

## 2021 FIRST CONSULTATION

1 July – 30 September 2021

### Compiled comments for "2021 First Consultation: Draft Annex to ISPM 20: Use of Specific Import Authorizations (2008-006)"

#### Summary

Name	Summary
EPPO Σ	Comments from the EPPO countries
European Union	The comments on this draft standard have been entered into the OCS by the European Commission on behalf of the EU and its member States.
Nepal	No comments
Singapore	Singapore is supportive of these changes.
South Africa	The NPPOZA is in agreement with this draft and has no further comments
Venezuela	La parte técnica del Organismo Fitosanitario de Venezuela, al analizar el proyecto de NIMF:concluyo estar de acuerdo con lo planteado por el Grupo de debate sobre normas

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

FAO sequential number	Para	Text	T	Comment
1	G	(General Comment)	C	<b>Argentina</b> We support the comments submitted by COSAVE <i>Category : SUBSTANTIVE</i>
2	G	(General Comment)	C	<b>Nepal</b> Nepal has no comments on Draft ANNEX TO ISPM 20: Use of specific import authorizations <i>Category : EDITORIAL</i>
3	G	(General Comment)	C	<b>Japan</b> It is necessary to clarify the range of application of specific import authorizations (SIAs) for phytosanitary purposes. Specific import authorizations (SIAs) are used in a wide range of purposes under phytosanitary activities, and moreover there are facts that each country is used in various forms. If the range of application of SIAs is not clarified, the ISPM results in guaranteeing "import restrictions". It is necessary to further research and organize the cases of each country and carefully consider them, including revision of the contents of Section 4.2.2 "Import authorization" of ISPM20. SIAs are "official consent for the import of specific regulated articles", and their forms include "license" and "permit". The examples of SIAs for phytosanitary purposes are as below: (a) When plants for which phytosanitary requirements have not been determined or the imports are prohibited are imported for the purpose of "cases" (*1) described in Section 4.2.2 of ISPM20. (b) If phytosanitary requirements have been established, regulated articles are usually imported under "4.2.1 Phytosanitary measures for consignments to be imported". However, for the purpose of "cases" (*1) described in Section 4.2.2 of ISPM20, when the regulated articles are imported as SIAs without going through the general process. (c) When a SIA is used for the purpose of "specifying phytosanitary import requirements" for the regulated articles for which phytosanitary requirements have been determined. However, especially in the case of (c), the purpose of SIAs is ambiguous, and it may become an "import restriction"

				<p>depending on the situation.</p> <p>Excerpt from Section 4.2.2 Import authorization of ISPM20</p> <p>*1 Cases where this type of authorization may be required include:</p> <ul style="list-style-type: none"> <li>- emergency or exceptional imports</li> <li>- imports with specific, individual phytosanitary import requirements such as those with post-entry quarantine requirements or designated end use or research purposes</li> </ul> <p>imports where the NPPO requires the ability to trace the material over a period of time after entry.</p> <p><i>Category : SUBSTANTIVE</i></p>
4	G	(General Comment)	C	<p><b>Japan</b></p> <p>Regarding "5. General import authorizations", it should specify what kind of cases are applicable to "General import authorization (GIA)". In particular, it is not clear about the differences between GIA and "4.2.1 Phytosanitary measures for consignments to be imported" of ISPM20.</p> <p><i>Category : SUBSTANTIVE</i></p>
5	G	(General Comment)	C	<p><b>Mexico</b></p> <p>Mexico supports OIRSA's comments</p> <p><i>Category : SUBSTANTIVE</i></p>
6	G	(General Comment)	C	<p><b>Canada</b></p> <p>Canada supports the draft Annex to ISPM 20. Few comments are submitted for consideration.</p> <p><i>Category : SUBSTANTIVE</i></p>
7	G	(General Comment)	C	<p><b>South Africa</b></p> <p>The NPPOZA is in agreement with this draft and has no further comments</p> <p><i>Category : EDITORIAL</i></p>
8	G	(General Comment)	C	<p><b>Korea, Republic of</b></p> <p>It should be clear SIAs are issued for a specific consignment or a specific commodity. Rep. of Korea think specific consignment is more proper.</p> <p><i>Category : EDITORIAL</i></p>
9	G	(General Comment)	C	<p><b>Colombia</b></p> <p>Antecedentes NIMF 20: Guidelines for a phytosanitary import regulation system The proposed annex seeks to be part of the ISPM 20 standard, which has the following scope:</p> <p>Scope This standard describes the structure and operation of a phytosanitary import regulatory system, as well as the rights, obligations, and responsibilities to be considered when establishing, operating, and reviewing the system. In another part of ISPM 20, when addressing the regulatory framework, the following is stated:</p> <p>4. Regulatory framework The government (contracting party) is responsible for promulgating regulations (Article IV.3c of the IPPC). Contracting parties, consistent with this responsibility, may grant authority to the NPPO to formulate phytosanitary import regulations and the implementation of the import regulatory system. Contracting parties should have in place a regulatory framework.... ... Contracting parties are required to make their regulations available upon request in accordance with Article VII.2(b) of the IPPC; these procedures may require a regulatory basis.</p> <p>Regarding phytosanitary measures, it defines the following:</p> <p>4.2 Phytosanitary measures for regulated articles Contracting parties should not apply phytosanitary measures to the entry of regulated articles, such as prohibitions,</p>

				<p>restrictions, or other phytosanitary import requirements, unless phytosanitary considerations warrant them as necessary and technically justified. Contracting parties should consider, as appropriate, international standards, and other relevant IPPC requirements and considerations when applying phytosanitary measures.</p> <p>Regarding the power of each country to issue import authorization, they note:</p> <p>4.2.2 Import Authorization  Import authority may be granted as a general authorization or by specific authorization on a case-by-case basis.  General import authorization  General import authorizations may be used  - when there are no phytosanitary import requirements.  when specific phytosanitary import requirements have been established allowing entry, as provided for in the regulations for several commodities.  General import authorizations should not require a license or permit; however, they may be subject to review at import.  Specific import authorization  Where official consent to import is required, specific import authorizations may be required, e.g., by means of a license or permit, which may be required for individual shipments or for a series of shipments from a particular origin. Among the cases in which this type of authorization is required are:  - emergency or exceptional imports  - imports with specific, individual phytosanitary import requirements such as those with post-entry quarantine or designated end-use requirements or for research purposes  - imports for which the NPPO requires traceability of the material for a certain period after entry.</p> <p>It has been observed that some countries use permits to specify general conditions for imports; nevertheless, when specific authorizations that are similar become a regular process, the development of general type authorizations will be encouraged.  Regarding this item, the proposed annex includes:  Considerations:</p> <ul style="list-style-type: none"> <li>• The annex describes the situations in which NPPOs may issue these authorizations, the information they should contain and the respective responsibilities of ISPMs.</li> <li>• Its application would be applied on a case-by-case basis and adapted to each import situation.</li> <li>• It addresses permissions for individual shipments or for a series of shipments.</li> </ul> <p>Nevertheless, the proposed annex does not include:</p> <ul style="list-style-type: none"> <li>• How to provide technical justification for specific authorizations.</li> <li>• The process for evaluating and establishing specific import authorizations.</li> <li>• The process for requesting a specific import authorization.</li> <li>• The way requests or applications for specific authorizations will be considered.</li> </ul> <p>Implementation issues  The annex outlines a scheme that addresses exceptional conditions where NPPOs define specific authorization under certain conditions that warrant it, based on the principle of country sovereignty. But in the proposal, these specific authorizations could be made routine, and in that case, it would become a general import authorization. It is not clear whether this condition would revert to a risk assessment process or legalize those conditions required in a phytosanitary requirement.</p> <p>Summarizing, the annex seems to propose a second way for the establishment of phytosanitary requirements in the countries, without a proposal to make their operation viable with technical justification and leaving the exceptional conditions within the reach of any user. This would cause importers to submit their requests as an exceptional situation in order to have an expeditious process for their request and the NPPOs would be faced with a growing increase in requests without having a defined process to evaluate and establish specific authorizations.</p>
--	--	--	--	---

				<p>Consequently, we found no technical support to harmonize specific authorization and general authorization for the establishment of requirements with the framework for pest risk analysis ISPM No. 2 (2007), ISPM No. 11 Pest risk analysis for quarantine pests, including environmental risk analysis and living modified organisms, as well as ISPM No. 3 (2005). Guidelines for the export, shipment, import and release of biological agents and other beneficial organisms, nor ISPM No. 21 (2004), Pest risk analysis for regulated non-quarantine pests. In our view, the proposed annex would run counter to the operating principles of the IPPC related to the establishment, implementation and monitoring of phytosanitary measures and the management of official phytosanitary systems (ISPM No. 1). Therefore, we consider that this annex should delimit how these import authorizations would operate within NPPOs and make them operational within the import authorization system, without affecting the risk analysis framework established by the IPPC. Otherwise, refrain from moving forward with this annex to ISPM 20.</p> <p><i>Category : SUBSTANTIVE</i></p>
10	G	(General Comment)	C	<p><b>Switzerland</b> Switzerland would like to formally endorse the EPPO comments submitted via the IPPC Online Comment System</p> <p><i>Category : TECHNICAL</i></p>
11	G	(General Comment)	C	<p><b>Jamaica</b> Jamaica supports the comments from the IPPC Caribbean Regional Workshop.</p> <p><i>Category : SUBSTANTIVE</i></p>
12	G	(General Comment)	C	<p><b>IPPC Regional Workshop Africa</b> Malawi supports the draft</p> <p><i>Category : SUBSTANTIVE</i></p>
13	G	(General Comment)	C	<p><b>Barbados</b> This is a good guide for NPPOs and allows for improvement in any current documents (SIAs)</p> <p><i>Category : SUBSTANTIVE</i></p>
14	G	(General Comment)	C	<p><b>COSAVE</b> We highlight the importance of having better traslation into Spanish in order to be consistent with the English version. Se destaca la importancia de contar con traducciones al español que reflejen mejor el contenido de la versión en inglés</p> <p><i>Category : TRANSLATION</i></p>
15	G	(General Comment)	C	<p><b>Uruguay</b> We highlight the importance of having better translation into Spanish in order to be consistent with the English version</p> <p><i>Category : TRANSLATION</i></p>
16	G	(General Comment)	C	<p><b>Caribbean Agricultural Health and Food Safety Agency</b> T&amp;T endorses the draft Annex to ISPM 20 . In T&amp;T several scenarios for Research and scientific purposes and Exhibition purposes</p> <p><i>Category : SUBSTANTIVE</i></p>
17	G	(General Comment)	C	<p><b>Caribbean Agricultural Health and Food Safety Agency</b> We support the document and we have no issues with the adoption of the standard.</p> <p><i>Category : SUBSTANTIVE</i></p>
18	G	(General Comment)	C	<p><b>Caribbean Agricultural Health and Food Safety Agency</b> No objections at this time.</p> <p><i>Category : SUBSTANTIVE</i></p>
19	G	(General Comment)	C	<p><b>Caribbean Agricultural Health and Food Safety Agency</b> The draft annex is okay as presented.</p> <p><i>Category : TECHNICAL</i></p>
20	G	(General Comment)	C	<p><b>Caribbean Agricultural Health and Food Safety Agency</b> This is a good guide for NPPOs and allow for improvement in any current documents (SIAs)</p> <p><i>Category : EDITORIAL</i></p>
21	G	(General Comment)	C	<p><b>Caribbean Agricultural Health and Food Safety Agency</b> The Bahamas supports the draft Annex to ISPM 20 for the use of specific import authorizations.</p>

