

## 2021 FIRST CONSULTATION

1 July – 30 September 2021

### Compiled comments for 2021 First Consultation: Draft Revision of ISPM 4 (2009-002)

#### 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 the draft ISPM with comments for consideration.
South Africa	The National Plant Protection Organization of South Africa is in agreement with this standard.
Trinidad and Tobago	In agreement with comments made in the CAHFSA Group
Venezuela	no tenemos observacion referente a la norma

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

FAO sequential number	Para	Text	T	Comment
1	G	(General Comment)	C	<b>Mexico</b> Mexico supports OIRSA's comments <i>Category : SUBSTANTIVE</i>
2	G	(General Comment)	C	<b>Argentina</b> We support the comments submitted by COSAVE <i>Category : SUBSTANTIVE</i>
3	G	(General Comment)	C	<b>Guyana</b> Guyana has no objection to the proposed document at this time. <i>Category : SUBSTANTIVE</i>
4	G	(General Comment)	C	<b>Nepal</b> Nepal has no comments on Revision of ISPM 4 (Requirements for the establishment of pest free areas) <i>Category : EDITORIAL</i>
5	G	(General Comment)	C	<b>Japan</b> The terms "measures" and "phytosanitary measures" should be distinguished to use depending on the situation, to interpret the requirements of this ISPM correctly. If the measures are for establishing and maintaining a PFA, "measures" should be used, because the measures to control domestic pests (i.e. other than the phytosanitary purposes) may also be applied to establish and maintain the PFA. On the other hand, the term "phytosanitary measure" is used for phytosanitary perspective like a case as "PFA is used as a phytosanitary measure for trade." <i>Category : SUBSTANTIVE</i>
6	G	(General Comment)	C	<b>Canada</b> Canada supports the draft Revision of ISPM 4. A few comments are presented for consideration.

				<i>Category : SUBSTANTIVE</i>
7	G	(General Comment)	C	<p><b>PPPO</b></p> <p>There are situations where a country may be able to claim a PFA (in line with this ISPM) as well as Pest Status of Absent (in line with ISPM8). Suggest additional text be included in section 2.1 to further clarifying that this can be the case.</p> <p><i>Category : SUBSTANTIVE</i></p>
8	G	(General Comment)	C	<p><b>PPPO</b></p> <p>Throughout this document, PFA is referred to as a 'phytosanitary measure' and the individual activities implemented to establish and maintain the PFA are also referred to as 'phytosanitary measures'.</p> <p>The sets up two levels of phytosanitary measures and creates some confusion. It is recommended that PFA be referred to as a 'phytosanitary measure' and the individual measures or phytosanitary measures implemented to establish and maintain the PFA be referred to as 'activities' or 'elements' throughout this document.</p> <p><i>Category : SUBSTANTIVE</i></p>
9	G	(General Comment)	C	<p><b>PPPO</b></p> <p>As an overarching document describing the requirements for establishment of PFAs, existing related ISPMs (e.g.ISPM26) and potential future documents describing the requirements for PFAs for specific pests should be annexed to this revised ISPM4.</p> <p><i>Category : SUBSTANTIVE</i></p>
10	G	(General Comment)	C	<p><b>PPPO</b></p> <p>ISPM 4 is an overarching document describing the requirements for establishment of PFAs. As such, it is proposed that existing, related ISPMs (e.g. ISPM26) and potential future documents describing the requirements for PFAs for specific pests should be Annexed to this revised ISPM4</p> <p><i>Category : SUBSTANTIVE</i></p>
11	G	(General Comment)	C	<p><b>PPPO</b></p> <p>Document needs to ensure consistency of terminology.</p> <p>e.g. There is a lot of usage of the terms phytosanitary measures or systems, monitoring and survey. It appears they are being used interchangeably but should be differentiated throughout.</p> <p>Another example is throughout the document PFA is a phytosanitary measure but the standard talks about phytosanitary measures to maintain PFA</p> <p><i>Category : EDITORIAL</i></p>
12	G	(General Comment)	C	<p><b>Korea, Republic of</b></p> <p>The use of terms such as "surveillance", "pest monitoring", "surveys", "outbreak", "detection" should be consistent throughout the document.</p> <p><i>Category : EDITORIAL</i></p>
13	G	(General Comment)	C	<p><b>Switzerland</b></p> <p>Switzerland would like to formally endorse the EPPO comments submitted via the IPPC Online Comment System</p> <p><i>Category : TECHNICAL</i></p>
14	G	(General Comment)	C	<p><b>Australia</b></p> <p>There are situations where a country may be able to claim a PFA (in line with this ISPM) as well as Pest Status of Absent (in line with ISPM8). Suggest additional text be included in section 2.1 to further clarifying that this can be the case.</p> <p><i>Category : TECHNICAL</i></p>
15	G	(General Comment)	C	<p><b>Australia</b></p> <p>Throughout this document, PFA is referred to as a 'phytosanitary measure' and the individual activities implemented to establish and maintain the PFA are also referred to as 'phytosanitary measures'.</p> <p>This sets up two levels of phytosanitary measures and creates some confusion. It is recommended that PFA be</p>

				referred to as a 'phytosanitary measure' and the individual measures or phytosanitary measures implemented to establish and maintain the PFA be referred to as 'activities' or 'elements' throughout this document. <i>Category : SUBSTANTIVE</i>
16	G	(General Comment)	C	<b>Australia</b> As an overarching document describing the requirements for establishment of PFAs, existing related ISPMs (e.g.ISPM26) and potential future documents describing the requirements for PFAs for specific pests, should be annexed to this revised ISPM4. <i>Category : SUBSTANTIVE</i>
17	G	(General Comment)	C	<b>Jamaica</b> Jamaica supports the comments from the IPPC Caribbean Regional Workshop. <i>Category : SUBSTANTIVE</i>
18	G	(General Comment)	C	<b>IPPC Regional Workshop Africa</b> Malawi supports the draft with its proposed comment No.9 made but indicated as IPPC Regional workshop <i>Category : SUBSTANTIVE</i>
19	G	(General Comment)	C	<b>Barbados</b> This is an important addition to the toolbox of NPPOs in determining PFAs. <i>Category : SUBSTANTIVE</i>
20	G	(General Comment)	C	<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 <i>Category : TRANSLATION</i>
21	G	(General Comment)	C	<b>Uruguay</b> We highlight the importance of having better translation into Spanish in order to be consistent with the English version <i>Category : TRANSLATION</i>
22	G	(General Comment)	C	<b>Malawi</b> We support draft ISPM: Revision of ISPM4 : requirements for the establishment 0f pest free areas (2009-002) <i>Category : SUBSTANTIVE</i>
23	G	(General Comment)	C	<b>Caribbean Agricultural Health and Food Safety Agency</b> We support the document. <i>Category : SUBSTANTIVE</i>
24	G	(General Comment)	C	<b>Caribbean Agricultural Health and Food Safety Agency</b> No objections at this time. <i>Category : SUBSTANTIVE</i>
25	G	(General Comment)	C	<b>Caribbean Agricultural Health and Food Safety Agency</b> A paragraph needs to be inserted to address cases of an outbreak where the PFA consist of multiple countries or more than one PFAs within the same country. <i>Category : SUBSTANTIVE</i>
26	G	(General Comment)	C	<b>Caribbean Agricultural Health and Food Safety Agency</b> Very good draft. It provides a stepwise guide for PFAs. <i>Category : TECHNICAL</i>
27	G	(General Comment)	C	<b>Caribbean Agricultural Health and Food Safety Agency</b> This is an important addition to the toolbox of NPPOs in determining PFAs. <i>Category : SUBSTANTIVE</i>

28	G	(General Comment)	C	<b>Saint Vincent and The Grenadines</b> It needs a paragraph to address cases where there is an outbreak where the PRA consist of multiple countries or more than one PRAs in the same country. <i>Category : SUBSTANTIVE</i>
29	G	(General Comment)	C	<b>Saint Vincent and The Grenadines</b> Very good ISPM. It provides clear stepwise guide for PFA. <i>Category : TECHNICAL</i>
30	G	(General Comment)	C	<b>Mexico</b> México apoya los comentarios de OIRSA <i>Category : SUBSTANTIVE</i>
31	1	<b>DRAFT ISPM: Revision of ISPM 4 (Requirements for the establishment of pest free areas) (2009-002)</b>	C	<b>IPPC Regional Workshop Africa</b> Le document est en version anglaise ce qui ne nous permet pas de bien comprendre afin de faire des commentaires <i>Category : TRANSLATION</i>
32	1	<b>DRAFT ISPM: Revision of ISPM 4 (Requirements for the establishment of pest free areas) (2009-002)</b>	C	<b>COSAVE</b> To avoid confusion between phytosanitary measure (the PFA) and the measures being needed to achieve the PFA we suggest to use "measures" to refer to the measures needed to establish the PFA throughout the text. <i>Category : TECHNICAL</i>
33	1	<b>DRAFT ISPM: Revision of ISPM 4 (Requirements for the establishment of pest free areas) (2009-002)</b>	C	<b>Uruguay</b> To avoid confusion between phytosanitary measure (the PFA) and the measures being needed to achieve the PFA we suggest to use "measures" to refer to the measures needed to establish the PFA throughout the text <i>Category : TECHNICAL</i>
Scope				
34	30	This standard describes the requirements for initiating, establishing and maintaining pest free areas (PFAs) as a phytosanitary measure <del>to attain or maintain the pest freedom of an area, to</del> support the phytosanitary certification of plants, plant products and other regulated articles exported from the PFA, or support the scientific justification for phytosanitary measures required by an importing	P	<b>Costa Rica</b> A PFA as a phytosanitary measure and therefore it has the purpose to prevent the introduction or spread o pests, not to attain the pest freedom of the area. Text deleted to avoid confusion between phytosanitary measure (the PFA) and the measures being needed to achieve the PFA. See general comment <i>Category : SUBSTANTIVE</i>

		country for protection of an endangered area.		
35	30	This standard describes the requirements for initiating, establishing and maintaining pest free areas (PFAs) as a phytosanitary measure to attain or maintain the pest freedom of an area, support the phytosanitary certification of plants, plant products and other regulated articles exported from the PFA, or support the scientific justification for phytosanitary measures required by <a href="#">the NPPO of</a> an importing country for protection of an endangered area.	P	<b>Canada</b> Adding clarity <i>Category : EDITORIAL</i>
36	30	<u>This standard describes the requirements for initiating, establishing and maintaining pest free areas (PFAs) as a phytosanitary measure to: 1. attain or maintain the pest free status of an area, 2. support the phytosanitary certification of plants, plant products and other regulated articles exported from the PFA, or support the scientific justification for phytosanitary measures</u>	P	<b>PPPO</b> reduce ambiguity and keep consistency throughout the document  Created by merging other changes together <i>Category : EDITORIAL</i>

