

2020 FIRST CONSULTATION

1 July – 30 September 2020

Compiled comments for Draft ISPM: Commodity-based standards for phytosanitary measures (2019-008)

Summary of Comments

Name	Summary
Bahrain	no comments
Cuba	No hay comentarios al documento propuesto.
European Union	The comments have been introduced by the European Commission on behalf of the European Union and its Member States.
New Zealand	Please see NZ's comments in APPPC sub-review
OIRSA	Revisión Completa
Saint Vincent and The Grenadines	Commodity standards do impose additional obligations on the exporting country especially in the case of private standards. High cost of implementation is usually associated with these standards.
South Africa	We support this standards

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

FAO sequential number	Para	Text	T	Comment
1	G	(General Comment)	C	Antigua and Barbuda Antigua and Barbuda agrees with the comments from the 2020 IPPC Virtual Regional Workshop in the Caribbean (September 1-3, 2020). <i>Category : SUBSTANTIVE</i>
2	G	(General Comment)	C	Guyana Guyana agrees with the comments submitted by the CAHFSA at the recently concluded IPPC Regional Workshop for the Caribbean. <i>Category : SUBSTANTIVE</i>
3	G	(General Comment)	C	Panama 1) "facilitation of safe trade" should be translated as "facilitación del comercio seguro" in: Background section paragraphs 42 and 44; Section 1, paragraphs 57 and 63; 2) We reiterate that Glossary terms should be translated according Spanish version of ISPM 5. 1) "facilitation of safe trade" debería traducirse como "facilitación del comercio seguro" en: párrafos 42 y 44 de la sección de antecedentes; Sección 1, párrafos 57 y 63; 2) Reiteramos que los términos del glosario deben traducirse de acuerdo con la versión en español de la NIMF 5. <i>Category : TRANSLATION</i>
4	G	(General Comment)	C	Panama We welcome the draft of the concept ISPM where states that the main objective of commodity standards is to support the development of technically justified phytosanitary import requirements that will facilitate safe trade, rather than being to harmonize measures, and that they will support PRA but not replace it. We would like to express our concern about including information on pests known not to be associated with the traded commodity in these standards, since commodity

				standards are aimed to provide options for phytosanitary measures to be considered by countries. Pests known not to be associated with the commodity are not compatible with the concept and purpose of commodity standards. Commodity standards will clearly describe the specific commodity to be addressed and its intended use, and will specify a discrete set of pests and related options for phytosanitary measures. As stated in the draft pests to be included in a commodity standard would need to be regulated at least for one contracting party for that specific commodity and intended use. Therefore, pests to be included should be only those associated with the specific commodity and intended use and thus its regulation would be technically justified. For these reasons, we will not support the inclusion of pests known not to be associated with the commodity in commodity standards. <i>Category : SUBSTANTIVE</i>
5	G	(General Comment)	C	Peru Peru agrees with COSAVE 's comments. <i>Category : TECHNICAL</i>
6	G	(General Comment)	C	Australia Use the term 'commodity standards' in place of 'commodity-based standards' throughout (including the title) to ensure consistency of terminology across the whole document. <i>Category : SUBSTANTIVE</i>
7	G	(General Comment)	C	Japan 1. We believe that it is difficult to categorize the measures into three categories (i.e. high, medium, and low) in an objective manner according to the confidence in different types of measures. We propose deletion of section 5 "Confidence in measures". If the current requirements of the draft ISPM are used, it is difficult to avoid arbitrary evaluation and to categorize the measures objectively (low, medium, high). There are various types of measures (e.g. treatment, test, pest free area, systems approach) of which the natures and methods are substantially different, so it is quite difficult to sort the measures into three categories in an impartial and rational manner. Confidence in measures may also increase or decrease depending on situation in conducting measures (i.e. outdoor or indoor, density of pests, existence of vectors). Instead of deletion of section 5, we suggest that the information on measures be included in commodity standard as additional information in an appendix as stated in paragraph 91 so that countries can use the information as reference when considering the measures to be adopted. <i>Category : SUBSTANTIVE</i>
8	G	(General Comment)	C	Mexico Mexico supports the draft ISPM on Commodity-based standards for phytosanitary measures (2019-008), but the content to be established by this draft ISPM leaves several unknowns regarding the process of adopting the annexes, the lists of specific products and associated pests and phytosanitary measures. We welcome the draft of the concept ISPM where states that the main objective of commodity standards is to support the development of technically justified phytosanitary import requirements that will facilitate safe trade, rather than being to harmonize measures, and that they will support PRA but not replace it. We would like to express our concern about including information on pests known not to be associated with the traded commodity in these standards, since commodity standards are aimed to provide options for phytosanitary measures to be considered by countries. Pests known not to be associated with the commodity are not compatible with the concept and purpose of commodity standards. Commodity standards will clearly describe the specific commodity to be addressed and its intended use, and will specify a discrete set of pests and related options for phytosanitary measures. As stated in the draft pests to be included in a commodity standard would need to be regulated at least for one contracting party for that specific commodity and intended use. Therefore, pests to be included should be only those associated with the specific commodity and intended use and thus its regulation would be technically justified. For these reasons, we will not support the inclusion of pests known not to be associated with the commodity in commodity standards.

				<i>Category : SUBSTANTIVE</i>
9	G	(General Comment)	C	Australia It is noted that the process for review and amendment (as in [6]) has yet to be determined by the TP, SC and CPM. <i>Category : SUBSTANTIVE</i>
10	G	(General Comment)	C	Brazil Brazil supports COSAVE's comments and suggestions. <i>Category : SUBSTANTIVE</i>
11	G	(General Comment)	C	Costa Rica Aún cuando la norma lo indica, que la inclusión de una plaga en estas norma no constituye un justificación técnica para que un países la regule, siempre esta la preocupación. Estas normas no aclara como simplificaría el comercio o ayudaría a las ONPF que no tiene constituidas unidades de ARP, ya que en la norma indica que la regulación de toda plaga sigue sujeta a una justificación técnica, utilizando un análisis de riesgo de plagas (ARP), Facilitaría en las opciones de medida, siempre y cuando las plagas incluidas en la lista correspondan a la plagas categorizadas mediante el ARP. Utilizar como criterio para incluir una plaga en un lista solo porque al menos una Parte Contratante la regula, no asegura que tenga la debida justificación técnica para su regulación, hay que determinar los factores utilizó para su regulación y si el ARP esta de conformidad con lo establecido en la NIMF, el estatus reglamentario de ese país, si se tiene un sistema de vigilancia que asegure la ausencia de la plaga o se tiene bajo control al momento de regular la plaga y la evaluación realizada de la probabilidades. , las plagas que se incluirán deben ser solo las asociadas con el producto específico y el uso previsto y de este modo su regulación estaría técnicamente justificada. Por estas razones, no apoyaremos la inclusión de plagas que se sepa que no están asociadas con el producto en las normas para productos. <i>Category : SUBSTANTIVE</i>
12	G	(General Comment)	C	Barbados Barbados is in general agreement with the standard as outlined but there may be a need for a name change considering that CODEX and national Standards bodies also issue Commodity Standards In addition, Barbados is also in agreement with those comments submitted from the proceedings of the Regional Workshop. <i>Category : SUBSTANTIVE</i>
13	G	(General Comment)	C	Canada Canada supports the Draft ISPM: Commodity-based standards for phytosanitary measures (2019-008). Substantive, technical and editorial comments are presented for consideration and incorporation. <i>Category : SUBSTANTIVE</i>
14	G	(General Comment)	C	Paraguay Paraguay agrees with Cosave's comments <i>Category : TECHNICAL</i>
15	G	(General Comment)	C	Argentina We fully support comments provided by COSAVE to this draft <i>Category : SUBSTANTIVE</i>
16	G	(General Comment)	C	Slovenia Slovenia would like to formally endorse the EPPC comments submitted via the IPPC Online Comment System. <i>Category : TECHNICAL</i>
17	G	(General Comment)	C	European Union The general concept and structure of the standard can be supported. It would be desirable that in developing the standard, focus would be made, not only on the lists of pests or groups of pests associated with certain products, but also on the development of guidelines, rules and criteria to justify the use of certain phytosanitary measures in various situations forpests or groups of pests causing a different level of risk. <i>Category : SUBSTANTIVE</i>

18	G	(General Comment)	C	<p>COSAVE</p> <p>1) "facilitation of safe trade" should be translated as "facilitación del comercio seguro" in: Background section paragraphs 42 and 44; Section 1, paragraphs 57 and 63;</p> <p>2) We reiterate that Glossary terms should be translated according Spanish version of ISPM 5.</p> <p>1) "facilitation of safe trade" debería traducirse como "facilitación del comercio seguro" en: párrafos 42 y 44 de la sección de antecedentes; Sección 1, párrafos 57 y 63;</p> <p>2) Reiteramos que los términos del glosario deben traducirse de acuerdo con la versión en español de la NIMF 5.</p> <p><i>Category : TRANSLATION</i></p>
19	G	(General Comment)	C	<p>COSAVE</p> <p>We welcome the draft of the concept ISPM where states that the main objective of commodity standards is to support the development of technically justified phytosanitary import requirements that will facilitate safe trade, rather than being to harmonize measures, and that they will support PRA but not replace it. We would like to express our concern about including information on pests known not to be associated with the traded commodity in these standards, since commodity standards are aimed to provide options for phytosanitary measures to be considered by countries. Pests known not to be associated with the commodity are not compatible with the concept and purpose of commodity standards. Commodity standards will clearly describe the specific commodity to be addressed and its intended use, and will specify a discrete set of pests and related options for phytosanitary measures. As stated in the draft pests to be included in a commodity standard would need to be regulated at least for one contracting party for that specific commodity and intended use. Therefore, pests to be included should be only those associated with the specific commodity and intended use and thus its regulation would be technically justified. For these reasons, we will not support the inclusion of pests known not to be associated with the commodity in commodity standards.</p> <p>Acogemos el borrador del concepto NIMF donde se establece que el objetivo principal de las normas para productos básicos es apoyar el desarrollo de requisitos fitosanitarios de importación técnicamente justificados que facilitarán el comercio seguro, en lugar de armonizar las medidas, y que respaldarán el ARP pero no serán reemplazados. Quisiéramos expresar nuestra preocupación por incluir información sobre plagas que se sabe que no están asociadas con el comercio del producto en estas normas, ya que las normas para productos tienen como objetivo brindar opciones para medidas fitosanitarias a ser considerado por los países. Las plagas de las que se sabe no están asociadas con el producto no son compatibles con el concepto y propósito de las normas para productos. Las normas para productos describirán claramente el producto específico a ser abordado y su uso previsto, y especificarán un conjunto reducido de plagas plagas y opciones relacionadas para las medidas fitosanitarias. Como se indica en el borrador, las plagas a ser incluidas en una norma para productos deberán estar reglamentadas al menos para una parte contratante para ese producto específico y uso previsto. Por lo tanto, las plagas que se incluirán deben ser solo las asociadas con el producto específico y el uso previsto y de este modo su regulación estaría técnicamente justificada. Por estas razones, no apoyaremos la inclusión de plagas que se sepa que no están asociadas con el producto en las normas para productos.</p> <p><i>Category : SUBSTANTIVE</i></p>
20	G	(General Comment)	C	<p>OIRSA</p> <p>We welcome the draft of the concept ISPM where states that the main objective of commodity standards is to support the development of technically justified phytosanitary import requirements that will facilitate safe trade, rather than being to harmonize measures, and that they will support PRA but not replace it. We would like to express our concern about including information on pests known not to be associated with the traded commodity in these standards, since commodity standards are aimed to provide options for phytosanitary measures to be considered by countries. Pests known not to be associated with the commodity are not compatible with the concept and purpose of commodity standards. Commodity standards will clearly describe the specific commodity to be addressed and its intended use, and will specify a discrete set of pests and related options for phytosanitary measures. As stated in the draft pests to be included in a commodity standard would need to be regulated at least for one contracting party for that specific commodity and intended use. Therefore, pests to be included should be only those associated with the specific commodity and intended use and thus its</p>

				regulation would be technically justified. For these reasons, we will not support the inclusion of pests known not to be associated with the commodity in commodity standards. <i>Category : SUBSTANTIVE</i>
21	G	(General Comment)	C	Japan 2. This draft ISPM should include the format of a list or lists of pests and a list or lists of measures. <i>Category : SUBSTANTIVE</i>
22	G	(General Comment)	C	Japan 3. Only pests which have appropriate measures should be included in the list. All pests which are included in the list should be indicated with any appropriate measure. <i>Category : SUBSTANTIVE</i>
23	G	(General Comment)	C	Japan 4. Topics for the development of specific commodity standards should be selected according to the procedure on Call for topics. The criteria for inclusion in the List of topics need to be defined taking into account in the report of Focus Group on Commodity and Pathway Standards, June 2019. <i>Category : SUBSTANTIVE</i>
24	G	(General Comment)	C	PPPO To the working group: New Zealand has provided revised comments in the APPPC sub-group. Please accept comments in the APPPC sub-group as final. <i>Category : SUBSTANTIVE</i>
25	G	(General Comment)	C	PPPO New Zealand supports the development of the commodity standards. The comments we provide aim to improve the structure and texts, provide clarification and suggestion so that the concept, rationale and structure of commodity standards could be better understood by contracting parties <i>Category : SUBSTANTIVE</i>
26	G	(General Comment)	C	PPPO Proposal to replace "measures" with "options for phytosanitary measures" where applicable, throughout the text. <i>Category : TECHNICAL</i>
27	G	(General Comment)	C	PPPO Recommend using 'commodity-based standards' or 'commodity standards' consistently throughout the document. <i>Category : EDITORIAL</i>
28	G	(General Comment)	C	PPPO Recommend adding a definition for 'commodity-based standards' or 'commodity standards' (whichever is used) to clearly explain the concept and scope. For example, would inanimate commodities that may harbour plant pests be within the scope. If not, suggest clearly indicate in the scope to exclude inanimate commodities, e.g. vehicles and machinery. <i>Category : TECHNICAL</i>
29	G	(General Comment)	C	Caribbean Agricultural Health and Food Safety Agency Jamaica thinks that this standard is timely and very instructive but is concerned that sections of the document is repetitive. <i>Category : SUBSTANTIVE</i>
30	G	(General Comment)	C	Caribbean Agricultural Health and Food Safety Agency The proposed Draft ISPM for Commodity-based standards for phytosanitary measures is a very positive step that would facilitate trade and assist small countries and territories with limited technical and human resources. Having a Commodity Standard would provide such countries/territories with a sound starting point in terms of identifying pest of potential

				quarantine importance and possible phytosanitary measures / treatments which could be applied to mitigate these threats thereby assisting in the development of import conditions appropriate to their circumstances which would facilitate trade while safeguarding their country's plant health. This is very much in line with the current CARICOM/CAHFS Project to develop guidance documents for phytosanitary measures for key commodities produced and traded within the region. <i>Category : SUBSTANTIVE</i>
31	G	(General Comment)	C	Caribbean Agricultural Health and Food Safety Agency Barbados is in general agreement with the standard as outlined but there may be a need for a name change considering that CODEX and national Standards bodies also issue Commodity Standards. <i>Category : SUBSTANTIVE</i>
32	G	(General Comment)	C	Caribbean Agricultural Health and Food Safety Agency We generally support this standard to facilitate the safe trade of commodities <i>Category : SUBSTANTIVE</i>
33	G	(General Comment)	C	Japan 5. The whole structure of ISPMs related to commodity standards (new, under-development and existing ones) is not clear. Specifically, it is not clear: - whether the draft commodity standards for cut flower and grain currently in pending status will be developed or given up. - the relationship between existing commodity standards (e.g. seed, wood) and the concept commodity standard - how to decide whether new specific commodity standards are attached to the overarching commodity standard or other ISPMs as per para 130. It is better to specify such whole structure on commodity standards. <i>Category : SUBSTANTIVE</i>
34	G	(General Comment)	C	Uruguay 1) "facilitation of safe trade" should be translated as "facilitación del comercio seguro" in: Background section paragraphs 42 and 44; Section 1, paragraphs 57 and 63; 2) We reiterate that Glossary terms should be translated according Spanish version of ISPM 5. 1) "facilitation of safe trade" debería traducirse como "facilitación del comercio seguro" en: párrafos 42 y 44 de la sección de antecedentes; Sección 1, párrafos 57 y 63; 2) Reiteramos que los términos del glosario deben traducirse de acuerdo con la versión en español de la NIMF 5. <i>Category : TRANSLATION</i>
35	G	(General Comment)	C	Uruguay We welcome the draft of the concept ISPM where states that the main objective of commodity standards is to support the development of technically justified phytosanitary import requirements that will facilitate safe trade, rather than being to harmonize measures, and that they will support PRA but not replace it. We would like to express our concern about including information on pests known not to be associated with the traded commodity in these standards, since commodity standards are aimed to provide options for phytosanitary measures to be considered by countries. Pests known not to be associated with the commodity are not compatible with the concept and purpose of commodity standards. Commodity standards will clearly describe the specific commodity to be addressed and its intended use, and will specify a discrete set of pests and related options for phytosanitary measures. As stated in the draft pests to be included in a commodity standard would need to be regulated at least for one contracting party for that specific commodity and intended use. Therefore, pests to be included should be only those associated with the specific commodity and intended use and thus its regulation would be technically justified. For these reasons, we will not support the inclusion of pests known not to be associated with the commodity in commodity standards. Acogemos el borrador del concepto NIMF donde se establece que el objetivo principal de las normas para productos básicos es apoyar el desarrollo de requisitos fitosanitarios de importación técnicamente justificados que facilitarán el comercio seguro, en lugar de armonizar las medidas, y que respaldarán el ARP pero no serán reemplazados. Quisiéramos

				<p>expresar nuestra preocupación por incluir información sobre plagas que se sabe que no están asociadas con el comercio del producto en estas normas, ya que las normas para productos tienen como objetivo brindar opciones para medidas fitosanitarias a ser considerado por los países. Las plagas de las que se sabe no están asociadas con el producto no son compatibles con el concepto y propósito de las normas para productos. Las normas para productos describirán claramente el producto específico a ser abordado y su uso previsto, y especificarán un conjunto reducido de plagas y opciones relacionadas para las medidas fitosanitarias. Como se indica en el borrador, las plagas a ser incluidas en una norma para productos deberán estar reglamentadas al menos para una parte contratante para ese producto específico y uso previsto. Por lo tanto, las plagas que se incluirán deben ser solo las asociadas con el producto específico y el uso previsto y de este modo su regulación estaría técnicamente justificada. Por estas razones, no apoyaremos la inclusión de plagas que se sepa que no están asociadas con el producto en las normas para productos.</p> <p><i>Category : SUBSTANTIVE</i></p>
36	G	(General Comment)	C	<p>Botswana In agreement with the standard <i>Category : SUBSTANTIVE</i></p>
37	G	(General Comment)	C	<p>EPPO The general concept and structure of the standard can be supported. It would be desirable that in developing the standard, focus would be made, not only on the lists of pests or groups of pests associated with certain products, but also on the development of guidelines, rules and criteria to justify the use of certain phytosanitary measures in various situations for pests or groups of pests causing a different level of risk. <i>Category : SUBSTANTIVE</i></p>
38	G	(General Comment)	C	<p>IPPC Regional Workshop Africa In support of the Draft ISPM <i>Category : SUBSTANTIVE</i></p>
39	G	(General Comment)	C	<p>IPPC Regional Workshop Africa we support the draft. There is need to have IC materials for this <i>Category : SUBSTANTIVE</i></p>
40	G	(General Comment)	C	<p>IPPC Regional Workshop Africa Malawi, We support the draft ISPM <i>Category : SUBSTANTIVE</i></p>
41	G	(General Comment)	C	<p>United States of America 1) We understand the intention of the standard, but in needs some language clarifying if there any changes in how the PCs will be used. 2) Suggest to adopt risk management standard first before continuing development this ISPM, or consider adding risk management concepts and language from NAPPO RSPM on risk management. 3) there is a need for clear separation of the efficacy of a measure from the confidence in information about the measure; both would need to be presented and evaluated together. In addition, there may not be a single measure but a combination of measures, depending on the regulated pests associated with the commodity. <i>Category : SUBSTANTIVE</i></p>
42	G	(General Comment)	C	<p>Qatar Agreement with the draft <i>Category : SUBSTANTIVE</i></p>
43	G	(General Comment)	C	<p>Malawi We support draft ISPM <i>Category : SUBSTANTIVE</i></p>
44	G	(General Comment)	C	<p>Costa Rica Translate in the spanish version: the word "trade safe" as "comercio seguro" and not as "inocuo" o "inocuidad" <i>Category : TRANSLATION</i></p>