				<i>Category : SUBSTANTIVE</i>
22	G	(General Comment)	C	<b>Malawi</b> No substantive on this draft annex <i>Category : SUBSTANTIVE</i>
23	G	(General Comment)	C	<b>United States of America</b> The major concern here is that instead of harmonizing the understanding of SIA, CPs might start imposing issuance of PCs on the organisms that are not regulated by some NPPOs. <i>Category : SUBSTANTIVE</i>
24	G	(General Comment)	C	<b>Saint Vincent and The Grenadines</b> This is a useful annex . It would be useful in our context. <i>Category : TECHNICAL</i>
25	G	(General Comment)	C	<b>Bahrain</b> Bahrain has no comments <i>Category : SUBSTANTIVE</i>
26	G	(General Comment)	C	<b>Mexico</b> México apoya los comentarios de OIRSA <i>Category : SUBSTANTIVE</i>
27	G	(General Comment)	C	<b>Panama</b> Se considera necesario incluir un párrafo en el que se señale el requisito a derivar de una evaluación de riesgo, como parte de las obligaciones de las ONPF para las autorizaciones específicas <i>Category : SUBSTANTIVE</i>
28	G	(General Comment)	C	<b>Nicaragua</b> Se considera necesario incluir un párrafo en el que se señale el requisito a derivar de una evaluación de riesgo, como parte de las obligaciones de las ONPF. <i>Category : TECHNICAL</i>
29	G	(General Comment)	C	<b>OIRSA</b> Se considera necesario incluir un párrafo en el que se señale el requisito a derivar de una evaluación de riesgo, como parte de las obligaciones de las ONPF. <i>Category : SUBSTANTIVE</i>
Draft ANNEX TO ISPM 20: Use of specific import authorizations (2008-006)				
30	1	<b>DRAFT ANNEX TO ISPM 20: USE OF SPECIFIC IMPORT AUTHORIZATIONS (2008-006)</b>	C	<b>Bhutan</b> Well drafted, and necessary document as part of annexure. No specific comments from NPPO Bhutan on this document. <i>Category : SUBSTANTIVE</i>
31	12	11/2016 Le Comité des normes (CN) a approuvé la spécification 64 (Utilisation d'autorisations d'importer spécifiques) par	P	<b>Congo</b> faire usage du titre authentique <i>Category : EDITORIAL</i>

		décision électronique (2016_eSC_May_05).		
ANNEX 2: Use of specific import authorizations				
32	24	<b>ANNEX 2: Use of specific import authorizations</b>	C	<b>COSAVE</b> 1) For consistency with Spanish versión of ISPM 20 "specific import authorization" should be translated into Spanish as "autorizaciones específicas de importación". 2) "specify" in the first sentence should be translated as "especifican" or other synonym, but not as establish because SIAs do not establish phytosanitary import requirements <i>Category : TRANSLATION</i>
33	24	<b>ANNEX 2: Use of specific import authorizations</b>	C	<b>Uruguay</b> For consistency with Spanish version of ISPM 20 "specific import authorization" should be translated into Spanish as "autorizaciones específicas de importación" <i>Category : TRANSLATION</i>
34	24	<b>ANNEXE 2: Utilisation d'autorisations d'importer spécifiques</b>	P	<b>Congo</b> faire usage du titre authentique <i>Category : EDITORIAL</i>
35	25	<u>Specific- For some specific regulated articles, phytosanitary import requirements have not been established or their imports are prohibited. In those cases, specific import authorizations (SIAs) as referred to in this standard (section 4.2.2) may provide official consent for</u>	P	<b>Japan</b> As pointed out in the general comment from Japan, proposed revision of the texts should clarify the range of application of Specific import authorizations (SIAs) for phytosanitary purposes. In particular, since the content of the second sentence is unclear, a part of 2nd sentence is moved to a new 1st sentence to clarify that the purpose of SIAs is to import the specific articles for which "phytosanitary import requirements have not been established" and "the imports are prohibited". In new 2nd sentence, it is to clarify that SIAs "provide official consent for the import" and SIAs are used for "the purpose of the cases described in Section 4.2.2 of this standard." In the last sentence, add information because it is not clear why SIAs do not replace the obligation of the NPPO of the importing country. <i>Category : SUBSTANTIVE</i>

		<p>the import of <del>these</del> specific regulated articles <del>for the</del> <del>purpose of the</del> <del>cases of SIAs in</del> <del>Section 4.2.2 of</del> <del>this standard</del> and specify phytosanitary import requirements for those articles. Specific import authorizations may be used <del>when</del> <del>official consent for</del> <del>import is</del> <del>necessary, or when</del> <del>to specify</del> phytosanitary import <del>requirements have</del> <del>not been</del> <del>established</del><del>require</del> <del>ments, or when</del> <del>import would</del> <del>otherwise be</del> <del>prohibited.</del> <del>Specific import</del> <del>but the</del> authorizations do not replace the obligation of the national plant protection organization (NPPO) of the importing country</p>		
--	--	--	--	--

		to communicate the phytosanitary import requirements to the NPPO of the exporting country.		
36	25	<p><del>Specific- For some specific regulated articles, phytosanitary import requirements have not been established or their imports are prohibited. In those cases, specific import authorizations (SIAs) as referred to in this standard (section 4.2.2) may provide official consent for the import of these specific regulated articles for the purpose of the cases of SIAs in Section 4.2.2 of this standard and specify phytosanitary import requirements for those articles. Specific import authorizations</del></p>	P	<p><b>Japan</b></p> <p>As pointed out in the general comment from Japan, proposed revision of the texts should clarify the range of application of Specific import authorizations (SIAs) for phytosanitary purposes.</p> <p>In particular, since the content of the second sentence is unclear, a part of 2nd sentence is moved to a new 1st sentence to clarify that the purpose of SIAs is to import the specific articles for which "phytosanitary import requirements have not been established" and "the imports are prohibited".</p> <p>In new 2nd sentence, it is to clarify that SIAs "provide official consent for the import" and SIAs are used for "the purpose of the cases described in Section 4.2.2 of this standard."</p> <p>In the last sentence, add information because it is not clear why SIAs do not replace the obligation of the NPPO of the importing country.</p> <p><i>Category : SUBSTANTIVE</i></p>



		<p>may be used <del>when official consent for import is necessary, or when to specify</del> phytosanitary import <del>requirements have not been established</del> <u>requirements</u>, <del>or when import would otherwise be prohibited.</del> <u>Specific import but the</u> authorizations do not replace the obligation of the national plant protection organization (NPPO) of the importing country to communicate the phytosanitary import requirements to the NPPO of the exporting country.</p>		
37	25	Specific import authorizations (SIAs) as referred to in this standard (section 4.2.2) provide official consent for the import of specific	P	<p><b>European Union</b> Improvement to make clear that this prohibition is not for non-phytosanitary reasons. <i>Category : TECHNICAL</i></p>

		<p>regulated articles and specify phytosanitary import requirements for those articles. Specific import authorizations may be used when official consent for import is necessary, or when phytosanitary import requirements have not been established, or when import would otherwise be <del>prohibited</del><a href="#">prohibited for phytosanitary reasons</a>. Specific import authorizations do not replace the obligation of the national plant protection organization (NPPO) of the importing country to communicate the phytosanitary import requirements to</p>		
--	--	--	--	--

		the NPPO of the exporting country.		
38	25	Specific import authorizations (SIAs) as referred to in this standard (section 4.2.2) provide official consent for the import of specific regulated articles and specify phytosanitary import requirements for those articles. Specific import authorizations may be used when official consent for import is necessary, or when phytosanitary import requirements have not <u>yet</u> been <u>established</u> <del>establis</del> <u>hed or cannot be fulfilled</u> , or when import would otherwise be prohibited. Specific import authorizations do not replace the obligation of the national plant protection	P	<p><b>European Union</b></p> <p>1) Proposal to improve the text through the addition of “yet” because a specific import authorisation can only be given when phytosanitary import requirements are available (see paragraph 40).</p> <p>2) An official consent for import can also be provided (e.g. for scientific purposes) if phytosanitary import requirements have already been established but cannot be fulfilled for the consignment. In our opinion, this is not equivalent to “when import would otherwise be prohibited”.</p> <p><i>Category : TECHNICAL</i></p>

		organization (NPPO) of the importing country to communicate the phytosanitary import requirements to the NPPO of the exporting country.		
39	25	Specific import authorizations (SIAs) as referred to in this standard (section 4.2.2) provide official consent for the import of specific regulated articles and specify phytosanitary import requirements for those articles. Specific import authorizations may be used when official consent for import is necessary, or when phytosanitary import requirements have not been established, or when import would otherwise be prohibited. <a href="#">Specific import</a>	P	<b>European Union</b> Proposal to improve the text with a more precise wording to be consistent with the rest of the Standard (section 5.1.9.2) and with the Convention. <i>Category : TECHNICAL</i>