		<p><del>required by an importing country for protection of an endangered area. This standard describes the requirements for initiating, establishing and maintaining pest free areas (PFAs) as a phytosanitary measure to attain or maintain the pest freedom of an area, support the phytosanitary certification of plants, plant products and other regulated articles exported from the PFA, or support the scientific justification for phytosanitary measures required by an importing country for protection of an endangered area.</del></p>		
37	30	<p>This standard describes the requirements for initiating, establishing and maintaining pest free areas (PFAs) as a phytosanitary measure <del>to attain or maintain the pest freedom of an area</del>, support the phytosanitary certification of plants, plant products and other regulated articles exported from the PFA, or support the scientific justification for phytosanitary measures</p>	P	<p><b>COSAVE</b>  A PFA as a phytosanitary measure and therefore it has the purpose to prevent the introduction or spread o pests, not to attain the pest freedom of the area. Text deleted to avoid confusion between phytosanitary measure (the PFA) and the measures being needed to achieve the PFA. See general comment  Category : <i>TECHNICAL</i></p>

		required by an importing country for protection of an endangered area.		
38	30	This standard describes the requirements for initiating, establishing and maintaining pest free areas (PFAs) as a phytosanitary measure to attain or maintain the pest freedom of an area, support the phytosanitary certification of plants, plant products and other regulated articles exported from the PFA, or support the scientific justification for phytosanitary measures required by an importing country for protection of an endangered area.	C	<b>China</b> PFA should be pest free area, "pest freedom" was used several time in this ISPM which is not very precise. We recommend change all the pest freedom to pest free. <i>Category : SUBSTANTIVE</i>
39	30	This standard describes the requirements for initiating, establishing and maintaining pest free areas (PFAs) as a phytosanitary measure to <del>attain or maintain the pest freedom of an area;</del> support the phytosanitary certification of plants, plant products and other regulated articles exported from the PFA, or support the scientific justification for phytosanitary measures	P	<b>Uruguay</b> A PFA as a phytosanitary measure and therefore it has the purpose to prevent the introduction or spread o pests, not to attain the pest freedom of the area. Text deleted to avoid confusion between phytosanitary measure (the PFA) and the measures being needed to achieve the PFA. See general comment <i>Category : TECHNICAL</i>

		required by an importing country for protection of an endangered area.		
40	30	En la presente norma se describen los requisitos para <del>iniciar</del> <u>iniciar la creación</u> , establecer y mantener áreas libres de plagas (ALP) como medida fitosanitaria con el fin de lograr o mantener la ausencia de plagas en un área, respaldar la certificación fitosanitaria de las plantas, productos vegetales y otros artículos reglamentados que se exporten desde el ALP, y respaldar la justificación científica de las medidas fitosanitarias que exigen los países importadores para proteger un área en peligro.	P	<b>Colombia</b> Se sugiere cambiar el término iniciar por “iniciar la creación”. Para unificar con el párrafo No. 70 <i>Category : EDITORIAL</i>
41	30	En la presente norma se describen los requisitos para iniciar, establecer y mantener <del>áreas libres</del> <u>Área Libres de plagas</u> (ALP) como medida fitosanitaria con el fin de lograr o mantener la ausencia de plagas en un área, respaldar la certificación fitosanitaria de las plantas, productos	P	<b>Colombia</b> Uso de las siglas y su denominación. Las palabras iniciales de la sigla ALP no están en mayúsculas. Cambiar “áreas libres de plagas” por “área libre de plaga”. En la NIMF 5 el término es área libre de plaga (ALP), se emplearía en el texto en singular. <i>Category : EDITORIAL</i>



		vegetales y otros artículos reglamentados que se exporten desde el ALP, y respaldar la justificación científica de las medidas fitosanitarias que exigen los países importadores para proteger un área en peligro.		
42	31	This standard does not cover <del>pest-free-pest-free</del> places of production or <del>pest-free-pest-free</del> production sites, the requirements for which can be found in ISPM 10 ( <i>Requirements for the establishment of pest free places of production and pest free production sites</i> ).	P	<b>PPPO</b> Grammar; words must be connected to reflect intended meaning <i>Category : EDITORIAL</i>
43	31	This standard does not cover pest free places of production or pest free production sites, the requirements for which can be found in ISPM 10 ( <i>Requirements for the establishment of pest free places of production and pest free production sites</i> ).	P	<b>Caribbean Agricultural Health and Food Safety Agency</b> It also does not cover the determination of pest status (ISPM 8: Determination of pest status in an area) nor recognition of pest-free areas which is covered by ISPM 29 (Recognition of pest free areas and areas of low pest prevalence). It also is not specifically finetuned towards PFAs for Tephritidae, which require stipulations of ISPM 4 and for which additional coverage is found in ISPM 26 (Establishment of pest free areas for fruit flies (Tephritidae)) <i>Category : EDITORIAL</i>
44	31	La presente norma no abarca los lugares de producción libres de plagas o sitios de producción libres de plagas, cuyos requisitos	P	<b>Colombia</b> Indicar el significado de la sigla. La primera vez que se nombra una sigla siempre debe indicarse su significado. <i>Category : EDITORIAL</i>

		se pueden encontrar en la <u>NIMF-Norma Internacional para Medidas Fitosanitarias (NIMF) 10 (Requisitos para el establecimiento de lugares de producción libres de plagas y sitios de producción libres de plagas).</u>		
Outline of requirements				
45	37	A PFA is a phytosanitary measure that may be used to facilitate safe trade and protect plant resources. National plant protection organizations (NPPOs) should consider a PFA to be a phytosanitary measure that, when used alone, is sufficient for managing pest risk and meeting <u>the phytosanitary import requirements of an importing country's appropriate level of protection</u> .	P	<b>European Union</b> The term "appropriate level of protection" is not defined in the Glossary but in the WTO Agreement on the Application of Sanitary and Phytosanitary Measures (SPS Agreement). According to the "General recommendations on consistency" in the "IPPC Style Guide ( <a href="https://assets.ippc.int/static/media/files/publication/en/2019/05/IPPCStyleGuide_2019-05-31.pdf">https://assets.ippc.int/static/media/files/publication/en/2019/05/IPPCStyleGuide_2019-05-31.pdf</a> ), this term "should only be used in ISPMs when referring to the SPS context, and with the precise wording of the SPS Agreement. Otherwise, in the phytosanitary context, it is preferable to state that exporting countries have to meet the "phytosanitary import requirements" of importing countries, not their "appropriate level of protection". Category : <i>TECHNICAL</i>
46	37	A PFA is <del>a phytosanitary measure that an option for managing pest risk and</del> may be used to facilitate safe trade and protect plant resources. National <del>plant protection organizations-Plant Protection Organizations</del> (NPPOs) should consider <del>a PFA to be as a</del>	P	<b>PPPO</b> The concepts in this paragraph are repeated in the 'Requirements' section and therefore this paragraph could be removed to avoid duplication. If the steward decides to remove then paragraph [38] should start with 'This ISPM provides guidance to NPPOs when initiating, establishing or maintaining a PFA.'  if the steward decides not to delete this para, our suggested wording aligns better with the draft ISPM commodity-based standards for phytosanitary measures and the rationale that phytosanitary measures are only options until they are set as requirements and implemented.  to delete the statement on 'appropriate level of protection. This term is not mentioned so should not be mentioned in the Outline ( which is supposed to be a precis of the requirements.). if it is not deleted, the statement assumes that every NPPO requires a high level of protection for every pest that has an established PFA. It is probably more accurate to say '...sufficient for managing pest risk at, or above the required level of protection of an importing country.'

		phytosanitary measure that, when used alone, is sufficient for managing pest <del>risk and meeting an importing country's appropriate level of protection</del> risk.		<i>Category : SUBSTANTIVE</i>
47	37	<u>One of the responsibilities of national plant protection organizations (NPPOs) according to Article IV.2(e) of the IPPC, is the designation, maintenance and surveillance of PFAs.</u> A PFA is a phytosanitary measure that may be used to facilitate safe trade and protect plant resources. National plant protection organizations (NPPOs) should consider a PFA to be a phytosanitary measure that, when used alone, is sufficient for managing pest risk and meeting an importing country's appropriate level of protection.	P	<b>COSAVE</b> 1) Text added moved from paragraph 41 for better reading. 2) "To facilitate safe trade" should be translated to spanish as "facilitar el comercio seguro" <i>Category : TECHNICAL</i>
48	37	A PFA is a phytosanitary measure that may be used to facilitate safe trade and protect plant resources. National plant protection organizations (NPPOs) should consider a PFA to be a phytosanitary measure that, when used alone, is sufficient for managing pest risk and	P	<b>EPPO</b> The term "appropriate level of protection" is not defined in the Glossary but in the WTO Agreement on the Application of Sanitary and Phytosanitary Measures (SPS Agreement). According to the "General recommendations on consistency" in the "IPPC Style Guide ( <a href="https://assets.ippc.int/static/media/files/publication/en/2019/05/IPPCStyleGuide_2019-05-31.pdf">https://assets.ippc.int/static/media/files/publication/en/2019/05/IPPCStyleGuide_2019-05-31.pdf</a> ), this term "should only be used in ISPMs when referring to the SPS context, and with the precise wording of the SPS Agreement. Otherwise, in the phytosanitary context, it is preferable to state that exporting countries have to meet the "phytosanitary import requirements" of importing countries, not their "appropriate level of protection"." <i>Category : TECHNICAL</i>

		meeting <u>the phytosanitary import requirements of</u> an importing country's appropriate level of protectioncountry.		
49	37	A PFA is a phytosanitary measure that may be used to facilitate safe trade and protect plant resources. National plant protection organizations (NPPOs) should consider a PFA to be a phytosanitary measure that, when used alone, is sufficient for managing pest risk and meeting an importing country's appropriate level of protection.	C	<b>Nicaragua</b> seguro Category : EDITORIAL
50	37	A PFA is a phytosanitary measure that may be used to facilitate safe trade and protect plant resources. National plant protection organizations (NPPOs) should consider a PFA to be a phytosanitary measure that, when used alone, is sufficient for managing pest risk and meeting an importing country's appropriate level of protection.	C	<b>Uruguay</b> "To facilitate safe trade" should be translated to spanish as "facilitar el comercio seguro" Category : TRANSLATION
51	37	<u>One of the responsibilities of national plant protection organizations (NPPOs) according to Article IV.2(e) of the</u>	P	<b>Uruguay</b> Text added moved from paragraph 41 for better reading. Category : TECHNICAL