45	G	(General Comment)	C	<p>Nigeria The NPPO Nigeria agrees with the Draft ISPM on Commodity Based Standards. <i>Category : SUBSTANTIVE</i></p>
46	G	(General Comment)	C	<p>NEPPO What about recognized pest list by WTO when countries adhere? We should take into consideration faisability of the implementation of the ISPM mainly justification of pest to be included by interesting countries regarding the PRA capacity? <i>Category : SUBSTANTIVE</i></p>
47	G	(General Comment)	C	<p>Jamaica Jamaica thinks this standard is timely and very instructive but is concerned that it is repetitive. <i>Category : SUBSTANTIVE</i></p>
48	G	(General Comment)	C	<p>Venezuela 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 para productos y vías, y no encontró problemas en la implementación de esta norma. <i>Category : TECHNICAL</i></p>
49	G	(General Comment)	C	<p>OIRSA Aún cuando la norma lo indica, que la inclusión de una plaga en estas norma no constituye un justificación técnica para que un países la regule, siempre esta la preocupación. Estas normas no aclara como simplificaría el comercio o ayudaría a las ONPF que no tiene constituidas unidades de ARP, ya que en la norma indica que la regulación de toda plaga sigue sujeta a una justificación técnica, utilizando un análisis de riesgo de plagas (ARP), Facilitaría en las opciones de medida, siempre y cuando las plagas incluidas en la lista correspondan a la plagas categorizadas mediante el ARP. Utilizar como criterio para incluir una plaga en un lista solo porque al menos una Parte Contratante la regula, no asegura que tenga la debida justificación técnica para su regulación, hay que determinar los factores utilizó para su regulación y si el ARP esta de conformidad con lo establecido en la NIMF, el estatus reglamentario de ese país, si se tiene un sistema de vigilancia que asegure la ausencia de la plaga o se tiene bajo control al momento de regular la plaga y la evaluación realizada de la probabilidades. <i>Category : SUBSTANTIVE</i></p>
50	G	(General Comment)	C	<p>OIRSA 1) "facilitation of safe trade" debería traducirse como "facilitación del comercio seguro" en: párrafos 42 y 44 de la sección de antecedentes; Sección 1, párrafos 57 y 63; 2) Reiteramos que los términos del glosario deben traducirse de acuerdo con la versión en español de la NIMF 5. <i>Category : TRANSLATION</i></p>
51	G	(General Comment)	C	<p>OIRSA Acogemos el borrador del concepto NIMF donde se establece que el objetivo principal de las normas para productos es apoyar el desarrollo de requisitos fitosanitarios de importación técnicamente justificados que facilitarán el comercio seguro, en lugar de armonizar las medidas, y que respaldarán el ARP pero no serán reemplazados. Quisiéramos expresar nuestra preocupación por incluir información sobre plagas que se sabe que no están asociadas con el comercio del producto en estas normas, ya que las normas para productos tienen como objetivo brindar opciones para medidas fitosanitarias a ser consideradas por los países. Las plagas de las que se sabe no están asociadas con el producto no son compatibles con el concepto y propósito de las normas para productos. Las normas para productos describirán claramente el producto específico a ser abordado y su uso previsto, y especificarán un conjunto reducido de plagas y opciones de medidas fitosanitarias relacionadas. Como se indica en el borrador, las plagas a ser incluidas en una norma para productos deberán estar reglamentadas al menos para una parte contratante para ese producto específico y uso previsto. Por lo tanto, las plagas que se incluirán deben ser solo las asociadas con el producto específico y el uso previsto y de este modo su regulación estaría técnicamente justificada. Por estas razones, no apoyaremos la inclusión de plagas que se sepa que no están asociadas con el producto en las normas para productos. <i>Category : SUBSTANTIVE</i></p>

52	G	(General Comment)	C	<p>OIRSA General: El contenido que pretende establecer este borrador de NIMF deja varias incógnitas respecto al proceso de adopción de los anexos, las listas de productos específicos y plagas asociadas y medidas fitosanitarias. <i>Category : SUBSTANTIVE</i></p>
53	G	(General Comment)	C	<p>Ecuador El contenido que pretende establecer este borrador de NIMF deja varias incógnitas respecto al proceso de adopción de los anexos, las listas de productos específicos y plagas asociadas y medidas fitosanitarias. <i>Category : SUBSTANTIVE</i></p>
54	G	(General Comment)	C	<p>Congo cette norme est d'une importance capitale, car elle va aider les parties contractantes dans la prise des décisions en rapport, surtout, avec les exigences phytosanitaires. C'est pourquoi nous devons éviter la confusion tel que: "les NIMPs relatives aux marchandises peuvent inclure les informations des organismes nuisibles associés aux espèces végétales...(section: résumé de référence)"; "les NIMPs relatives aux marchandises ne sont pas élaborées...si: -il existe déjà une NIMP contenant suffisamment d'indications(3è tiret du chapitre "Exigence" à la section n°1: objet et champ d'application des NIMPs); " le cas échéant, les NIMPs peuvent être présentées sous forme d'autres annexes...(section 6: publication des annexes)". Nous pensons que la difficulté à faire aboutir certaines NIMPs des marchandises comme "les déplacements internationaux des fleurs coupées, des grains" ont permis à la CIPV de réfléchir sur cette NIMP conceptuelle; ceci dit, toute NIMP des marchandises doit être classée sous cette NIMP. Faisant allusion aux NIMPs 38 et 39, elles peuvent être classées sous cette NIMP, car elles répondent, tant soit peu, à ses orientations. Nous pensons, le problème se situe pas au niveau des futures annexes des 2 NIMPs(38 et 39); comme ils sont encore en cours d'élaboration(soit un sujet retenu, soit une spécification, etc), nous proposons que le secrétariat de la CIPV, le Bureau de la CMP et le Comité des Normes, pendant la réunion de la planification stratégique, puissent réfléchir sur ce sujet: il s'agirait de réviser les futures annexes de ces 2 NIMPs(38 et 39), afin de les rendre indépendantes et/ou de les classer sous une NIMP conceptuelle à leur convenance. <i>Category : TECHNICAL</i></p>
55	1	DRAFT ISPM: Commodity-based standards for phytosanitary measures (2019-008)	C	<p>Nepal We have no comments in the draft ISPM <i>Category : EDITORIAL</i></p>
56	1	DRAFT ISPM: Commodity-based standards for phytosanitary measures Standards for phytosanitary measures Phytosanitary Measures (2019-008)	P	<p>Ghana <i>Category : EDITORIAL</i></p>
Scope				

57	29	Scope	C	<p>United States of America If there is an issue with continuous infection by contaminating pests in the same commodity, how will this be addressed? Would it be one of the issues prompting the revision of the standard by the TPCS, along with other evidence? <i>Category : TECHNICAL</i></p>
58	30	<p>This standard provides guidance on the purpose, use, content and publication of commodity-based standards for phytosanitary measures. Such standards, presented as annexes to this overarching concept standard, apply to commodities being moved in international trade and identify pests associated with these commodities and options for relevant phytosanitary measures to be considered by contracting parties.</p> <p><u>As in the Principles and elsewhere in this standard, lists of pests and measures are not intended to be exhaustive.</u></p>	P	<p>Australia Addition to ensure the scope of the standard is clearly defined. <i>Category : TECHNICAL</i></p>

59	30	This standard provides guidance on the purpose, use, content and content , publication and review of commodity-based standards for phytosanitary measures. Such standards, presented as annexes to this overarching concept standard, apply to commodities being moved in international trade and identify pests associated with these commodities and options for relevant phytosanitary measures to be considered by contracting parties.	P	<p>European Union Important information to be mentioned in the scope (please see [132] in Section 7: Review and Re-evaluations). <i>Category : SUBSTANTIVE</i></p>
60	30	This standard provides guidance on the purpose, use, content and content , publication and review of commodity-based standards for	P	<p>EPPO Important information to be mentioned in the scope (please see [132] in Section 7: Review and Re-evaluations). <i>Category : SUBSTANTIVE</i></p>

		<p>phytosanitary measures. Such standards, presented as annexes to this overarching concept standard, apply to commodities being moved in international trade and identify pests associated with these commodities and options for relevant phytosanitary measures to be considered by contracting parties.</p>		
61	30	<p>La presente norma proporciona orientación sobre la finalidad, el uso, el contenido y la publicación de normas para medidas fitosanitarias para productos. Dichas normas, que figuran en los anexos de esta norma conceptual de carácter general<u>general o cuando proceda, en los anexos de</u></p>	P	<p>Costa Rica Consistencia con lo indicado en el punto 6 <i>Category : SUBSTANTIVE</i></p>

		<p><u>otras NIMF</u>, se aplican a los productos que circulan en el comercio internacional y en ellas se determinan las plagas asociadas a estos productos y las opciones de medidas fitosanitarias pertinentes que deben examinar las Partes Contratantes.</p>		
62	30	<p>La presente norma proporciona orientación sobre la finalidad, el uso, el contenido y la publicación de normas para medidas fitosanitarias para productos. Dichas normas, que figuran en los anexos de esta norma conceptual de carácter general, se aplican a los productos que circulan en el comercio internacional y en ellas se determinan</p>	P	<p>Ecuador Se considera indispensable acotar el ámbito de aplicación y dejar a salvo el derecho soberano de las partes contratantes para establecer el nivel adecuado de protección fitosanitaria <i>Category : SUBSTANTIVE</i></p>

		<p>las plagas asociadas a estos productos y las opciones de medidas fitosanitarias pertinentes <u>que deben podrian</u> examinar las Partes Contratantes, <u>sin perjuicio del derecho soberano que tienen las Partes Contratantes para establecer el nivel adecuado de protección fitosanitaria.</u></p>		
63	31	<p>The scope of this standard and its annexes does not include consideration of contaminating pests or diversion from intended use <u>use of commodities.</u></p>	P	<p>Japan To clarify the meaning of the sentence. <i>Category : EDITORIAL</i></p>
64	31	<p>The scope of this standard and its annexes does not include consideration of contaminating pests or diversion from intended use.</p>	C	<p>Botswana In agreement <i>Category : SUBSTANTIVE</i></p>

65	31	The scope of this standard and its annexes does not include consideration of contaminating pests or diversion from intended use.	C	United States of America Regarding "contaminating pests" - What about regulated articles such as soil, pests in soil? This is NOT contamination. ISPM 5 lists these as two separate things. <i>Category : SUBSTANTIVE</i>
Outline of Requirements				
66	37	Outline of Requirements	C	United States of America The outline doesn't include "verification of compliance". Where does that fit in to each individual annex? It's not listed in the Content of Commodity Standards (para 70) either. <i>Category : TECHNICAL</i>
67	38	Commodity standards should be considered by contracting parties when developing phytosanitary import requirements. Such standards-Each commodity standard contain lists-a list of pests and corresponding options for phytosanitary measures for commodities being moved in international trade. The lists-list of pests include includes those known to be associated with the specified commodity and	P	Panama 1) Each commodity standard will contain only ONE list with probably many pests. For each pest there will be one or more options for phytosanitary measures. 2) Pests not known to be associated with the commodity in trade should not be mentioned/listed. The inclusion of such pests in the standard could lead to a high degree of discretion and misunderstanding when establishing phytosanitary import requirements. 3) To improve clarity. <i>Category : SUBSTANTIVE</i>

		<p>intended use. Commodity standards may also include information on pests known to be associated with the plant species but not with the commodity being traded. The <u>options of phytosanitary</u> measures listed are those that satisfy minimum criteria for inclusion in the standard¹, and are categorized according to confidence in the measures. The lists of pests and options for phytosanitary measures are not intended to be exhaustive and are subject to review and amendment.</p>		
68	38	<p>Commodity standards should be considered by contracting parties when developing phytosanitary import requirements. Such</p>	C	<p>Australia It is noted that the process for review and amendment (as in [6]) has yet to be determined by the TP, SC and CPM. Once agreed, this process should be referenced appropriately. <i>Category : EDITORIAL</i></p>

		<p>standards contain lists of pests and corresponding options for phytosanitary measures for commodities being moved in international trade. The lists of pests include those known to be associated with the specified commodity and intended use. Commodity standards may also include information on pests known to be associated with the plant species but not with the commodity being traded. The measures listed are those that satisfy minimum criteria for inclusion in the standard¹, and are categorized according to confidence in the measures. The lists of pests and options for phytosanitary</p>		
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		measures are not intended to be exhaustive and are subject to review and amendment .		
69	38	<p>Commodity standards should be considered by contracting parties when developing phytosanitary import requirements. Such standards contain lists of pests and corresponding options for phytosanitary measures for commodities being moved in international trade. The lists of pests include those known to be associated with the specified commodity and intended use.</p> <p>Commodity standards may also include information on pests known to be associated with the plant species but not with the commodity being</p>	P	<p>Australia It is not necessary to include this level of detail if the purpose of this ISPM is illustrative of key pests associated with the traded commodity. Category : EDITORIAL</p>

		<p>traded– The measures listed are those that satisfy minimum criteria for inclusion in the standard', and are categorized according to confidence in the measures. The lists of pests and options for phytosanitary measures are not intended to be exhaustive and are subject to review and amendment.</p>		
70	38	<p>Commodity standards should be considered by contracting parties when developing phytosanitary import requirements. Such standards contain lists of pests <u>as illustrative examples</u> and corresponding options for phytosanitary measures for <u>the identified target pests associated with the exported commodities</u> being</p>	P	<p>Australia The addition of these words adds clarity to the text. <i>Category : EDITORIAL</i></p>

		<p>moved in international trade. The lists of pests include those known to be associated with the specified commodity and intended use. Commodity standards may also include information on pests known to be associated with the plant species but not with the commodity being traded. The measures listed are those that satisfy minimum criteria for inclusion in the standard¹, and are categorized according to confidence in the measures. The lists of pests and options for phytosanitary measures are not intended to be exhaustive and are subject to review and amendment.</p>		
71	38	Commodity standards should	P	<p>Costa Rica Pests not known to be associated with the commodity in trade should not be mentioned/listed. The inclusion of such pests</p>

	<p>be considered by contracting parties when developing phytosanitary import requirements. Such standards contain lists of pests and corresponding options for phytosanitary measures for commodities being moved in international trade. The lists of pests include those known to be associated with the specified commodity and intended use.</p> <p>Commodity standards may also include information on pests known to be associated with the plant species but not with the commodity being traded. The measures listed are those that satisfy minimum criteria for inclusion in the standard¹, and are categorized</p>		<p>in the standard could lead to a high degree of discretion and misunderstanding when establishing phytosanitary import requirements</p> <p><i>Category : SUBSTANTIVE</i></p>
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		according to confidence in the measures. The lists of pests and options for phytosanitary measures are not intended to be exhaustive and are subject to review and amendment.		
72	38	Commodity standards should be considered by contracting parties when developing phytosanitary import requirements. Such standards contain lists of pests and corresponding options for phytosanitary measures for commodities being moved in international trade. The lists of pests include those known to be associated with the specified commodity and intended use. Commodity standards may also include	P	<p>European Union</p> <p>1) The standard include a list of pests known to be associated with the commodity but no information on these pests. No?</p> <p>2) ... to be associated with 'the plant species'...: to which plant species does this statement refer? First time 'plant species' is mentioned in the text. Sentence unclear. The example in 2.3 (Mangifera) makes clear what is meant but without reading 2.3 this sentence is unclear.</p> <p><i>Category : EDITORIAL</i></p>

		<p>information on list of pests known to be associated with the plant species in the field but not with the commodity part of the plant being traded traded (the commodity). The measures listed are those that satisfy minimum criteria for inclusion in the standard¹, and are categorized according to confidence in the measures. The lists of pests and options for phytosanitary measures are not intended to be exhaustive and are subject to review and amendment.</p>		
73	38	<p>Commodity standards should be considered by contracting parties when developing phytosanitary import requirements. Such standards contain lists of pests and corresponding</p>	P	<p>European Union Precisions given in particular to better make the difference with contaminating pests which are excluded from the scope (please see [31] and the definitions of "contaminating pest" and "infestation (of a commodity)") and to explain why the intended use of the commodity has to be taken into account (please see [81] in Section 2.2: Description of the commodity and its intended use). <i>Category : SUBSTANTIVE</i></p>

	<p>options for phytosanitary measures for commodities being moved in international trade. The lists of pests include those known to be associated with the specified commodity and intended use, <u>i.e. those pests which may infest the plant or plant product concerned and which may present a risk as a result of the part of the plant traded and the intended use of the commodity.</u> Commodity standards may also include information on pests known to be associated with the plant species but not with the commodity being traded. The measures listed are those that satisfy minimum criteria for inclusion in the</p>		
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		standard ¹ , and are categorized according to confidence in the measures. The lists of pests and options for phytosanitary measures are not intended to be exhaustive and are subject to review and amendment.		
74	38	Commodity standards should be considered by contracting parties when developing phytosanitary import requirements. Such standards contain lists Each commodity standard contains a list of pests and corresponding options for phytosanitary measures for commodities being moved in international trade. The lists list of pests include includes those known to be associated with the	P	<p>COSAVE</p> <p>1) Each commodity standard will contain only ONE list with probably many pests. For each pest there will be one or more options for phytosanitary measures.</p> <p>2) Pests not known to be associated with the commodity in trade should not be mentioned/listed. The inclusion of such pests in the standard could lead to a high degree of discretion and misunderstanding when establishing phytosanitary import requirements.</p> <p>3) To improve clarity.</p> <p>1) Cada norma para productos contendrá solo UNA lista con probablemente muchas plagas. Para cada plaga habrá una o más opciones de medidas fitosanitarias.</p> <p>2) No se deben mencionar/enumerar las plagas que no se sabe estén asociadas con el producto en comercio. La inclusión de tales plagas en la norma podría dar lugar a un alto grado de discreción y malentendidos al establecer requisitos fitosanitarios de importación.</p> <p>3) Para mayor claridad.</p> <p>Category : <i>SUBSTANTIVE</i></p>

		<p>specified commodity and intended use. Commodity standards may also include information on pests known to be associated with the plant species but not with the commodity being traded. The options of phytosanitary measures listed are those that satisfy minimum criteria for inclusion in the standard¹, and are categorized according to confidence in the measures. The lists of pests and options for phytosanitary measures are not intended to be exhaustive and are subject to review and amendment.</p>		
75	38	<p>Commodity standards should be considered by contracting parties when developing phytosanitary</p>	P	<p>OIRSA 1) Each commodity standard will contain only ONE list with probably many pests. For each pest there will be one or more options for phytosanitary measures. 2) Pests not known to be associated with the commodity in trade should not be mentioned/listed. The inclusion of such pests in the standard could lead to a high degree of discretion and misunderstanding when establishing phytosanitary import requirements. 3) To improve clarity. <i>Category : SUBSTANTIVE</i></p>

	<p>import requirements. Such standards contain lists of <u>Rach commodity satndard contains a listof</u> pests and corresponding options for phytosanitary measures for commodities being moved in international trade. The lists-list of pests include <u>includes</u> those known to be associated with the specified commodity and intended use. Commodity standards may also include information on pests known to be associated with the plant species but not with the commodity being traded. The <u>opcion of phytosanitary</u> measures listed are those that satisfy minimum criteria for inclusion in the standard', and are</p>		
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		categorized according to confidence in the measures. The lists of pests and options for phytosanitary measures are not intended to be exhaustive and are subject to review and amendment.		
76	38	Commodity standards should be considered by contracting parties when developing phytosanitary import requirements. Such standards contain lists of pests and corresponding options for phytosanitary measures for commodities being moved in international trade. The lists of pests include those known to be associated with the specified commodity and intended use. Commodity standards may also	P	Japan The sentence does not need to be included in the "Outline of Requirements" as it is not a major issue in commodity standards. <i>Category : SUBSTANTIVE</i>

		<p>include information on pests known to be associated with the plant species but not with the commodity being traded. The measures listed are those that satisfy minimum criteria for inclusion in the standard¹, and are categorized according to confidence in the measures. The lists of pests and options for phytosanitary measures are not intended to be exhaustive and are subject to review and amendment.</p>		
77	38	Commodity standards should be considered by contracting parties when developing phytosanitary import requirements. Such standards contain lists of pests and corresponding options for phytosanitary	P	<p>PPPO proposal to include "phytosanitary" into text <i>Category : EDITORIAL</i></p>

	<p>measures for commodities being moved in international trade. The lists of pests include those known to be associated with the specified commodity and intended use. Commodity standards may also include information on pests known to be associated with the plant species but not with the commodity being traded. The measures listed are those that satisfy minimum criteria for inclusion in the standard¹, and are categorized according to confidence in the phytosanitary measures. The lists of pests and options for phytosanitary measures are not intended to be exhaustive and are</p>		
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		subject to review and amendment.		
78	38	Commodity standards should be considered by contracting parties when developing phytosanitary import requirements. Such standards contain lists of pests and corresponding options for phytosanitary measures for commodities being moved in international trade. The lists of pests include those known to be associated with the specified commodity and intended use. Commodity standards may also include information on pests known to be associated with the plant species but not with the commodity being traded. The measures listed are those that satisfy	C	<p>PPPO</p> <p>Suggest to consider adding more rationale upfront about why 'confidence' is used over 'efficacy' so that the concept of commodity standard is better understood.</p> <p><i>Category : SUBSTANTIVE</i></p>

