM) Under point (3) of the Tasks section, we would like to suggest that documents directly related to seed production and quality systems in seed production from different regions in the world are used as the source of reference, such as Good Seed and Plant Practices (GSPP), the Regulatory Framework for Seed Health (ReFreSH) of the United States Department of Agriculture, and the Disease Prevention Program (DPP).
90	34	Review existing systems approaches and quality management systems for seed (e.g. <i>The guide to seed quality management</i> (ASTA, n.d.), Good Seed and Plant Practices (GSPP), the Regulatory Framework for Seed Health (ReFreSH) of the United States Department of Agriculture, the Disease Prevention Program (DPP)) and <u>[New task] Review existing systems approaches in other industry and commodity sectors (e.g. the Biosecure Hazard Analysis and Critical Control Point (HACCP) approach, the Systems Approach for Nursery Certification (SANC) of the National Plant Board (covering 50 U.S. states, Puerto Rico and Guam))</u> .	P	<i>Category : TECHNICAL</i> (9) United States of America (24 Aug 2020 5:08 PM) 1) we propose to split task 3 (para 34) in two. Both topics overlap (presumably) but are unique in their own right. In particular, systems approaches (in this context) are implemented primarily between two or more NPPOs for trade in a commodity, whereas QMS (in this context) is mostly implemented by private entities (seed companies) for the purpose of managing the quality of their production systems. We suggest to separate and highlight these points, look at commonalities and determine how to build on these commonalities to manage pest risk. Reviewing systems approaches and reviewing QMSs are robust topics on their own and require some different types of expertise. These are two different processes, so we proposed a clear separation of existing practices for quality management for seeds from systems approaches existing in other industries and commodity sectors. 2) We propose removing the reference to the ASTA Guide to seed quality management because the remaining examples are the most relevant and we can't list all possible examples here. However, please retain it as a reference in the Reference section for the EWG. 3) Editorial in [New task, last line] Capitalized the "S" in states, and removed the extra brackets.
91	35	Examine existing seed production practices that can contribute to pest risk reduction and result in clean seeds lead to a systems approach that are free from known and emerging seed borne or seed transmitted pests <u>serves as an additional alternative option for phytosanitary certification of seeds.</u>	P	<i>Category : SUBSTANTIVE</i> (141) European Union (31 Aug 2020 9:03 PM) We feel that the goal should more ambitious.
92	35	Examine existing seed production practices that can contribute to pest risk reduction and result in clean seeds that are free from known and emerging seed-borne or seed-transmitted pests.	C	<i>Category : SUBSTANTIVE</i> (142) European Union (31 Aug 2020 9:03 PM) To be reconsidered as there is overlap with task (3) as seed production practices that can contribute to pest risk reduction are normally included in quality management systems for seeds. Does this task needs to be a separate task from (3)?

93	35	Examine existing seed production practices up to the packaging stage that can contribute to pest risk reduction and result in clean seeds that are free from known and emerging seed-borne or seed-transmitted pests.	P	<p><i>Category : TECHNICAL</i> (140) European Union (31 Aug 2020 8:59 PM) Does that imply from base seeds to harvest or also to packaging (so including cleaning, sorting...)? It would be interesting to examine the whole process. An alternative could be "Examine existing seed production practices (up to the packaging stage)"</p>
94	35	Examine existing seed production practices up to the packaging stage that can contribute to pest risk reduction and lead to a systems approach that serves as an additional alternative option for phytosanitary certification of seeds. Examine existing seed production practices that can contribute to pest risk reduction and result in clean seeds that are free from known and emerging seed-borne or seed-transmitted pests.	P	<p><i>Category : SUBSTANTIVE</i> (118) EPP0 (31 Aug 2020 5:22 PM) Does that imply from base seeds to harvest or also to packaging (so including cleaning, sorting...)? It would be interesting to examine the whole process. We propose rewording as we feel that the goal should more ambitious.</p>
95	35	Examine existing seed production practices that can contribute to pest risk reduction and result in clean seeds that are free from known and emerging seed-borne or seed-transmitted pests.	C	<p><i>Category : SUBSTANTIVE</i> (117) EPP0 (31 Aug 2020 5:22 PM) To be reconsidered as there is overlap with task (3) as seed production practices that can contribute to pest risk reduction are normally included in quality management systems for seeds. Does this task needs to be a separate task from (3)?</p>