		<p><u>IPPC, is the designation, maintenance and surveillance of PFAs.</u> A PFA is a phytosanitary measure that may be used to facilitate safe trade and protect plant resources. National plant protection organizations (NPPOs) should consider a PFA to be a phytosanitary measure that, when used alone, is sufficient for managing pest risk and meeting an importing country's appropriate level of protection.</p>		
52	37	<p>A PFA is a phytosanitary measure that may be used to facilitate safe trade and protect plant <del>resources</del><u>resources or maintain the pest freedom of an area, support the phytosanitary certification of plants.</u> National plant protection organizations (NPPOs) should consider a PFA to be a phytosanitary measure that, when used alone, is sufficient for managing pest risk and meeting an importing country's appropriate level of protection.</p>	P	<p><b>Egypt</b> This addition is to be in conformity with the scope of this draft <i>Category : EDITORIAL</i></p>
53	37	<p>Un ALP es una medida fitosanitaria que <del>se</del> puede</p>	P	<p><b>Panama</b></p>

		utilizar para facilitar el comercio en condiciones de inocuidad y proteger los recursos vegetales. Las organizaciones nacionales de protección fitosanitaria (ONPF) deberían considerar las ALP como una medida fitosanitaria que, al utilizarse sola, es suficiente para gestionar el riesgo de plagas y lograr el nivel adecuado de protección de los países importadores.		<i>Category : EDITORIAL</i>
54	37	Un ALP es una medida fitosanitaria que se puede utilizar para facilitar el comercio <del>en condiciones de inocuidad seguro</del> y proteger los recursos vegetales. Las organizaciones nacionales de protección fitosanitaria (ONPF) deberían considerar las ALP como una medida fitosanitaria que, al utilizarse sola, es suficiente para gestionar el riesgo de plagas y lograr el nivel adecuado de protección de los países importadores.	P	<b>Colombia</b> Cambiar “comercio en condiciones de inocuidad” por “comercio seguro”. En la versión en inglés se emplea el término “safe trade” que correspondería a “comercio seguro”. <i>Category : TRANSLATION</i>
55	37	Un ALP es una medida fitosanitaria que se puede utilizar para facilitar el comercio en condiciones	P	<b>Colombia</b> La primera vez que se nombra una sigla siempre debe indicarse su significado. <i>Category : EDITORIAL</i>

		de inocuidad y proteger los recursos vegetales. Las <del>organizaciones nacionales</del> <u>Organizaciones Nacionales de protección fitosanitaria-Protección Fitosanitaria</u> (ONPF) deberían considerar las ALP como una medida fitosanitaria que, al utilizarse sola, es suficiente para gestionar el riesgo de plagas y lograr el nivel adecuado de protección de los países importadores.		
56	37	Un ALP es una medida fitosanitaria que se puede utilizar para facilitar el comercio <del>en condiciones de inocuidad-seguro</del> y proteger los recursos vegetales. Las organizaciones nacionales de protección fitosanitaria (ONPF) deberían considerar las ALP como una medida fitosanitaria que, al utilizarse sola, es suficiente para gestionar el riesgo de plagas y lograr el nivel adecuado de protección de los países importadores.	P	<b>OIRSA</b> Es el termino más adecuado <i>Category : TRANSLATION</i>
57	38	When initiating, establishing or maintaining a PFA,	P	<b>Japan</b> The terms "measures" and "phytosanitary measures" should be distinguished to use depending on the situation, to interpret the requirements of this ISPM correctly. If the measures are for establishing and maintaining a PFA, "measures" should be used, because the measures to

		<p>NPPOs should follow the requirements outlined in this standard.</p> <p>Requirements include systems to establish pest freedom, systems to maintain pest freedom, verification that pest freedom has been attained or maintained, appropriate corrective actions for pest detections, proper documentation of these systems and appropriate record keeping, and transparency and stakeholder communication. The <del>phytosanitary</del> measures used to establish or maintain the PFA should be based on an assessment of pest risk.</p>		<p>control domestic pests (i.e. other than the phytosanitary purposes) may also be applied to establish and maintain the PFA.</p> <p>On the other hand, the term "phytosanitary measure" is used for phytosanitary perspective like a case as "PFA is used as a phytosanitary measure for trade."</p> <p><i>Category : SUBSTANTIVE</i></p>
58	38	<p>When initiating, establishing or maintaining a PFA, NPPOs should follow the requirements outlined in this standard.</p> <p>Requirements include systems to establish <del>pest freedom, systems to and</del> maintain pest freedom, verification that pest freedom has been attained or maintained, appropriate corrective actions for pest detections, proper</p>	P	<p><b>Uruguay</b></p> <p>For simplification. See also general comment</p> <p><i>Category : TECHNICAL</i></p>



		documentation of these systems and appropriate record keeping, and transparency and stakeholder communication. The <del>phytosanitary</del> measures used to establish or maintain the PFA should be based on an assessment of pest risk.		
59	38	<u>When initiating, establishing or maintaining a PFA, NPPOs should follow the requirements outlined in this standard. Requirements include:- systems to establish pest freedom, - programme to maintain pest freedom, - verification and regular review that pest free status has been attained or maintained, - appropriate corrective actions for detection of target pest or group of pests, - proper documentation of these systems, and - appropriate record keeping, and transparency and stakeholder communication. The phytosanitary activities used to establish or maintain the PFA should be based on an</u>	P	<p><b>PPPO</b></p> <p>To provide clarity about the detection of which pest in a PFA. Also, propose including 'group of pests' to align with paragraph [46]. 41 words in a single sentence. Plain English is more user-friendly.</p> <p>Justification: As in the general comment at the beginning of this document, this alternate description, "activities", is proposed to clarify the meaning and remove the seeming two levels/tiers of 'phytosanitary measures'</p> <p>Category : <i>TECHNICAL</i></p>

		<p><del>assessment of pest risk. When initiating, establishing or maintaining a PFA, NPPOs should follow the requirements outlined in this standard. Requirements include systems to establish pest freedom, systems to maintain pest freedom, verification that pest freedom has been attained or maintained, appropriate corrective actions for pest detections, proper documentation of these systems and appropriate record keeping, and transparency and stakeholder communication. The phytosanitary measures used to establish or maintain the PFA should be based on an assessment of pest risk.</del></p>		
60	38	<p>When initiating, establishing or maintaining a PFA, NPPOs should follow the requirements outlined in this standard.</p> <p>Requirements include systems to establish pest freedom, systems to maintain pest freedom, verification that pest</p>	C	<p><b>PPPO</b></p> <p>This comment applies to the "phytosanitary measures" in the following paragraphs: [38] [51] [60] [96] [100] [131] [134] [136].</p> <p>As PFA is a phytosanitary measure, it is confusing to use the word measures for the individual components. We propose another word should be used such as: Methods, means, systems, procedures, or steps taken</p> <p>Category : <i>SUBSTANTIVE</i></p>

		freedom has been attained or maintained, appropriate corrective actions for pest detections, proper documentation of these systems and appropriate record keeping, and transparency and stakeholder communication. The phytosanitary measures used to establish or maintain the PFA should be based on an assessment of pest risk.		
61	38	When initiating, establishing or maintaining a PFA, NPPOs should follow the requirements outlined in this standard. Requirements include systems to establish pest freedom, systems to maintain pest freedom, verification that pest freedom has been attained or maintained, appropriate corrective actions for pest detections, proper documentation of these systems and appropriate record keeping, and transparency and stakeholder communication. The phytosanitary measures used to establish or	C	<b>PPPO</b> NZ supports including the word 'attained' here as this allows more flexibility for NPPOs who take corrective actions when a target pest is detected in a PFA <i>Category : SUBSTANTIVE</i>

		maintain the PFA should be based on an assessment of pest risk.		
62	38	<p>When initiating, establishing or maintaining a PFA, NPPOs should follow the requirements outlined in this standard.</p> <p>Requirements include systems to establish <a href="#">and maintain</a> pest freedom, <del>systems to maintain pest freedom</del>, verification that pest freedom has been attained or maintained, appropriate corrective actions for pest detections, proper documentation of these systems and appropriate record keeping, and transparency and stakeholder communication. The phytosanitary measures used to establish or maintain the PFA should be based on an assessment of pest risk.</p>	P	<p><b>COSAVE</b> For simplification <i>Category : EDITORIAL</i></p>
63	38	<p>When initiating, establishing or maintaining a PFA, NPPOs should follow the requirements outlined in this standard.</p> <p>Requirements include systems to establish pest</p>	P	<p><b>Australia</b> Justification: As described in the general comment at the beginning of the document, this alternate description, "activities", is proposed to clarify the meaning and remove the seeming two levels/tiers of 'phytosanitary measures' referenced in this document. <i>Category : TECHNICAL</i></p>

		freedom, systems to maintain pest freedom, verification that pest freedom has been attained or maintained, appropriate corrective actions for pest detections, proper documentation of these systems and appropriate record keeping, and transparency and stakeholder communication. The phytosanitary <del>measures</del> <u>activities</u> used to establish or maintain the PFA should be based on an assessment of pest risk.		
64	38	When initiating, establishing or maintaining a PFA, NPPOs should follow the requirements outlined in this standard. Requirements include systems to establish pest freedom, systems to maintain pest freedom, verification that pest freedom has been attained or maintained, appropriate corrective actions for pest detections, proper documentation of these systems and appropriate record keeping, and transparency and stakeholder	P	<b>COSAVE</b> See general comment <i>Category : TECHNICAL</i>

		communication. The <del>phytosanitary</del> measures used to establish or maintain the PFA should be based on an assessment of pest risk.		
65	38	When initiating, establishing or maintaining a PFA, NPPOs should follow the requirements outlined in this standard. Requirements include systems to establish pest freedom, systems to maintain pest freedom, verification <u>and regular review</u> that pest freedom has been attained or maintained, appropriate corrective actions for pest detections, proper documentation of these systems and appropriate record keeping, and transparency and stakeholder communication. The phytosanitary measures used to establish or maintain the PFA should be based on an assessment of pest risk.	P	<b>China</b> It is mentioned in the title of section 4 that the maintenance and implementation of pest free areas should be verified and regularly reviewed. As outline of the ISPMs, "regularly reviewed" should be described here. <i>Category : SUBSTANTIVE</i>
66	38	When initiating, establishing or maintaining a PFA, NPPOs should follow the requirements outlined in	P	<b>Egypt</b> <i>Category : EDITORIAL</i>