		<p>minimum criteria for inclusion in the standard', and are categorized according to confidence in the measures. The lists of pests and options for phytosanitary measures are not intended to be exhaustive and are subject to review and amendment.</p>		
79	38	<p>Commodity standards should be considered by contracting parties when developing phytosanitary import requirements. Such standards contain lists of pests and corresponding options for phytosanitary measures for commodities being moved in international trade. The lists of pests include those known to be associated with the specified commodity and</p>	P	<p>Korea, Republic of This is the purpose of this standard. Category : EDITORIAL</p>

	<p>intended use. Commodity standards may also include information on pests known to be associated with the plant species but not with the commodity being traded. The measures listed are those that satisfy minimum criteria for inclusion in the standard¹, and are categorized according to confidence in the measures. The lists of pests and options for phytosanitary measures are not intended to be exhaustive and are subject to review and amendment.</p> <p><u>NPPOs of importing and exporting countries should recognize the use of these measures to manage the target pests or provide technical justification to</u></p>	
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		<u>support alternative measures</u>		
80	38	<p>Commodity standards should be considered by contracting parties when developing phytosanitary import requirements. Such standards contain lists of pests and corresponding options for phytosanitary measures for commodities being moved in international trade. The lists of pests include those known to be associated with the specified commodity and intended use. Commodity standards may also include information on pests known to be associated with the plant species but not with the commodity being traded. The measures listed are those that satisfy</p>	P	<p>China Put [39] at the end of [38]. This is a very important principle of the standard and should be placed in the text. <i>Category : EDITORIAL</i></p>

		<p>minimum criteria for inclusion in the standard¹, and are categorized according to confidence in the measures. The lists of pests and options for phytosanitary measures are not intended to be exhaustive and are subject to review and amendment.</p> <p>The inclusion of a measure in this ISPM does not create any obligation for a contracting party to approve it, register it or adopt it for use in its territory.</p>		
81	38	<p>Commodity standards should be considered by contracting parties when developing phytosanitary import requirements. Such standards contain lists <u>Each standard contains a list</u> of pests and corresponding</p>	P	<p>Uruguay</p> <p>1) Each commodity standard will contain only ONE list with probably many pests. For each pest there will be one or more options for phytosanitary measures.</p> <p>2) Pests not known to be associated with the commodity in trade should not be mentioned/listed. The inclusion of such pests in the standard could lead to a high degree of discretion and misunderstanding when establishing phytosanitary import requirements.</p> <p>3) To improve clarity.</p> <p>1) Cada norma para productos contendrá solo UNA lista con probablemente muchas plagas. Para cada plaga habrá una o más opciones de medidas fitosanitarias.</p> <p>2) No se deben mencionar/enumerar las plagas que no se sabe estén asociadas con el producto en comercio. La inclusión de tales plagas en la norma podría dar lugar a un alto grado de discreción y malentendidos al establecer requisitos fitosanitarios de importación.</p> <p>3) Para mayor claridad.</p> <p><i>Category : SUBSTANTIVE</i></p>

	<p>options for phytosanitary measures for commodities being moved in international trade. The lists-list of pests include <u>includes</u> those known to be associated with the specified commodity and intended use. Commodity standards may also include information on pests known to be associated with the plant species but not with the commodity being traded. The <u>options of phytosanitary</u> measures listed are those that satisfy minimum criteria for inclusion in the standard¹, and are categorized according to confidence in the measures. The lists of pests and options for phytosanitary</p>		
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		measures are not intended to be exhaustive and are subject to review and amendment.		
82	38	Commodity standards should be considered by contracting parties when developing phytosanitary import requirements. Such standards contain lists of pests and corresponding options for phytosanitary measures for commodities being moved in international trade. The lists of pests include those known to be associated with the specified commodity and intended use. Commodity standards may also include information on pests known to be associated with the plant species but not with the commodity being	P	<p>Japan See general comment 1. It is quite difficult to sort the measures into three categories in an impartial and rational manner. <i>Category : SUBSTANTIVE</i></p>

		<p>traded. The measures listed are those that satisfy minimum criteria for inclusion in the standard¹, and are categorized according to confidence in the measures. The lists of pests and options for phytosanitary measures are not intended to be exhaustive and are subject to review and amendment.</p>		
83	38	<p>Commodity standards should be considered by contracting parties when developing phytosanitary import requirements. Such standards contain lists of pests and corresponding options for phytosanitary measures for commodities being moved in international trade. The lists of pests include those known to be</p>	P	<p>Japan To clarify the meaning of the sentence. <i>Category : EDITORIAL</i></p>

		<p>associated with the specified commodity and its intended use. Commodity standards may also include information on pests known to be associated with the plant species but not with the commodity being traded. The measures listed are those that satisfy minimum criteria for inclusion in the standard¹, and are categorized according to confidence in the measures. The lists of pests and options for phytosanitary measures are not intended to be exhaustive and are subject to review and amendment.</p>		
84	38	Commodity standards should be considered by contracting parties when developing phytosanitary import	C	<p>Botswana in agreement <i>Category : SUBSTANTIVE</i></p>

	<p>requirements. Such standards contain lists of pests and corresponding options for phytosanitary measures for commodities being moved in international trade. The lists of pests include those known to be associated with the specified commodity and intended use. Commodity standards may also include information on pests known to be associated with the plant species but not with the commodity being traded. The measures listed are those that satisfy minimum criteria for inclusion in the standard¹, and are categorized according to confidence in the measures. The lists of pests and options for</p>		
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		phytosanitary measures are not intended to be exhaustive and are subject to review and amendment.		
85	38	Commodity standards should be considered by contracting parties when developing phytosanitary import requirements. Such standards contain lists of pests and corresponding options for phytosanitary measures for commodities being moved in international trade. The lists of pests include those known to be associated with the specified commodity and intended use, <u>i.e. those pests which may infest the plant or plant product concerned and which may present a risk as a result of the part of the plant traded</u>	P	<p>EPPO</p> <p>Precisions given in particular to better make the difference with contaminating pests which are excluded from the scope (please see [31] and the definitions of "contaminating pest" and "infestation (of a commodity)") and to explain why the intended use of the commodity has to be taken into account (please see [81] in Section 2.2: Description of the commodity and its intended use).</p> <p>1) EDITORIAL The standard include a list pest known to be associated with the commodity but no information on these pests?</p> <p>2) EDITORIAL 'the plant species': to which plant species does this statement refer? First time 'plant species' is mentioned in the text. Sentence unclear. The example in 2.3 (Mangifera) makes clear what is meant but without reading 2.3 this sentence is unclear. <i>Category : SUBSTANTIVE</i></p>

		<p><u>and the intended use of the commodity.</u> Commodity standards may also include <u>information on list of</u> pests known to be associated with the plant species <u>in the field</u> but not with the <u>commodity part of the plant</u> being traded <u>traded (the commodity)</u>. The measures listed are those that satisfy minimum criteria for inclusion in the standard¹, and are categorized according to confidence in the measures. The lists of pests and options for phytosanitary measures are not intended to be exhaustive and are subject to review and amendment.</p>		
86	38	Commodity standards <u>should</u> <u>could</u> be considered by contracting parties	P	<p>United States of America 1) Should to could - changed the wording to reflect US edits in paragraph 58 2) replaced "confidence in" with "efficacy of" to reflect the US change made to the corresponding section below (para 115). <i>Category : EDITORIAL</i></p>

		<p>when developing phytosanitary import requirements. Such standards contain lists of pests and corresponding options for phytosanitary measures for commodities being moved in international trade. The lists of pests include those known to be associated with the specified commodity and intended use. Commodity standards may also include information on pests known to be associated with the plant species but not with the commodity being traded. The measures listed are those that satisfy minimum criteria for inclusion in the standard¹, and are categorized according to confidence in</p>		
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		<p>efficacy of the measures. The lists of pests and options for phytosanitary measures are not intended to be exhaustive and are subject to review and amendment.</p>		
87	38	<p>Les normes relatives à des marchandises devraient être prises en compte par les parties contractantes lors de l'élaboration des exigences phytosanitaires à l'importation. Ces normes contiennent des listes d'organismes nuisibles et des options de mesures phytosanitaires correspondantes pour les produits faisant l'objet d'un commerce international. Les listes comprennent les organismes nuisibles qui sont connus pour être associés au produit spécifié et à son</p>	P	<p>Congo cette phrase risquera de semer la confusion, du fait de cette possibilité à citer les organismes de l'espèce végétale. si cet organisme nuisible n'a aucun effet sur la marchandise, pourquoi en parler? <i>Category : SUBSTANTIVE</i></p>

		<p>utilisation prévue. Les normes relatives à des marchandises peuvent également inclure des informations sur des organismes nuisibles qui sont connus pour être associés aux espèces végétales mais pas à la marchandise faisant l'objet de commerce. Les mesures énumérées sont celles qui satisfont aux critères minimaux d'inclusion dans la norme¹ et elles sont classées en fonction de la confiance dont elles jouissent. Les listes d'organismes nuisibles et les mesures phytosanitaires ne sont pas censées être exhaustives et sont sujettes à révision et à modification.</p>		
88	38	Les normes relatives à des	P	<p>Congo Le champ d'application de la NIMP est clairement défini, il parle des options de mesures phytosanitaires et non des</p>

	<p>marchandises devraient être prises en compte par les parties contractantes lors de l'élaboration des exigences phytosanitaires à l'importation. Ces normes contiennent des listes d'organismes nuisibles et des options de mesures phytosanitaires correspondantes pour les produits faisant l'objet d'un commerce international. Les listes comprennent les organismes nuisibles qui sont connus pour être associés au produit spécifié et à son utilisation prévue. Les normes relatives à des marchandises peuvent également inclure des informations sur des organismes nuisibles qui sont connus pour être associés aux espèces végétales</p>		<p>mesures phytosanitaires qui sont en rapport avec les organismes nuisibles règlementés. soyons précis avec des termes pour éviter la confusion. <i>Category : SUBSTANTIVE</i></p>
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		mais pas à la marchandise faisant l'objet de commerce. Les mesures énumérées sont celles qui satisfont aux critères minimaux d'inclusion dans la norme ¹ et elles sont classées en fonction de la confiance dont elles jouissent. Les listes d'organismes nuisibles et les options des mesures phytosanitaires ne sont pas censées être exhaustives et sont sujettes à révision et à modification.		
89	39	The inclusion of a measure in this ISPM-a commodity standard does not create any obligation for a contracting party to approve it, register it or adopt it for use in its territory.	P	European Union The measures listed concern a specified commodity and intended use and therefore a specific commodity standard (please see [38]). <i>Category : TECHNICAL</i>
90	39	The inclusion of NPPOs of a measure in this ISPM does not create any	P	PPPO Obligation of this ISPM worth further discussion and clarification. If this ISPM does not create any obligation, why makes it into an ISPM? shouldn't it be a guidance document if no obligation for contracting parties? Suggest to re-word. APPPC RSPM for mango fruit uses similar wording to what we propose above.

		obligation for a contracting party importing countries should recognise the effectiveness of these measures to approve it manage the target pest/pests or, register it or adopt it for use in its territory provide technical justification to support alternative measures.		<i>Category : SUBSTANTIVE</i>
91	39	The inclusion of a measure in this ISPM does not create any obligation for a contracting party to approve it, register it or adopt it for use in its territory.	P	Korea, Republic of redundant. <i>Category : EDITORIAL</i>
92	39	The inclusion of a measure in this ISPM does not create any obligation for a contracting party to approve it, register it or adopt it for use in its territory.	P	China Put this paragraph at the end of [38]. This is an very important principle of the standard and should be placed in the text. <i>Category : EDITORIAL</i>
93	39	The inclusion of a measure in this <u>ISPM-a commodity standard</u> does not create any obligation for a contracting party to approve it, register it or adopt it	P	EPPO The measures listed concern a specified commodity and intended use and therefore a specific commodity standard (please see [38]). <i>Category : TECHNICAL</i>

		for use in its territory.		
Background				
94	42	Two key elements of the International Plant Protection Convention (IPPC) are the safeguarding protection of agriculture, forests and the environmentenvironment from pests , and the facilitation of safe trade. Trade supports economic growth and development, helping to reduce poverty around the world. Significant advances in the facilitation of safe trade can be made through the development and adoption of international commodity-based standards for phytosanitary measuresSPMs .	P	Panama For consistency and to align with Spanish version. <i>Category : TECHNICAL</i>
95	42	Two key elements of the International Plant Protection Convention (IPPC) are the	P	Costa Rica For consistency and to align with Spanish version. <i>Category : TECHNICAL</i>

		<p><u>safeguarding protection</u> of agriculture, forests and the <u>environmentenvironment</u> <u>environment from pests</u>, and the facilitation of safe trade.</p> <p>Trade supports economic growth and development, helping to reduce poverty around the world. Significant advances in the facilitation of safe trade can be made through the development and adoption of <u>international commodity-based standards for phytosanitary measures of commodity-based</u></p>		
96	42	<p><u>Two key elements of the The</u> International Plant Protection Convention (IPPC) <u>are the safeguarding of intends to safeguard</u> agriculture, forests and the environment, <u>and</u></p>	P	<p>European Union Improvement suggested to be consistent with the preamble of the IPPC, second indent, end of sentence, Art VII.2. <i>Category : SUBSTANTIVE</i></p>

		<p>the facilitation of safe without unjustified impediment to trade. Trade supports economic growth and development, helping to reduce poverty around the world. Significant advances in the facilitation of safe trade can be made through the development and adoption of international commodity-based standards for phytosanitary measures.</p>		
97	42	<p>Two key elements of the International Plant Protection Convention (IPPC) are the safeguarding protection of agriculture, forests and the environment enviro nment from pests, and the facilitation of safe trade. Trade supports economic growth and development,</p>	P	<p>COSAVE For consistency and to align with Spanish version.</p> <p>Por coherencia y alineación con la versión en español. <i>Category : TECHNICAL</i></p>

		<p>helping to reduce poverty around the world. Significant advances in the facilitation of safe trade can be made through the development and adoption of international commodity-based standards for phytosanitary measures ISPMs.</p>		
98	42	<p>Two key elements of the International Plant Protection Convention (IPPC) are the safeguarding protection of agriculture, forests and the environment environment from pest, and the facilitation of safe trade. Trade supports economic growth and development, helping to reduce poverty around the world. Significant advances in the facilitation of safe trade can be made through the development and</p>	P	<p>OIRSA For consistency and to align with Spanish version. <i>Category : TECHNICAL</i></p>

		adoption of international commodity-based standards for phytosanitary measures ISPM's.		
99	42	<u>Based on the regulations of IPPC, trade supports economic growth and development, helping to reduce poverty around the world. Significant advances in the facilitation of safe trade can be made through the development and adoption of international commodity-based standards for phytosanitary measures. Two key elements of the International Plant Protection Convention (IPPC) are the safeguarding of agriculture, forests and the environment, and the facilitation of safe trade. Trade supports economic</u>	P	China More concise. <i>Category : EDITORIAL</i>

		<p>growth and development, helping to reduce poverty around the world. Significant advances in the facilitation of safe trade can be made through the development and adoption of international commodity based standards for phytosanitary measures.</p>		
100	42	<p>Two key elements of the International Plant Protection Convention (IPPC) are the safeguarding of agriculture, forests and the environment, and the facilitation of safe trade. Trade supports economic growth and development, helping to reduce poverty around the world. Significant advances in the facilitation of safe trade can be made through the development and</p>	C	<p>Uruguay Safe trade should be translated into Spanish as “Comercio seguro” throughout the text. See general comment. <i>Category : TRANSLATION</i></p>

		adoption of international commodity-based standards for phytosanitary measures.		
101	42	<p>Two key elements of the International Plant Protection Convention (IPPC) are the safeguarding protection of agriculture, forests and the environmentenvironment from pests, and the facilitation of safe trade.</p> <p>Trade supports economic growth and development, helping to reduce poverty around the world. Significant advances in the facilitation of safe trade can be made through the development and adoption of international commodity-based standards for phytosanitary measuresISPMs.</p>	P	<p>Uruguay For consistency and to align with Spanish version.</p> <p>Por coherencia y alineación con la versión en español. <i>Category : TECHNICAL</i></p>
102	42	Two key elements of the The	P	<p>EPPO Improvement suggested to be consistent with the preamble of the IPPC, second indent end of sentence, Art VII.2.</p>

		<p>International Plant Protection Convention (IPPC) are the safeguarding of intends to safeguard agriculture, forests and the environment, and the facilitation of safe environment without unjustified impediment to trade. Trade supports economic growth and development, helping to reduce poverty around the world. Significant advances in the facilitation of safe trade can be made through the development and adoption of international commodity-based standards for phytosanitary measures.</p>		<p><i>Category : SUBSTANTIVE</i></p>
<p>103</p>	<p>42</p>	<p>Two key elements of the International Plant Protection Convention (IPPC) are the safeguarding of</p>	<p>P</p>	<p>United States of America Propose deletion because this isn't relative to the standard <i>Category : SUBSTANTIVE</i></p>

		<p>agriculture, forests and the environment, and the facilitation of safe trade. Trade supports economic growth and development, helping to reduce poverty around the world. Significant advances in the facilitation of safe trade can be made through the development and adoption of international commodity-based standards for phytosanitary measures.</p>		
104	42	<p>Dos de los elementos fundamentales de la Convención Internacional de Protección Fitosanitaria (CIPF) son, por un lado, la protección de la agricultura, los bosques y el medio ambiente y, por el otro, la facilitación del comercio en condiciones de</p>	P	<p>Costa Rica Traducción adecuada para "safe trade" <i>Category : TRANSLATION</i></p>

		<p>inocuidadseguras. El comercio apoya el crecimiento económico y el desarrollo, ayudando a reducir la pobreza en todo el mundo. Pueden lograrse avances importantes en la facilitación del comercio en condiciones de inocuidad seguras por medio de la elaboración y adopción de NIMF para productos.</p>		
105	42	<p>Dos de los elementos fundamentales de la Convención Internacional de Protección Fitosanitaria (CIPF) son, por un lado, la protección de la agricultura, los bosques y el medio ambiente y, por el otro, la facilitación del comercio en condiciones de inocuidadseguro. El comercio apoya el crecimiento económico y el</p>	P	<p>Ecuador El alcance de este borrador de norma no versa sobre la inocuidad de los alimentos y se entiende que eventualmente existe un error en la traducción del inglés al español. <i>Category : TRANSLATION</i></p>

		desarrollo, ayudando a reducir la pobreza en todo el mundo. Pueden lograrse avances importantes en la facilitación del comercio en condiciones de inocuidad seguro por medio de la elaboración y adopción de NIMF para productos.		
106	43	The IPPC Strategic Framework 2020–2030 proposes the development of ISPMs for specific commodities, with accompanying diagnostic protocols; phytosanitary treatments and guidance, to simplify trade and expedite market-access negotiations.	P	Japan Delete diagnostic protocols to avoid confusion as they are currently not included as the content of the draft commodity standards. <i>Category : SUBSTANTIVE</i>
107	43	The IPPC Strategic Framework 2020–2030 proposes the development of ISPMs for specific commodities, with accompanying diagnostic	C	United States of America See US comment in paragraph 42 regarding this deletion. If US comment is agreed, propose combining paragraph 43 with paragraph 42, into one paragraph. <i>Category : EDITORIAL</i>

		protocols, phytosanitary treatments and guidance, to simplify trade and expedite market-access negotiations.		
108	43	En el Marco estratégico de la CIPF para 2020-2030 se propone la elaboración de NIMF para productos específicos, acompañadas de protocolos de diagnóstico, tratamientos fitosanitarios y orientación con miras a simplificar el comercio y agilizar y las negociaciones de acceso al mercado.	P	Ecuador Las negociaciones entre las partes no tienen un tiempo establecido y varía de acuerdo al caso, de manera que no se podría entender frente a que comparativo estarían resultando mas ágiles. <i>Category : SUBSTANTIVE</i>
109	44	The purpose of this standard is to provide guidance on the development and use of commodity standards . Such standards, which are presented as annexes to this standard, and are	P	Canada This standard is also provides guidance in the development of commodity standards. <i>Category : SUBSTANTIVE</i>

		designed to support the development of phytosanitary import requirements that facilitate safe trade.		
110	44	The purpose of this standard is to provide guidance on the use of commodity standards. Such standards, presented as annexes to this standard, are designed to support the development of phytosanitary import requirements that facilitate safe trade.	C	COSAVE Safe trade should be translated into Spanish as "Comercio seguro" throughout the text. See general comment. <i>Category : TRANSLATION</i>
111	44	The purpose of this standard is to provide guidance on the use of commodity standards. Such standards, presented as annexes to this standard, are designed to support the	C	OIRSA Safe trade should be translated into Spanish as "Comercio seguro" throughout the text. See general comment <i>Category : TRANSLATION</i>