96	35	Examine existing seed production and pest management practices used in the seed industry that can contribute to pest risk reduction and result in clean seeds that are free from known and emerging seed-borne or seed-transmitted pests.	P	<p><i>Category : SUBSTANTIVE</i> (49) Japan (27 Aug 2020 2:36 PM) The words "industry practices" does not cover only "seed production". Other practices after harvesting seedse e.g. drying, disinfection, testing and selection of seeds, can also become dependent measures, of which the systems approach is composed.</p>
97	35	Examine existing seed production practices and critical control points that can contribute to pest risk reduction and result in clean seeds that are free from known and emerging seed-borne or seed-transmitted pests. (5) Identify practices that, when combined into a system, reduce the risk to an appropriate level and demonstrate the technical justification.	P	<p><i>Category : SUBSTANTIVE</i> (97) Australia (31 Aug 2020 4:14 AM) The proposed text more clearly describes the task of examining components that could form parts of a system, acknowledging some practices may increase pest risk and other decrease it. An additional point is included. The new point clarifies the production practices that reduce pest risk will need to be combined in a system to achieve a reduction in pest risk that can be used as a measure.</p>
98	35	(4) Identify the critical points in the seed production process that introduce pest risk. (to insert as additional task) Examine existing seed production practices that can contribute to pest risk reduction and result in clean seeds that are free from known and emerging seed-borne or seed-transmitted pests.	P	<p><i>Category : TECHNICAL</i> (90) New Zealand (31 Aug 2020 12:57 AM) Addition proposed, ideally prior to paragraph [35]</p>

99	35	Examine existing seed production practices that can contribute to pest risk reduction and result in clean seeds that are free from known and emerging seed-borne or seed-transmitted pests.	C	Category : TECHNICAL (42) South Africa (27 Aug 2020 8:38 AM) Request clarification on the use of seed production practices
100	35	Examine existing seed production practices that can contribute to pest risk reduction and result in clean seeds that are free from known and emerging seed-borne or seed-transmitted pests.	C	Category : SUBSTANTIVE (34) International Seed Federation (25 Aug 2020 2:57 PM) Under point (4) of the Tasks section, we would like to suggest rephrasing this to read 'Examine how existing seed production practices contribute to the mitigation of pest risks and lead to a systems approach that delivers an alternative to consignment-by-consignment certification'
101	35	Examine existing seed production practices that can contribute to pest risk reduction and result in clean seeds that are free from known and emerging seed-borne or seed-transmitted pests. (4) Examine existing seed production practices contribute to the mitigation of pest risks and lead to a systems approach that delivers and alternative to consignment-by-consignment certification.	P	Category : TECHNICAL (12) United States of America (24 Aug 2020 5:14 PM) This is a clearer explanation of the task
102	36	(6) Define the general requirements of a applicable systems approach approaches for seeds as informed by the information gathered in tasks 1-4 1-5.	P	Category : SUBSTANTIVE (74) Australia (28 Aug 2020 12:36 AM) Making consistent with the comment in Scope, regarding the need for a number of systems approaches due to different risks and end uses.
103	36	Define the general requirements of a systems approach for seeds as informed by which can be applied phytosanitary certification, based on the information gathered in tasks 1-4.	P	Category : SUBSTANTIVE (50) Japan (27 Aug 2020 2:38 PM) To clarify. Risk management of seed industries does not necessarily meet phytosanitary requirement, so here it is important to define requirements of a systems approach for phytosanitary certification.
104	36	Define the general requirements of a systems approach for seeds as informed by the information gathered in tasks 1-4.	C	Category : SUBSTANTIVE (91) New Zealand (31 Aug 2020 1:00 AM) Recommend that the EWG will consider critical control points as part of task (6). Also recommend guidance materials to be developed under implementation consideration. For points (5) & (6) it is probably implied but, in these considerations, it would be essential to identify & define the critical control points in the different stages of the system (for industry & NPPOs).