		<p><del>authorizations do not replace the obligation. Even when using SIAs as part of the national plant protection organization (NPPO) of the importing country their phytosanitary regulatory import regime, NPPOs are still required to communicate the make their</del></p> <p>phytosanitary import requirements <del>to the NPPO</del> available as described in section 5.1.9.2 of this standard and in article VII.2.b of the <del>exporting country</del> Convention.</p>		
40	25	<p>Specific import authorizations (SIAs) as referred to in this standard (section 4.2.2) provide official consent <del>for the to</del> import <del>of</del> specific regulated articles and specify</p>	P	<p><b>PPPO</b></p> <p>The exporting country NPPO should also duly meet and satisfy the importing country phytosanitary requirements where a formal pathway has not yet been established.</p> <p>Category : EDITORIAL</p>

		<p>phytosanitary import requirements for those articles. Specific import authorizations may be used when official consent for import is necessary, or when phytosanitary import requirements have not been established, or when import would otherwise be prohibited. Specific import authorizations do not replace the obligation of the <u>importing country's</u> national plant protection organization (NPPO) <del>of the importing country</del> to communicate the phytosanitary import requirements to the NPPO of the exporting country.</p>		
41	25	Specific import authorizations (SIAs) as referred	P	<p><b>Korea, Republic of</b>  we suggest adding the phrase to explain that SIA is not mean the import permit.  Category : <i>SUBSTANTIVE</i></p>

		<p>to in this standard (section 4.2.2) provide official consent for the import of specific regulated articles and specify phytosanitary import requirements for those articles.</p> <p><u>SIAs should be distinguished from general import permit which allows import of a consignment that's phytosanitary import requirements have been set.</u> Specific import authorizations may be used when official consent for import is necessary, or when phytosanitary import requirements have not been established, or when import would otherwise be prohibited. Specific import authorizations do not replace the</p>		
--	--	---	--	--

		obligation of the national plant protection organization (NPPO) of the importing country to communicate the phytosanitary import requirements to the NPPO of the exporting country.		
42	25	Specific import authorizations (SIAs) as referred to in this <del>standard</del> <del>(section 4.2.2)</del> <u>standard</u> provide official consent for the import of specific regulated articles and specify phytosanitary import requirements for those articles. Specific import authorizations may be used when official consent for import is necessary, or when phytosanitary import requirements have not been established, or	P	<b>Korea, Republic of</b> 4.2.2 was not stipulated within this draft. <i>Category : SUBSTANTIVE</i>



		when import would otherwise be prohibited. Specific import authorizations do not replace the obligation of the national plant protection organization (NPPO) of the importing country to communicate the phytosanitary import requirements to the NPPO of the exporting country.		
43	25	Specific import authorizations (SIAs) as referred to in this standard (section 4.2.2) provide official consent for the import of specific regulated articles and specify phytosanitary import requirements for those articles. Specific import authorizations <del>may be used when official consent for import is necessary, or when</del>	P	<b>COSAVE</b> Core text provides the cases where this type of authorization may be required, therefore should not be included again in the annex Category : <i>TECHNICAL</i>

		<p>phytosanitary import requirements have not been established, or when import would otherwise be prohibited. Specific import authorizations do not replace the obligation of the national plant protection organization (NPPO) of the importing country to communicate the phytosanitary import requirements to the NPPO of the exporting country.</p>		
44	25	<p>Specific import authorizations (SIAs) as referred to in this standard (section 4.2.2) provide official consent for the import of specific regulated articles and specify phytosanitary import requirements for those articles. Specific import</p>	P	<p><b>EPPO</b></p> <p>1) Proposal to improve the text through the addition of “yet” because a specific import authorisation can only be given when phytosanitary import requirements are available (see paragraph 40).</p> <p>2) An official consent for import can also be provided (e.g. for scientific purposes) if phytosanitary import requirements have already been established but cannot be fulfilled for the consignment. In our opinion, this is not equivalent to “when import would otherwise be prohibited”.</p> <p>3) Improvement to make clear that this prohibition is not for non-phytosanitary reasons.</p> <p>3) Proposal to improve the text with a more precise wording to be consistent with the rest of the Standard (section 5.1.9.2) and with the Convention.  <i>Category : TECHNICAL</i></p>

		<p>authorizations may be used when official consent for import is necessary, or when phytosanitary import requirements have not <u>yet</u> been <u>established</u><del>establis</del><u>hed or cannot be fulfilled</u>, or when import would otherwise be <u>prohibited</u><del>prohibit</del><u>ed for</u> <u>phytosanitary reasons</u>. <u>Specific import</u> <u>authorizations do not replace the obligation</u> <u>Even when using SIAs as part of the national plant protection organization (NPPO) of the importing country</u> <u>their phytosanitary regulatory import regime</u>, NPPOs <u>are still required to</u> <u>communicate the</u> <u>make their</u> phytosanitary import requirements <del>to</del></p>		
--	--	---	--	--

		the NPPQ available as described in section 5.1.9.2 of this standard and in article VII.2.b of the exporting country Convention.		
45	25	Specific import authorizations (SIAs) as referred to in this standard (section 4.2.2) provide official consent for the import of specific regulated articles and specify phytosanitary import requirements for those articles. Specific import authorizations may be used when official consent for import is necessary, or when phytosanitary import requirements have not been established, or when import would otherwise be prohibited. Specific import	C	<b>United States of America</b> While many countries use SIA for import of biocontrol organisms, phytosanitary certificates may or may not be required, depending on the Agency that regulates those organisms. <i>Category : SUBSTANTIVE</i>

		authorizations do not replace the obligation of the national plant protection organization (NPPO) of the importing country to communicate the phytosanitary import requirements to the NPPO of the exporting country.		
46	25	Specific import authorizations (SIAs) as referred to in this standard (section 4.2.2) provide official consent for the import of specific regulated articles and specify phytosanitary import requirements for those articles. Specific import authorizations may be used when official consent for import is necessary, or when phytosanitary import requirements have not been	P	<b>China</b> The first English letter of the National Plant Protection Organization is capitalized. Category : <i>EDITORIAL</i>

		established, or when import would otherwise be prohibited. Specific import authorizations do not replace the obligation of the <del>national plant protection organization</del> <u>National Plant Protection Organization</u> (NPPO) of the importing country to communicate the phytosanitary import requirements to the NPPO of the exporting country.		
47	25	Specific import authorizations (SIAs) as referred to in this standard (section 4.2.2) provide official consent for the import of specific regulated articles and specify phytosanitary import requirements for those articles. Specific import authorizations	P	<b>Uruguay</b> Core text provides the cases where this type of authorization may be required, therefore should not be included again in the annex <i>Category : TECHNICAL</i>

		<p><del>may be used when official consent for import is necessary, or when phytosanitary import requirements have not been established, or when import would otherwise be prohibited. Specific import authorizations</del> do not replace the obligation of the national plant protection organization (NPPO) of the importing country to communicate the phytosanitary import requirements to the NPPO of the exporting country.</p>		
48	25	Specific import authorizations (SIAs) as referred to in this standard (section 4.2.2) provide official consent for the import of specific regulated articles and specify phytosanitary	C	<p><b>Uruguay</b>  "specify" in the first sentence should be translated as "especifican" or other synonym, but not as establish because SIAs do not establish phytosanitary import requirements  Category : <i>TRANSLATION</i></p>

		import requirements for those articles. Specific import authorizations may be used when official consent for import is necessary, or when phytosanitary import requirements have not been established, or when import would otherwise be prohibited. Specific import authorizations do not replace the obligation of the national plant protection organization (NPPO) of the importing country to communicate the phytosanitary import requirements to the NPPO of the exporting country.		
49	26	<u>SIA should be issued only for a individual case of specific regulated articles with specific</u>	P	<b>Korea, Republic of</b> We suggest adding the phrase to clarify when SIA should be issued. <i>Category : EDITORIAL</i>



		<p><u>requirements.</u> This annex describes situations where the use of SIAs may be required by an NPPO, the information that should be included on SIAs, and the respective responsibilities of the various parties involved. Specific import authorizations are generally applied on a case-by-case basis and tailored to each specific import situation. They may be issued for individual consignments or a series of consignments.</p>		
50	26	<p>This annex describes situations where the use of SIAs may be required by an NPPO, the information that should be included on SIAs, and the respective responsibilities of the <del>various</del> parties</p>	P	<p><b>COSAVE</b> Not necessary Category : EDITORIAL</p>

		involved. Specific import authorizations are generally applied on a case-by-case basis and tailored to each specific import situation. They may be issued for individual consignments or a series of consignments.		
51	26	This annex describes situations where the use of SIAs may be required by an NPPO, the information that should be included on SIAs, and the respective responsibilities of the <del>various</del> parties involved. Specific import authorizations are generally applied on a case-by-case basis and tailored to each specific import situation. They may be issued for individual consignments or a	P	<b>Uruguay</b> Not necessary <i>Category : EDITORIAL</i>

		series of consignments.		
52	27	Although it is noted that some countries include non-phytosanitary requirements in their SIAs, this annex addresses only <del>import requirements that lie within the scope of the IPPC</del> <u>phytosanitary requirements</u> . This annex does not cover transit authorization.	P	<b>COSAVE</b> Import requirements that lie within the scope of the IPPC are phytosanitary requirements. Wording more appropriate to make the contrast with non-phytosanitary requirements <i>Category : TECHNICAL</i>
53	27	Although it is noted that some countries include non-phytosanitary requirements in their SIAs, this annex addresses only <del>import requirements that lie within the scope of the IPPC</del> <u>phytosanitary requirements</u> . This annex does not cover transit authorization.	P	<b>Uruguay</b> Import requirements that lie within the scope of the IPPC are phytosanitary requirements. Wording more appropriate to make the contrast with non-phytosanitary requirements <i>Category : TECHNICAL</i>
1. The types of specific import authorizations				
54	28	<b>1. <u>The types</u> of</b>	P	<b>Costa Rica</b> <i>Category : EDITORIAL</i>