		<p>this standard.</p> <p>Requirements include systems to establish <del>pest freedom, systems to or</del> maintain pest freedom, verification that pest freedom has been attained or maintained, appropriate corrective actions for pest detections, proper documentation of these systems and appropriate record keeping, and transparency and stakeholder communication. The phytosanitary measures used to establish or maintain the PFA should be based on an assessment of pest risk.</p>		
67	38	<p>Al iniciar, establecer y mantener un ALP, las ONPF deberían cumplir los requisitos que se indican en la presente norma. Los requisitos se refieren a los sistemas para establecer la ausencia de plagas, los sistemas para mantener la ausencia de plagas, la verificación de que se ha logrado <del>e mantenido y se mantiene</del> la ausencia de plagas, las medidas correctivas apropiadas en caso de detección de</p>	P	<p><b>Panama</b>  Mejor comprensión del texto  Category : EDITORIAL</p>

		plagas, la debida documentación de estos sistemas y el mantenimiento de registros adecuado, y la transparencia y la comunicación con las partes interesadas. Las medidas fitosanitarias utilizadas para establecer o mantener las ALP se deberían basar en una evaluación del riesgo de plagas.		
68	38	Al iniciar, establecer y mantener un ALP, las ONPF deberían cumplir los requisitos que se indican en la presente norma. Los requisitos se refieren a los sistemas para establecer la ausencia de plagas, los sistemas para mantener la ausencia de plagas, la verificación de que se ha logrado o mantenido la ausencia de plagas, las medidas correctivas apropiadas en caso de detección de plagas, la debida documentación de estos sistemas y el <u>adecuado</u> mantenimiento de <u>registros</u> <u>adecuado</u> <u>registros</u> , y la transparencia y la comunicación con las	P	<b>Colombia</b> Se puede mejorar la traducción. La frase "y el mantenimiento de registros adecuado" se puede mejorar <i>Category : TECHNICAL</i>



		partes interesadas. Las medidas fitosanitarias utilizadas para establecer o mantener las ALP se deberían basar en una evaluación del riesgo de plagas.		
69	38	Al iniciar, establecer y mantener un ALP, las ONPF deberían cumplir los requisitos que se indican en la presente norma. Los requisitos se refieren a los sistemas para establecer la ausencia de plagas, los sistemas para mantener la ausencia de plagas, la verificación de que se ha logrado <del>e-mantenido-y se mantiene</del> la ausencia de plagas, las medidas correctivas apropiadas en caso de detección de plagas, la debida documentación de estos sistemas y el mantenimiento de registros adecuado, y la transparencia y la comunicación con las partes interesadas. Las medidas fitosanitarias utilizadas para establecer o mantener las ALP se deberían basar en una evaluación del riesgo de plagas.	P	<b>OIRSA</b> Mejor comprensión del texto <i>Category : EDITORIAL</i>

Background				
70	39	<b>BACKGROUND</b>	P	<b>COSAVE</b> We suggest to delete this section because most of the information duplicates information provided in the section "outline of requirements" <i>Category : TECHNICAL</i>
71	39	<b>BACKGROUND</b>	P	<b>Uruguay</b> We suggest to delete this section because most of the information duplicates information provided in the section "outline of requirements" <i>Category : TECHNICAL</i>
72	40	A PFA is recognized as one of the phytosanitary measures that <del>may be used to facilitate safe trade and may:</del> • protect the plant resources of an area for agricultural, forestry or ecological conservation purposes;• <u>facilitate safe trade;</u> • <u>increase the market-access opportunities for exporting countries.</u>	P	<b>European Union</b> Proposal to avoid repetition of what is in paragraphs 42 and 43. It is also suggested to remove paragraphs 42, 43 and 44. <i>Category : EDITORIAL</i>
73	40	<del>A PFA is recognized as one of the phytosanitary measures that may be used to facilitate safe trade and protect the plant resources of an area for agricultural, forestry or ecological conservation purposes.</del>	P	<b>PPPO</b> Repeating information, suggest deleting paragraph [40] as the information is stated in paragraphs [42] – [44] <i>Category : TECHNICAL</i>
74	40	<del>A PFA is recognized as one of the phytosanitary measures that may be used to facilitate safe trade and protect the plant resources of an area for agricultural, forestry or</del>	P	<b>COSAVE</b> To avoid redundancy with paragraph 37 <i>Category : TECHNICAL</i>

		<del>ecological conservation purposes.</del>		
75	40	A PFA is recognized as one of the phytosanitary measures that <del>may be used to facilitate safe trade and may</del> :- protect the plant resources of an area for agricultural, forestry or ecological conservation purposes. <del>;-</del> <del>facilitate safe trade;-</del> <del>increase the market-access opportunities for exporting countries.</del>	P	<b>EPPO</b> Proposal to avoid repetition of what is in paragraphs 42 and 43. It is also suggested to remove paragraphs 42, 43 and 44. <i>Category : EDITORIAL</i>
76	40	<del>A PFA is recognized as one of the phytosanitary measures that may be used to facilitate safe trade and protect the plant resources of an area for agricultural, forestry or ecological conservation purposes.</del>	P	<b>Uruguay</b> To avoid redundancy with paragraph 37 <i>Category : TECHNICAL</i>
77	40	<del>Se considera que las ALP son una de las medidas fitosanitarias que se podrán utilizar para facilitar el comercio en condiciones de inocuidad y proteger los recursos vegetales de un área con fines agrícolas, forestales o de conservación ecológica.</del>	P	<b>Panama</b> Repetición <i>Category : EDITORIAL</i>
78	40	Se considera que las ALP son una de las medidas fitosanitarias que se	P	<b>Colombia</b> Cambiar "comercio en condiciones de inocuidad" por "comercio seguro". En la versión en inglés se emplea el término "safe trade" que correspondería a "comercio seguro".

		podrán utilizar para facilitar el comercio <del>en condiciones de inocuidad seguro</del> y proteger los recursos vegetales de un área con fines agrícolas, forestales o de conservación ecológica.		<i>Category : TRANSLATION</i>
79	40	Se considera que las ALP son una de las medidas fitosanitarias que se podrán utilizar para facilitar el comercio <del>en condiciones de inocuidad seguro</del> y proteger los recursos vegetales de un área con fines agrícolas, forestales o de conservación ecológica.	P	<b>OIRSA</b> Uso correcto del termino <i>Category : TRANSLATION</i>
80	41	This <u>ISPM</u> establishes the linkage of PFAs to pest risk management and <u>the recognition of PFAs by contracting parties</u> is outlined as one of the operational principles in ISPM 1 ( <i>Phytosanitary principles for the protection of plants and the application of phytosanitary measures in international trade</i> ). <del>Where economically beneficial</del> , PFAs can also offer a cost-effective risk mitigation option for NPPOs and industry in both importing and	P	<b>PPPO</b> The first sentence requires a noun to follow 'this' or it does not make sense. Suggest aligning the wording more closely with the operational principal in ISPM 1 noting that for recognition to occur a contracting party needs to establish, implement and monitor a PFA as a measure. Grammar; full stop after text in italics and in brackets was not intended and sentence two was intended to be connected to sentence one. <i>Category : TECHNICAL</i>

		exporting countries. One of the responsibilities of NPPOs, according to Article IV.2(e) of the IPPC, is the designation, maintenance and surveillance of <del>PFA</del> <u>PFA</u> s where <u>economically beneficial</u> .		
81	41	<del>This establishes the linkage of PFAs to pest risk management and is outlined as one of the operational principles in ISPM 1 (Phytosanitary principles for the protection of plants and the application of phytosanitary measures in international trade). Where economically beneficial, PFAs can also offer a cost effective risk mitigation option for NPPOs and industry in both importing and exporting countries. One of the responsibilities of NPPOs, according to Article IV.2(e) of the IPPC, is the designation, maintenance and surveillance of PFAs.</del>	P	<b>COSAVE</b> First sentence deleted for simplification and better reading. Second sentence deleted because it was already mentioned that the PFA is a risk mitigation option and we consider the sentence not appropriate for this section. Last sentence moved as first sentence of paragraph 37. <i>Category : TECHNICAL</i>
82	41	<del>This establishes the linkage of PFAs to pest risk management and is outlined as one of the operational principles in</del>	P	<b>Uruguay</b> First sentence deleted for simplification and better reading. Second sentence deleted because it was already mentioned that the PFA is a risk mitigation option and we consider the sentence not appropriate for this section. Last sentence moved as first sentence of paragraph 37. <i>Category : TECHNICAL</i>