105	36	Define the general requirements of a systems approach for seeds as informed by based on the information gathered in tasks 1-4.	P	Category : EDITORIAL (64) NAPPO (27 Aug 2020 9:22 PM)
106	36	Define the general requirements of a systems approach for seeds as informed by and ensure that the information gathered in tasks 1-4 measures have a rational relationship with the risk and level of risk.	P	Category : TECHNICAL (13) United States of America (24 Aug 2020 5:15 PM) We feel this should be added to capture the feasibility, practicality, applicability and rational relationship of measures to risk. NAPPO RSPM 40 provides practical guidance on how measures are decided and could be considered by the EWG.

107	37	Describe a procedure to document the requirements of the systems and their application that includes defined audits and verification verification by the NPPO of the exporting countries.	P	<i>Category : SUBSTANTIVE</i> (145) European Union (31 Aug 2020 9:07 PM) In order to clarify that audits are not performed by the NPPO of exporting countries.
108	37	Describe a procedure to document the requirements of the systems and their application that includes defined audits and verification verification procedures.	P	<i>Category : TECHNICAL</i> (144) European Union (31 Aug 2020 9:06 PM) More precise wording.
109	37	Describe a procedure to document the requirements of the systems approaches and their application that includes defined audits and verification.	P	<i>Category : TECHNICAL</i> (143) European Union (31 Aug 2020 9:05 PM) Addition in order to make sure what system is meant here.
110	37	Describe a procedure to document the requirements of the systems approaches and their application that includes defined audits and verification verification procedures by the NPPO of the exporting countries.	P	<i>Category : TECHNICAL</i> (119) EPPO (31 Aug 2020 5:22 PM) Addition of 'approaches' in order to make sure what system is meant here. Addition of 'procedures' as it's more precise wording. Addition of NPPO in order to clarify that audits are not performed by the NPPO of importing countries.
111	37	Describe a procedure to document the requirements of the systems and their application-implementation that includes defined audits and verification.	P	<i>Category : EDITORIAL</i> (105) Canada (31 Aug 2020 12:05 PM) More suitable word and consistent with what is indicated in the Scope.
112	37	Describe a procedure to document the requirements of the systems and their-its application that includes defined audits and verification.	P	<i>Category : EDITORIAL</i> (104) Canada (31 Aug 2020 12:04 PM)
113	37	Describe a procedure to document the requirements of the systems approach and their application that includes defined audits and verification.	P	<i>Category : TECHNICAL</i> (103) Canada (31 Aug 2020 12:04 PM) Proposed change to reflect the content of task 5, which is about defining the requirements of the systems approach.
114	37	Describe a procedure to document the requirements of the systems and their application that includes defined audits and verification.	C	<i>Category : SUBSTANTIVE</i> (92) New Zealand (31 Aug 2020 1:00 AM) Same comment as Task (5)
115	37	(7) Describe a procedure to document the requirements of the systems and their application that includes defined-accreditation, verification for export production systems under the standard including audits and verification verification processes.	P	<i>Category : TECHNICAL</i> (75) Australia (28 Aug 2020 12:41 AM) The included text more clearly articulates the requirements for inclusion in the procedure document to provide assurance in the system.
116	37	Describe a procedure to document the requirements of the systems-system and their-its application that includes defined audits and verification.	P	<i>Category : EDITORIAL</i> (65) NAPPO (27 Aug 2020 9:23 PM)
117	37	Describe a procedure to document the requirements of the systems and their application that includes defined audits and verification.	C	<i>Category : SUBSTANTIVE</i> (43) South Africa (27 Aug 2020 8:38 AM) Recommendation that the description of the stated procedure will allow for the inclusion of existing Quality Management Systems adopted by the global seed industry

118	37	Describe a procedure to document the requirements of the systems and their application that includes defined audits and verification.	C	<i>Category : TECHNICAL</i> (35) International Seed Federation (25 Aug 2020 2:57 PM) Under point (6) of the Tasks section, we recommend that the description of the stated procedure will allow for the inclusion of existing Quality Management Systems adopted by the seed industry.