		<b>specific import authorizations</b>		
55	28	<b>1. <u>Types</u></b> <b>The types of specific import authorizations</b>	P	<b>COSAVE</b> Editorial <i>Category : EDITORIAL</i>
56	28	<b>1. <u>The types</u></b> <b>Types of specific import authorizations</b>	P	<b>Uruguay</b> Editorial <i>Category : EDITORIAL</i>
57	28	<b>1. <u>Los tipos</u></b> <b>Tipos de autorizaciones específicas para la importación</b>	P	<b>Costa Rica</b> <i>Category : EDITORIAL</i>
58	29	Specific import authorizations may be provided in the form of import permits, licences or other types of written authorization as determined by the <u>importing country</u> NPPO, and may be in either paper or electronic format.	P	<b>PPPO</b> to clarify which NPPO writes the SIA <i>Category : EDITORIAL</i>
59	29	Specific import authorizations may be provided in the form of import permits, licences or other types of written	P	<b>Korea, Republic of</b> To clarify which NPPO writes the SIA. <i>Category : EDITORIAL</i>

		authorization as determined by the <u>importing country</u> NPPO, and may be in either paper or electronic format.		
60	29	Specific import authorizations may be provided in the form of import permits, <u>licences</u> <del>licences</del> or other types of written authorization as determined by the NPPO, and may be in either paper or electronic format.	P	<b>United States of America</b> Spelling Category : EDITORIAL
2. The elements of specific import authorizations				
61	30	2. <u>Elements</u> <del>The elements</del> of specific import authorizations	P	<b>COSAVE</b> Editorial Category : EDITORIAL
62	30	2. <del>The</del> <u>elements</u> of specific import authorizations	P	<b>Uruguay</b> Editorial Category : EDITORIAL
63	30	2. <del>Los</del> <u>elementos</u> de las	P	<b>Costa Rica</b> Category : EDITORIAL

		<b>autorizaciones específicas para la importación</b>		
2.1 Addressee or consignee				
64	31	<b>2.1</b> <b>Addressee or consignee</b>	P	<b>COSAVE</b> Merged with paragraph 35 for simplification Category : <i>TECHNICAL</i>
65	31	<b>2.1</b> <b>Addressee or consignee</b>	P	<b>Uruguay</b> Merged with paragraph 35 for simplification Category : <i>TECHNICAL</i>
66	32	When SIAs are used, they should be issued by the NPPOs of <del>the</del> importing <del>countries-country</del> to importers.	P	<b>Costa Rica</b> For consistency Category : <i>EDITORIAL</i>
67	32	<del>When SIAs are used, they</del> SIAs should be issued by the NPPOs <del>NPPO of the</del> importing <del>countries-country</del> to importers.	P	<b>COSAVE</b> For consistency Category : <i>TECHNICAL</i>
68	32	<del>When SIAs are used, they</del> should be issued by the NPPOs of importing countries to importers.	P	<b>United States of America</b> SIAs are "issued", not "used". Need consistency throughout this document where both terms are being used. Category : <i>EDITORIAL</i>
69	32	<del>When SIAs are used, they</del> should be issued by the <del>NPPOs-NPPO</del> of <del>the</del> importing	P	<b>Uruguay</b> For consistency Category : <i>TECHNICAL</i>

		<del>countries-country</del> to importers.		
70	32	Cuando se utilizan, las autorizaciones específicas para la importación deberían <del>expedirlas las</del> <del>expedirla la</del> ONPF <del>de-del país</del> <del>importador a</del> los <del>países</del> <del>importadores para</del> los <del>exportadores</del> <del>importadores</del> .	P	<b>Costa Rica</b> Las Autorizaciones las emite el ONPF del país importador para que los importadores y no a los exportadores. Consistencia con la versión en inglés <i>Category : SUBSTANTIVE</i>
2.2 Minimum information requirements				
71	33	<b>2.2</b> <b>Minimum information requirements</b>	C	<b>Barbados</b> The name of the exporter (company or individual) should be included in the list of minimum information requirement. <i>Category : SUBSTANTIVE</i>
72	33	<b>2.2</b> <b><u>Information</u> Minimum information requirements</b>	P	<b>COSAVE</b> 1) Consequential change as per comment in paragraph 31, 2) Title wording simplified as a consequence of comment in paragraph 34. <i>Category : TECHNICAL</i>
73	33	<b>2.2</b> <b>Minimum information requirements</b>	C	<b>Caribbean Agricultural Health and Food Safety Agency</b> The name of the exporter (company or individual) should be included in the list <i>Category : SUBSTANTIVE</i>
74	33	<b>2.21</b> <b><u>Minimum information requirements</u></b>	P	<b>Uruguay</b> 1) Consequential change as per comment in paragraph 31, 2) Title wording simplified as a consequence of comment in paragraph 34. <i>Category : TECHNICAL</i>

75	34	The following information <u>is the minimum information that</u> should be included in SIAs:	P	<b>COSAVE</b> Inserted in the chapeau sentence to simplify the title of the section <i>Category : TECHNICAL</i>
76	34	The following information <u>is the minimum information that</u> should be included in SIAs:	P	<b>Uruguay</b> Inserted in the chapeau sentence to simplify the title of the section <i>Category : TECHNICAL</i>
77	35	<u>name of the importing country issuing the SIA along with the name of the NPPO;-</u> importer's information;	P	<b>European Union</b> This information is necessary to give to the NPPO of the exporting country the possibility to contact the NPPO of the importing country (see paragraph 32) to verify the authenticity of the SIA if needed (see paragraph 77). For the suggested wording, please see section 4 of ISPM 12 (i.e. non-modified paragraph 152 of the draft revised ISPM 12). <i>Category : SUBSTANTIVE</i>
78	35	<u>identifier or authorization number;-</u> importer's information;	P	<b>PPPO</b> move the following bullet from list 2.3 to list 2.2: [44]identifier or authorization number;- move to minimum info section  We consider that maintaining traceability of imported goods is important. To maintain traceability of what goods were cleared under a SIA it is necessary to include an identifying number, and exporter's information. <i>Category : TECHNICAL</i>
79	35	<u>- name of the importing country issuing the SIA along with the name of the NPPO</u> importer's information;	P	<b>EPPO</b> This information is necessary to give to the NPPO of the exporting country the possibility to contact the NPPO of the importing country (see paragraph 32) to verify the authenticity of the SIA if needed (see paragraph 77). For the suggested wording, please see section 4 of ISPM 12 (i.e. non-modified paragraph 152 of the draft revised ISPM 12). <i>Category : SUBSTANTIVE</i>
80	35	<u>importer's information;</u>	C	<b>United States of America</b> Does it need to specify contact information or be more specific? Importer's information can mean many things. <i>Category : TECHNICAL</i>
81	37	description of <u>commodity or commodities the</u>	P	<b>PPPO</b> many SIAs are for not commonly traded items and would not all be commodities <i>Category : TECHNICAL</i>



		<del>goods</del> covered by the SIA;		
82	37	description of <del>commodity or commodities</del> <u>consignment</u> covered by the SIA;	P	<b>Korea, Republic of</b> "consignment" is more suitable rather than "commodity" because many SIAs are not for all the commodities <i>Category : EDITORIAL</i>
83	38	country of origin and country of <del>export</del> <u>export or re-export</u> ;	P	<b>European Union</b> Precision given to improve clarity. <i>Category : TECHNICAL</i>
84	38	country of origin and country of <del>export</del> <u>export or re-export</u> ;	P	<b>EPPO</b> Precision given to improve clarity. <i>Category : TECHNICAL</i>
85	39	<del>intended use of the commodity or commodities</del> ;	P	<b>PPPO</b> Information about intended use of the commodity would be better placed in section 2.3 as additional information. phytosanitary requirements in this section should have included intended use of commodity. NZ does not use SIA to control the end use of products primarily because it is difficult to enforce the end use. For this reason, NZ (and possibly other countries) are not in a position to comply if this were to become a minimum requirement. <i>Category : SUBSTANTIVE</i>
86	40	phytosanitary import <del>requirements</del> <u>requirements specified for the SIA</u> ;	P	<b>European Union</b> Improvement to make clear that the phytosanitary import requirements are those specified for the SIA. <i>Category : TECHNICAL</i>
87	40	phytosanitary import <del>requirements</del> <u>requirements specified for the SIA</u> ;	P	<b>EPPO</b> Improvement to make clear that the phytosanitary import requirements are those specified for the SIA. <i>Category : TECHNICAL</i>
88	41	period of validity- <u>issuing official (i.e. contact details for verification purposes).</u>	P	<b>European Union</b> This information helps to verify the authenticity of the SIA and should always be included. It was therefore moved from paragraph 49 and the wording was clarified. <i>Category : SUBSTANTIVE</i>