		<p><del>ISPM 1 (<i>Phytosanitary principles for the protection of plants and the application of phytosanitary measures in international trade</i>): Where economically beneficial, PFAs can also offer a cost effective risk mitigation option for NPPOs and industry in both importing and exporting countries. One of the responsibilities of NPPOs, according to Article IV.2(e) of the IPPC, is the designation, maintenance and surveillance of PFAs.</del></p>		
83	41	<p>Ello establece el vínculo de las ALP con la gestión del riesgo de plagas y se menciona como uno de los principios operativos en la NIMF 1 (<i>Principios fitosanitarios para la protección de las plantas y la aplicación de medidas fitosanitarias en el comercio internacional</i>) Si resulta beneficioso desde el punto de vista económico, las ALP también pueden representar una opción de mitigación de riesgos eficaz en función de los costos para las ONPF y la</p>	P	<p><b>Colombia</b> Cambiar IPPC por CIPF. Indicar el nombre completo de la sigla. Por tratarse de la versión en español debe ir la sigla en español. Se hace necesario indicar el nombre completo de la sigla por ser la primera vez que se nombra. <i>Category : TRANSLATION</i></p>

		industria tanto en países importadores como exportadores. Una de las responsabilidades de las ONPF, según lo establecido en el Artículo IV.2 e) de la <u>IPPC Convención Internacional de Protección Fitosanitaria (CIPF)</u> , es la designación, el mantenimiento y la vigilancia de las ALP.		
84	41	Ello establece el vínculo de las ALP con la gestión del riesgo de plagas y se menciona como uno de los principios operativos en la NIMF 1 ( <i>Principios fitosanitarios para la protección de las plantas y la aplicación de medidas fitosanitarias en el comercio internacional</i> ). Si resulta beneficioso desde el punto de vista económico, las ALP también pueden representar una opción de mitigación de riesgos eficaz en función de los costos para las ONPF y la industria tanto en países importadores como exportadores. Una de las responsabilidades de las ONPF, según lo establecido en el	P	<b>Colombia</b> Falta un punto en: ...medidas fitosanitarias en el comercio internacional). Si resulta... <i>Category : EDITORIAL</i>

		Artículo IV.2 e) de la IPPC, es la designación, el mantenimiento y la vigilancia de las ALP.		
85	42	<del>A PFA may be established as a phytosanitary measure for various purposes, including:</del>	P	<b>European Union</b> See comment on section 40. <i>Category : EDITORIAL</i>
86	42	<del>A PFA may be established as a phytosanitary measure for various purposes, including:</del>	P	<b>COSAVE</b> Deleted to avoid redundancy with paragraph 37 <i>Category : TECHNICAL</i>
87	42	<del>A PFA may be established as a phytosanitary measure for various purposes, including:</del>	P	<b>EPPO</b> See comment on section 40. <i>Category : EDITORIAL</i>
88	42	<del>A PFA may be established as a phytosanitary measure for various purposes, including:</del>	P	<b>Uruguay</b> Deleted to avoid redundancy with paragraph 37 <i>Category : TECHNICAL</i>
89	43	<del>protecting areas of plant production or ecological conservation in importing or exporting countries;</del>	P	<b>European Union</b> See comment on section 40. <i>Category : EDITORIAL</i>
90	43	<del>- increasing the market-access opportunities for exporting countries. -</del> protecting areas of plant production or ecological conservation in <del>importing or exporting</del> countries;	P	<b>Japan</b> The main purpose of PFA as a phytosanitary measure is to increase the market-access opportunities for exporting countries, so put it first. Delete "in importing or exporting countries" because whether importing countries or exporting countries is not relevant in protecting areas of plant production or ecological conservation. <i>Category : SUBSTANTIVE</i>
91	43	protecting areas of plant production or ecological	P	<b>Korea, Republic of</b> Delete redundant wording. <i>Category : SUBSTANTIVE</i>



		conservation <del>in importing or exporting countries;</del>		
92	43	<del>protecting areas of plant production or ecological conservation in importing or exporting countries;</del>	P	<b>COSAVE</b> Deleted to avoid redundancy with paragraph 37 <i>Category : TECHNICAL</i>
93	43	<del>protecting areas of plant production or ecological conservation in importing or exporting countries;</del>	P	<b>EPPO</b> See comment on section 40. <i>Category : EDITORIAL</i>
94	43	protecting areas of plant production or ecological <b>conservation</b> in importing or exporting countries;	C	<b>United States of America</b> are there any other situations that might be relevant to these areas of protection? <i>Category : TECHNICAL</i>
95	43	<del>protecting areas of plant production or ecological conservation in importing or exporting countries;</del>	P	<b>Uruguay</b> Deleted to avoid redundancy with paragraph 37 <i>Category : TECHNICAL</i>
96	44	<del>increasing the market access opportunities for exporting countries.</del>	P	<b>European Union</b> See comment on section 40. <i>Category : EDITORIAL</i>
97	44	<del>increasing the market access opportunities for exporting countries.</del>	P	<b>Japan</b> See the comment to paragraph 43 from Japan. <i>Category : SUBSTANTIVE</i>
98	44	increasing the <del>market access</del> market access opportunities for exporting countries.	P	<b>PPPO</b> <i>Category : EDITORIAL</i>
99	44	<del>increasing the market access opportunities for exporting countries.</del>	P	<b>COSAVE</b> Deleted to avoid redundancy with paragraph 37 <i>Category : TECHNICAL</i>
100	44	<del>increasing the market access opportunities for exporting countries</del> See comment on section 40.-	P	<b>EPPO</b> See comment on section 40. <i>Category : EDITORIAL</i>

101	44	<del>increasing the market access opportunities for exporting countries.</del>	P	<b>Uruguay</b> Deleted to avoid redundancy with paragraph 37 <i>Category : TECHNICAL</i>
102	45	A PFA may be applied to an entire country or part of it. A PFA may, as appropriate, include the territory of all or parts of several countries. Within a single country, more than one PFA may be established for the same pest, depending on the geographical nature of the country, the distribution of the pest and its hosts and the biology of the pest.	P	<b>Canada</b> Editorial <i>Category : EDITORIAL</i>
103	45	A PFA may be applied <del>to</del> an entire country or part of it. A PFA may, as appropriate, include the territory of all or parts of several countries. Within a single country, more than one PFA may be established for the same pest, depending on the geographical nature of the country, the distribution of the pest and its hosts and the biology of the pest.	P	<b>European Union</b> Typo. <i>Category : EDITORIAL</i>
104	45	A PFA may be applied to an entire country or part of it. A PFA may, as appropriate, include the territory of all or parts of	P	<b>PPPO</b> <i>Category : EDITORIAL</i>

		several countries. Within a single country, more than one PFA may be established for the same pest, depending on the geographical nature of the country, the distribution of the pest and its hosts and the biology of the pest.		
105	45	A PFA may be applied to an entire country or part of it. A PFA may, as appropriate, include the territory of all or parts of several countries. Within a single country, more than one PFA may be established for the same pest, depending on the geographical nature of the country, the distribution of the pest and its hosts and the biology of the pest.	P	<b>Australia</b> Removal of ] Category : EDITORIAL
106	45	A PFA may be applied to an entire country or part of it. A PFA may, as appropriate, include the territory of all or parts of several countries. Within a single country, more than one PFA may be established for the same pest, depending on the geographical nature of the country, the distribution of the pest and its hosts	P	<b>EPPO</b> Typo. Category : EDITORIAL

		and the biology of the pest.		
107	45	A PFA may be applied to an entire country or part of it. A PFA may, as appropriate, include the territory of all or parts of several countries. Within a single country, more than one PFA may be established for the same pest, depending on the geographical nature of the country, the distribution of the pest and its hosts and the biology of the pest.	P	<b>Caribbean Agricultural Health and Food Safety Agency</b> <i>Category : EDITORIAL</i>
108	45	A PFA may be applied to an entire country or part of it. A PFA may, as appropriate, include the territory of all or parts of several countries. Within a single country, more than one PFA may be established for the same pest, depending on the geographical nature of the country, the distribution of the pest and its hosts and the biology of the pest-. <a href="#">(Put this paragraph after paragraph 45)</a>	P	<b>China</b> It is more logical to describe the content pest of PFA first and then the geographical information. <i>Category : EDITORIAL</i>
109	45	A PFA may be applied to an entire country or part of it. A PFA may, as appropriate, include the territory of all or parts of	P	<b>China</b> Typo. <i>Category : EDITORIAL</i>

		several countries. Within a single country, more than one PFA may be established for the same pest, depending on the geographical nature of the country, the distribution of the pest and its hosts and the biology of the pest.		
110	45	<del>Las ALP se podrán aplicar a un país entero o a parte de él. Según proceda, las ALP podrán incluir el territorio de varios países enteros o de partes de ellos. Se podrá establecer más de un ALP para la misma plaga dentro de un mismo país, dependiendo de sus características geográficas, de la distribución de la plaga y sus hospedantes y de las características biológicas de la plaga.</del>	P	<b>Panama</b> Repetición <i>Category : EDITORIAL</i>
111	45	Las ALP se podrán aplicar a un país <del>entero</del> o a parte de él. Según proceda, las ALP podrán incluir el territorio de varios países <del>enteros</del> o de partes de ellos. Se podrá establecer más de un ALP para la misma plaga dentro de un mismo país, dependiendo de sus	P	<b>Colombia</b> Uso de palabras adicionales. Sobran palabras y se puede mejorar la traducción: ... varios países enteros o de partes de ellos. Se podrá establecer más de un ALP para la misma plaga dentro de un mismo país, dependiendo de sus características geográficas, de la distribución de la plaga y sus hospedantes y de las características biológicas de la plaga. <i>Category : EDITORIAL</i>

		características geográficas, de la distribución de la plaga y sus hospedantes y <u>así como</u> de las características biológicas de la plaga.		
<b>IMPACTS ON BIODIVERSITY AND THE ENVIRONMENT</b>				
112	48	This standard may contribute to the protection of biodiversity and the environment by preventing the introduction of regulated pests into an <del>area (either a whole country or part of a country)</del> <u>area</u> . When establishing and maintaining PFAs, countries are encouraged to consider phytosanitary procedures that minimize impact on the environment.	P	<b>European Union</b> The text proposed to be deleted seems unnecessary because this is already explained in paragraph 45. <i>Category : EDITORIAL</i>
113	48	This standard may contribute to the protection of biodiversity and the environment by preventing the introduction of regulated pests into an area (either <del>a whole</del> <u>an entire</u> country or part of a country). When establishing and maintaining PFAs, countries are encouraged to consider phytosanitary procedures that minimize	P	<b>Japan</b> Change "a whole country" to "an entire country" to be consistent with other parts in this standard. <i>Category : EDITORIAL</i>