119	37	<u>Examine how Describe a procedure to document the requirements-procedures of existing Quality Management Systems adopted by the industry (e.g. audits, verification) could be incorporated into the systems and their application that includes defined audits and verification approach).</u>	P	<i>Category : TECHNICAL</i> (14) United States of America (24 Aug 2020 5:18 PM) This is a clearer explanation of the task
120	38	<u>(NEW TASK) Define a harmonized system for NPPOs to accredit compliance with the systems approach.</u> Consider whether the annex could affect in a specific way (positively or negatively) the protection of biodiversity and the environment. If this is the case, the impact should be identified, addressed and clarified in the draft annex.	P	<i>Category : SUBSTANTIVE</i> (106) Canada (31 Aug 2020 12:07 PM) New task added and reflects the content of the Scope of the Annex.
121	38	<u>Consider whether the annex could affect in a specific way (positively or negatively) the protection of biodiversity and the environment. If this is the case, the impact should be identified, addressed and clarified in the draft annex.</u>	C	<i>Category : SUBSTANTIVE</i> (93) New Zealand (31 Aug 2020 1:01 AM) It would be ideal if some consideration could be given to include a guidance document for NPPOs, especially on approaches to address any identified issues.
122	38	<u>(8) Consider whether the annex could affect in a specific way (positively or negatively) the protection of biodiversity and the environment. If this is the case, the impact should be identified, addressed and clarified in the draft annex.</u>	P	<i>Category : EDITORIAL</i> (78) Australia (28 Aug 2020 12:55 AM) Suggest re-numbering considering suggestion to add new dot point.
123	38	<u>[New task 1] Describe a procedure for multilateral recognition by NPPOs of quality management systems used by seed companies and how such recognition of quality management systems could be considered in the context of systems approaches</u> <u>[New task 2] Develop guidance to NPPOs on acceptance and implementation of multilateral system approaches.</u> Consider whether the annex could affect in a specific way (positively or negatively) the protection of biodiversity and the environment. If this is the case, the impact should be identified, addressed and clarified in the draft annex.	P	<i>Category : SUBSTANTIVE</i> (15) United States of America (24 Aug 2020 5:20 PM) 1) New task 1 - This will lead to harmonization of the criteria for NPPOs on multilateral recognition of quality management systems that can be included in the future systems approaches. 2) New task 2 - a multilaterally recognized Systems Approach for seeds should be the ultimate outcome of this annex, as compared with existing Systems Approaches used for fruits and vegetables based on ISPM 14, based on bilateral agreements between countries. Bilateral approaches are not harmonized, which in turn does not facilitate re-export activities (a significant aspect of the international movement of seed). Without multilateral recognitions, the industry will not be able to implement this Annex.
124	39	Consider <u>harmonised</u> implementation of the annex by contracting parties and identify potential operational and technical implementation issues. Provide information and possible recommendations on these issues to the Standards Committee.	P	<i>Category : SUBSTANTIVE</i> (146) European Union (31 Aug 2020 9:08 PM) Preferably, the implementation should focus on a multilateral systems approach rather than having a wide range of bilateral approaches.

125	39	Consider harmonized implementation of the annex by contracting parties and identify potential operational and technical implementation issues. Provide information and possible recommendations on these issues to the Standards Committee.	P	<i>Category : SUBSTANTIVE</i> (120) EPPO (31 Aug 2020 5:22 PM) Preferably, the implementation should focus on a multilateral systems approach rather than having a wide range of bilateral approaches.