89	41	period of validity.- <u>issuing official</u> <u>(i.e. contact details</u> <u>for verification</u> <u>purposes).</u>	P	<b>EPPO</b> This information helps to verify the authenticity of the SIA and should always be included. It was therefore moved from paragraph 49 and the wording was clarified. <i>Category : SUBSTANTIVE</i>
90	41	period of validity.- <u>name of exporter</u>	P	<b>Caribbean Agricultural Health and Food Safety Agency</b> <i>Category : SUBSTANTIVE</i>
91	41	period of validity. <u>disposal</u> <u>of the</u> <u>commodities after</u> <u>intended</u> <u>use.quantity of the</u> <u>commodity or</u> <u>commodities</u> <u>(numeber or</u> <u>weight)</u>	P	<b>China</b> it should be listed in the SIAs about the disposal of the commodities after intended use.For specific import authorizations, quantity of the commodity or commodities (number or weight) are very important information. Different quantity and weight, carrying risk and later supervision are different. <i>Category : SUBSTANTIVE</i>
2.3 Additional information that may be included				
92	42	<del>2.3</del> <b>Addition al information that may be included</b>	P	<b>COSAVE</b> Deleted as a consequence of comment in paragraph 33 <i>Category : EDITORIAL</i>
93	42	<del>2.3</del> <b>Addition al information that may be included</b>	C	<b>United States of America</b> Check the language used in ISPM 12 text and model certificates for consistency with paras 44-50. <i>Category : TECHNICAL</i>
94	42	<del>2.3</del> <b>Addition al information that may be included</b>	P	<b>Uruguay</b> Deleted as a consequence of comment in paragraph 33 <i>Category : TECHNICAL</i>
95	43	In addition, the following information may	P	<b>PPPO</b> Specifying the facility that the goods need to be directed/consigned to after entry into the country on SIAs could minimize the risk of misdirected goods at the border. This could be important for managing risk on commodities where all import requirements are not met on arrival.

		also be included in SIAs:- <u>Facility that goods are to be directed to after arrival at the port of entry (e.g. post-entry quarantine facility)</u>		<i>Category : TECHNICAL</i>
96	44	<del>identifier or authorization number;</del>	P	<b>PPPO</b> We suggest moving this bullet point to the minimum information section. We consider that maintaining traceability of imported goods is important. To maintain traceability of what goods were cleared under a SIA it is necessary to include an identifying number, and exporter's information. <i>Category : TECHNICAL</i>
97	44	<del>identifier</del> <u>identification code</u> or <del>authorization</del> <u>SIA</u> number;	P	<b>United States of America</b> "Identifier" can mean different things. We propose to use language as per ISPM 12. <i>Category : TECHNICAL</i>
98	45	quantity of the <del>commodity or commodities</del> <u>goods</u> (number or weight);	P	<b>PPPO</b> many SIAs are for not commonly traded items and would not all be commodities <i>Category : TECHNICAL</i>
99	45	quantity of the <del>commodity or commodities</del> <u>consignment</u> (number or weight);	P	<b>Korea, Republic of</b> For consistency with section 2.2 <i>Category : EDITORIAL</i>
100	45	<del>quantity of the commodity or commodities</del> (number or weight);	P	<b>Barbados</b> This sentence should be moved to 2.2 since this is a minimum requirement <i>Category : SUBSTANTIVE</i>
101	45	<del>quantity of the commodity or commodities</del> (number or weight);	P	<b>Caribbean Agricultural Health and Food Safety Agency</b> <i>Category : SUBSTANTIVE</i>

102	45	quantity of the commodity or commodities (number or weight);	C	<b>Caribbean Agricultural Health and Food Safety Agency</b> Jamaica is proposing the movement of [45] from 2.3(Additional information that may be included) to 2.2 (Minimum information required) <i>Category : SUBSTANTIVE</i>
103	45	<del>quantity of the commodity or commodities (number or weight);</del>	P	<b>China</b> It is recommended that this article be adjusted from the “2.3 additional information that may be included” to the “2.2 minimum information requirements” For specific import authorizations, quantity of the commodity or commodities (number or weight) are very important information. Different quantity and weight, carrying risk and later supervision are different. <i>Category : SUBSTANTIVE</i>
104	46	whether the authorization is for a <del>single individual</del> or <del>multiple series of</del> consignments;	P	<b>Japan</b> Propose change to be aligned with para 26 “They may be issued for individual consignments or a series of consignments.” in order to avoid confusion. <i>Category : EDITORIAL</i>
105	46	whether the authorization is for a single or multiple consignments; <del>intended use of the commodity or commodities</del>	P	<b>PPPO</b> Information about intended use of the commodity would be better placed in section 2.3 as additional information if it is not already covered under phytosanitary import requirements. SIA specify import requirements and these requirements account for the end use. NZ does not use SIA to control the end use of products primarily because it is difficult to enforce the end use. For this reason, NZ (and possibly other countries) are not in a position to comply if this were to become a minimum requirement. <i>Category : TECHNICAL</i>
106	49	<del>authorizing officer;</del>	P	<b>European Union</b> See comment on paragraph 41. <i>Category : SUBSTANTIVE</i>
107	49	<del>authorizing officer;</del>	P	<b>EPPO</b> See comment on paragraph 41. <i>Category : SUBSTANTIVE</i>
108	50	exporter’s information; <del>Treatment Provider registration number</del>	P	<b>PPPO</b> to add a new bullet point to track NPPO approved treatment providers between countries. To track the treatment of a consignment requires a treatment certificate to be part of the documentation supplied with the consignment. Treatment Certificates do not accompany consignments under a phytosanitary certificate. Treatment providers within the Australian Accreditation Scheme provide registration numbers of treatment providers. It would be beneficial to know that a treatment provider of the exporting country is NPPO approved or approved through another scheme (i.e Australian Accreditation Scheme or the NZ/Australia Brown Marmorated Stink Bug scheme). Approval can be checked through an NPPO website/another scheme site. This would allow for improved transparency that treatments have been applied. <i>Category : TECHNICAL</i>

109	50	exporter's information. ___- <u>restriction of use.</u>	P	<b>Korea, Republic of</b> To add a new example. <i>Category : EDITORIAL</i>
110	50	<del>exporter's information.</del>	P	<b>Caribbean Agricultural Health and Food Safety Agency</b> This is too important to be included under 'additional information' and should be moved under 2.2 <i>Category : SUBSTANTIVE</i>
2.4 Language				
111	51	<del>2.4</del> : _____ <b>Language</b> <b>e</b>	P	<b>COSAVE</b> Consequential change as per previous comments <i>Category : EDITORIAL</i>
112	51	<del>2.4</del> <u>2</u> _____ <b>Language</b> <b>e</b>	P	<b>Uruguay</b> Consequential change as per previous comments <i>Category : EDITORIAL</i>
113	52	The NPPOs of importing countries may choose the language or languages in which their SIAs are issued but are encouraged to also use one of the languages of the Food and Agriculture Organization of the United Nations. <u>Nations. , preferably in English.</u>	P	<b>Japan</b> 2.2 Minimum information requirements in this Annex includes "phytosanitary import requirements" as an information which should be described in SIAs. On the other hand, ISPM 7 section 5.2 says "NPPOs are encouraged to provide their official phytosanitary import requirements to RPPOs or on the IPP in one of the official languages of FAO, preferably in English". In light of the above, It is also appropriate to encourage countries to use English for SIAs if possible, in order to communicate accurate and clear information to exporting countries. <i>Category : SUBSTANTIVE</i>
114	52	The NPPOs of importing countries may choose the language or languages in which their SIAs	P	<b>European Union</b> We suggest to use the same wording as in ISPM 12 (section 3.2). <i>Category : TECHNICAL</i>

		are issued but are encouraged to also use one of the <a href="#">official</a> languages of the Food and Agriculture Organization of the United Nations, <a href="#">preferably English</a> .		
115	52	The NPPOs of importing countries may choose the language or languages in which their SIAs are issued but are encouraged to also use one of the <a href="#">official</a> languages of the Food and Agriculture Organization of the United Nations, <a href="#">preferably English</a> .	P	<b>EPPO</b> We suggest to use the same wording as in ISPM 12 (section 3.2). <i>Category : TECHNICAL</i>
116	52	The NPPOs of importing countries may choose the language or languages in which their SIAs are issued but are encouraged to also	P	<b>United States of America</b> For clarity. <i>Category : TECHNICAL</i>

		use one of the languages of the Food and Agriculture Organization of the United Nations <del>Nations</del> <u>per the IPPC</u> .		
117	52	Las ONPF de los países importadores podrán elegir el idioma o idiomas en que se expedirán sus autorizaciones específicas para la importación, pero se <del>las</del> <u>les</u> alienta a utilizar también uno de los idiomas de la Organización de las Naciones Unidas para la Alimentación y la Agricultura.	P	<b>Costa Rica</b> concordancia en la redacción <i>Category : EDITORIAL</i>
3. Possible uses of specific import authorizations				
118	53	<b>3. Possible Uses</b> <del>uses</del> <u>uses</u> of specific import authorizations	P	<b>COSAVE</b> According to paragraph 54 this section includes just examples, therefore it is not necessary to add the word “possible” to the title. <i>Category : TECHNICAL</i>
119	53	<b>3. Possible Uses</b> <del>uses</del> <u>uses</u> of specific import authorizations	P	<b>Uruguay</b> According to paragraph 54 this section includes just examples, therefore it is not necessary to add the word “possible” to the title. <i>Category : TECHNICAL</i>