		development of phytosanitary import requirements that facilitate safe trade.		
112	44	The purpose of this standard is to provide guidance on the <u>development and</u> use of commodity standards. Such standards, presented as annexes to this standard, are designed to support the development of phytosanitary import requirements that facilitate safe trade.	P	Japan This draft ISPM provides not only guidance on the use of commodity standards but also guidance on the development of the standards (e.g. criteria for inclusion of measures). <i>Category : SUBSTANTIVE</i>
113	44	The purpose of this standard is to provide guidance on the use of commodity standards. Such standards, presented as annexes to this standard, are designed to support the development of	C	Uruguay Safe trade should be translated into Spanish as “Comercio seguro” throughout the text. See general comment. <i>Category : TRANSLATION</i>

		phytosanitary import requirements that facilitate safe trade.		
114	44	The purpose of this standard is to provide guidance on the use of commodity standards. Such standards, presented as annexes to this standard, are designed to support the development of phytosanitary import requirements that facilitate safe trade.	C	Botswana Agree <i>Category : SUBSTANTIVE</i>
115	44	The purpose of this standard is to provide guidance on the use of commodity standards. Such standards, presented as annexes to this standard, are designed to support the development of phytosanitary import	C	COSAVE Safe trade should be translated into Spanish as "Comercio seguro" throughout the text. See general comment. <i>Category : TRANSLATION</i>

		requirements that facilitate safe trade.		
116	44	La finalidad de la presente norma es proporcionar orientación sobre el uso de las normas para productos. Dichas normas, recogidas en los anexos de esta norma <u>norma o cuando proceda, en los anexos de otras NIMF</u> , están concebidas para brindar apoyo al establecimiento de requisitos fitosanitarios de importación que faciliten el comercio en condiciones de inocuidad.	P	Costa Rica Consistencia con el punto 6 <i>Category : SUBSTANTIVE</i>
117	44	La finalidad de la presente norma es proporcionar orientación sobre el uso de las normas para productos. Dichas normas, recogidas en los anexos de esta norma, están concebidas para brindar apoyo al	P	Costa Rica Traducción adecuada de "safe trade" <i>Category : TRANSLATION</i>

		establecimiento de requisitos fitosanitarios de importación que faciliten el comercio en condiciones de inocuidadseguras .		
118	44	La finalidad de la presente norma es proporcionar orientación sobre el uso de las normas para productos. Dichas normas, recogidas en los anexos de esta norma, están concebidas para brindar apoyo al establecimiento de requisitos fitosanitarios de importación que faciliten el comercio en condiciones de inocuidadseguro .	P	Ecuador El alcance de este borrador de norma no versa sobre la inocuidad de los alimentos y se entiende que existe un error en la traducción del inglés al español. <i>Category : TRANSLATION</i>
IMPACTS ON BIODIVERSITY AND THE ENVIRONMENT				
119	45	IMPACTS ON BIODIVERSITY AND THE ENVIRONMENT	C	Thailand The statement under this section should be considered to be complied with the Convention on Biological Diversity. <i>Category : SUBSTANTIVE</i>
120	46	The commodity standards developed according to this	P	Panama To simplify and avoid redundant text. <i>Category : TECHNICAL</i>

		<p>standard provide guidance on options for phytosanitary measures. Such measures may help preserve biodiversity by managing the pest risk posed by commodities that are moved internationally, including the pest risk posed by invasive alien species.</p>		
<p>121</p>	<p>46</p>	<p>The commodity standards developed according to this standard provide guidance on options for phytosanitary measures. Such measures may help preserve biodiversity by managing the pest risk posed by commodities that are moved internationally, including the pest risk posed by invasive alien species.</p>	<p>P</p>	<p>COSAVE To simplify and avoid redundant text. Para simplificar y evitar texto redundante. <i>Category : TECHNICAL</i></p>

122	46	The commodity standards developed according to this standard provide guidance on options for phytosanitary measures. Such measures may help preserve biodiversity by managing the pest risk posed by commodities that are moved internationally, including the pest risk posed by invasive alien species.	P	<p>OIRSA To simplify and avoid redundant text. <i>Category : TECHNICAL</i></p>
123	46	The commodity standards developed according to this standard provide guidance on options for phytosanitary measures. Such measures may help preserve biodiversity by managing the pest risk posed by commodities that are moved internationally,	P	<p>China To avoid negative impacts of commodity standards on biodiversity and the environment. <i>Category : SUBSTANTIVE</i></p>

		including the pest risk posed by invasive alien species. Such measures should avoid negative impacts on biodiversity and the environment.		
124	46	The commodity standards developed according to this standard provide guidance on options for phytosanitary measures. Such measures may help preserve biodiversity by managing the pest risk posed by commodities that are moved internationally, including the pest risk posed by invasive alien species.	P	Uruguay To simplify and avoid redundant text. Para simplificar y evitar texto redundante <i>Category : TECHNICAL</i>
125	46	The commodity standards developed according to this standard provide guidance on options for phytosanitary	C	Botswana Agree <i>Category : SUBSTANTIVE</i>

		measures. Such measures may help preserve biodiversity by managing the pest risk posed by commodities that are moved internationally, including the pest risk posed by invasive alien species.		
126	46	Las normas para productos elaboradas con arreglo a la presente norma proporcionan orientación sobre opciones de medidas fitosanitarias. Dichas normas <u>medidas</u> podrán ayudar a conservar la biodiversidad mediante la gestión de los riesgos de plagas que supone la circulación internacional de productos, incluidos los que plantean las especies exóticas invasoras.	P	Costa Rica Consistencia con la versión en inglés <i>Category : SUBSTANTIVE</i>

PRINCIPLES				
127	47	PRINCIPLES	P	PPPO These are not all principles (e.g. para 52 is already mentioned in scope), therefore the title of the section is incorrect. Suggest either renaming the section or incorporating the contents into appropriate sections, e.g. background, outline of requirements, scope etc. <i>Category : SUBSTANTIVE</i>
128	48	The IPPC contains a range of international rights and obligations. In the context of these rights and obligations, the basic principles of particular importance and relevance to commodity standards are as follows:	P	Panama Redundant the IPPC is an International Convention. <i>Category : EDITORIAL</i>
129	48	The IPPC contains a range of international rights and obligations. In the context of these rights and obligations, the basic principles of particular importance and relevance to commodity standards are as follows:	P	COSAVE Redundant the IPPC is an International Convention. Redundante la CIPF es una Convención Internacional. <i>Category : TECHNICAL</i>
130	48	The IPPC contains a range of international rights and obligations. In the context of	P	OIRSA Redundant the IPPC is an International Convention. <i>Category : TECHNICAL</i>

		these rights and obligations, the basic principles of particular importance and relevance to commodity standards are as follows:		
131	48	The IPPC contains a range of international rights and obligations. In the context of these rights and obligations, the basic principles of particular importance and relevance to commodity standards are as follows:	P	Uruguay Redundant the IPPC is an International Convention. Redundante la CIPF es una Convención Internacional <i>Category : TECHNICAL</i>
132	49	Los derechos soberanos <u>de las Partes Contratantes, en particular, para prescribir y adoptar las medidas fitosanitarias con el fin de proteger la sanidad vegetal dentro de sus territorios y determinar el nivel adecuado de</u>	P	Ecuador Teniendo en cuenta el alcance que propone la norma, se recomienda que en los principios se salvaguarden de manera taxativa los derechos soberanos que reconoce el texto de la Convención y la NIMF N°1 <i>Category : SUBSTANTIVE</i>

		<u>protección fitosanitaria</u> , no se ven afectados por las normas para productos.		
133	50	- <u>Diversion from intended use is not addressed.</u> - Existing international obligations of contracting parties under the IPPC and the World Trade Organization Agreement on the Application of Sanitary and Phytosanitary Measures remain unaffected.	P	Australia It is considered that principles should be included in this overarching concept standard. Some comments made at regional workshops suggested these should be removed as they are not written as principles. These edits aim to articulate the points as principles <i>Category : SUBSTANTIVE</i>
134	51	Commodity standards do not impose additional <u>Additional obligations are not imposed</u> on importing countries over and above those already identified in the IPPC.	P	Australia It is considered that principles should be included in this overarching concept standard. Some comments made at regional workshops suggested these should be removed as they are not written as principles. These edits aim to articulate the points as principles. <i>Category : SUBSTANTIVE</i>
135	51	Commodity standards do not impose additional obligations on importing	P	China To avoid unnecessary impediment to existing trade and creating trade barriers for developing countries. <i>Category : SUBSTANTIVE</i>

		countries over and above those already identified in the IPPC. <u>Additional obligations imposed on exporting countries should be adapted to the level of development and avoid unnecessary obstacles to trade.</u>		
136	51	Commodity standards do not impose additional obligations on importing countries over and above those already identified in the IPPC.	C	United States of America Paragraphs 51-54 – These are not principles, pull out, delete or put somewhere else. These are goals, objectives, aspirations. Include principles of least trade restrictive and ALOP. <i>Category : SUBSTANTIVE</i>
137	52	The scope of commodity standards does not include diversion from intended use.	P	Australia Moved to the second dot point <i>Category : SUBSTANTIVE</i>
138	52	The scope of commodity standards does not include diversion from intended use.	P	China This has been described in the scope, more concise. <i>Category : EDITORIAL</i>
139	53	Lists of pests are presented in commodity standards. However, the	P	Panama For consistency. <i>Category : TECHNICAL</i>

		regulation of any pest remains subject to technical justification, using an appropriate a pest risk analysis (PRA) or, where applicable, another comparable examination and evaluation of available scientific information (Articles II and VI of the IPPC).		
140	53	Lists Regulation of pests are presented in commodity standards. However, the regulation of any pest pests listed remains subject to technical justification, using an appropriate pest risk analysis (PRA) or, where applicable, another comparable examination and evaluation of available scientific information (Articles II and VI of the IPPC).	P	Australia It is considered that principles should be included in this overarching concept standard. Some comments made at regional workshops suggested these should be removed as they are not written as principles. These edits aim to articulate the points as principles <i>Category : SUBSTANTIVE</i>
141	53	Lists of pests are presented in	P	COSAVE For consistency.

		commodity standards. However, the regulation of any pest remains subject to technical justification, using an appropriate a pest risk analysis (PRA) or, where applicable, another comparable examination and evaluation of available scientific information (Articles II and VI of the IPPC).		<i>Category : TECHNICAL</i>
142	53	Lists of pests are presented in commodity standards. However, the regulation of any pest remains subject to technical justification, using an appropriate a pest risk analysis (PRA) or, where applicable, another comparable examination and evaluation of available scientific information (Articles II and VI of the IPPC).	P	Uruguay For consistency Por consistencia <i>Category : TECHNICAL</i>

143	53	<p>Lists of pests are presented in commodity standards. However, the regulation of any pest remains subject to technical justification, using an appropriate pest risk analysis (PRA) or, where applicable, another comparable examination and evaluation of available scientific information (Articles II and VI of the IPPC).</p>	C	<p>United States of America In reference to “any” - Contaminating pests are not included in the scope section; is this consistent with the scope? <i>Category : SUBSTANTIVE</i></p>
144	53	<p>Lists of pests are presented in commodity standards. However, the regulation of any pest associated with the specific commodity remains subject to technical justification, using an appropriate pest risk analysis (PRA) or, where applicable, another comparable examination and</p>	P	<p>United States of America for consistency with the comment below (para 54) on “contaminating pests” <i>Category : TECHNICAL</i></p>

		evaluation of available scientific information (Articles II and VI of the IPPC).		
145	53	Las normas para productos recogen listas de plagas. Sin embargo, la regulación de toda plaga sigue sujeta a una justificación técnica, utilizando un análisis de riesgo de plagas (ARP) apropiado o, cuando proceda, otro examen y evaluación comparables de la información científica disponible (artículos II y VI de la CIPF).	C	Ecuador ¿Cuál sería este otro examen o evaluación reconocido por la CIPF? Se recomienda mencionarlo específicamente. <i>Category : SUBSTANTIVE</i>
146	54	Commodity standards provide contracting parties with options <u>Options</u> for phytosanitary measures <u>provided</u> to prevent the entry and establishment of regulated pests . These options <u>pests</u> are not	P	Australia It is considered that principles should be included in this overarching concept standard. Some comments made at regional workshops suggested these should be removed as they are not written as principles. These edits aim to articulate the points as principles <i>Category : SUBSTANTIVE</i>

		intended to be exhaustive; other measures may be implemented by contracting parties, if technically justified, and may be proposed for inclusion in <u>revisions of</u> commodity standards.		
147	54	Commodity standards provide contracting parties with options for phytosanitary measures to prevent the entry and establishment of regulated pests. These options are not intended to be exhaustive; other <u>phytosanitary</u> measures may be implemented by contracting parties, if technically justified, and may be proposed for inclusion in commodity standards.	P	COSAVE For consistency <i>Category : TECHNICAL</i>
148	54	Commodity standards provide contracting parties with options for	P	OIRSA For consistency <i>Category : TECHNICAL</i>

		<p>phytosanitary measures to prevent the entry and establishment of regulated pests. These options are not intended to be exhaustive; other <u>phytosanitary</u> measures may be implemented by contracting parties, if technically justified, and may be proposed for inclusion in commodity standards.</p>		
149	54	<p>Commodity standards provide contracting parties with options for phytosanitary measures to prevent the entry <u>introduction</u> and establishment of regulated pests. These options are not intended to be exhaustive; other measures may be implemented by contracting parties, if technically justified, and may be proposed for inclusion in</p>	P	<p>Korea, Republic of "introduction" is more appropriate. Category : EDITORIAL</p>

		commodity standards.		
150	54	Commodity standards provide contracting parties with options for phytosanitary measures to prevent the entry introduction and establishment of regulated pests. These options are not intended to be exhaustive; other measures may be implemented by contracting parties, if technically justified, and may be proposed for inclusion in commodity standards.	P	China Introduction" covers a broader range and is more accurate <i>Category : SUBSTANTIVE</i>
151	54	Commodity standards provide contracting parties with options for phytosanitary measures to prevent the entry and establishment of regulated pests. These options are not intended to be exhaustive; other phytosanitary measures may be	P	Uruguay For consistency <i>Category : TECHNICAL</i>

		implemented by contracting parties, if technically justified, and may be proposed for inclusion in commodity standards.		
152	54	Commodity standards provide contracting parties with options for phytosanitary measures to prevent the entry and establishment introduction of regulated pests. These options are not intended to be exhaustive; other measures may be implemented by contracting parties, if technically justified, and may be proposed for inclusion in commodity standards.	P	United States of America IPPC definition of "introduction" is "entry" resulting in "establishment". Suggest to replace with "introduction". <i>Category : TECHNICAL</i>
153	54	Las normas para productos ofrecen a las Partes Contratantes opciones de medidas fitosanitarias para evitar la entrada y	C	Ecuador Se recomienda proporcionar claridad sobre la forma en que las partes contratantes podrán proponer la inclusión de medidas en la norma para productos. <i>Category : SUBSTANTIVE</i>

		<p>el establecimiento de plagas reglamentadas. Estas opciones no pretenden ser exhaustivas; las Partes Contratantes podrán aplicar otras medidas que se justifiquen técnicamente, y se podrá proponer su inclusión en las normas para productos.</p>		
154	54	<p>Las normas para productos ofrecen a las Partes Contratantes opciones de <u>posibles</u> medidas fitosanitarias para evitar la entrada y el establecimiento de plagas reglamentadas. Estas opciones no pretenden ser exhaustivas; las Partes Contratantes podrán aplicar otras medidas que se justifiquen técnicamente, y se podrá proponer su inclusión en las</p>	P	<p>Ecuador Dado que la norma no tiene un carácter exhaustivo, las partes contratantes deciden si consideran las posibles medidas, entre otras que en ejercicio de su derecho soberano encuentren a bien considerar <i>Category : SUBSTANTIVE</i></p>

		normas para productos.		
1. Purpose and Use of Commodity Standards				
155	56	1. Purpose and Use of Commodity Standards	C	IPPC Regional Workshop Africa we support draft ISPM <i>Category : SUBSTANTIVE</i>
156	57	The purpose of commodity standards is to support the development of phytosanitary import requirements that facilitate safe trade, <u>i.e. trade posing an acceptable level of pest risk to the importing country, as described in ISPM 2 (Framework for pest risk analysis) and ISPM 11 (Pest risk analysis for quarantine pests).</u>	P	European Union Improvement suggested to clarify what it is meant. Usually the pest risk still exists (e.g. see [65]), but phytosanitary measures to reduce it to an acceptable level can be identified and implemented at reasonable cost (please see ISPM 2 and ISPM 11). <i>Category : SUBSTANTIVE</i>
157	57	The purpose of commodity standards is to support the development of phytosanitary import requirements that	C	COSAVE "Safe trade" should be translated as "Comercio seguro" throughout the standard. See general comment. "Safe trade" debe traducirse como "Comercio seguro" en toda la norma. Ver comentario general <i>Category : TRANSLATION</i>

		facilitate safe trade.		
158	57	The purpose of commodity standards is to support the development of phytosanitary import requirements that facilitate safe trade.	C	<p>Uruguay "Safe trade" should be translated as "Comercio seguro" throughout the standard. See general comment.</p> <p>"Safe trade" debe traducirse como "Comercio seguro" en toda la norma. Ver comentario general <i>Category : TRANSLATION</i></p>
159	57	The purpose of commodity standards is to support the development of phytosanitary import requirements that facilitate safe trade, i.e. trade posing an acceptable level of pest risk to the importing country, as described in ISPM 2 (Framework for pest risk analysis) and ISPM 11 (Pest risk analysis for quarantine pests) .	P	<p>EPPO Improvement suggested to clarify what it is meant. Usually the pest risk still exists (e.g. see [65]), but phytosanitary measures to reduce it to an acceptable level can be identified and implemented at reasonable cost (please see ISPM 2 and ISPM 11). <i>Category : SUBSTANTIVE</i></p>
160	57	La finalidad de las normas para productos es respaldar el establecimiento de	P	<p>Costa Rica Traducción adecuada de "safe trade" <i>Category : TRANSLATION</i></p>

		requisitos fitosanitarios de importación que faciliten el comercio en condiciones de inocuidad seguras.		
161	57	La finalidad de las normas para productos es respaldar el establecimiento de requisitos fitosanitarios de importación que faciliten el comercio en condiciones de inocuidad seguro.	P	Ecuador Por consistencia con el comentario realizado en el párrafo 42 <i>Category : TRANSLATION</i>
162	57	La finalidad de las normas para productos es respaldar apoyar el establecimiento de requisitos fitosanitarios de importación que faciliten el comercio en condiciones de inocuidad.	P	Ecuador El alcance de la norma permite apoyar el proceso de toma de decisiones, pero no es un sustento o un respaldo para el establecimiento de las medidas, por cuanto este se determina a través del ARP <i>Category : SUBSTANTIVE</i>
163	58	Pest list and options for phytosanitary measures contained within commodity standards should	P	Canada Commodity standard also contain pest lists. It is options for phytosanitary measures that are to be presented in commodity standards. <i>Category : SUBSTANTIVE</i>

	<p><u>be considered when developing phytosanitary import requirements. These standards may serve to facilitate the evaluation of such measures in PRA (or other comparable examination and evaluation). These standards may also be useful during market access discussions.</u></p> <p>Measures contained within commodity standards should be considered when developing phytosanitary import requirements. These standards may serve to facilitate the evaluation of such measures in PRA (or other comparable examination and evaluation). These standards may also be useful during</p>		
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		market access discussions.		
164	58	Measures contained within commodity standards should be considered when developing phytosanitary import requirements. These standards may serve to facilitate the evaluation of such measures in PRA (or other comparable examination and evaluation). These standards may also be useful during market access market-access discussions.	P	European Union Typo, for consistency with [59] and [62]. Category : EDITORIAL
165	58	Phytosanitary import requirements are established by importing countries, respecting sovereign rights and international obligations and considering market-access discussions.	P	European Union Moved from [59] for a more logical order. Category : EDITORIAL

		Measures contained within commodity standards should be considered when developing phytosanitary import requirements. These standards may serve to facilitate the evaluation of such measures in PRA (or other comparable examination and evaluation). These standards may also be useful during market access discussions.		
166	58	Measures contained within commodity standards should be considered when developing phytosanitary import requirements. These standards may serve to facilitate the evaluation of such measures in PRA (or other comparable	P	China To be consistent with the other context. <i>Category : EDITORIAL</i>

		examination and evaluation). These standards may also be useful during market access <u>market-access</u> discussions.		
167	58	Measures contained within commodity standards should be considered when developing phytosanitary import requirements. These standards may serve to facilitate the evaluation of such measures in PRA (or other comparable examination and evaluation). These standards may also be useful during market access discussions.	P	Japan To avoid duplication with paragraph 62. <i>Category : SUBSTANTIVE</i>
168	58	Measures contained within commodity standards should <u>may</u> be considered when developing phytosanitary import requirements.	P	Thailand We would like to replace a term "should" with "may" due to the fact that this standard could be used as a reference for PRA process only. The term "should" in this context may lead to the understanding that only the measures given in commodity standard can be used. <i>Category : SUBSTANTIVE</i>