126	39	Consider implementation of the annex by contracting parties and identify identifying potential operational and technical implementation issues. Provide information and possible recommendations on these issues to the Standards Committee.	P	<i>Category : EDITORIAL</i> (94) New Zealand (31 Aug 2020 1:02 AM)
127	39	(9) Consider implementation of the annex by contracting parties and identify potential operational and technical implementation issues. Provide information and possible recommendations on these issues to the Standards Committee.	P	<i>Category : EDITORIAL</i> (79) Australia (28 Aug 2020 12:55 AM) Suggest re-numbering considering suggestion to add new dot point.
128	39	Consider implementation of the annex by contracting parties and identify potential operational and technical implementation issues. Provide information and possible recommendations on these issues to the Standards Committee.	C	<i>Category : TECHNICAL</i> (76) Australia (28 Aug 2020 12:47 AM) General Comment: When implementing this standard, there will be variability as each practice is going to have a different impact on pest risk and each NPPO may implement each practice or system differently. There may still be gaps and this standard may not reduce all pest risk to an appropriate level for all NPPOs and so other measures may still be required.
129	39	Consider implementation of the annex by contracting parties and identify potential operational and technical implementation issues. Provide information and possible recommendations on these issues to the Standards Committee and the Implementation and Capacity Development Committee.	P	<i>Category : SUBSTANTIVE</i> (66) NAPPO (27 Aug 2020 9:24 PM) if an implementation challenge is identified, the IC can assist by developing a resource to solve the issue
130	39	Consider implementation of the annex by contracting parties and identify potential operational and technical implementation issues. Provide information and possible recommendations on these issues to the Standards Committee.	C	<i>Category : TECHNICAL</i> (36) International Seed Federation (25 Aug 2020 2:58 PM) Under point (8) of the Tasks section, we would encourage the Expert Working Group (EWG) to provide specific guidance on the process for implementing a multilateral systems approach for seeds.
131	47	Experts with a wide knowledge and experience in one or more of the following areas: the development or implementation of phytosanitary measures to manage the pest risk associated with the production, processing and international movement of seeds, pest risk analysis, seed testing and storage, and use of integrated measures in systems approaches. The EWG should include at least one person with knowledge of existing international guidance related to the international movement of seed; at least one person knowledgeable in quality management systems and auditing for compliance; at least one person knowledgeable in seed pathology; and at least one person knowledgeable in operational industry seed-quality management, including seed production, processing and testing.	C	<i>Category : SUBSTANTIVE</i> (147) European Union (31 Aug 2020 9:09 PM) The major focus of ISPMs is on safeguarding plant health, therefore at least two persons should be considered.

132	47	Experts with a wide knowledge and experience in one or more of the following areas: the development or implementation of phytosanitary measures to manage the pest risk associated with the production, processing and international movement of seeds, pest risk analysis, seed testing and storage, and use of integrated measures in systems approaches. The EWG should include at least one person with knowledge of existing international guidance related to the international movement of seed; at least one person knowledgeable in quality management systems and auditing for compliance; at least one person two persons knowledgeable in seed pathology; and at least one person knowledgeable in operational industry seed-quality management, including seed production, processing and testing.	P	<p><i>Category : SUBSTANTIVE</i> (121) EPPO (31 Aug 2020 5:22 PM) The major focus of ISPMs is on safeguarding plant health, therefore at least two persons should be considered.</p>
133	47	Experts with a wide knowledge and experience in one or more of the following areas: the development or implementation of phytosanitary measures to manage the pest risk associated with the production, processing and international movement of seeds, pest risk analysis, seed testing and storage, and use of integrated measures in systems approaches. The EWG should include at least one person with knowledge of existing international guidance related to the international movement of seed; at least one person knowledgeable in quality management systems and auditing for compliance; at least one person knowledgeable in seed pathology; and at least one person knowledgeable in operational industry seed-quality management, including seed production, processing and testing.	C	<p><i>Category : SUBSTANTIVE</i> (108) Canada (31 Aug 2020 12:26 PM) This person need to be from the seed industry and preferably be nominated by the seed industry</p>