120	54	The following examples of purposes, articles and situations related to import indicate where use of SIAs may be appropriate:	C	<b>Japan</b> There are many items listed, but main situations where SIAs may be used should be only 3 cases i.e. para 59, 62 and 63. Other items can be included as one of the examples in the 3 items. While the 3 cases are conceptual ones, other items are concrete purposes or articles, so it can be listed in a different way.  Add evidence for criminal investigation as one of the concrete examples. <i>Category : SUBSTANTIVE</i>
121	54	The following examples <del>of purposes, articles and situations related to import</del> indicate where <u>the</u> use of SIAs may be appropriate:	P	<b>COSAVE</b> Suggested simplification to avoid confusion, the section provides examples where using SIAs may be appropriate <i>Category : TECHNICAL</i>
122	54	The following examples of purposes, articles and situations related to import indicate where use of SIAs may be appropriate: <u>Internal affair of the embassy;</u>	P	<b>Thailand</b> We would like to add one of the common specific import authorization case that is requested by the embassy. <i>Category : SUBSTANTIVE</i>
123	54	The following examples <del>of purposes, articles and situations related to import</del> indicate where <u>the</u> use of SIAs may be appropriate:	P	<b>Uruguay</b> Suggested simplification to avoid confusion, the section provides examples where using SIAs may be appropriate <i>Category : TECHNICAL</i>
124	55	<del>research and scientific purposes;</del>	P	<b>Japan</b> See the comment to paragraph 54 from Japan. <i>Category : SUBSTANTIVE</i>



125	55	para <del>investigación</del> <del>y-investigación</del> , fines <del>científicoscientific</del> <del>os y análisis de</del> <del>calidad incluido</del> <del>suelo</del> ;	P	<b>Ecuador</b> para mayor precisión <i>Category : EDITORIAL</i>
126	56	<del>exhibition</del> <del>purposes;</del>	P	<b>Japan</b> See the comment to paragraph54 from Japan. <i>Category : SUBSTANTIVE</i>
127	57	<del>educational</del> <del>purposes;</del>	P	<b>Japan</b> See the comment to paragraph54 from Japan. <i>Category : SUBSTANTIVE</i>
128	58	<del>religious or</del> <del>cultural purposes</del> <del>(e.g. religious</del> <del>festivals, ancestral</del> <del>customs);</del>	P	<b>Japan</b> See the comment to paragraph54 from Japan. <i>Category : SUBSTANTIVE</i>
129	59	articles for which the NPPO of the importing country requires the ability to trace and manage over a period of time after entry (e.g. articles subject to post- entry quarantine or <del>processing</del> ) <del>process</del> <del>ing. research and</del> <del>scientific</del> <del>purposes,</del> <del>exhibition</del> <del>purposes,</del> <del>educational</del> <del>purposes, religious</del> <del>festivals, ancestral</del> <del>customs,</del>	P	<b>Japan</b> See the comment to paragraph54 from Japan. <i>Category : SUBSTANTIVE</i>

		<u>biological control agents and other beneficial organisms</u> );		
130	59	articles for which the NPPO of the importing country requires the ability to trace and manage over a period of time after entry (e.g. articles subject to post-entry quarantine or processing);	P	<b>Barbados</b> This is not an example but a responsibility. Suggest including at 4.1 <i>Category : SUBSTANTIVE</i>
131	59	articles for which the NPPO of the importing country requires the ability to trace and manage over a period of time after entry (e.g. articles subject to post-entry quarantine or processing);	C	<b>Caribbean Agricultural Health and Food Safety Agency</b> This is not an example but a responsibility. Suggest including at 4.1 <i>Category : SUBSTANTIVE</i>
132	59	articles pour lesquels l'ONPV du pays importateur exige la traçabilité et la gestion pendant une certaine période après l'entrée (articles	C	<b>Congo</b> exigence de traçabilité et de gestion des articles par l'ONPV du pays importateur pendant une certaine période après l'entrée (articles soumis à une quarantaine ou à un traitement après l'entrée par exemple) <b>Congo</b> pour le besoin d'harmonie, car il s'agit des utilisations. <i>Category : EDITORIAL</i>

		soumis à une quarantaine ou à un traitement après l'entrée, par exemple);		
133	60	<del>emergency situations;</del>	P	<b>Japan</b> See the comment to paragraph 54 from Japan. <i>Category : SUBSTANTIVE</i>
134	60	emergency situations, <del>e.g.</del> <u>food and aids during emergency situations;</u>	P	<b>PPPO</b> <i>Category : EDITORIAL</i>
135	60	emergency <u>or exceptional</u> situations;	P	<b>COSAVE</b> For consistency with ISPM 20 (Section 4.2.2) <i>Category : TECHNICAL</i>
136	60	emergency <u>or exceptional</u> situations;	P	<b>Uruguay</b> For consistency with ISPM 20 (Section 4.2.2) <i>Category : TECHNICAL</i>
137	61	<del>biological control agents and other beneficial organisms;</del>	P	<b>Japan</b> See the comment to paragraph 54 from Japan. <i>Category : SUBSTANTIVE</i>
138	61	biological control agents and other beneficial organisms; <del>vehicle and machinery for military or emergency use</del>	P	<b>PPPO</b> adding another example <i>Category : SUBSTANTIVE</i>
139	61	agentes de control biológico y otros organismos <del>beneficiosos</del> <u>benéficos</u> ;	P	<b>Costa Rica</b> Termino correcto en español <i>Category : SUBSTANTIVE</i>
140	61	agentes de control biológico y otros	P	<b>Panama</b> Uso correcto de términos

		organismos <u>beneficiosos</u> <u>benéfi</u> <u>cos</u> ;		<i>Category : EDITORIAL</i>
141	61	agentes de control biológico y otros organismos <u>beneficiosos</u> <u>benéfi</u> <u>cos</u> ;	P	<b>Nicaragua</b> Uso correcto del término <i>Category : TECHNICAL</i>
142	61	agentes de control biológico y otros organismos <u>beneficiosos</u> <u>benéfi</u> <u>cos</u> ;	P	<b>OIRSA</b> uso correcto de terminos <i>Category : EDITORIAL</i>
143	61	agents de lutte biologique et autres organismes utiles;	C	<b>Congo</b> importation d'agents de lutte biologique et autres organismes utiles <b>Congo</b> pour le besoin d'harmonie, car il s'agit d' utilisation. <i>Category : EDITORIAL</i>
144	62	situations where general import authorizations have not been developed;(e.g. <u>emergency</u> <u>situations,</u> <u>evidence for</u> <u>criminal</u> <u>investigation</u> );	P	<b>Japan</b> See the comment to paragraph54 from Japan. <i>Category : SUBSTANTIVE</i>
145	63	situations where it is not possible to develop general phytosanitary import requirements that can manage the relevant pest risk._ <u>Articles which are</u>	P	<b>PPPO</b> To add a new example. To be consistent with the Report from the Expert Working Group on the use of specific import authorizations (2008-006). <i>Category : SUBSTANTIVE</i>

		<u>not routinely imported.</u>		
146	63	situations where it is not possible to develop general phytosanitary import requirements that can manage the relevant pest risk requirements.	P	<b>COSAVE</b> Text not relevant <i>Category : TECHNICAL</i>
147	63	situations where it is not possible to develop general phytosanitary import requirements that can manage the relevant pest risk.	C	<b>Caribbean Agricultural Health and Food Safety Agency</b> Revisit terminology. This can be misconstrued to be requiring the NPPO to accept a risk without having developed phytosanitary measures to manage the risk  Suggest using the term general import authorization instead of general phytosanitary import requirements <i>Category : SUBSTANTIVE</i>
148	63	situations where it is not possible to develop general phytosanitary import requirements that can manage the relevant pest risk.	C	<b>United States of America</b> Regarding import permits: for many seed consignments NPPOs of the importing countries include phytosanitary import requirements for pests in which there has been no PRA performed, resulting in phytosanitary requirements that are not technically justified (e.g., seed not a pathway, seed/plant not a host, pest occurs in the country and is not under official control, etc.). Possible uses listed in paragraphs 62 and 63 appear to be routinely abused. There needs to be a review process to ensure that NPPOs technically justify their phytosanitary requirements included in import permits. <i>Category : SUBSTANTIVE</i>
149	63	situations where it is not possible to develop general phytosanitary import requirements that can manage the relevant pest risk requirements.	P	<b>Uruguay</b> Text not relevant <i>Category : TECHNICAL</i>
4.1 The NPPO of the importing country				

150	66	<b>4.1 The NPPO of the importing country</b>	P	<b>COSAVE</b> Editorial <i>Category : EDITORIAL</i>
151	66	<b>4.1 The NPPO of the importing country</b>	P	<b>Uruguay</b> Editorial <i>Category : EDITORIAL</i>
152	67	When using SIAs, the NPPO of the importing country should comply with the principles described in the IPPC and ISPM 1 ( <i>Phytosanitary principles for the protection of plants and the application of phytosanitary measures in international trade</i> ), such as those relating to minimal impact, transparency, non-discrimination, technical <a href="#">justification</a> , <a href="#">cooperation</a> <a href="#">justification</a> and <a href="#">use of languages</a> <a href="#">cooperation</a> .	P	<b>COSAVE</b> The use of languages is not a principle <i>Category : TECHNICAL</i>
153	67	When using SIAs, the NPPO of the	P	<b>Uruguay</b> The use of languages is not a principle <i>Category : TECHNICAL</i>

		importing country should comply with the principles described in the IPPC and ISPM 1 ( <i>Phytosanitary principles for the protection of plants and the application of phytosanitary measures in international trade</i> ), such as those relating to minimal impact, transparency, non-discrimination, technical <del>justification,</del> <del>cooperation</del> <u>justification</u> and <del>use of</del> <u>languages cooperation</u> <u>ion</u> .		
154	67	Al utilizar autorizaciones específicas para la importación, la ONPF del país importador debería cumplir los principios descritos en la CIPF y la NIMF 1 ( <i>Principios fitosanitarios para la protección de</i>	P	<b>Costa Rica</b> La utilización de los idiomas no forma parte de los principios <i>Category : TRANSLATION</i>

		las plantas y la aplicación de medidas fitosanitarias en el comercio internacional), como los relativos a los efectos mínimos, la transparencia, la no discriminación, la justificación técnica, la cooperación <del>y la utilización de los idiomas.</del>		
155	69	publishing ( <a href="#">including NPPO website</a> ) information on the regulated articles and intended uses for which an SIA is required;	P	<b>United States of America</b> This option is now available for most NPPOs. Category : <i>TECHNICAL</i>
156	70	having a process in place for assessing and setting up SIAs (identifying the information that will be needed, etc.); <del>having a process in place for amending, suspending or revoking SIAs, including a process to</del>	P	<b>Australia</b> Suggest the addition of a responsibility for the NPPO of the importing country to have a process in place for amending, suspending and revoking SIAs.  Justification: There are circumstances where SIAs will need to be amended, suspended or revoked. For example, due to the phytosanitary requirements no longer being sufficient or no longer being necessary to manage the phytosanitary risk of the commodities covered by an SIA and to manage non-compliance. Category : <i>SUBSTANTIVE</i>