		<p>These standards may serve to facilitate the evaluation of such measures in PRA (or other comparable examination and evaluation). These standards may also be useful during market access discussions.</p>		
169	58	<p><u>Phytosanitary import requirements are established by importing countries, respecting sovereign rights and international obligations and considering market-access discussions.</u></p> <p>Measures contained within commodity standards should be considered when developing phytosanitary import requirements. These standards may serve to facilitate the</p>	P	<p>EPPO</p> <p>1) Moved from [59] for a more logical order.</p> <p>2) Typo, for consistency with [59] and [62]. <i>Category : EDITORIAL</i></p>

		evaluation of such measures in PRA (or other comparable examination and evaluation). These standards may also be useful during market access market-access discussions.		
170	58	Measures contained within commodity standards should be considered when developing phytosanitary import requirements. These standards may serve to facilitate the evaluation of such measures in PRA (or other comparable examination and evaluation). These standards may also be useful during market access discussions.	C	United States of America Second sentence - If the measure is already based on PRA, what is the purpose of the standard? The measures included are based on technical justification in principle, and therefore using them for PRA becomes a circular exercise. PRA is the basis for justification of the measures. <i>Category : SUBSTANTIVE</i>
171	58	Measures contained within commodity standards should could be	P	United States of America Should to could - not obligatory, since commodity standards is an alternative option for countries to use. <i>Category : EDITORIAL</i>

		<p>considered when developing phytosanitary import requirements. These standards may serve to facilitate the evaluation of such measures in PRA (or other comparable examination and evaluation). These standards may also be useful during market access discussions.</p>		
172	58	<p>Deberían tenerse en cuenta las medidas recogidas en las normas para productos al establecer requisitos fitosanitarios de importación. Estas normas podrán servir para facilitar la evaluación de dichas medidas en un ARP (u otro examen y evaluación comparables). Asimismo, podrán resultar útiles durante los debates</p>	C	<p>Ecuador ¿Cuál sería este otro examen o evaluación reconocido por la CIPF? Se recomienda mencionarlo específicamente. <i>Category : SUBSTANTIVE</i></p>

		sobre el acceso a los mercados.		
173	58	<p><u>Las medidas recogidas en las normas para productos serán útiles al establecer requisitos fitosanitarios de importación. Estas normas podrán servir para facilitar la evaluación de dichas medidas en un ARP (u otro examen y evaluación comparables). Asimismo, podrán resultar útiles durante los debates sobre el acceso a los mercados. Deberían tenerse en cuenta las medidas recogidas en las normas para productos al establecer requisitos fitosanitarios de importación. Estas normas podrán servir para facilitar la evaluación de dichas medidas en un ARP (u otro</u></p>	P	<p>Ecuador Por consistencia con el comentario del párrafo 49 Category : <i>SUBSTANTIVE</i></p>

		examen y evaluación comparables). Asimismo, podrán resultar útiles durante los debates sobre el acceso a los mercados.		
174	59	Phytosanitary import requirements are established by importing countries, respecting sovereign rights and international obligations and considering market access discussions.	P	European Union Moved after [57] for a more logical order. Category : EDITORIAL
175	59	Phytosanitary import requirements are established by importing countries, respecting sovereign rights and international obligations and considering market access discussions.	P	EPPO Moved after [57] for a more logical order. Category : EDITORIAL
176	60	It is intended that commodity standards provide benefits for both	C	Thailand We would like to suggest that it will be more appropriate to move this whole paragraph and place under the section "Background". Category : SUBSTANTIVE

		importing and exporting countries. For example, commodity standards may be beneficial by:		
177	60	It is intended that commodity standards provide benefits for both importing and exporting countries. For example, commodity standards may be beneficial by:	C	United States of America 1) Suggest removing this section because these are speculative at this point, and don't belong in an ISPM. 2) Is this a requirement? We understand these standards as an option to PRA. We believe that NPPOs should be applying technically justified measures, therefore our preference would be for a PRA option. <i>Category : SUBSTANTIVE</i>
178	60	Les normes relatives à des marchandises sont censées procurer des avantages aux <u>pays importateurs et exportateurs dans le commerce international des marchandises</u> . Par exemple, elles peuvent:	P	Congo <i>Category : SUBSTANTIVE</i>
179	61	supporting and assisting developing countries	C	United States of America Has this been proven as beneficial or this is a supposition? <i>Category : SUBSTANTIVE</i>
180	61	la prestación de apoyo y asistencia	C	Ecuador ¿Cómo se obtendría el apoyo y la asistencia? <i>Category : SUBSTANTIVE</i>

		a los países en desarrollo;		
181	61	la prestación de apoyo y asistencia a los países en desarrollo <u>que no cuenten con la capacidad o que así lo requieran;</u>	P	Ecuador Para no prejuzgar sobre la capacidad que tienen los países en desarrollo <i>Category : SUBSTANTIVE</i>
182	61	soutenir et assister les pays en développement <u>exportateurs; -orienter les importateurs dans la prise des décisions par rapport aux exigences phytosanitaires</u>	P	Congo nous pensons que les avantages que procurent ces normes vont plutôt à l'endroit de la facilitation du commerce international et de ceux qui l'exercent (c'est à dire les exportateurs et importateurs de tout continent confondu) et non à un bloc de pays donnés, c'est pour cette raison qu'elles sont nommées normes internationales; citer en relief les pays en développement, ne sert à rien. <i>Category : SUBSTANTIVE</i>
183	62	facilitating market access <u>market access</u> discussions	P	Japan To consistent with other ISPMs such as ISPM30. <i>Category : EDITORIAL</i>
184	63	facilitating safe trade- <u>supporting countries to consider effective phytosanitary measures to prevent the entry and establishment of regulated pests according to their own situation.</u>	P	Japan Preventing the entry and establishment of pests is one of the main goals of IPPC and it is an important benefit for countries. Supporting countries to consider effective phytosanitary measures according to each country situation will contribute to the goal. <i>Category : SUBSTANTIVE</i>
185	63	la facilitación del comercio en condiciones de <u>inseguras;</u>	P	Costa Rica Traducción adecuada de "safe trade" <i>Category : TRANSLATION</i>

186	63	la facilitación del comercio en condiciones de inocuidad seguro ;	P	Ecuador Por consistencia con el comentario formulado en el párrafo 42 <i>Category : TRANSLATION</i>
187	65	identifying and increasing awareness of measures available to minimize pests risk associated with the movement of commodities in international trade.	P	Panama The purpose is to minimize pest risk not to minimize pests. <i>Category : TECHNICAL</i>
188	65	identifying and increasing awareness of measures available to minimize pests associated pest risk with the movement of commodities in international trade.	P	Costa Rica The purpose is to minimize pest risk not to minimize pests, and consistency with the general comment <i>Category : TECHNICAL</i>
189	65	identifying and increasing awareness of measures available to minimize pests pest risk associated with the movement of commodities in international trade.	P	Canada Pest risk is a better choice and provides clarity. <i>Category : TECHNICAL</i>
190	65	identifying and increasing awareness of measures available to minimize pests pest risks associated with the	P	European Union More precise wording. <i>Category : EDITORIAL</i>

		movement of commodities in international trade.		
191	65	identifying and increasing awareness of measures available to minimize pests <u>pest risks</u> associated with the movement of commodities in international trade.	P	<p>COSAVE The purpose is to minimize pest risk not to minimize pests.</p> <p>El propósito es minimizar el riesgo de plagas, no minimizar las plagas. <i>Category : TECHNICAL</i></p>
192	65	identifying and increasing awareness of measures available to minimize <u>manage</u> pests <u>commonly</u> associated with the movement of commodities in international trade.- <u>Identifying and increasing awareness of pests of the commodity commonly managed by NPPOs.</u>	P	<p>PPPO Suggest an addition bullet on 'pest' given the previous bullet is about measures, although it is noted that these are examples only <i>Category : EDITORIAL</i></p>
193	65	identifying and increasing awareness of measures available to minimize pests <u>pest risk</u> associated with the movement	P	<p>Uruguay The purpose is to minimize pest risk not to minimize pests.</p> <p>El propósito es minimizar el riesgo de plagas, no minimizar las plagas <i>Category : TECHNICAL</i></p>

		of commodities in international trade.		
194	65	identifying and increasing awareness of measures available to minimize pests pest risk associated with the movement of commodities in international trade.	P	Japan <i>Category : EDITORIAL</i>
195	65	identifying and increasing awareness of measures available to minimize pests pest risks associated with the movement of commodities in international trade.	P	EPPO More precise wording. <i>Category : EDITORIAL</i>
196	65	<u>recenser-mettre à la disposition des parties contractantes, la liste des organismes nuisibles en rapport avec la marchandise;- recenser</u> et mieux faire connaître les mesures existantes qui permettent de réduire les risques phytosanitaires associés au déplacement de	P	Congo <i>Category : TECHNICAL</i>

		marchandises dans le commerce international.		
197	66	Commodity standards are not developed as annexes to this standard in the following situations:	P	Panama They are not developed in the situations described in this paragraph, no matter how. <i>Category : EDITORIAL</i>
198	66	Commodity standards are not developed as annexes to this standard in the following situations:	P	Uruguay They are not developed in the situations described in this paragraph, no matter how. No se desarrollan en las condiciones descritas en este párrafo, no importa cómo. <i>Category : TECHNICAL</i>
199	66	Commodity standards are not developed as annexes to this standard in the following situations:	C	Thailand We would like to suggest that it will be more appropriate to move this whole paragraph and place under the section "Principles". <i>Category : SUBSTANTIVE</i>
200	67	when no effective phytosanitary measures are available	C	United States of America What about systems approaches: such as ALPP, PF place of production, or combinations of measures in a systems approach, etc.? <i>Category : TECHNICAL</i>
201	67	aucune <u>option de</u> mesure phytosanitaire n'est disponible;	P	Congo <i>Category : SUBSTANTIVE</i>
202	68	il existe déjà une NIMP contenant suffisamment <u>d'indications</u> d'indi	P	Congo Cette NIMP répond-t-elle aux orientations de la norme conceptuelle? Si non, pourquoi ne pas élaborer la norme de la marchandise en se servant des informations et/ou indications de ladite NIMP? <i>Category : SUBSTANTIVE</i>

		cations sur la marchandise;		
203	69	when a commodity (e.g. processed to an extent which mitigates all pest risk) should not be regulated within the scope of the IPPC.	P	Canada For clarity Category : <i>TECHNICAL</i>
2. Content of Commodity Standards				
204	70	2. Contenido de las normas para productos	C	Ecuador ¿Cuáles serán los criterios para incluir los productos dentro de la norma? No está claro como será el proceso para la adopción de los anexos y la fuente de los ARP para determinar y llenar el contenido que se sugiere en este acápite. Category : <i>SUBSTANTIVE</i>
205	71	The commodity standards that form the annexes to this standard are arranged according to the content of these sections is described below, together with the following sections basis on which pests (section 2.3) and measures (sections 2.4 and 4) are included in the standards:	P	Viet Nam Viet Nam would like to combine 2 paragraphs Category : <i>EDITORIAL</i>
206	72	Scope	C	Viet Nam Viet Nam would like to delete this bullet Category : <i>EDITORIAL</i>
207	73	Description of the commodity and its intended use	C	Viet Nam Viet Nam would like to delete this bullet Category : <i>EDITORIAL</i>

208	74	Pests	C	Viet Nam Viet Nam would like to delete this bullet <i>Category : EDITORIAL</i>
209	74	Key Pests	P	Australia As previous this indicates not all pests will be listed. <i>Category : TECHNICAL</i>
210	74	PestsPests associated with the commodity	P	Costa Rica To improve guidance on which pests are covered in these standards. <i>Category : SUBSTANTIVE</i>
211	74	List of pPestsests	P	European Union More precise wording (please see [81] and [83]). <i>Category : EDITORIAL</i>
212	74	PestsPests associated with the commodity	P	COSAVE To improve guidance on which pests are covered in these standards. Mejorar la orientación sobre que plagas están cubiertas en estas normas. <i>Category : SUBSTANTIVE</i>
213	74	PestsPests associated with the commodity	P	OIRSA To improve guidance on which pests are covered in these standards. <i>Category : TECHNICAL</i>
214	74	PestsPests associated with the commodity	P	Uruguay To improve guidance on which pests are covered in these standards. Mejorar la orientación sobre que plagas están cubiertas en estas normas. <i>Category : SUBSTANTIVE</i>
215	74	PestsList of pests	P	EPPO More precise wording (please see [81] and [83]). <i>Category : EDITORIAL</i>
216	75	Options for phytosanitary measures	C	Viet Nam Viet Nam would like to delete this bullet <i>Category : EDITORIAL</i>
217	76	References.	C	Viet Nam Viet Nam would like to delete this bullet <i>Category : EDITORIAL</i>
218	76	References.	C	United States of America Suggest rewording: "evidence and quality of evidence" (see more in Confidence of measures section) <i>Category : SUBSTANTIVE</i>
219	77	The content of these sections is described below, together with the basis on which pests (section 2.3) and measures	C	Viet Nam Viet Nam would like to delete <i>Category : EDITORIAL</i>

		(sections 2.4 and 4) are included in the standards.		
220	77	The content of these sections is described below, together with the basis on which pests (section 2.3) and <u>phytosanitary</u> measures (sections 2.4 and 4) are included in the standards.	P	Costa Rica For consistency <i>Category : TECHNICAL</i>
221	77	The content of these sections is described below, together with the basis on which pests (section 2.3) and <u>phytosanitary</u> measures (sections 2.4 and 4) are included in the standards.	P	COSAVE For consistency. <i>Category : TECHNICAL</i>
222	77	The content of these sections is described below, together with the basis on which pests (section 2.3) and <u>options for phytosanitary</u> measures (sections 2.4 and 4) are included in the standards.	P	PPPO addition of text <i>Category : EDITORIAL</i>

223	77	The content of these sections is described below, together with the basis on which pests (section 2.3) and <u>phytosanitary</u> measures (sections 2.4 and 4) are included in the standards.	P	Uruguay For consistency <i>Category : TECHNICAL</i>
2.1 Scope				
224	79	A commodity standard clearly describes the specific commodity and its intended use, and covers a discrete set-list of pests and related options for phytosanitary measures.	P	Australia Consistency of phrasing. This is the only sentence where the phrasing is “discrete set of pests”. <i>Category : TECHNICAL</i>
225	79	A commodity standard clearly describes the specific commodity and its intended use, and covers a discrete set of <u>associated</u> pests and related options for phytosanitary measures.	P	Costa Rica Pests associated with the commodity are the pests covered by commodity-standards <i>Category : SUBSTANTIVE</i>
226	79	A commodity standard clearly describes the	P	European Union Precision given. <i>Category : SUBSTANTIVE</i>

		specific commodity and its intended use, and covers a discrete set of the most relevant associated pests and related options for phytosanitary measures.		
227	79	A commodity standard clearly describes the specific commodity and its intended use, and covers a discrete set of associated pests and related options for phytosanitary measures.	P	COSAVE Pests associated with the commodity are the pests covered by commodity-standards. Las plagas asociadas con el producto son las plagas cubiertas por las normas para productos. <i>Category : SUBSTANTIVE</i>
228	79	A commodity standard clearly describes the specific commodity and its intended useuses , and covers a discrete set of pests and related options for phytosanitary measures.	P	PPPO Suggest removing 'specific'. If 'specific' is used then there is potential for confusion with varieties or grade standards etc. <i>Category : TECHNICAL</i>
229	79	A commodity standard clearly describes the specific	P	Japan It should be also clarified in the scope of specific commodity standards. <i>Category : SUBSTANTIVE</i>

		commodity and its intended use, and covers a discrete set of pests and related options for phytosanitary measures. <u>The scope of commodity standards does not include diversion from intended use.</u>		
230	79	A commodity standard clearly describes the specific commodity and its intended use, and covers <u>a discrete set of the most relevant associated</u> pests and related options for phytosanitary measures.	P	EPPO Precision given. <i>Category : SUBSTANTIVE</i>
231	79	A commodity standard clearly describes the specific commodity and its intended use, and covers a discrete set of pests and related options for phytosanitary measures.	C	United States of America "Discrete" - Propose to change this word to an "alternative" because the list will be broader than "discrete" <i>Category : TECHNICAL</i>
232	79	En una norma para productos se	P	Ecuador Para que una plaga sea sujeto de medidas fitosanitarias esta debe ser considerada una plaga reglamentada. De lo

	<p>describe claramente el producto específico y su uso previsto y se recoge un conjunto discreto de plagas y opciones de medidas fitosanitarias conexas. <u>Tales mediadas podrán ser exigidas por la parte contratante importadora, si las plagas recogidas en la norma se han establecido como plagas reglamentadas en su territorio, siempre que las medidas sean consistentes con el riesgo de plagas y en tanto resulten necesarias. Las medidas fitosanitarias conexas podrán ser exigidas por las Partes Contratantes importadoras siempre y cuando a su juicio dichas medidas configuren un</u></p>		<p>contrario se contravendría la Convención respecto a los siguientes extremos:</p> <p>El artículo VI.2 de la Convención: “Las partes contratantes no exigirán medidas fitosanitarias para las plagas no reglamentadas.”.</p> <p>El principio de necesidad establecido en el numeral 1.2 de la NIMF N°1 : “Las partes contratantes pueden aplicar medidas fitosanitarias solamente cuando tales medidas sean necesarias para prevenir la introducción y/o dispersión de plagas cuarentenarias, o para limitar el impacto económico de las plagas no cuarentenarias reglamentadas.”</p> <p><i>Category : SUBSTANTIVE</i></p>
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		<u>nivel adecuado de protección fitosanitaria; o cuando las medidas sean reconocidas como equivalentes por la Parte Contratante importadora.</u>		
233	79	En una norma para productos se describe claramente el producto específico y su uso previsto y se recoge un conjunto discreto de plagas y opciones de medidas fitosanitarias conexas.	C	Ecuador ¿Qué criterios se empearán para establecer una lista discreta de plagas? Se recomienda especificar a que se refiere. <i>Category : SUBSTANTIVE</i>
2.2 Description of the commodity and its intended use				
234	81	<u>The description of the commodity and its intended use is intended to provide sufficient information to allow the identification of a focused list of pests and associated options for phytosanitary measures. The intended use of the commodity is</u>	P	Japan To avoid redundancy with paragraph 79. <i>Category : SUBSTANTIVE</i>

		<p>given because of the influence it has on the pest risk posed by the commodity, as described in ISPM 32 (This section clearly describes the commodity and its intended use. The description is intended to provide sufficient information to allow the identification of a focused list of pests and associated options for phytosanitary measures. The intended use of the commodity is given because of the influence it has on the pest risk posed by the commodity, as described in ISPM 32 (Categorization of commodities according to their pest risk).</p>		
235	81	<p>This section clearly describes the commodity</p>	P	<p>United States of America suggest adding "such as plant part that is specifically being traded". Not only the species, but also plant parts (e.g. stems, leaves, etc.) Category : <i>TECHNICAL</i></p>

		<p>commodity, such as the plant part that is specifically being traded, and its intended use. The description is intended to provide sufficient information to allow the identification of a focused list of pests and associated options for phytosanitary measures. The intended use of the commodity is given because of the influence it has on the pest risk posed by the commodity, as described in ISPM 32 (<i>Categorization of commodities according to their pest risk</i>).</p>		
2.3 Pests				
236	82	2.3 Pests associated with the commodity.	P	Panama To improve guidance on which pests are covered in these standards. <i>Category : SUBSTANTIVE</i>
237	82	2.3 Pests-List of pests	P	European Union More precise wording (please see [81] and [83]). <i>Category : EDITORIAL</i>
238	82	2.3 Pests-List of pests	P	EPPO More precise wording (please see [81] and [83]). <i>Category : EDITORIAL</i>

239	83	<p>This section includes a list or lists of pests that are known to be associated with the commodity described. Criteria for inclusion of pests include the availability of a PRA, or other technical justification, and regulation by at least one contracting party. The list or lists of pests are is presented in tabular format with the corresponding options for phytosanitary measures (see below) <u>measures</u>.</p>	P	<p>Costa Rica 1) The standard will include a list of pests with related options for phytosanitary measures, 2) The format is not presented below. It would be advisable to include the format as an appendix to standardize the format. <i>Category : TECHNICAL</i></p>
240	83	<p>This section includes a list or lists of pests <u>or groups of pests</u> that are known to be associated with the commodity described. Criteria for inclusion of pests include <u>regulation by at least one contracting party</u></p>	P	<p>European Union 1) precision given. 2) If the PRA or other technical justification does not concern the territory of the contracting party regulating the pest, the basis for listing the pest in the commodity standard is open to challenge. <i>Category : SUBSTANTIVE</i></p>