134	47	Experts with a wide knowledge and experience in one or more of the following areas: the development or implementation of phytosanitary measures to manage the pest risk associated with the production, processing and international movement of seeds, pest risk analysis, seed testing and storage, and use of integrated measures in systems approaches. The EWG should include at least one person with knowledge of existing international guidance related to the international movement of seed; at least one person knowledgeable in quality management systems and auditing for compliance; at least one person knowledgeable in seed pathology; and at least one person knowledgeable in operational industry seed-quality management, including seed production, processing and testing.	C	<p><i>Category : TECHNICAL</i> (99) Australia (31 Aug 2020 6:48 AM) In addition to the seed industry, there are a number of other "downstream" industries that use seed that is moved international, as the basis for their industries. These include melon and vegetable industries and through are not the specific target for this standard, do have an interest in the movement of high health seed and so consideration should be given, not have having them as a member of the EWG (as it is not strictly in scope) but rather seeking advice/information from them on the impacts of seed borne diseases on their industries, perhaps through a discussion paper of other means</p>
135	47	Experts with a wide knowledge and experience in one or more of the following areas: the development or implementation of phytosanitary measures to manage the pest risk associated with the production, processing and	P	<p><i>Category : TECHNICAL</i> (77) Australia (28 Aug 2020 12:50 AM) The development of this standard will require the assessment of the equivalence of commercial seed production practices to mitigate</p>

		international movement of seeds, pest risk analysis, seed testing and storage, and use of integrated measures in systems approaches. The EWG should include at least one person with knowledge of existing international guidance related to the international movement of seed; at least one person knowledgeable in quality-pest risk assessment and management systems and auditing for compliance; at least one person knowledgeable in seed pathology; and at least one person knowledgeable in operational industry seed quality management, including commercial seed production, processing and testing production practices (both from a commercial & breeders' seed production perspective).		identified phytosanitary risks. This requires pest risk assessment and pest risk management skills to assess submitted detailed evidence of standard seed production practices.
136	47	Experts with a wide knowledge and experience in one or more of the following areas: the development or implementation of phytosanitary measures to manage the pest risk associated with the production, processing and international movement of seeds, pest risk analysis, seed testing and storage, and use of integrated measures in systems approaches. The EWG should include at least one person with knowledge of existing international guidance related to the international movement of seed; at least one person knowledgeable in <u>with knowledge of</u> quality management systems and auditing for compliance; at least one person knowledgeable in <u>with knowledge of</u> seed pathology; and at least one person knowledgeable in <u>with knowledge of</u> operational industry seed-quality management, including seed production, processing and testing.	P	<i>Category : EDITORIAL</i> (95) New Zealand (31 Aug 2020 1:04 AM) To be consistence with other part of the same paragraph
137	47	Experts with a wide knowledge and experience in one or more of the following areas: the development or implementation of phytosanitary measures to manage the pest risk associated with the production, processing and international movement of seeds, pest risk analysis, seed testing and storage, and use of integrated measures in systems approaches. The EWG should include at least one person with knowledge of existing international guidance related to the international movement of seed; at least one person knowledgeable in quality management systems and auditing for compliance; at least one person knowledgeable in seed pathology; and at least one person knowledgeable in operational industry seed-quality management, including seed production, processing and testing-; <u>at least one person who is working on plant quarantine; and at least one person who knows well about PRA and systems approaches.</u>	P	<i>Category : SUBSTANTIVE</i> (83) China (28 Aug 2020 11:01 AM) The EWG can offer suggestions according to working experience.