		<u>communicate with relevant parties when this occurs;</u>		
157	70	<u>stablishing</u> <del>having</del> a process in place for NPPOs assessing <del>and setting up SIAs</del> (identifying the need for SIAs, identifying the necessary information <del>that will be needed for SIA, etc.)</del> and setting up a process for issuing SIA;	P	<b>United States of America</b> More specific, step by step requirements. <i>Category : TECHNICAL</i>
158	71	publicar el proceso mediante el cual los importadores pueden solicitar una autorización específica para la importación y el formulario de solicitud que el importador debe <del>rellenar</del> <u>completar</u> ;	P	<b>Nicaragua</b> Término más adecuado <i>Category : TECHNICAL</i>
159	72	communicating <u>all</u> requirements to the importer;	P	<b>European Union</b> Precision given to improve clarity. <i>Category : TECHNICAL</i>
160	72	communicating <u>all</u> requirements to the importer;	P	<b>EPPO</b> Precision given to improve clarity. <i>Category : TECHNICAL</i>
161	73	<u>considering requests or applications for</u>	P	<b>COSAVE</b> Simplified text to clarify the responsibility of the NPPO, that is to issue the SIA if requirements are met <i>Category : TECHNICAL</i>

		<u>SIA, providing responses and, - Issuing an SIA without undue delay</u> if the requirements for the SIA are met; <u>issuing an SIA without undue delay; -</u>		
162	73	<del>considering requests or applications for SIAs, providing responses and, issuing an SIA without undue delay</del> if the requirements for the SIA are met; <del>issuing an SIA without undue delay;</del>	P	<b>Uruguay</b> Simplified text to clarify the responsibility of the NPPO, that is to issue the SIA if requirements are met <i>Category : TECHNICAL</i>
163	74	defining the language used in SIAs; - <u>[New] providing importers with a translation of phytosanitary import requirements on the SIA, when necessary to supply exporting countries with clear and accurate information</u>	P	<b>Japan</b> In this Annex, the responsibility of translation rests with importers or exporters, but it is sometimes difficult for them to translate precisely phytosanitary import requirements of SIAs especially for technical phytosanitary words. On the other hands, ISPM 7 section 5.2 states "In order to supply the NPPO of the exporting country with phytosanitary import requirements, clear and accurate information should be provided by the importing country". It is therefore appropriate to add, as a responsibility of the NPPO of the importing country, a translation of phytosanitary import requirements on the SIA in order to supply exporting countries with clear and accurate information.  ISPM7 Phytosanitary certification system "5.2 Communication between NPPOs" In order to supply the NPPO of the exporting country with phytosanitary import requirements, clear and accurate information should be provided by the importing country, preferably by its IPPC contact point in accordance with IPPC Article VII.2(b) and also in response to a request by the NPPO of the exporting country. <i>Category : SUBSTANTIVE</i>

164	74	defining the <u>language languages</u> used in SIAs;	P	<b>China</b> There may be more than one language used in SIAs. <i>Category : EDITORIAL</i>
165	75	<u>publishing the official format of</u> SIAs;	P	<b>Canada</b> Requiring an official format is unclear and may not be necessary. SIAs can be issued in the form of a permit (with boxes for each category of information required), while in other cases it is issued in the form of a letter. The minimum information required as specified in section 2.2 is very important. Official format is unclear. Suggest deletion. <i>Category : SUBSTANTIVE</i>
166	76	<u>especificar correctamente esta</u> <del>blecer de forma inequívoca</del> los requisitos fitosanitarios de importación en las autorizaciones específicas para la importación;	P	<b>Costa Rica</b> Los requisitos fitosanitarios se establecen con la debida justificación técnica y científica y de previo a la emisión de la autorización de importación por lo que, no se podría establecer de forma inequívoca porque deben tener su sustento científico, Aquí lo que se pretende es que al emitir la Autorización no se indique los requisitos fitosanitarios establecidos con el fundamento técnico de forma incorrecta y que ocasionen problemas en el intercambio comercial <i>Category : SUBSTANTIVE</i>
167	76	<u>emitir establecer de forma</u> <del>inequívoca</del> los requisitos fitosanitarios de importación en las autorizaciones específicas para la importación;	P	<b>Panama</b> Los requisitos fitosanitarios son determinados bajo respaldo técnico-científico <i>Category : TECHNICAL</i>
168	76	<del>emitir establecer de forma inequívoca</del> los requisitos fitosanitarios de importación en las autorizaciones específicas para la importación;	P	<b>Nicaragua</b> Los requisitos fitosanitarios son determinados bajo respaldo técnico-científico <i>Category : TECHNICAL</i>
169	76	<u>emitir los</u> <del>establecer de</del>	P	<b>OIRSA</b> Los requisitos fitosanitarios son determinados bajo respaldo técnico-científico

		<del>forma inequívoca</del> los requisitos fitosanitarios de importación en las autorizaciones específicas para la importación;		Category : <i>SUBSTANTIVE</i>
4.2 Importers				
170	81	applying for an SIA before import <del>as soon as possible</del> in situations where an SIA is required;	P	<b>PPPO</b> We suggest adding the phrase “and as soon as possible”, because it emphasises that an importer should be prioritising applying for an SIA where required so that NPPOs have enough time to assess. This suggested wording is also consistent with other ISPMs. Category : <i>EDITORIAL</i>
171	81	demande une autorisation spécifique d’importation avant l’importation, <del>lorsque celle-ci est requise;</del>	P	<b>IPPC Regional Workshop Africa</b> cette partie de phrase n'a pas d'importance, puisque ces responsabilités sont définies dans le cadre d'autorisations spécifiques d'importation. Category : <i>SUBSTANTIVE</i>
172	81	demande une autorisation spécifique d’importation avant l’importation, <del>lorsque celle-ci est requise;</del>	P	<b>Congo</b> ce morceau de phrase n'a pas d'importance, ces responsabilités sont définies dans le cadre d'autorisations spécifiques d'importation. Category : <i>SUBSTANTIVE</i>
4.3 Exporters				
173	87	The responsibilities of exporters, <del>- may include; as determined by the NPPO of the importing country; may include;</del>	P	<b>COSAVE</b> For clarification Category : <i>TECHNICAL</i>

174	87	The responsibilities of exporters, <del>may include:</del> <del>as determined by the NPPO of the importing country,</del> <del>may include:</del>	P	<b>Uruguay</b> For clarification <i>Category : TECHNICAL</i>
175	88	obtaining an SIA from the importer before export if an SIA is required; <del>complying with the requirements of the SIA; - safeguarding transport according to the requirements of the importing country;</del>	P	<b>European Union</b> These are important responsibilities for the exporters that need to be considered when applicable. <i>Category : TECHNICAL</i>
176	88	obtaining an SIA from the importer before export if an SIA is required; <del>complying with the requirements of the SIA; - safeguarding transport according to the requirements of the importing country;</del>	P	<b>EPPO</b> These are important responsibilities for the exporters that need to be considered when applicable. <i>Category : TECHNICAL</i>
177	89	submitting a legible <del>SIA and communicating the phytosanitary</del>	P	<b>Costa Rica</b> In accordance with what is indicated in the minimum requirements that an AIS must have, it is already indicated that phytosanitary requirements must be indicated correctly, so it is not necessary to include this phrase, with only the presentation of the AIS to the NPPO of the exporting country, already by itself the SIA communicates the phytosanitary requirements.

		<del>import requirements-SIA</del> to the NPPO of the exporting country;		<i>Category : EDITORIAL</i>
178	89	submitting a legible SIA <del>and communicating the phytosanitary import requirements</del> to the NPPO of the exporting country;	P	<b>COSAVE</b> Phytosanitary import requirements are included in the SIA (minimum information according section 2.2) <i>Category : TECHNICAL</i>
179	89	submitting a legible SIA <del>and communicating the phytosanitary import requirements</del> to the NPPO of the exporting country;	P	<b>Uruguay</b> Phytosanitary import requirements are included in the SIA (minimum information according section 2.2) <i>Category : TECHNICAL</i>
180	90	<del>applying for a phytosanitary certificate from the NPPO of the exporting country;</del>	P	<b>COSAVE</b> This is a regular procedure, independant of SIAs. Should not be part of this annex. <i>Category : SUBSTANTIVE</i>
181	90	applying for a phytosanitary certificate from the NPPO of the exporting <del>country when required by importing country;</del>	P	<b>United States of America</b> for clarity: the requirements can differ. <i>Category : TECHNICAL</i>
182	90	<del>applying for a phytosanitary certificate from the NPPO of the exporting country;</del>	P	<b>Uruguay</b> This is a regular procedure, independant of SIAs. Should not be part of this annex. <i>Category : TECHNICAL</i>