		impact on the environment.		
114	48	This standard may contribute to the protection of biodiversity and the environment by preventing the introduction of regulated pests into an <del>area (either a whole country or part of a country)</del> area. When establishing and maintaining PFAs, countries are encouraged to consider phytosanitary procedures that minimize impact on the environment.	P	<b>COSAVE</b> For simplification, it is not necessary to explain again the scope of the term area in this section. <i>Category : TECHNICAL</i>
115	48	This standard may contribute to the protection of biodiversity and the environment by preventing the introduction of regulated pests into an <del>area (either a whole country or part of a country)</del> area. When establishing and maintaining PFAs, countries are encouraged to consider phytosanitary procedures that minimize impact on the environment.	P	<b>EPPO</b> The text proposed to be deleted seems unnecessary because this is already explained in paragraph 45. <i>Category : EDITORIAL</i>
116	48	This standard may contribute to the protection of biodiversity and the environment by	P	<b>Uruguay</b> For simplification, it is not necessary to explain again the scope of the term area in this section. <i>Category : TECHNICAL</i>

		preventing the introduction of regulated pests into an <del>area (either a whole country or part of a country)</del> area. When establishing and maintaining PFAs, countries are encouraged to consider phytosanitary procedures that minimize impact on the environment.		
117	48	La presente norma puede contribuir a la protección de la biodiversidad y el medio ambiente al prevenir la introducción de plagas reglamentadas en un área (ya sea un país <del>entero</del> o parte de él). Se alienta a los países a que, para establecer y mantener ALP, consideren procedimientos fitosanitarios que tengan el menor impacto ambiental posible.	P	<b>Colombia</b> Mejora de traducción <i>Category : EDITORIAL</i>
<b>Requirements</b>				
118	50	A PFA should be considered a phytosanitary measure that, when used alone, is sufficient for managing the pest risk associated with a specific pest. Where a PFA has been established in full	P	<b>Japan</b> Aside from the phytosanitary measures in conformity with this standard, measures to prevent infestation or contamination during transport or storage after harvest may be required in order to assure phytosanitary security. So, suggest to clarify that the phytosanitary security should be assured.  ISPM 5 "Phytosanitary security(under consultation) ": State of a consignment when its integrity has been maintained and its infestation and contamination by regulated pests, prevented through the application of phytosanitary measures. <i>Category : SUBSTANTIVE</i>



		conformity with this standard, additional phytosanitary measures in relation to the specified pest should not be <del>required</del> <u>required while the phytosanitary security of the consignment should be assured.</u>		
119	50	A PFA should be considered a phytosanitary measure that, when used alone, is sufficient for managing the pest risk associated with a specific pest. Where a PFA has been established <del>in full</del> <u>conformity with this standard</u> <u>following the core components of the ISPM for establishing, maintaining and verifying the PFA,</u> additional phytosanitary measures in relation to the specified pest should not be required.	P	<b>PPPO</b> What is the intent of the statement 'full conformity with the standard'? Suggest rewording to 'following the core components of the ISPM for establishing, maintaining and verifying the PFA'. <i>Category : EDITORIAL</i>
120	50	A PFA should be considered a phytosanitary measure that, when used alone, is sufficient for managing the pest risk associated with a specific pest. Where a PFA has been established in <del>full</del> <u>conformity with this</u>	P	<b>COSAVE</b> For consistency with other ISPMs. All ISPMs should be considered in full <i>Category : TECHNICAL</i>

		standard, additional phytosanitary measures in relation to the specified pest should not be required.		
121	50	A PFA should be considered a phytosanitary measure that, when used alone, is sufficient for managing the pest risk associated with a specific pest. Where a PFA has been established <del>in full</del> <a href="#">conformity with according to the requirements of</a> this standard, additional phytosanitary measures in relation to the specified pest should not be required.	P	<b>United States of America</b> More clarity <i>Category : EDITORIAL</i>
122	50	A PFA should be considered a phytosanitary measure that, when used alone, is sufficient for managing the pest risk associated with a specific pest. Where a PFA has been established in <del>full</del> conformity with this standard, additional phytosanitary measures in relation to the specified pest should not be required.	P	<b>Uruguay</b> For consistency with other ISPMs. All ISPMs should be considered in full <i>Category : TECHNICAL</i>

123	50	Las ALP se deberían considerar como una medida fitosanitaria que, al utilizarse sola, es suficiente para gestionar el riesgo asociado a una determinada plaga. Si las ALP se establecen en total conformidad con la presente norma, no se deberían necesitar medidas fitosanitarias adicionales en relación con la plaga <del>específica de que se trate</del> específica.	P	<b>Colombia</b> Mejora de redacción. <i>Category : EDITORIAL</i>
124	51	<del>There are several</del> <u>The</u> requirements that should be met for a PFA to be established and to be used as a phytosanitary measure for trade, <del>as are</del> detailed below. Depending on the pest concerned, an individual or a combination of phytosanitary <del>measures</del> <u>procedures</u> may be used to meet each requirement. <del>The selection of these phytosanitary measures should be risk based and in accordance with the principles of the IPPC.</del>	P	<b>PPPO</b> What is the intent of the statement 'several requirements that should be met'? It appears to be conflicting with the above 'full conformity' statement, and does not give an indication of what requirements should be met.  PFA is described as a standalone phytosanitary measure in paragraph [50]. It would be preferable to use the terminology of 'phytosanitary procedures' here rather than 'measures' to aid understanding that procedures are performed to meet a requirement and implement PFA as a phytosanitary measure. This proposal also aligns with the ISPM 5 definition.  Suggest removing the last sentence – it adds little value. <i>Category : TECHNICAL</i>
125	51	There are several requirements that should be met for a PFA to be established and to be used as a phytosanitary	P	<b>Korea, Republic of</b> Suggest removing the last sentence – it adds little value. <i>Category : SUBSTANTIVE</i>

		measure for trade, as detailed below. Depending on the pest concerned, an individual or a combination of phytosanitary measures may be used to meet each requirement. <del>The selection of these phytosanitary measures should be risk-based and in accordance with the principles of the IPPC.</del>		
126	51	There are several requirements that should be met for a PFA to be established and to be used as a phytosanitary measure for trade, as detailed below. Depending on the pest concerned, an individual or a combination of phytosanitary measures may be used to meet each requirement. The selection of these phytosanitary <del>measures</del> <u>activities</u> should be risk-based and in accordance with the principles of the IPPC.	P	<b>Australia</b> Justification: As described in the general comment at the beginning of the document, this alternate description, "activities", is proposed to clarify the meaning and remove the seeming two levels/tiers of 'phytosanitary measures' referenced in this document. <i>Category : TECHNICAL</i>
127	51	There are several requirements that should be met for a PFA to be established and to be used as a phytosanitary measure for trade, as	P	<b>Australia</b> Clarification of text to enhance understanding. As described in the general comment at the beginning of the document, this alternate description, "activities", is proposed to clarify the meaning and remove the seeming two levels/tiers of 'phytosanitary measures' referenced in this document. <i>Category : TECHNICAL</i>

		<p>detailed below.</p> <p>Depending on the pest concerned, <del>an individual or a combination of phytosanitary measures activities</del> may be <del>used required to meet each requirement</del> establish and maintain the PFA. The selection of these phytosanitary measures should be risk-based and in accordance with the principles of the IPPC.</p>		
128	51	<p><del>There are several requirements that should be met for a PFA to be established and to be used as a phytosanitary measure for trade, as detailed below.</del></p> <p><del>Depending on the pest concerned, an individual or a combination of phytosanitary measures may be used to meet each requirement. The selection of these phytosanitary measures should be risk-based and in accordance with the principles of the IPPC.</del></p>	P	<p><b>COSAVE</b></p> <p>Deleted to avoid redundancy with paragraph 52 and no additional information is provided</p> <p>Category : <i>TECHNICAL</i></p>
129	51	<p><del>There are several requirements that should be met for a PFA to be established and to be used as a phytosanitary measure for trade, as</del></p>	P	<p><b>Uruguay</b></p> <p>Deleted to avoid redundancy with paragraph 52 and no additional information is provided</p> <p>Category : <i>TECHNICAL</i></p>

		<del>detailed below. Depending on the pest concerned, an individual or a combination of phytosanitary measures may be used to meet each requirement. The selection of these phytosanitary measures should be risk based and in accordance with the principles of the IPPC.</del>		
130	51	Para poder establecer un ALP y utilizarla como medida fitosanitaria para el comercio, se deberían cumplir los requisitos que se detallan a continuación. Según la plaga de que se trate, se podrán utilizar una o más medidas fitosanitarias combinadas para cumplir cada requisito. La selección de estas medidas fitosanitarias debería basarse en el <u>análisis de riesgo de plaga</u> y seguir los principios de la CIPF.	P	<b>Colombia</b> Para dar mayor claridad se sugiere emplear el término completo. <i>Category : EDITORIAL</i>
131	52	Requirements for the establishment and maintenance of a <u>PFA as a phytosanitary measure</u> <u>PFA</u> by an NPPO include:	P	<b>COSAVE</b> Deleted to avoid redundancy <i>Category : TECHNICAL</i>

132	52	Requirements for the establishment and maintenance of a PFA as a phytosanitary measure by an NPPO <del>include</del> <u>include but not limited to:</u>	P	<b>China</b> There are much more requirements for an NPPO and it is hard to list all, so we recommend add "but not limited to" after include to make it more comprehensive. <i>Category : SUBSTANTIVE</i>
133	52	Requirements for the establishment and maintenance of a PFA <del>as a phytosanitary measure</del> by an NPPO include:	P	<b>Uruguay</b> Deleted to avoid redundancy <i>Category : TECHNICAL</i>
134	54	<del>programmes</del> <u>systems</u> to maintain pest freedom;	P	<b>PPPO</b> Suggest this is renamed 'programme' to align with paragraphs [98] and [127]. <i>Category : EDITORIAL</i>
135	55	verification that pest freedom has been <del>attained</del> <del>or attained;- verification that pest freedom has been</del> maintained;	P	<b>European Union</b> This is more clear to consider both aspects: establishment and maintenance and for consistency with paragraphs 53 and 54. <i>Category : TECHNICAL</i>
136	55	verification <del>and regular review</del> that pest <del>freedom free status</del> has been attained or maintained;	P	<b>PPPO</b> align with section 4 heading <i>Category : TECHNICAL</i>
137	55	verification that pest freedom has been <del>attained</del> <del>or attained;- verification that pest freedom has been</del> maintained;	P	<b>EPPO</b> It is clearer to consider both aspects: establishment and maintenance and for consistency with paragraphs 53 and 54. <i>Category : TECHNICAL</i>
138	55	verification <del>and regular review</del> that pest freedom has been attained or maintained;	P	<b>China</b> It is mentioned in the title of section 4 that the maintenance and implementation of pest free areas should be verified and regularly reviewed. <i>Category : SUBSTANTIVE</i>
139	55	verificación de que se ha logrado <del>e-mantenido-y se mantiene</del> la ausencia de plagas;	P	<b>Panama</b> Para mejor comprensión del texto <i>Category : EDITORIAL</i>