138	47	Experts with a wide knowledge and experience in one or more of the following areas: the development or implementation of phytosanitary measures to manage the pest risk associated with the production, processing and international movement of seeds, pest risk analysis, seed testing and storage, and use of integrated measures in systems approaches. The EWG should include at least one person with knowledge of existing international guidance related to the international movement of seed; at least one person knowledgeable in quality management systems and auditing for compliance; at least one person knowledgeable in seed pathology; and at least one person knowledgeable in operational industry seed-quality management, including seed production, biosecure hazard analysis processing and testing.	P	<i>Category : SUBSTANTIVE</i> (53) Egypt (27 Aug 2020 3:56 PM)
139	47	Experts with a wide knowledge and experience in one or more of the following areas: the development or implementation of phytosanitary measures to manage the pest risk associated with the production, processing and international movement of seeds, pest risk analysis, seed testing and storage, and use of integrated measures in systems approaches. The EWG should include at least one person with knowledge of existing international guidance related to the international movement of seed; at least one person knowledgeable in quality management systems and auditing for compliance; at least one person knowledgeable in seed pathology; and at least one person knowledgeable in operational industry seed-quality management, including seed production, processing and testing.	C	<i>Category : SUBSTANTIVE</i> (44) South Africa (27 Aug 2020 8:41 AM) We support the inclusion of a person in the EWG who is “knowledgeable in operational industry seed-quality management, including seed production, processing and testing” and would ask that this person be nominated by the seed industry via the International Seed Federation (ISF). As a result of daily involvement in trade and seed production, an industry expert is best placed to provide extensive knowledge about the import and export of seeds and its challenges. Participation of a seed industry participant was very valuable for both parties during the development of ISPM 38 and we would ask that this collaboration continue as part of this process.
140	47	Experts with a wide knowledge and experience in one or more of the following areas: the development or implementation of phytosanitary measures to manage the pest risk associated with the production, processing and international movement of seeds, pest risk analysis, seed testing and storage, and use of integrated measures in systems approaches. The EWG should include at least one person with knowledge of existing international guidance related to the international movement of seed; at least one person knowledgeable in quality management systems and auditing for compliance; at least one person knowledgeable in seed pathology; and at least one person knowledgeable in operational industry seed-quality management management systems , including seed production, processing and testing.	P	<i>Category : EDITORIAL</i> (16) United States of America (24 Aug 2020 5:21 PM) See US comment in paragraph 25
141	47	Les participants devraient être dotés d’une expérience et de connaissances importantes dans au moins un des domaines suivants: élaboration ou mise en œuvre de mesures de gestion des risques phytosanitaires associés à la	P	<i>Category : SUBSTANTIVE</i> (84) Congo (28 Aug 2020 3:31 PM) IFS et ISTA sont des partenaires de la CIPV et de grandes organisations en matière de semences. La présence de leurs experts

		<p>production, au traitement et aux déplacements internationaux de semences, analyse du risque phytosanitaire, analyse et entreposage des semences et recours à des mesures intégrées dans le cadre d'approches systémiques. Le groupe de travail devrait compter au moins un expert dans chacun des domaines suivants: directives internationales existantes sur les déplacements internationaux de semences, systèmes de gestion de la qualité et vérification de la conformité, pathologies des semences et gestion de la qualité des semences dans le cadre des activités industrielles, y compris les étapes de production, de traitement et d'analyse.</p> <p><u>IFS et ISTA, devraient être invitées à proposer un expert chacune, qui pourra assister aux réunions du groupe de travail, en qualité d'experts invités.</u></p>		<p>pendant les réunions du groupe de travail en charge de la rédaction de l'annexe à la NIMP 38, pourrait susciter le partage des informations à leur portée.</p>
142	52	<p>ASTA (American Seed Trade Association). n.d. The guide to seed quality management. Available at https://www.betterseed.org/the-guide-to-seed-quality-management/ (last accessed 10 March 2020).</p>	C	<p>Category : EDITORIAL (96) New Zealand (31 Aug 2020 1:05 AM) The link to ASTA "Guide to seed quality management" doesn't work</p>
143	65	<p>NAPPO (North American Plant Protection Organization). 2014. <i>Principles of pest risk management for the import of commodities</i>. Regional Standard for Phytosanitary Measures (RSPM) 40. Ottawa, NAPPO. 28 pp.</p> <p><u>NAPPO (North American Plant Protection Organization). 2018. Use of systems approaches to manage pest risks associated with the movement of forest products. Regional Standard for Phytosanitary Measures (RSPM) 41. Raleigh, NAPPO. 54 pp.</u></p>	P	<p>Category : EDITORIAL (17) United States of America (24 Aug 2020 5:22 PM) Add reference, per US comment in tasks</p>