183	90	demande un certificat phytosanitaire à l'ONPV du pays exportateur;	P	<b>IPPC Regional Workshop Africa</b> nous parlons ici des responsabilités des exportateurs en ce qui concerne les autorisations spécifiques d'importation qui est une activité en amont de la délivrance du certificat phytosanitaire. <i>Category : SUBSTANTIVE</i>
184	90	demande un certificat phytosanitaire à l'ONPV du pays exportateur;	P	<b>Congo</b> nous parlons ici des responsabilités des exportateurs en ce qui concerne les autorisations spécifiques d'importation. c'est une activité en amont de la délivrance du certificat phytosanitaire. cette phrase ferait foi à la certification et à la délivrance du certificat phytosanitaire( NIMPs: 7, 12). <i>Category : SUBSTANTIVE</i>
4.4 NPPOs of exporting countries				
185	92	<b>4.4 NPPOs</b> <b><u>NPPO of the</u></b> <b><u>exporting</u></b> <b><u>countries</u></b> <b><u>country</u></b>	P	<b>Costa Rica</b>  <i>Category : EDITORIAL</i>
186	92	<b>4.4 NPPOs</b> <b><u>NPPO of the</u></b> <b><u>exporting</u></b> <b><u>countries</u></b> <b><u>country</u></b>	P	<b>COSAVE</b> For consistency <i>Category : EDITORIAL</i>
187	92	<b>4.4 NPPOs</b> <b><u>NPPO of the</u></b> <b><u>exporting</u></b> <b><u>countries</u></b> <b><u>country</u></b>	P	<b>Uruguay</b> For consistency <i>Category : EDITORIAL</i>
188	93	The responsibilities of the <b><u>NPPOs</u></b> <b><u>NPPO</u></b> of <b><u>the</u></b> exporting <b><u>countries</u></b> <b><u>country</u></b> may include:	P	<b>Costa Rica</b>  <i>Category : EDITORIAL</i>
189	93	The responsibilities of the <b><u>NPPOs</u></b> <b><u>NPPO</u></b> of exporting	P	<b>COSAVE</b> For consistency <i>Category : TECHNICAL</i>

		<del>countries-country</del> may include:		
190	93	The responsibilities of the <del>NPPOs-NPPO</del> of <del>the</del> exporting <del>countries-country</del> may include:	P	<b>Uruguay</b> For consistency Category : <i>TECHNICAL</i>
191	94	obtaining the phytosanitary import requirements of the importing country <del>for in</del> <u>addition to those specified in</u> the SIA;	P	<b>European Union</b> More appropriate and clearer (an SIA on its own does not necessarily include all the phytosanitary import requirements). Category : <i>TECHNICAL</i>
192	94	obtaining the <del>phytosanitary import requirements of the importing country for the</del> SIA;	P	<b>COSAVE</b> In cases when the importing country requires an SIA, phytosanitary import requirements are included in such authorization, therefore the NPPO of the exporting country should obtain the SIA Category : <i>TECHNICAL</i>
193	94	obtaining the phytosanitary import requirements of the importing country <del>for in</del> <u>addition to those specified in</u> the SIA;	P	<b>EPPO</b> More appropriate and clearer (an SIA on its own does not necessarily include all the phytosanitary import requirements). Category : <i>TECHNICAL</i>
194	94	obtaining the <del>phytosanitary import requirements of the importing</del>	P	<b>Uruguay</b> In cases when the importing country requires an SIA, phytosanitary import requirements are included in such authorization, therefore the NPPO of the exporting country should obtain the SIA Category : <i>TECHNICAL</i>



		<del>country for the</del> SIA;		
195	95	<del>certifying the compliance of plants, plant products or other regulated articles with these phytosanitary import requirements,</del> when a request for export phytosanitary certification is accompanied by an SIA <del>with phytosanitary import requirements, certifying specifying the compliance of plants, plant products or other regulated articles with these</del> phytosanitary import requirements.	P	<b>Canada</b> The proposed reorganization of the indent flows and reads better with the overarching statement in para 93. <i>Category : EDITORIAL</i>
196	95	when a request for export phytosanitary certification is accompanied by an SIA with phytosanitary import	P	<b>Australia</b> Improves readability of sentence <i>Category : EDITORIAL</i>

		requirements, certifying the compliance of plants, plant products or other regulated articles with <del>these the</del> phytosanitary import requirements.		
197	95	when a request for export phytosanitary certification is accompanied by an <del>SIA with</del> <del>phytosanitary import requirements</del> <u>SIA</u> , certifying the compliance of plants, plant products or other regulated articles with <del>these the</del> phytosanitary import <del>requirements</del> <u>requirements set up in the SIA</u> .	P	<b>COSAVE</b> All SIAs should include phytosanitary import requirements according section 2.2 (minimum information). Therefore the NPPO of the exporting country should certify compliance with the phytosanitary import requirements established in the SIA <i>Category : TECHNICAL</i>
198	95	when a request for export phytosanitary certification is accompanied by an <del>SIA with</del> <del>phytosanitary import</del>	P	<b>Uruguay</b> All SIAs should include phytosanitary import requirements according section 2.2 (minimum information). Therefore the NPPO of the exporting country should certify compliance with the phytosanitary import requirements established in the SIA <i>Category : TECHNICAL</i>

		<del>requirements</del> SIA, certifying the compliance of plants, plant products or other regulated articles with <del>these the</del> phytosanitary import <del>requirements</del> <u>requirements set up in the SIA.</u>		
5. General import authorizations				
199	96	<b>5. General import authorizations</b>	C	<b>PPPO</b> Further information may be required for implementation to transition from SIA to GIA. <i>Category : TECHNICAL</i>
200	96	<b>5. General import authorizations</b> <b>Termination of SIA</b>	P	<b>Korea, Republic of</b> General import authorizations is not needed because SIA would be terminated after finished the responsibilities instead of transferring to GIA. <i>Category : EDITORIAL</i>
201	97	Guidance on general import authorizations is provided in section 4.2.2 of this standard. The following examples describe circumstances under which SIAs may be <del>transferred to general import authorization</del> <u>terminated</u> :	P	<b>Korea, Republic of</b> General import authorizations is a new terminology and not necessary here <i>Category : EDITORIAL</i>
202	97	Guidance on general import	P	<b>Korea, Republic of</b> 4.2.2 was not stipulated within this draft. <i>Category : EDITORIAL</i>

		authorizations is provided in <a href="#">section 4.2.2</a> <a href="#">section ?</a> of this standard. The following examples describe circumstances under which SIAs may be transferred to general import authorizations:		
203	98	when <a href="#">import requirements specified in the SIAs</a> <del>become routine</del> <a href="#">are established as import requirements for normalized trade (e.g. transitioning trial period import requirements for a new commodity or new origin to general import requirements, when monitoring of trade confirms the effectiveness of phytosanitary import requirements set in an SIA)</a> ;	P	<p><b>Canada</b></p> <p>The use of "become routine" is vague and confusing. For example, research labs importing soil under a SIA on a monthly basis may be routine but it does not qualify to become a general import authorization.</p> <p>Paragraph 98 and 100 are linked. The scenario in paragraph 100 is an example of the proposed changed in paragraph 98. Suggest deleting paragraph 100.</p> <p>Category : <i>SUBSTANTIVE</i></p>
204	98	when SIAs become <del>routine</del> <a href="#">routine</a>	P	<p><b>Barbados</b></p> <p>Once an SIA is routine, the only way for it to be added to the general import requirement system is for the NPPO to have appropriate phytosanitary measures in place</p> <p>Category : <i>SUBSTANTIVE</i></p>

		<u>and appropriate phytosanitary measures have been established.</u>		
205	98	when SIAs become <del>routine</del> <u>routine and appropriate phytosanitary measures have been established;</u>	P	<b>Caribbean Agricultural Health and Food Safety Agency</b> <i>Category : SUBSTANTIVE</i>
206	98	when SIAs become routine;	C	<b>Caribbean Agricultural Health and Food Safety Agency</b> Add "and appropriate phytosanitary measures have been established." Once an SIA is routine, the only way for it to be added to the general import requirement system is for the NPPO to have appropriate phytosanitary measures in place. <i>Category : SUBSTANTIVE</i>
207	98	when SIAs become <u>routine</u> ;	C	<b>United States of America</b> The meaning of "routine" requires more clarity because of different interpretations relevant to various situations. Needs more examples describing the "routine". Otherwise this is very broad. No examples of routine is given in ISPM 20 or other ISPMs. <i>Category : TECHNICAL</i>
208	99	when an SIA has been issued as a result of an emergency situation but appropriate phytosanitary <del>measures-import requirements</del> have been established;	P	<b>European Union</b> Please see ISPM 5 and second indent of section 4.2.2 of ISPM 20. <i>Category : TECHNICAL</i>
209	99	when an SIA has been issued as a result of an emergency situation but appropriate phytosanitary <del>measures-import requirements</del> have been established;	P	<b>EPPO</b> Please see ISPM 5 and second indent of section 4.2.2 of ISPM 20. <i>Category : TECHNICAL</i>

210	100	<del>when monitoring of trade confirms the effectiveness of phytosanitary import requirements set in an SIA.</del>	P	<b>Canada</b> See previous comment in para 98. <i>Category : SUBSTANTIVE</i>
211	100	<del>when</del> where monitoring of trade confirms the effectiveness of phytosanitary import requirements set in an SIA.	P	<b>IPPC Regional Workshop Africa</b> <i>Category : SUBSTANTIVE</i>
212	100	<del>when monitoring of trade confirms the effectiveness of phytosanitary import requirements set in an SIA.</del>	P	<b>COSAVE</b> Deleted text is considered included in first bullet. Furthermore the understanding of monitoring of trade could be confusing in relation to confirm the effectiveness of phytosanitary import requirements. <i>Category : TECHNICAL</i>
213	100	<del>when monitoring of trade confirms the effectiveness of phytosanitary import requirements set in an SIA.</del>	P	<b>Uruguay</b> Deleted text is considered included in first bullet. Furthermore the understanding of monitoring of trade could be confusing in relation to confirm the effectiveness of phytosanitary import requirements. <i>Category : TECHNICAL</i>
214	101	<b>Potential implementation issues</b>	C	<b>Guyana</b> SOPs and requisite legal framework needed. <i>Category : SUBSTANTIVE</i>