		<p>based on the availability of a PRA, PRA or other technical justification, and regulation by at least one contracting party.</p> <p>The list or lists of pests are presented in tabular format with the corresponding options for phytosanitary measures (see below).</p>		
241	83	<p>This section includes a list or lists of pests that are known to be associated with the commodity described. Criteria for inclusion of pests include the availability of a PRA, or other technical justification, and regulation by at least one contracting party. The list or lists of pests are is presented in tabular format with the corresponding</p>	P	<p>COSAVE</p> <p>1) The standard will include a list of pests with related options for phytosanitary measures, 2) The format is not presented below. It would be advisable to include the format as an appendix to standardize the format.</p> <p>1) La norma incluirá una lista de plagas con opciones relacionadas para medidas fitosanitarias, 2) El formato no se presenta a continuación. Sería recomendable incluir el formato como apéndice para estandarizar el formato. <i>Category : TECHNICAL</i></p>

		options for phytosanitary measures (see below) measures.		
242	83	<p>This section includes a list or lists of pests that are known to be associated with the commodity described. Criteria for inclusion of pests include the availability of a-an appropriate PRA, or other technical justification, and regulation by at least one contracting party.</p> <p><u>Where necessary, the sources of information that an organism was determined as a pest in a PRA or others should be made available to evaluate whether the determination is supported by scientifically sound rationale, when the Technical Panel on Commodity Standards or any contracting party</u></p>	P	<p>Japan</p> <p>Regarding "criteria for inclusion of pests", the selection of pests should be based on the availability of "an appropriate PRA" in which reliable information used in the PRA, not "the availability of an appropriate PRA".</p> <p>For example, even if a PRA is available, a pest species which should not be scientifically targeted might be selected as a target pest if the information of the PRA is inappropriate or the judgment in PRA is incorrect.</p> <p>In fact, there are inappropriate cases that target such pests based on PRAs as follows:</p> <ul style="list-style-type: none"> - Non-seed transmitted pests are selected as pests in seeds; - Field disease pests are selected as pests on commodities for human consumption which are not likely to be a pathway of the pests; - Pests are selected as targeted pests based on only information experimental hosts. <p>From a viewpoint of transparency and ensuring the sources of information, the information of the reason why pests were included in PRAs should be surely available so that these sources are used for consideration by TPCS and contracting parties.</p> <p><i>Category : SUBSTANTIVE</i></p>

		<u>requests so.</u> The list or lists of pests are presented in tabular format with the corresponding options for phytosanitary measures (see below).		
243	83	This section includes a list or lists of pests that are known to be associated with the commodity described. Criteria for inclusion of pests include the availability of a PRA, or other technical justification, and regulation <u>as quarantine pests</u> by at least one contracting party. The list or lists of pests are presented in tabular format with the corresponding options for phytosanitary measures (see below).	P	Korea, Republic of Clarify about the meaning of "regulation". <i>Category : EDITORIAL</i>
244	83	This section includes a list or lists of pests that	P	China More reasonable and transparent in technology. <i>Category : TECHNICAL</i>

		are known to be associated with the commodity described. Criteria for inclusion of pests include the availability of a PRA, or other technical justification, and regulation by at least one contracting party. The list or lists of pests are presented in tabular format with the corresponding options for phytosanitary measures (see below) ^{2.4} . <u>The pests listed should be supported by public references and listed in the references.</u>		
245	83	This section includes a list or lists of pests that are known to be associated with the commodity described. Criteria for inclusion of pests include the availability of a PRA, or other	P	<p>Uruguay</p> <p>1) The standard will include a list of pests with related options for phytosanitary measures, 2) The format is not presented below. It would be advisable to include the format as an appendix to standardize the format.</p> <p>1) La norma incluirá una lista de plagas con opciones relacionadas para medidas fitosanitarias, 2) El formato no se presenta a continuación. Sería recomendable incluir el formato como apéndice para estandarizar el formato.</p> <p><i>Category : TECHNICAL</i></p>

		<p>technical justification, and regulation by at least one contracting party. The list or lists of pests are is presented in tabular format with the corresponding options for phytosanitary measures (see below)measures.</p>		
246	83	<p><u>This section includes a list or lists of pests or groups of pests that are known to be associated with the commodity described. Criteria for inclusion of pests include regulation by at least one contracting party based on the availability for its territory of a PRA or other technical justification. The list or lists of pests are presented in tabular format with the corresponding options for phytosanitary</u></p>	P	<p>EPPO 1) precision given 2) If the PRA or other technical justification does not concern the territory of the contracting party regulating the pest, the basis for listing the pest in the commodity standard is open to challenge. <i>Category : SUBSTANTIVE</i></p>

		<p>measures (see below). This section includes a list or lists of pests that are known to be associated with the commodity described. Criteria for inclusion of pests include the availability of a PRA, or other technical justification, and regulation by at least one contracting party. The list or lists of pests are presented in tabular format with the corresponding options for phytosanitary measures (see below).</p>		
247	83	<p>This section includes a list or lists of pests that are known to be associated with the commodity described. Criteria for inclusion of pests include the availability of a PRA, or other technical</p>	C	<p>IPPC Regional Workshop Africa This information referenced as see below is not provided or there. Category : <i>TECHNICAL</i></p>

		<p>justification, and regulation by at least one contracting party. The list or lists of pests are presented in tabular format with the corresponding options for phytosanitary measures (see below).</p>		
248	83	<p>This section includes a list or lists of pests that are known to be associated with the commodity described. Criteria for inclusion of pests include the availability of a PRA, or other technical justification, and regulation by at least one contracting party. The list or lists of pests are presented in tabular format with the corresponding options for phytosanitary measures (see below).</p>	C	<p>Malawi This information that list or lists are presented in tabular form (see below) is not provided <i>Category : SUBSTANTIVE</i></p>

249	83	This section includes a list or lists of pests that are known to be associated with the commodity described. Criteria for inclusion of pests include the availability of a PRA, or other technical justification, and regulation by at least one contracting party. The list or lists of pests are is presented in tabular format with the corresponding options for phytosanitary measures (see below).	P	<p>United States of America</p> <p>1) change to "list of pests" - is there one pest list per commodity? The list would not be plural. 2) "(see below)" - please make reference to particular section, is this 2.4? Please clarify. Category : <i>EDITORIAL</i></p>
250	83	This section includes a list or lists of pests that are known to be associated with the commodity described. Criteria for inclusion of pests include the availability of a evidence, such as reliable scientific data , PRA, or	P	<p>United States of America</p> <p>Justification should be based on ISPM 8 – using scientific evidence. Category : <i>TECHNICAL</i></p>

		<p>other technical justification, and regulation by at least one contracting party. The list or lists of pests are presented in tabular format with the corresponding options for phytosanitary measures (see below).</p>		
251	83	<p>This section includes a list or lists of pests that are known to be associated with the commodity described. Criteria for inclusion of pests include the availability of a PRA, or other technical justification, and regulation by at least one contracting party. The list or lists of pests are presented in tabular format with the corresponding options for phytosanitary</p>	C	<p>United States of America 1) Second sentence - if the PRA already exists, why do we want to use a commodity standard? Also should be based on scientific evidence 2) other country's PRA should not be used as evidence because each PRA has different assumptions and different scope; only info sources therein could be used for accessing primary data. <i>Category : SUBSTANTIVE</i></p>

		measures (see below).		
252	83	This section includes a list or lists of pests that are known to be associated with the commodity described. Criteria for inclusion of pests include the availability of a PRA, or other technical justification, and regulation by at least one contracting party. The list or lists of pests are presented in tabular format with the corresponding options for phytosanitary measures (see below). (What about recognized pest list by WTO? Should countries justify them?)	P	NEPPO <i>Category : SUBSTANTIVE</i>
253	83	Esta sección incluye una o varias listas de plagas que se sabe que están relacionadas con el producto descrito.	P	Ecuador Teniendo en cuenta el alcance y sensibilidad de este proyecto de norma, se encuentra indispensable que todos los criterios queden expresamente mencionados, sin dar lugar a ambigüedades. Esto se refiere que no se mencionan cuales son los otros criterios que eventualmente se considerarían. <i>Category : SUBSTANTIVE</i>

		<p>Algunos de los Los criterios para la inclusión de plagas son la disponibilidad de un ARP, u otra justificación técnica, ARP y la regulación por al menos una Parte Contratante. La lista o las listas de plagas se presentan en cuadros con las correspondientes opciones de medidas fitosanitarias (véase más abajo).</p>		
254	84	<p>La inclusión de una plaga en una norma para productos no constituye una justificación técnica para su regulación. Corresponde a cada país importador determinar si regular estas plagas, basándose en una justificación técnica utilizando un ARP apropiado e, cuando proceda,</p>	P	<p>Ecuador Se recomienda especificar "cuando procede" y cual sería el otro examen de evaluación o de lo contrario suprimir para evitar ambigüedad Category : <i>SUBSTANTIVE</i></p>

		<p>otro examen y evaluación comparables de la información científica disponible apropiado.</p>		
255	85	<p>This section may also include information on pests known to be associated with the plant species but, based on available scientific information, known not to be associated with the traded commodity described (e.g. pests associated with <i>Mangifera indica</i> for propagation but not with the traded commodity, mango fruit).</p>	P	<p>Panama Commodity standards are aimed to provide options for phytosanitary measures for a particular commodity and intended use to facilitate safe trade. There is no reason to include pests that are not associated to the commodity. Pests to be included in a commodity standard would need to be regulated at least for one contracting party for that specific commodity and intended use. Therefore pest to be included should be only those associated with the specific commodity and intended use and thus its regulation would be technically justified <i>Category : SUBSTANTIVE</i></p>
256	85	<p>This section may also include information on pests known to be associated with the plant species but, based on available scientific information, known not to be associated with the</p>	P	<p>Costa Rica Commodity standards are aimed to provide options for phytosanitary measures for a particular commodity and intended use to facilitate safe trade. There is no reason to include pests that are not associated to the commodity. Pests to be included in a commodity standard would need to be regulated at least for one contracting party for that specific commodity and intended use. Therefore pest to be included should be only those associated with the specific commodity and intended use and thus its regulation would be technically justified <i>Category : SUBSTANTIVE</i></p>

		traded commodity described (e.g. pests associated with <i>Mangifera indica</i> for propagation but not with the traded commodity, mango fruit).		
257	85	This section may also include information on pests known to be associated with the plant species but, based on available scientific information, known not to be associated with the traded commodity described (e.g. pests associated with <i>Mangifera indica</i> for propagation but not with the traded commodity, mango fruit).	P	<p>COSAVE</p> <p>Commodity standards are aimed to provide options for phytosanitary measures for a particular commodity and intended use to facilitate safe trade. There is no reason to include pests that are not associated to the commodity. Pests to be included in a commodity standard would need to be regulated at least for one contracting party for that specific commodity and intended use. Therefore pest to be included should be only those associated with the specific commodity and intended use and thus its regulation would be technically justified</p> <p>Las normas para productos tienen por objeto ofrecer opciones para las medidas fitosanitarias para un producto en particular y el uso previsto para facilitar el comercio seguro. No hay razón para incluir plagas que no estén asociadas al producto. Las plagas que se incluirán en una norma para productos deberían estar reguladas al menos para una parte contratante para ese producto específico y uso previsto. Por lo tanto, las plagas que deben incluirse deben ser solo las asociadas con el producto específico y el uso previsto y, por lo tanto, su regulación estaría técnicamente justificada.</p> <p>Category : <i>SUBSTANTIVE</i></p>
258	85	This section may also include information on pests known to be associated with the plant species but, based on available scientific information,	P	<p>OIRSA</p> <p>Commodity standards are aimed to provide options for phytosanitary measures for a particular commodity and intended use to facilitate safe trade. There is no reason to include pests that are not associated to the commodity. Pests to be included in a commodity standard would need to be regulated at least for one contracting party for that specific commodity and intended use. Therefore pest to be included should be only those associated with the specific commodity and intended use and thus its regulation would be technically justified</p> <p>Category : <i>SUBSTANTIVE</i></p>

		known not to be associated with the traded commodity described (e.g. pests associated with <i>Mangifera indica</i> for propagation but not with the traded commodity, mango fruit).		
259	85	This section may also include information (<u>but not measures</u>) on pests known to be associated with the plant species but, based on available scientific information, known not to be associated with the traded commodity described (e.g. pests associated with <i>Mangifera indica</i> for propagation but not with the traded commodity, mango fruit).	P	PPPO Adding text to avoid confusion, e.g. the example in the text, or those pests associated with other parts of the plant (e.g. leaf), but may not be associated with the plant part being traded (e.g. fruit). Such pests will not require measures. <i>Category : EDITORIAL</i>
260	85	This section may also include information on pests known to be associated with the plant species but,	P	Japan Relevant explanation about pests known to be associated with the plant species but known not to be associated with the traded commodity should be added to this section, as it is useful for contracting parties to consider import requirements. <i>Category : SUBSTANTIVE</i>

		based on available scientific information, known not to be associated with the traded commodity described (e.g. pests associated with <i>Mangifera indica</i> for propagation but not with the traded commodity, mango fruit). <u>In such case, relevant explanation should be added.</u>		
261	85	This section may also include information on pests known to be associated with the plant species but, based on available scientific information, known not to be associated with the traded commodity described (e.g. pests associated with <i>Mangifera indica</i> for propagation but not with the traded commodity, mango fruit).	P	<p>Uruguay</p> <p>Commodity standards are aimed to provide options for phytosanitary measures for a particular commodity and intended use to facilitate safe trade. There is no reason to include pests that are not associated to the commodity. Pests to be included in a commodity standard would need to be regulated at least for one contracting party for that specific commodity and intended use. Therefore, pests to be included should be only those associated with the specific commodity and intended use and thus its regulation would be technically justified.</p> <p>El objetivo de las normas por producto es dar opciones de medidas fitosanitarias para un producto y uso previsto en particular para facilitar el comercio seguro. No hay razón para incluir plagas que no estén asociadas con el producto. Las plagas que deben incluirse en las normas por producto deben estar reglamentadas por al menos una parte contratante para ese producto y uso previsto. Por lo tanto las plagas a incluir deberían ser solamente las asociadas al producto y uso previsto para los que la reglamentación estaría justificada técnicamente</p> <p>Category : <i>SUBSTANTIVE</i></p>

262	85	En esta sección podrá también figurar información sobre plagas que se sepa que están relacionadas con la especie vegetal, pero que, basándose la información científica disponible, no guardan relación con el producto comercializado descrito (por ejemplo, plagas relacionadas con <i>Mangifera indica</i> para propagación, pero no con el producto comercializado, esto es, el mango).	P	Ecuador Este párrafo no aporta al propósito de la norma y no tampoco proporciona claridad. Las normas por producto deberían ser lo más puntuales y claras como sea posible. Se recomienda aclar o de lo contrario eliminarlo. <i>Category : SUBSTANTIVE</i>
263	86	The list or lists of pests are is not intended to be exhaustive.	P	Costa Rica Commodity-standards will include a list of pests with related options for phytosanitary measures <i>Category : TECHNICAL</i>
264	86	The list or lists of pests are is not intended to be exhaustive.	P	COSAVE Commodity-standards will include a list of pests with related options for phytosanitary measures. Las normas para productos incluirán una lista de plagas con opciones relacionadas a las medidas fitosanitarias. <i>Category : TECHNICAL</i>
265	86	The list or lists of pests are is not intended to be exhaustive.	P	Uruguay Commodity-standards will include a list of pests with related options for phytosanitary measures. Las normas para productos incluirán una lista de plagas con opciones relacionadas a las medidas fitosanitarias. <i>Category : TECHNICAL</i>

266	86	The list or lists of pests are not intended to be exhaustive.	C	South Africa Maybe regular amendments need to be flagged. <i>Category : SUBSTANTIVE</i>
267	86	Las listas de plagas no pretenden ser exhaustivas.	C	Ecuador Se entiende que la lista de plagas no sería completa y ello refuerza la observación para que se establezcan de manera clara los criterios para incluir plagas en las listas <i>Category : SUBSTANTIVE</i>
2.4 Options for phytosanitary measures				
268	88	This section presents options for phytosanitary measures, including measures adopted in ISPMs or currently used in trade. Individual or combinations of measures may be provided for each pest and may relate to any stage or stages of international trade prior to import.	C	Australia Request the steward reconsider this wording as they may not all be phytosanitary measures as defined by ISPM5. Suggest an approach may be to define the critical control points where phytosanitary measures may be applied to mitigate risks in export systems. Onto this framework, commercial production practices (measures, but not necessarily phytosanitary measures) can be overlaid to determine their relative equivalence to mitigate identified risks. <i>Category : TECHNICAL</i>
269	88	This section presents options for phytosanitary measures, including measures adopted in ISPMs or currently used in trade. Individual or combinations of measures may be provided for each	P	China More reasonable and transparent in technology. <i>Category : TECHNICAL</i>

		<p>pest and may relate to any stage or stages of international trade prior to import.</p> <p><u>The phytosanitary measures listed should be supported by public references and listed in the references.</u></p>		
270	88	<p>This section presents options for phytosanitary measures, including measures adopted in ISPMs or <u>ISPMs, currently used in trade that are based on evidence in managing pests.</u> Individual or combinations of measures may be provided for each pest and may relate to any stage or stages of international trade prior to import.</p>	P	<p>United States of America should be evidence based, not historical. Otherwise, there should be very specific criteria provided guiding NPPOs on how to distinguish reliable historical information indicating efficacy from a given volume of trade information. <i>Category : SUBSTANTIVE</i></p>
271	89	<p>Although commodity standards only present <u>options for phytosanitary</u></p>	P	<p>PPPO addition of text- countries can only be provided with options of phytosanitary measures to use. <i>Category : EDITORIAL</i></p>

		measures that may be applied up to the point of import, post-entry measures may <u>also</u> be considered by contracting parties, as described in ISPM 20 (<i>Guidelines for a phytosanitary import regulatory system</i>).		
272	89	Although commodity standards only present measures that may be applied up to the point of <u>import and before</u> import, post-entry measures may be considered by contracting parties, as described in ISPM 20 (<i>Guidelines for a phytosanitary import regulatory system</i>).	P	China Some phytosanitary measures such as in-transit cold treatment could be applied before the point of import. <i>Category : SUBSTANTIVE</i>
273	90	The list or lists of measures are-is not intended to be exhaustive but rather to give countries options for consideration.	P	Costa Rica for consistency <i>Category : TECHNICAL</i>

274	90	The list or lists of <u>phytosanitary</u> measures are-is not intended to be exhaustive but rather to give countries options for consideration.	P	COSAVE For consistency. <i>Category : TECHNICAL</i>
275	90	The list or lists of <u>listed</u> measures are not intended to be exhaustive but rather to give countries options for consideration.	P	PPPO Simplify text <i>Category : EDITORIAL</i>
276	90	The list or lists of <u>phytosanitary</u> measures are-is not intended to be exhaustive but rather to give countries options for consideration.	P	Uruguay For consistency <i>Category : TECHNICAL</i>
277	91	The measures are presented in the table or tables of pests known to be associated with the commodity, with each measure being listed against the corresponding pest or pests that it controls. A description of each measure, sufficient to indicate its use and practical	P	Japan We suggest to include in an appendix the information by which the inclusion of the measures is decided based on Section 4 because such information (e.g. experimental data) is useful for countries to consider the measures to be adopted. Delete "when necessary" and change from "may" to "should" as it is essential to include the information on measures in a commodity standard. <i>Category : SUBSTANTIVE</i>

		<p>application, is provided. When necessary, additional <u>Additional</u> information on the <u>measures, such as the information by which the inclusion of the measures may in a commodity standard is decided based on the criteria set out in Section4, should</u> be included in an appendix.</p>		
278	91	<p>The <u>phytosanitary</u> measures are presented in the table or tables of pests known to be associated with the commodity, with each measure being listed against the corresponding pest or pests that it controlspests. A description of each measure, sufficient to indicate its use and practical application, is provided. When necessary, additional</p>	P	<p>Costa Rica Phytosanitary measures are not aimed to control pests, they are applied to manage pest risk. <i>Category : TECHNICAL</i></p>

		information on the measures may be included in an appendix.		
279	91	The phytosanitary measures are presented in the table or tables of pests known to be associated with the commodity, with each measure being listed against the corresponding pest or pests that it controls pests. A description of each measure, sufficient to indicate its use and practical application, is provided. When necessary, additional information on the measures may be included in an appendix.	P	COSAVE Phytosanitary measures are not aimed to control pests, they are applied to manage pest risk. Las medidas fitosanitarias no están destinadas a controlar plagas, se aplican para gestionar el riesgo de plagas. <i>Category : TECHNICAL</i>
280	91	The measures are presented in the a table or tables of with pests known to be associated with the commodity, with each measure commodity being listed against the	P	Japan We suggest that the structure of the table of measures is rather "Measure A - Pest A, B, C..." than "Pest A - Measure A, B, C..." in alignment with the RSPM on mango as the structure looks more user-friendly. <i>Category : SUBSTANTIVE</i>