140	55	verificación de que se ha logrado <del>e-mantenido y se mantiene</del> la ausencia de plagas;	P	<b>OIRSA</b> Mejor comprensión del párrafo <i>Category : EDITORIAL</i>
141	58	transparency and <del>stakeholder</del> communication.	P	<b>Japan</b> Delete "stakeholder". Communication needs to take place not only with stakeholders(domestic industries and local regulatory bodies) but with contracting parties and other NPPOs as well. <i>Category : SUBSTANTIVE</i>
142	59	<del>Pest-free</del> <u>Pest-free</u> areas may take significant time and resources to establish and maintain. To ensure that a PFA achieves its objectives, the following elements should be considered:	P	<b>PPPO</b>  <i>Category : EDITORIAL</i>
143	59	<u>The following elements should be considered when establishing and maintaining a PFA:</u> <del>Pest free areas may take significant time and resources to establish and maintain. To ensure that a PFA achieves its objectives, the following elements should be considered:</del>	P	<b>COSAVE</b> Deleted text is not a requirement to establish or maintain a PFA <i>Category : TECHNICAL</i>
144	59	<u>The following elements should be considered when establishing and maintaining a PFA:</u> <del>Pest free areas may take significant time and resources to establish and maintain. To ensure that a PFA achieves its objectives, the following</del>	P	<b>Uruguay</b> Deleted text is not a requirement to establish or maintain a PFA <i>Category : TECHNICAL</i>



		<del>elements should be considered:</del>		
145	59	El establecimiento y mantenimiento de las ALP pueden requerir una cantidad considerable de tiempo y recursos. A fin de garantizar que las ALP logren sus objetivos, se deberían considerar los <del>elementos siguientes</del> <del>elementos:</del>	P	<b>Colombia</b> Mejora de redacción. <i>Category : EDITORIAL</i>
146	60	the requirement that measures used to establish and maintain a PFA should be based <del>on on;</del> - the biology of the pest of <del>concern</del> <del>concern</del> ( <u>survival potential, rate of reproduction, means of dispersal, the availability of host plants etc.</u> ), <del>the relevant pathways and pathways</del> - the characteristics of the <del>PFA</del> <u>PFA</u> ( <u>size, degree of isolation, ecological conditions, homogeneity etc.</u> );	P	<b>Japan</b> Add examples for consideration of each element "the biology of the pest of concern" and "the characteristics of the PFA" because it is better to show readers a concrete examples for better understanding. The examples are referred to from the present ISPM4. In addition to adding the examples in brackets, the three elements in paragraph 60 are divided into three sub-paragraphs. <i>Category : SUBSTANTIVE</i>
147	60	the requirement that <del>measures</del> <u>activities</u> used to establish and maintain a PFA should be based on the biology of the pest of concern, the relevant pathways and the	P	<b>PPPO</b> Justification: As in the general comment at the beginning of this document, this alternate description, "activities", is proposed to clarify the meaning and remove the seeming two levels/tiers of 'phytosanitary measures' <i>Category : TECHNICAL</i>

		characteristics of the PFA;		
148	60	the requirement that <del>measures-activities</del> used to establish and maintain a PFA should be based on the biology of the pest of concern, the relevant pathways and the characteristics of the PFA;	P	<b>Australia</b> Justification: As described in the general comment at the beginning of the document, this alternate description, "activities", is proposed to clarify the meaning and remove the seeming two levels/tiers of 'phytosanitary measures' referenced in this document. <i>Category : TECHNICAL</i>
149	60	<del>the requirement that</del> measures <del>used to establish and maintain a PFA</del> should be based on the biology of the pest of concern, the relevant pathways and the characteristics of the <del>PFA</del> area;	P	<b>COSAVE</b> Reworded to avoid redundancy. This bullet include elements to consider to establish the PFA, therefore what it should be considered are the characteristics of the area and not the PFA <i>Category : TECHNICAL</i>
150	60	<del>the requirement that</del> measures <del>used to establish and maintain a PFA</del> should be based on the biology of the pest of concern, the relevant pathways and the characteristics of the <del>PFA</del> area;	P	<b>Uruguay</b> Reworded to avoid redundancy. This bullet include elements to consider to establish the PFA, therefore what it should be considered are the characteristics of the area and not the PFA <i>Category : TECHNICAL</i>
151	60	<del>el requisito de que</del> las medidas empleadas para establecer y mantener un ALP deberían basarse en las características biológicas de la <del>plaga de que se trata</del> plaga, las vías <del>pertinentes de entrada y</del>	P	<b>Colombia</b> Para mayor claridad y concordancia con la definición de la NIMF No. 5.  Mejora de redacción <i>Category : EDITORIAL</i>

		las características del ALP;		
152	61	the existence of an appropriate legislative framework to support the establishment and maintenance of the PFA; <del>the availability of appropriate surveillance tools for the specified pest (detection and identification)</del>	P	<b>Australia</b> Justification: it is considered that surveillance is a critical tool for the maintenance of a PFA and should be considered. <i>Category : SUBSTANTIVE</i>
153	62	<del>the feasibility of the PFA in terms of resources:</del>	P	<b>PPPO</b> Justification: These economic considerations should not be included as requirements in an ISPM. <i>Category : SUBSTANTIVE</i>
154	62	<del>the feasibility of the PFA in terms of resources:</del>	P	<b>Australia</b> Justification: These economic considerations should not be included as requirements in an ISPM. It is proposed this sentiment be made options, as in the proposed additional text at the end of this section. <i>Category : SUBSTANTIVE</i>
155	63	<del>economic considerations based on a cost benefit analysis,</del>	P	<b>PPPO</b> Justification: These economic considerations should not be included as requirements in an ISPM. <i>Category : SUBSTANTIVE</i>
156	63	<del>economic considerations based on a cost benefit analysis,</del>	P	<b>Australia</b> Justification: These economic considerations should not be included as requirements in an ISPM. It is proposed this sentiment be made options, as in the proposed additional text at the end of this section. <i>Category : SUBSTANTIVE</i>
157	63	consideraciones económicas basadas en un análisis de costos <del>y</del> beneficios,	P	<b>Panama</b> Uso correcto del párrafo <i>Category : EDITORIAL</i>
158	63	consideraciones económicas basadas en un análisis de costos <del>y</del> beneficios,	P	<b>OIRSA</b> Uso correcto del párrafo <i>Category : EDITORIAL</i>
159	64	the availability of human <del>resources and resources,</del> technical <del>expertise</del> <u>expertise and equipment;</u>	P	<b>European Union</b> Equipment is an important element to be considered. <i>Category : TECHNICAL</i>

160	64	<del>the availability of human resources and technical expertise;</del>	P	<b>PPPO</b> Justification: These economic considerations should not be included as requirements in an ISPM. <i>Category : SUBSTANTIVE</i>
161	64	<del>the availability of human resources and technical expertise;</del>	P	<b>Australia</b> Justification: These economic considerations should not be included as requirements in an ISPM. It is proposed this sentiment be made options, as in the proposed additional text at the end of this section. <i>Category : SUBSTANTIVE</i>
162	64	the availability of human <del>resources and resources,</del> technical <del>expertise</del> <u>expertise and equipment;</u>	P	<b>EPPO</b> Equipment is an important element to be considered. <i>Category : TECHNICAL</i>
163	65	the availability of <u>stable funding over the long term;</u>	C	<b>United States of America</b> this might need either better explanation of what "stable funding" implies or it belongs in the Implementation Guide. <i>Category : TECHNICAL</i>
164	65	la disponibilidad de <u>financiación</u> <u>financiamiento</u> estable a largo plazo;	P	<b>Panama</b> Uso correcto de términos <i>Category : EDITORIAL</i>
165	65	la disponibilidad de <del>financiación</del> <u>financiamiento</u> estable a largo plazo;	P	<b>OIRSA</b> Uso correcto de términos <i>Category : EDITORIAL</i>
166	67	the importance of communicating with and raising awareness among other NPPOs, stakeholders and the general public. <u>Additionally, NPPOs may consider the feasibility of the PFA in terms of resource availability (economic, human and technical) over the long term as well as the cost-benefit.</u>	P	<b>PPPO</b> Justification: These considerations should not be requirements within an ISPM, but to maintain the reminder to NPPOs that these considerations could be made, the concept is included here as "may consider". <i>Category : SUBSTANTIVE</i>

167	67	the importance of communicating with and raising awareness among other NPPOs, stakeholders and the general public.	C	<b>PPPO</b> para 67...108, and section 6 etc - availability of information to importing country – does this need to be considered – when they do an audit, how will they inspect the records etc – is this thought about when the whole system is set up? <i>Category : SUBSTANTIVE</i>
168	67	the importance of communicating with and raising awareness among other NPPOs, stakeholders and the general public. <u>Additionally, NPPOs may consider the feasibility of the PFA in terms of resource availability (economic, human and technical) over the long term as well as cost-benefit.</u>	P	<b>Australia</b> Justification: These considerations should not be requirements within an ISPM, but to maintain the reminder to NPPOs that these considerations could be made, the concept is included here as “may consider”. <i>Category : SUBSTANTIVE</i>
169	67	la importancia de <u>sensibilizar y</u> comunicarse con otras ONPF, las partes interesadas y el público <u>general y de aumentar su sensibilización general.</u>	P	<b>Colombia</b> Mejora de redacción y traducción. <i>Category : TRANSLATION</i>
170	67	l'importance de la communication et de la sensibilisation auprès des autres ONPV, des parties prenantes et du grand public. <u>-la complémentarité dans la réalisation des activités relatives à l'établissement et le maintien d'une ZE au cas où la zone concerne</u>	P	<b>IPPC Regional Workshop Africa</b> En se référant à la définition d'une zone(NIMP 5), cette phrase aurait sa raison d'être, une façon de gérer la zone à l'unanimité, d'impliquer tous les pays concernés, afin de mieux la prévenir contre l'introduction et la dissémination de l'organisme nuisible concerné <i>Category : SUBSTANTIVE</i>