		<p>corresponding pest or pests <u>measures</u> that it controls <u>control the pests</u>. A description of each measure, sufficient to indicate its use and practical application, is provided. When necessary, additional information on the measures may be included in an appendix.</p>		
281	91	<p>The <u>phytosanitary</u> measures are presented in the table or tables of pests known to be associated with the commodity, with each measure being listed against the corresponding pest or pests that it controls <u>pests</u>. A description of each measure, sufficient to indicate its use and practical application, is provided. When necessary, additional information on the</p>	P	<p>Uruguay Phytosanitary measures are not aimed to control pests, they are applied to manage pest risk. Las medidas fitosanitarias no están destinadas a controlar plagas, se aplican para gestionar el riesgo de plagas Category : <i>TECHNICAL</i></p>

		measures may be included in an appendix.		
282	91	The measures are presented in the table or tables of pests known to be associated with the commodity, with each measure being listed against the corresponding pest or pests that it controls. A description of each measure, sufficient to indicate its use and practical application, is provided. When necessary, additional information on the measures may be included in an appendix.	C	United States of America First sentence - Please clarify, are there different tables of pests in one annex? Is this separate types (pathogens, arthropods), or by region? Also table or list? <i>Category : SUBSTANTIVE</i>
2.5 References				
283	92	2.5 Reference s	C	United States of America every entry in this annex should be followed by the associated reference proving the information. <i>Category : SUBSTANTIVE</i>
3. Verification of Compliance				
284	94	3. Verificati on-of Compliance	P	Panama Delete section 3 because it does not provide additional guidance for commodity-standards. <i>Category : SUBSTANTIVE</i>
285	94	3. Verificati	P	Costa Rica Delete section 3 because it does not provide additional guidance for commodity-standards. <i>Category : TECHNICAL</i>

		on of Compliance		
286	94	3. Verification of Compliance	P	Uruguay Delete section 3 because it does not provide additional guidance for commodity-standards. Suprimir la sección 3 porque no proporciona orientación adicional para las normas para productos. <i>Category : TECHNICAL</i>
287	94	3. Verification of Compliance	C	Thailand This section could be deleted as it is just a reference to existing standards. However, if this section is retained, others ISPM such as ISPM 23, 27, 28, 31 should also be referred in this section. <i>Category : SUBSTANTIVE</i>
288	94	3. Verification of Compliance	C	United States of America General comment on this section: Perhaps there needs to be a scientific justification section, separate from ISPMs that already list how to verify compliance. <i>Category : SUBSTANTIVE</i>
289	94	3. Verification of Compliance	C	United States of America given the reference to these, which particular ISPMs, which compliance we are looking for, based on what? <i>Category : SUBSTANTIVE</i>
290	95	Several ISPMs provide information on verification of compliance. Examples include ISPM 7 (Phytosanitary certification system), ISPM 12 (Phytosanitary certificates), ISPM 13 (Guidelines for the notification of non-compliance and emergency action), ISPM 18	P	Panama Delete section 3 because it does not provide additional guidance for commodity-standards. <i>Category : TECHNICAL</i>

		<i>(Guidelines for the use of irradiation as a phytosanitary measure) and ISPM 20.</i>		
291	95	Several ISPMs provide information on verification of compliance. Examples include ISPM 7 (<i>Phytosanitary certification system</i>), ISPM 12 (<i>Phytosanitary certificates</i>), ISPM 13 (<i>Guidelines for the notification of non-compliance and emergency action</i>), ISPM 18 (<i>Guidelines for the use of irradiation as a phytosanitary measure</i>) and ISPM 20.	P	Costa Rica Delete section 3 because it does not provide additional guidance for commodity-standards. <i>Category : TECHNICAL</i>
292	95	Several ISPMs provide information on verification of compliance. Examples include ISPM 7 (<i>Phytosanitary certification system</i>), ISPM 12	P	COSAVE Delete section 3 because it does not provide additional guidance for commodity-standards. Suprimir la sección 3 porque no proporciona orientación adicional para las normas para productos. <i>Category : TECHNICAL</i>

		<p><i>(Phytosanitary certificates); ISPM 13 (Guidelines for the notification of non-compliance and emergency action); ISPM 18 (Guidelines for the use of irradiation as a phytosanitary measure) and ISPM 20.</i></p>		
293	95	<p>Several ISPMs provide information on verification of compliance. Examples include ISPM 7 <i>(Phytosanitary certification system)</i>, ISPM 12 <i>(Phytosanitary certificates)</i>, ISPM 13 <i>(Guidelines for the notification of non-compliance and emergency action)</i>, ISPM 18 <i>(Guidelines for the use of irradiation as a phytosanitary measure)</i> and ISPM 20.</p>	P	<p>OIRSA Delete section 3 because it does not provide additional guidance for commodity-standards. Category : <i>SUBSTANTIVE</i></p>
294	95	<p>Several ISPMs provide</p>	C	<p>Caribbean Agricultural Health and Food Safety Agency Jamaica is proposing to include the title of ISPM 20 for consistency. Guidelines for a phytosanitary regulatory system.</p>

		information on verification of compliance. Examples include ISPM 7 (<i>Phytosanitary certification system</i>), ISPM 12 (<i>Phytosanitary certificates</i>), ISPM 13 (<i>Guidelines for the notification of non-compliance and emergency action</i>), ISPM 18 (<i>Guidelines for the use of irradiation as a phytosanitary measure</i>) and ISPM 20.		<i>Category : SUBSTANTIVE</i>
295	95	Several ISPMs provide information on verification of compliance. Examples include ISPM 7 (<i>Phytosanitary certification system</i>), ISPM 12 (<i>Phytosanitary certificates</i>), ISPM 13 (<i>Guidelines for the notification of non-compliance and emergency action</i>),	P	Uruguay Delete section 3 because it does not provide additional guidance for commodity-standards. Suprimir la sección 3 porque no proporciona orientación adicional para las normas para productos. <i>Category : TECHNICAL</i>

		ISPM 18 <i>(Guidelines for the use of irradiation as a phytosanitary measure)</i> and ISPM 20 .		
296	95	Several ISPMs provide information on verification of compliance. Examples include ISPM 7 (<i>Phytosanitary certification system</i>), ISPM 12 (<i>Phytosanitary certificates</i>), ISPM 13 (<i>Guidelines for the notification of non-compliance and emergency action</i>), ISPM 18 (<i>Guidelines for the use of irradiation as a phytosanitary measure</i>) and ISPM 2020 <u>Guidelines for a phytosanitary import regulatory system</u> .	P	Costa Rica consistency with the other ISPM mentioned <i>Category : EDITORIAL</i>
297	95	Several ISPMs provide information on verification of compliance.	C	Jamaica Jamaica proposes to include the title of ISPM 20 for consistency. Guidelines for a phytosanitary regulatory system. <i>Category : EDITORIAL</i>

		Examples include ISPM 7 (<i>Phytosanitary certification system</i>), ISPM 12 (<i>Phytosanitary certificates</i>), ISPM 13 (<i>Guidelines for the notification of non-compliance and emergency action</i>), ISPM 18 (<i>Guidelines for the use of irradiation as a phytosanitary measure</i>) and ISPM 20.		
298	95	Varias NIMF presentan información sobre la verificación del cumplimiento. Algunos ejemplos son la NIMF 7 (<i>Sistema de certificación fitosanitaria</i>), la NIMF 12 (<i>Certificados fitosanitarios</i>), la NIMF 13 (<i>Directrices para la notificación del incumplimiento y acción de emergencia</i>), la NIMF 18	P	Costa Rica Unificar con las indicado en el mismo párrafo para otras NIMF Category : EDITORIAL

		(Directrices para utilizar la irradiación como medida fitosanitaria) y la NIMF 2020 Directrices sobre un sistema fitosanitario de reglamentación de importaciones.		
4. Criteria for Inclusion of Measures in Commodity Standards				
299	96	4. Criteria for Inclusion of Measures in Commodity Standards	C	Canada Move as a sub-section under 2.4. Provides better flow and all relevant information on measures will be contained in one section. <i>Category : SUBSTANTIVE</i>
300	96	4. Criteria for Inclusion of <u>Phytosanitary</u> Measures in Commodity Standards	P	Uruguay For consistency <i>Category : TECHNICAL</i>
301	96	4. Criteria for Inclusion of Measures in Commodity Standards	C	United States of America General comments on section 4.: 1) what is the criteria for measuring efficacy? 2) what is presented in this section is more of the list of suggestions rather than criteria for including measures in an ISPM. The criteria need to be more explicit. Is there an intent on the order? This entire section needs to be rewritten with the overarching focus on scientific evidence that the measure is effective; that would open the door for combinations of measures, and least restrictive measures. If there is no scientific evidence, then historical evidence can be considered (see our previous comments on historical measures). Equivalence should also be considered, such as domestic measures, other activities that would define equivalent measures. See 2.4.2 of RSPM 40, and also selecting measures from RSPM 40. Actual criteria should focus on risk, how measure could be combined meeting ALOP, include evidence supporting both efficacy of and confidence in measures, feasibility of the measures. <i>Category : SUBSTANTIVE</i>
302	97	A <u>phytosanitary</u> measure is considered for inclusion in a	P	Costa Rica For consistency <i>Category : TECHNICAL</i>

		commodity standard when it is, or has been, set as a phytosanitary import requirement by at least one contracting party (and hence in operation between at least two contracting parties) or when included in at least one bilateral arrangement. Inclusion in the standard is further supported if one or more of the following criteria are met:		
303	97	A measure is considered for inclusion in a commodity standard when it is, or has been, set as a phytosanitary import requirement by at least one contracting party (and hence in operation between at least two contracting parties) or when <u>it</u>	P	European Union More logical order because if a measure is included in at least one bilateral agreement, it is in operation between at least two contracting parties. <i>Category : TECHNICAL</i>

		<p>is included in at least one bilateral arrangement, and is hence in operation between at least two contracting parties. Inclusion in the standard is further supported if one or more of the following criteria are met:</p>		
304	97	<p>A measure is considered for inclusion in a commodity standard when its level of effectiveness has been scientifically demonstrated to be acceptable (e.g. phytosanitary treatments adopted as annexes to ISPM 28 (Phytosanitary treatments for regulated pests)) or when it is, or has been, set as a phytosanitary import requirement by at least one contracting party (and hence in</p>	P	<p>European Union The objective criterion of measured or quantitative assessment of the effectiveness of a measure (e.g. the efficacy of a phytosanitary treatment adopted as an annex to ISPM 28 (Phytosanitary treatments for regulated pests)) is missing and should appear first, i.e. before the more subjective or qualitative criteria listed in [98] to [113]. Please also see the addition suggested before [117]. <i>Category : SUBSTANTIVE</i></p>

		operation between at least two contracting parties) or when included in at least one bilateral arrangement. Inclusion in the standard is further supported if one or more of the following criteria are met:		
305	97	A phytosanitary measure is considered for inclusion in a commodity standard when it is, or has been, set as a phytosanitary import requirement by at least one contracting party (and hence in operation between at least two contracting parties) or when included in at least one bilateral arrangement. Inclusion in the standard is further supported if one or more of the	P	COSAVE For consistency <i>Category : TECHNICAL</i>

		following criteria are met:		
306	97	A measure is considered for inclusion in a commodity standard when it is, or has been, set as a phytosanitary import requirement by at least one contracting party <u>party, and it will not harm the quality of commodities</u> (and hence in operation between at least two contracting parties) or when included in at least one bilateral arrangement. Inclusion in the standard is further supported if one or more of the following criteria are met:	P	China Some phytosanitary measures are alternative measures in bilateral arrangements. These measures should not be considered for inclusion in a commodity standard if they are harmful for the quality of commodities. <i>Category : SUBSTANTIVE</i>
307	97	A <u>phytosanitary</u> measure is considered for inclusion in a commodity standard when it is, or has been, set as a phytosanitary	P	Uruguay For consistency <i>Category : TECHNICAL</i>

		import requirement by at least one contracting party (and hence in operation between at least two contracting parties) or when included in at least one bilateral arrangement. Inclusion in the standard is further supported if one or more of the following criteria are met:		
308	97	A measure is considered for inclusion in a commodity standard <u>by the Technical Panel for Commodity Standards</u> when it is, or has been, set as a phytosanitary import requirement by at least one contracting party (and hence in operation between at least two contracting parties) or when included in at least	P	Japan Add "by the Technical Panel for Commodity Standards" as the consideration of measures for inclusion in a commodity standard is conducted by the TPCS. <i>Category : SUBSTANTIVE</i>

		one bilateral arrangement. Inclusion in the standard is further supported if one or more of the following criteria are met:		
309	97	A measure is considered for inclusion in a commodity standard when <u>its level of effectiveness has been scientifically demonstrated to be acceptable (e.g. phytosanitary treatments adopted as annexes to ISPM 28 (Phytosanitary treatments for regulated pests)) or when it is, or has been, set as a phytosanitary import requirement by at least one contracting party (and hence in operation between at least two contracting parties)</u> or when <u>it is</u> included in at	P	<p>EPPO</p> <p>The objective criterion of measured or quantitative assessment of the effectiveness of a measure (e.g. the efficacy of a phytosanitary treatment adopted as an annex to ISPM 28 (Phytosanitary treatments for regulated pests)) is missing and should appear first, i.e. before the more subjective or qualitative criteria listed in [98] to [113]. Please also see the addition suggested before [117].</p> <p>More logical order because if a measure is included in at least one bilateral agreement, it is in operation between at least two contracting parties. <i>Category : TECHNICAL</i></p>

		<p>least one bilateral arrangement, <u>and is hence in operation between at least two contracting parties</u>. Inclusion in the standard is further supported if one or more of the following criteria are met:</p>		
310	97	<p>A measure is considered for inclusion in a commodity standard when it is, or has been, set as a phytosanitary import requirement by at least one contracting party (and hence in operation between at least two contracting parties) or when included in at least one bilateral arrangement. Inclusion in the standard is further supported if one or more of the following criteria are met:</p>	C	<p>United States of America When “there is technically justified scientific evidence”. We understand how these examples could be relevant, however as written, these could be an implementation challenge. The ambiguity of this section may not be very well transferred to these annexes on individual commodities. <i>Category : SUBSTANTIVE</i></p>

311	97	A measure is considered for inclusion in a commodity standard when it is, or has been, set as a phytosanitary import requirement by at least one contracting party (and hence in operation between at least two contracting parties) or when included in at least one bilateral arrangement. Inclusion in the standard is further supported if one or more of the following criteria are met:	C	<p>United States of America Also would be helpful to define a reduction in risk (e.g., safeguarding or compliance) and at which point the measure is applied in commodity supply chain (i.e., field, post-harvest). Category : <i>TECHNICAL</i></p>
312	97	Se estudia <u>considera</u> la inclusión de una medida en una norma para productos cuando al menos una Parte Contratante establece la medida como requisito fitosanitario de importación, o la	P	<p>Costa Rica Termino mas adecuado Category : <i>EDITORIAL</i></p>

		ha establecido previamente —y, por tanto, al menos dos Partes Contratantes la utilizan—, o cuando figura en al menos un acuerdo bilateral. La inclusión en la norma se verá reforzada si se cumplen uno o varios de los criterios siguientes:		
313	98	Experience from use in international trade indicates that the measure is effective. For example:	P	European Union Because [103] to [108] is about domestic use. <i>Category : TECHNICAL</i>
314	98	Experience from use in international trade indicates that the measure is effective. For example:	P	EPPO Because [103] to [108] is about domestic use. <i>Category : TECHNICAL</i>
315	98	La experiencia del uso en el comercio indica que la medida es eficaz. Por ejemplo:	C	Ecuador ¿Cuál sería el mecanismo para recopilar esta información? <i>Category : SUBSTANTIVE</i>
316	99	interception data indicate that the measure is effective	P	China Interception data could only indicate that the measure is non-effective. <i>Category : SUBSTANTIVE</i>

317	99	interception data indicate that the measure is effective	C	United States of America Could it be an indicator that your inspection system is not reliable? <i>Category : SUBSTANTIVE</i>
318	102	information from <u>plant health phytosanitary certification schemes systems</u> indicate that the measure is effective.	P	COSAVE What is intended to include as a criteria is the information from phytosanitary certification systems. Plant health certification schemes is not clear. Spanish version refers to phytosanitary certification schemes. Lo que se pretende incluir como criterio es la información de los sistemas de certificación fitosanitaria. Los esquemas de certificación fitosanitaria no están claros. La versión en español se refiere a los esquemas de certificación fitosanitaria. <i>Category : TECHNICAL</i>
319	102	information from <u>plant health phytosanitary certification schemes systems</u> indicate that the measure is effective.	P	Uruguay What is intended to include as a criteria is the information from phytosanitary certification systems. Plant health certification schemes is not clear. Spanish version refers to phytosanitary certification schemes. Lo que se pretende incluir como criterio es la información de los sistemas de certificación fitosanitaria. Los esquemas de certificación fitosanitaria no están claros. La versión en español se refiere a los esquemas de certificación fitosanitaria. <i>Category : TECHNICAL</i>
320	105	the measure has been used successfully in <u>outbreak management containment and suppression eradication programmes</u>	P	Australia This edit is to clarify that management and suppression measures may not be sufficient to mitigate the risk. This comments may be impacted by our General Comment regarding inconsistent use of Phytosanitary Measure and measure throughout the document. <i>Category : SUBSTANTIVE</i>
321	105	<u>the measure has been used successfully in outbreak management and suppression</u>	P	European Union Suggest to move after [106] for a more logical order. <i>Category : EDITORIAL</i>
322	105	the measure has been used successfully in outbreak	P	China Interception data could only indicate that the measure is non-effective. <i>Category : TECHNICAL</i>

		<u>management and suppression management</u>		
323	105	the measure has been used successfully in outbreak management and suppression	P	EPPO Suggest to move after [106] for a more logical order. <i>Category : EDITORIAL</i>
324	106	results from eradication programmes indicate that the measure is effective	P	Australia This edit is to clarify that management and suppression measures may not be sufficient to mitigate the risk. This comment may be impacted by our General Comment regarding inconsistent use of Phytosanitary Measure and measure throughout the document. <i>Category : TECHNICAL</i>
325	106	results from eradication programmes indicate that the measure is effective- <u>the measure has been used successfully in outbreak management and suppression</u>	P	European Union Moved from [105] for a more logical order. <i>Category : EDITORIAL</i>
326	106	results from eradication programmes indicate that the measure is effective- <u>the measure has been used successfully in outbreak management and suppression</u>	P	EPPO Moved from [105] for a more logical order. <i>Category : EDITORIAL</i>

327	109	Experimental evidence indicates that the measure is effective. For example:	P	Panama Consequential change according to the deletion of the next bullet. <i>Category : EDITORIAL</i>
328	109	Experimental evidence indicates that the measure is effective. For example:	P	COSAVE Consequential change according to the deletion of the next bullet. Cambio consecuente según la eliminación de la siguiente viñeta. <i>Category : EDITORIAL</i>
329	109	Experimental evidence indicates that the measure is effective. For example:.	P	OIRSA Consequential change according to the deletion of the next bullet. <i>Category : TECHNICAL</i>
330	109	Experimental evidence indicates that the measure is effective. For example:	P	Uruguay Consequential change according to the deletion of the next bullet. Cambio como consecuencia de la propuesta de eliminación de la siguiente viñeta. <i>Category : TECHNICAL</i>
331	110	private or public sector research indicates that the measure is effective.	P	Panama To avoid redundancy with previous bullet. <i>Category : EDITORIAL</i>
332	110	private or public sector research indicates that the measure is effective.	P	COSAVE To avoid redundancy with previous bullet. Para evitar redundancia con viñeta anterior. <i>Category : EDITORIAL</i>
333	110	private or public sector research indicates that the measure is effective.	P	OIRSA To avoid redundancy with previous bullet. <i>Category : TECHNICAL</i>
334	110	private or public sector research	P	Japan The experimental data such as efficacy level is also useful to indicate that the measure is effective. <i>Category : SUBSTANTIVE</i>

		indicates that the measure is effective. <u>experimental data (e.g. efficacy level) indicates that the measure is effective.</u>		
335	110	private or public sector research indicates that the measure is effective.	P	Uruguay To avoid redundancy with previous bullet. Para evitar redundancia con viñeta anterior <i>Category : TECHNICAL</i>
336	114	The practicability <u>practicality</u> and feasibility of the measure is also taken into account when a measure is being considered for inclusion in a commodity standard. <u>Practicality and feasibility of a potential measure may also be considered when a member country is assessing the specific suitability of a measure when implementing a commodity standard.</u>	P	Australia This inclusion indicates that practicability and feasibility should also be considered at the time of implementation to ensure countries can implement the relevant measure. <i>Category : SUBSTANTIVE</i>
337	114	The practicability and feasibility of the measure is also	P	Australia This inclusion indicates that practicability and feasibility should also be considered at the time of implementation to ensure countries can implement the relevant measure. <i>Category : TECHNICAL</i>

		<p>taken into account when a measure is being considered for inclusion in a commodity standard.</p> <p><u>Practicability and feasibility of a potential measure may also be considered when a member country is assessing the specific suitability of a measure when implementing a commodity standard</u></p>		
338	114	<p>The practicability and practicability, feasibility and cost of the measure is also taken into account when a measure is being considered for inclusion in a commodity standard.</p>	P	<p>European Union</p> <p>Even if the cost of the measure can be considered as included in the practicability and feasibility of the measure, it is preferable to explicitly mention it because it is an important criteria to take into account when selecting measures to be included in a commodity standard.</p> <p><i>Category : SUBSTANTIVE</i></p>
339	114	<p>The practicability and practicability, feasibility and cost of the measure is also taken into account when a measure is being considered for inclusion in a</p>	P	<p>EPPO</p> <p>Even if the cost of the measure can be considered as included in the practicability and feasibility of the measure, it is preferable to explicitly mention it because it is an important criteria to take into account when selecting measures to be included in a commodity standard.</p> <p><i>Category : SUBSTANTIVE</i></p>

		commodity standard.		
5. Confidence in Measures				
340	115	5. Confidence in Measures	P	<p>Japan See general comment 1.</p> <p>We suggest to delete this section. It is difficult to avoid arbitrary evaluation and to categorize the measures objectively (low, medium, high). There are various types of measures (e.g. treatment, test, pest free area, systems approach) of which the natures and methods are substantially different, so it is quite difficult to sort the measures into three categories in an impartial and rational manner. Confidence in measures may also increase or decrease depending on situation in conducting measures (i.e. outdoor or indoor, density of pests, existence of vectors).</p> <p>Instead of deletion of section 5, we suggest that the information on measures be included in commodity standard as additional information in an appendix as stated in paragraph 91 so that countries can use the information as reference when considering the measures to be adopted. <i>Category : SUBSTANTIVE</i></p>
341	115	5. Confidence in Measures	C	<p>Viet Nam Viet Nam would like to delete this Section <i>Category : EDITORIAL</i></p>
342	115	5. Confidence in Measures	C	<p>Canada Move as a sub-section under 2.4. Provides better flow and all relevant information on measures will be contained in one section. <i>Category : SUBSTANTIVE</i></p>
343	115	5. Confidence in Measures	C	<p>PPPO Please see comment above re. confidence vs efficacy. The three categories also worth further description or clarification so that contracting parties could better understand. <i>Category : SUBSTANTIVE</i></p>
344	115	5. Confidence in Phytosanitary Measures	P	<p>PPPO addition of text <i>Category : EDITORIAL</i></p>
345	115	5. Confidence in Measures	C	<p>Thailand We would like to suggest that ISPM 24 Guidelines for the determination and recognition of equivalence of phytosanitary measures should be recognized for evaluation and categorization of measures and this should also be referred in this section. <i>Category : SUBSTANTIVE</i></p>
346	115	5. Confidence in Efficacy of Measures	P	<p>United States of America More appropriate heading <i>Category : SUBSTANTIVE</i></p>

<p>347</p>	<p>116</p>	<p>Measures are evaluated by the Technical Panel on Commodity Standards and categorized according to confidence in the measure. There are three categories – high, medium and low – and each category is accompanied by an explanatory description. These categories may be based on factors such as:</p>	<p>C</p>	<p>Australia Part 5 Confidence in Measures requires review. It is understood that the thinking may be linked to a desire to include tables like those in ISPM 8, but it appears contradictory for efficacious and technically justified phytosanitary measures or those used in commercial trade to be ranked for confidence of their effectiveness. If not confident that a measure is efficacious and fit-for-purpose, then it should not be included in the ISPM. <i>Category : TECHNICAL</i></p>
<p>348</p>	<p>116</p>	<p>Measures are evaluated by the Technical Panel on Commodity Standards and categorized according to confidence in the measure. There are three categories – high, medium and low – and each category is accompanied by an explanatory description. These categories may be based on factors such as:</p>	<p>P</p>	<p>COSAVE It does not seem appropriate to categorize phytosanitary measures in an ISPM as "high, medium and low". Some measures (e.g. irradiation) might have a short history of use for a given commodity but be of high confidence. Listed factors could lead to a subjective categorization, which would be not correct for an international standard. We suggest not to define categories. It would be better that the TPCS evaluates the measures according the factors described and provide an explanatory description of each measure. No parece apropiado clasificar las medidas fitosanitarias en una NIMF como "alta, media y baja". Algunas medidas (por ejemplo, la irradiación) pueden tener un breve historial de uso para un producto determinado, pero son de gran confianza. Los factores enumerados podrían llevar a una categorización subjetiva, que no sería correcta para un estándar internacional. Sugerimos no definir categorías. Sería mejor que el TPCS evalúe las medidas de acuerdo con los factores descritos y proporcione una descripción explicativa de cada medida. <i>Category : SUBSTANTIVE</i></p>

349	116	<p>Measures are evaluated by the Technical Panel on Commodity Standards and categorized according to Standards to confidence in the measure. There are three categories—high, medium and low—and each category is accompanied by an explanatory description. These categories may be based on factors such as: <u>include a effective phytosanitary measures.</u></p>	P	<p>Korea, Republic of High, medium, low categories are not clear. Category : <i>EDITORIAL</i></p>
350	116	<p>Measures are evaluated by the Technical Panel on Commodity Standards and categorized according to confidence in the measure. There are three categories—high, medium and low—and each category is accompanied by an explanatory</p>	P	<p>Uruguay It does not seem appropriate to categorize phytosanitary measures in an ISPM as "high, medium and low". Some measures (e.g. irradiation) might have a short history of use for a given commodity but be of high confidence. Listed factors could lead to a subjective categorization, which would be not correct for an international standard. We suggest not to define categories. It would be better that the TPCS evaluates the measures according the factors described and provide an explanatory description of each measure. Category : <i>TECHNICAL</i></p>

		description. These categories may be based on factors such as:		
351	116	Measures are evaluated by the Technical Panel on Commodity Standards and categorized according to confidence in the measure. There are three categories – high, medium and low – and each category is accompanied by an explanatory description. These categories may <u>All proposed measures should be based on factors such as science, even if they belong to different categories. The categories to consider may be as follows:</u>	P	United States of America Expectation for harmonization is that all measures are based on science <i>Category : SUBSTANTIVE</i>
352	117	<u>the quantitative assessment of the effectiveness of the measure (e.g. the measured efficacy of a phytosanitary treatment)- the presence of the</u>	P	European Union The objective factor of quantitative assessment of the effectiveness of a measure (e.g. the efficacy of a phytosanitary treatment) is missing and should appear first, i.e. before the more subjective or qualitative factors listed in [117] to [127]. Please also see the addition suggested in the first sentence of [97]. <i>Category : SUBSTANTIVE</i>

		measure in an adopted ISPM		
353	117	- the quantitative assessment of the effectiveness of the measure (e.g. the measured efficacy of a phytosanitary treatment) the presence of the measure in an adopted ISPM	P	EPPO The objective factor of quantitative assessment of the effectiveness of a measure (e.g. the efficacy of a phytosanitary treatment) is missing and should appear first, i.e. before the more subjective or qualitative factors listed in [117] to [127]. Please also see the addition suggested in the first sentence of [97]. <i>Category : SUBSTANTIVE</i>
354	117	[new category] science-based measures with proven efficacy at different places in the pathway the presence of the measure in an adopted ISPM	P	United States of America We propose adding a category using science-based measures, as the first item <i>Category : SUBSTANTIVE</i>
355	119	the history of the use of the measure by contracting parties	C	United States of America If the measure is bilateral, it could be based on agreement and not necessarily backed by science. This approach could continue but it does not belong to a standard, because it could call for harmonization of measures with no actual evidence of the efficacy. <i>Category : SUBSTANTIVE</i>
356	121	the inclusion of the measure in a PRA	P	European Union This factor is included in [122] and is therefore redundant. <i>Category : TECHNICAL</i>
357	121	the inclusion of the measure in a PRA	P	EPPO This factor is included in [122] and is therefore redundant. <i>Category : TECHNICAL</i>
358	122	the number of PRAs that include the measure	C	United States of America This is also not reliable, because PRAs usually have limited application: e.g., endangered areas would differ, level of risk and ALOP would differ, etc. <i>Category : TECHNICAL</i>
359	123	the number of years that the measure has been in use	C	United States of America how would this be categorized? 1 year to -9years and 11 months is low confidence, while 10 years IS ok? Does it depend on the volume of trade, see para 123? <i>Category : TECHNICAL</i>

360	124	reports of success or failure of the measure, including interception data	C	United States of America See US comment above (para 99) on the interceptions during inspection. <i>Category : TECHNICAL</i>
361	127	the number and diversity of countries applying the measures measure.	P	European Union "Measure" in singular for consistency with [117] to [126]. <i>Category : EDITORIAL</i>
362	127	the number and diversity of countries applying the measures. <u>The description of a category should keep its stability relatively, while confidence in a specific measure could be evaluated and adjusted dynamically.</u>	P	China To ensure the stability of the evaluation criteria, and make the work more consistent. <i>Category : SUBSTANTIVE</i>
363	127	the number and diversity of countries applying the measures measure.	P	EPPO "Measure" in singular for consistency with [117] to [126]. <i>Category : EDITORIAL</i>
364	127	the number and diversity of countries applying the measures.	C	United States of America how this will be approached in the absence of specific guidance? <i>Category : SUBSTANTIVE</i>
365	127	le nombre et la diversité des pays qui appliquent les mesures. <u>l'existence d'un accord bilatéral sur</u>	P	Congo l'accord bilatéral revêt un caractère obligatoire, car il est le résultat de la concertation de 2 parties contractantes, de ce fait la mesure retenue dans ledit accord ne peut qu'être fondée et pertinente. <i>Category : TECHNICAL</i>

		la mesure entre parties contractantes		
366	128	Confidence depends on the rigour of any supporting analyses and may be increased if there are cumulative sources of evidence, such as information on usage or acceptance.	C	Australia Additional to the above, it is unclear how this rigour will be assessed. For example, will factors be equally ranked or weighted? It is likely that rigour will be disputed and a mechanism for resolution required. The approach is also likely to result in issues where the export and import countries disagree on the stringency and/or confidence given to an option proposed as a measure. <i>Category : TECHNICAL</i>
367	128	Confidence depends on the rigour of any supporting analyses and may be increased if there are cumulative sources of evidence, such as information on usage or acceptance.	C	United States of America there is no specific guidance on the meaning for the level of confidence of supporting analysis. <i>Category : SUBSTANTIVE</i>
6. Publication of Annexes				
368	129	6. Publication of Annexes Commodity-standards	P	Panama For consistency. <i>Category : TECHNICAL</i>
369	129	6. Publication of Annexes Commodity-standards	P	Costa Rica For consistency <i>Category : TECHNICAL</i>

		on of Annexes Commodity standard		
370	129	6. Publicati on of Annexes Commodity-standards	P	COSAVE For consistency. <i>Category : TECHNICAL</i>
371	129	6. Publicati on of Annexes Commodity Standards	P	OIRSA For consistency <i>Category : EDITORIAL</i>
372	129	6. Publicati on of Annexes Commodity-standards	P	Uruguay For consistency <i>Category : TECHNICAL</i>
373	130	After adoption by the Commission on Phytosanitary Measures (CPM), commodity-specific standards; containing lists of pests and options for phytosanitary measures for commodities being moved in international trade, are posted separately on the IPP as annexes to this standard. These annexes	P	Panama 1) Redundant 2) For consistency with ISPM 28 <i>Category : TECHNICAL</i>

		<p>have the status of an ISPM and should be considered accordingly.</p> <p>Where appropriate, commodity standards may instead be presented as annexes of other ISPMs.</p>		
374	130	<p>After adoption by the Commission on Phytosanitary Measures (CPM), commodity-specific standards; containing lists of pests and options for phytosanitary measures for commodities being moved in international trade, are posted separately on the IPP as annexes to this standard. These annexes have the status of an ISPM and should be considered accordingly.</p> <p>Where appropriate, commodity standards may</p>	P	<p>Costa Rica 1) Redundant, 2) For consistency with ISPM 28 <i>Category : TECHNICAL</i></p>

		instead be presented as annexes of other ISPMs.		
375	130	<p>After adoption by the Commission on Phytosanitary Measures (CPM), commodity-specific standards, containing lists of pests and options for phytosanitary measures for commodities being moved in international trade, standards are posted separately on the IPP as annexes to this standard. These annexes have the status of an ISPM and should be considered accordingly. Where appropriate, commodity standards may instead be presented as annexes of other ISPMs.</p>	P	<p>COSAVE 1) Redundant 2) For consistency with ISPM 28</p> <p>1) Redundante 2) Para mantener la coherencia con la NIMF 28 Category : <i>TECHNICAL</i></p>
376	130	<p>After adoption by the Commission on Phytosanitary Measures (CPM),</p>	P	<p>OIRSA 1) Redundant, 2) For consistency with ISPM 28 Category : <i>TECHNICAL</i></p>

	<p>commodity-specific standards, containing lists of pests and options for phytosanitary measures for commodities being moved in international trade, are posted separately on the IPP as annexes to this standard. These annexes have the status of an ISPM and should be considered accordingly.</p> <p>Where appropriate, commodity standards may instead be presented as annexes of other ISPMs.</p> <p><u>After adoption by the Commission on Phytosanitary Measures (CPM), commodity-specific standards, containing lists of pests and options for phytosanitary measures for commodities being moved in international trade, standards are posted separately on the IPP as annexes to</u></p>		
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		<p><u>this standard. These annexes have the status of an ISPM and should be considered accordingly. Where appropriate, commodity standards may instead be presented as annexes of other ISPMs.</u></p>		
377	130	<p>After adoption by the Commission on Phytosanitary Measures (CPM), commodity-specific standards, containing lists of pests and options for phytosanitary measures for commodities being moved in international trade, are posted separately on the IPP as annexes to this standard. These annexes have the status of an ISPM and should be considered accordingly. Where appropriate, commodity standards may instead be presented as</p>	P	<p>Uruguay 1) Redundant, 2) For consistency with ISPM 28 1) Redundante, 2) Para mantener la coherencia con la NIMF 28 <i>Category : TECHNICAL</i></p>

		annexes of other ISPMs.		
378	130	After adoption by the Commission on Phytosanitary Measures (CPM), commodity-specific standards, containing lists of pests and options for phytosanitary measures for commodities being moved in international trade, are posted separately on the IPP as annexes to this standard. These annexes have the status of an ISPM and should be considered accordingly. Where appropriate, commodity standards may instead be presented as annexes of other ISPMs.	C	Jamaica "containing lists of pests and options for phytosanitary measures for commodities being moved in international trade, are posted separately on the IPP as annexes to this standard is repetitive and can be deleted." <i>Category : SUBSTANTIVE</i>
7. Review and Re-evaluations				
379	132	Contracting parties should submit to the IPPC Secretariat any new information	P	Panama CPM will not adopt lists of pests or lists of phytosanitary measures, it will adopt commodity standards containing these lists. <i>Category : SUBSTANTIVE</i>

		<p>that could have an impact on the lists of pests or lists of options for phytosanitary measures commodity standards currently adopted by the CPM. Appropriate information should be provided to support any claims. The Technical Panel on Commodity Standards will review the data and revise the lists standards if necessary, following the Standard setting process.</p>		
380	132	<p>Contracting parties should submit to the IPPC Secretariat any new information that could have an impact on the lists of pests or lists of options for phytosanitary measures commodity-standards currently adopted by the</p>	P	<p>Costa Rica CPM will not adopt lists of pests or lists of phytosanitary measures, it will adopt commodity standards containing these lists. <i>Category : SUBSTANTIVE</i></p>

		<p>CPM. Appropriate information should be provided to support any claims. The Technical Panel on Commodity Standards will review the data and revise the lists standards if necessary, following the Standard setting process.</p>		
381	132	<p>Contracting parties should submit to the IPPC Secretariat any new information that could have an impact on the lists of pests or lists of options for phytosanitary measures commodity-standards currently adopted by the CPM. Appropriate information should be provided to support any claims. The Technical Panel on Commodity Standards will review the data</p>	P	<p>COSAVE CPM will not adopt lists of pests or lists of phytosanitary measures, it will adopt commodity standards containing these lists.</p> <p>La CMF no adoptará listas de plagas o listas de medidas fitosanitarias, adoptará normas para productos que contengan estas listas. Category : <i>TECHNICAL</i></p>

		and revise the lists standards if necessary, following the Standard setting process.		
382	132	Contracting parties should submit to the IPPC Secretariat any new information that could have an impact on the lists of pests or lists of options for phytosanitary measures commodity-standards currently adopted by the CPM. Appropriate information should be provided to support any claims. The Technical Panel on Commodity Standards will review the data and revise the lists standards if necessary, following the Standard setting process.	P	<p>Uruguay CPM will not adopt lists of pests or lists of phytosanitary measures, it will adopt commodity standards containing these lists.</p> <p>La CMF no adoptará listas de plagas o listas de medidas fitosanitarias, adoptará normas para productos que contengan estas listas. <i>Category : TECHNICAL</i></p>
383	132	Contracting parties should submit to the IPPC	P	<p>United States of America reporting to TPCS/ Secretariat any implementation issues and periodic re-evaluation to show that the measures are on target - that is in addition to reporting on pests mentioned in the draft. <i>Category : SUBSTANTIVE</i></p>

		<p>Secretariat any new information on implementation that could have an impact on the lists of pests or lists of options for phytosanitary measures currently adopted by the CPM. Appropriate information should be provided to support any claims. The Technical Panel on Commodity Standards will review the data and revise the lists if necessary, following the Standard setting process.</p>		
384	132	<p>Contracting parties should submit to the IPPC Secretariat any new information that could have an impact on the lists of pests or lists of options for phytosanitary measures currently adopted by the CPM. Appropriate information should</p>	C	<p>Nigeria claim <i>Category : EDITORIAL</i></p>

		be provided to support any claims . The Technical Panel on Commodity Standards will review the data and revise the lists if necessary, following the Standard setting process.		
385	133	Potential implementation issues	C	<p>Australia</p> <p>The concept of commodity standards, while having been discussed for some time, is only now being clearly articulated. Material to support understanding of the concept of commodity standards, similar to that provided to the regional workshops, that clearly outlines the scope, intent and principles, would be beneficial for those countries with established and well-resourced biosecurity systems. For countries implementing commodity standards to facilitate trade, an assessment of the critical factors necessary for an NPPO to effectively implement a commodity standard, and exploring the barriers that the commodity standard cannot overcome would be beneficial. By doing so explicitly as part of the development process would give opportunity to develop a more robust ISPM, provide further confidence that measure options are fit for purpose and may assist adoption.</p> <p><i>Category : SUBSTANTIVE</i></p>
386	133	Potential implementation issues	C	<p>Canada</p> <p>Potentially, some countries might struggle with surveillance and setting up PFAs for a specific pest identified in the commodity standard. Suggest the inclusion of specific guidance for surveillance/PFA for pests as part of the proposed measures.</p> <p><i>Category : SUBSTANTIVE</i></p>
387	134	This section is not part of the standard. To allow the Secretariat to gather information on any potential implementation issues related to this draft, please provide details of potential implementation issues and	P	<p>European Union</p> <p>Typo: a dot missing at the end of the sentence.</p> <p><i>Category : EDITORIAL</i></p>

		proposals on how to address them.		
388	134	This section is not part of the standard. To allow the Secretariat to gather information on any potential implementation issues related to this draft, please provide details of potential implementation issues and proposals on how to address them <u>Decision on prioritising commodities for which there is common interest between countries. Possible high costs associated with development of standards due to high diversity of commodities and group of commodities of interest to contracting parties.</u>	P	PPPO addition of two paragraphs <i>Category : EDITORIAL</i>
389	134	This section is not part of the standard. To allow the Secretariat to	P	EPPO Typo: a dot missing at the end of the sentence. <i>Category : EDITORIAL</i>

		gather information on any potential implementation issues related to this draft, please provide details of potential implementation issues and proposals on how to address them.		
390	134	This section is not part of the standard. To allow the Secretariat to gather information on any potential implementation issues related to this draft, please provide details of potential implementation issues and proposals on how to address them	C	<p>United States of America</p> <p>Some implementation issues are mentioned through the text. Mostly, it is absence of clear criteria in inclusion of measures in Section 4 and in evaluating the proposed measures in Section 5. Further developing of this draft should be put on hold, until the conceptual ISPM on Pest risk management is adopted to avoid further confusion in understanding relationship of measures to risk.</p> <p><i>Category : SUBSTANTIVE</i></p>