		<a href="#">plusieurs pays ou les parties de plusieurs pays</a>		
171	67	l'importance de la communication et de la sensibilisation auprès des autres ONPV, des parties prenantes et du grand public.- <a href="#">la complémentarité dans la réalisation des activités relatives à l'établissement et le maintien d'une ZE au cas où la zone concerne plusieurs pays ou les parties de plusieurs pays</a>	P	<b>Congo</b> en se référant à la définition d'une zone(NIMP 5), cette phrase aurait sa raison d'être, une façon de gérer la zone à l'unanimité, d'impliquer tous les pays concernés, afin de mieux la prévenir contre l'introduction et la dissémination de l'organisme nuisible concerné <i>Category : SUBSTANTIVE</i>
1.1 Pest and area to be controlled				
172	69	<b>1.1 Pest and area to be controlled</b> <a href="#">characterization</a>	P	<b>Costa Rica</b> consistency with what is indicated in the paragraphs of the section <i>Category : SUBSTANTIVE</i>
173	69	<b>1.1 Pest and area to be controlled</b>	P	<b>European Union</b> We suggest that this section just describes the pest and not the area, because identification of the area is described in 1.3. It is unnecessary duplication to describe the identity of the area in this section. <i>Category : TECHNICAL</i>
174	69	<b>1.1 Pest and area to be controlled</b> <a href="#">characterization</a>	P	<b>COSAVE</b> To align with the content of the section. See comment in paragraph 70. <i>Category : TECHNICAL</i>
175	69	<b>1.1 Pest and area to be controlled</b>	P	<b>EPPO</b> We suggest that this section just describes the pest and not the area, because identification of the area is described in 1.3. It is unnecessary duplication to describe the identity of the area in this section. <i>Category : TECHNICAL</i>
176	69	<b>1.1 Pest and area to be controlled</b> <a href="#">characterization</a>	P	<b>Uruguay</b> To align with the content of the section. See comment in paragraph 70. <i>Category : TECHNICAL</i>
177	70	When initiating a PFA, an NPPO should first	P	<b>Costa Rica</b> It is removed because section 1.3 is the section dealing with area identification, to avoid duplication. <i>Category : SUBSTANTIVE</i>

		characterize the pest – including the scientific name of the pest, valid identification methods and relevant aspects of its biology <del>—and identify the area that is being considered for pest freedom. The area may be the entire country, a part of a country, or all or part of several countries.</del>		
178	70	When initiating a PFA, an NPPO should first characterize the pest – including the scientific name of the pest, valid identification methods and relevant aspects of its <del>biology—</del> and identify the <del>area that is being considered for pest freedom</del> biology. <del>The area may be the entire country, a part of a country, or all or part of several countries.</del>	P	<b>European Union</b> We suggest that this section just describes the pest and not the area, because identification of the area is described in 1.3. It is unnecessary duplication to describe the identity of the area in this section. See also comment on 74. <i>Category : TECHNICAL</i>
179	70	When initiating a PFA, an NPPO should first characterize the pest – including the scientific name of the pest, valid identification methods and relevant aspects of its biology – and identify the area that is being considered for pest freedom. The area may be	P	<b>Japan</b> Add the following complementary explanations on : - the relationship between the boundary of PFA and the country border. - the involvements of relevant NPPOs in the case of the PFA across multiple countries <i>Category : SUBSTANTIVE</i>

		the entire country, a part of a country, or all or part of several countries. <u>The boundary of a PFA may not necessarily mean the country's border, depending on the situation of the targeted pest. If a PFA extends beyond a border between two or more countries, establishing and maintaining the PFA should involve the NPPOs concerned.</u>		
180	70	<u>When initiating a PFA, an NPPO or Regional Plant Protection Organization should first characterize the pest – including the scientific name of the pest, valid identification methods and relevant aspects of its biology – and identify the area that is being considered for pest free status. The area may be the entire country, a part of a country, or all or part of several countries. When initiating a PFA, an NPPO should first characterize the pest – including the scientific name of the pest, valid identification methods and relevant aspects of its biology – and identify the</u>	P	<p><b>PPPO</b></p> <p>This paragraph refers to PFAs including all or part of several countries. If this is the case, there is a role for Regional Plant Protection Organizations to be involved in the PFA initiation, establishment, maintenance and verification process.</p> <p>Examples of this already occurring are where the PPPO has set up multi-country PFAs for <i>Bactrocera kirkii</i> (Fiji, Tuvalu, Samoa, Tonga and US Samoa) and Subterranean termites (Fiji, Samoa and the Cook Is)</p> <p>Category : <i>SUBSTANTIVE</i></p>



		<del>area that is being considered for pest freedom. The area may be the entire country, a part of a country, or all or part of several countries.</del>		
181	70	When initiating a PFA, an NPPO should first characterize the pest – including the scientific <del>name of the pest</del> <u>name</u> , valid identification methods and relevant aspects of its <del>biology—</del> <u>and identify the area that is being considered for pest freedom. The area may be the entire country, a part of a country, or all or part of several countries. biology.</u>	P	<b>COSAVE</b> "of the pest" deleted to avoid redundancy. Last part of the paragraph deleted because section 1.3 is the section dealing with the identification of the area, to avoid duplication. Last sentence moved to paragraph 74 <i>Category : TECHNICAL</i>
182	70	When initiating a PFA, an NPPO should first characterize the pest – including the scientific name of the pest, valid identification methods and relevant aspects of its <del>biology—</del> <u>and identify the area that is being considered for pest freedom</u> <u>biology. The area may be the entire country, a part of a country, or all or part of several countries.</u>	P	<b>EPPO</b> We suggest that this section just describes the pest and not the area, because identification of the area is described in 1.3. It is unnecessary duplication to describe the identity of the area in this section. See also comment on 74. <i>Category : TECHNICAL</i>
183	70	When initiating a PFA, an NPPO should first	P	<b>United States of America</b> Move para 81 here. This creates a decision point where a country (NPPO) understands that in cases where the pest

		characterize the pest – including the scientific name of the pest, valid identification methods and relevant aspects of its biology – and identify the area that is being considered for pest freedom. The area may be the entire country, a part of a country, or all or part of several countries. <a href="#">If the pest status is “absent: pest not recorded” as defined in ISPM 8 and this is supported by current scientific evidence – such as from continued surveillance for pest absence in the area, the results of which are made available on request – then establishing and maintaining an official PFA as set in this ISPM, should not be required.</a>		is absent, because it has not been recorded, and there is no need to go through the entire process of establishing a PFA <i>Category : SUBSTANTIVE</i>
184	70	When initiating a PFA, an NPPO should first characterize the pest – including the scientific name of the pest, valid identification methods and relevant aspects of its biology – and identify the area that is being considered for pest freedom. The area may be <del>the entire country</del> , a part	P	<b>China</b> An NPPO could only establish and maintain PFA in its country territory. Only several NPPO may together establish PFA covered all or parts of several countries. <i>Category : SUBSTANTIVE</i>

		of a country, <u>several parts of a country</u> or <u>the entire country</u> . Several NPPO <u>may together establish PFA covered</u> all or <del>part</del> <u>parts</u> of several countries.		
185	70	When initiating a PFA, an NPPO should first characterize the pest – including the scientific <del>name of the pest</del> <u>name</u> , valid identification methods and relevant aspects of its <del>biology</del> <u>and identify the area that is being considered for pest freedom</u> <u>biology</u> . The area may be the entire country, a part of a country, or all or part of several countries.	P	<b>Uruguay</b> “of the pest” deleted to avoid redundancy. Last part of the paragraph deleted because section 1.3 is the section dealing with the identification of the area, to avoid duplication. Last sentence moved to paragraph 74 <i>Category : TECHNICAL</i>
186	70	En el momento de iniciar la creación de un ALP, las ONPF deberían primero caracterizar la plaga (lo que incluirá la indicación de su <del>nombre científico</del> <u>clasificación taxonómica actualizada</u> , los métodos válidos para identificarla y sus características biológicas de interés) y determinar el área para la que se está considerando la condición de área libre de plagas. El área puede ser un <del>país</del>	P	<b>Colombia</b> Es pertinente indicar la clasificación taxonómica actualizada de la plaga, con el fin de tener precisión en la identidad de la plaga objeto.  Mejora de redacción <i>Category : TECHNICAL</i>

		<del>enter</del> país, parte de un país, varios países completos o partes de ellos.		
<b>1.2 Suitability of ecological conditions in the area</b>				
187	71	<b>1.2 Suitability of ecological conditions in the area</b>	C	<b>COSAVE</b> We suggest to move section 1.2 after section 1.3 for mor logical order. The area should be identified first and then evaluate the conditions in the area <i>Category : TECHNICAL</i>
188	72	The NPPO of the country in which the area is situated should determine the presence of host plants in the area. Potential differences in host susceptibility in the specified area, the climatic suitability of the area, and the potential for entry and establishment of the pest in the area should also be considered.	C	<b>Uruguay</b> We suggest to move section 1.2 after section 1.3 for more logical order. The area should be identified first and then evaluate the conditions in the area <i>Category : TECHNICAL</i>
<b>1.3 Identification of the area</b>				
189	73	<b>1.3 Identification of the area</b>	C	<b>COSAVE</b> We suggest to move this section before section 1.2. See comment in paragraph 71 <i>Category : TECHNICAL</i>
190	73	<b>1.3</b> <u><b>Delimitation</b></u> <del><b>Identification</b></del> of the area	P	<b>Thailand</b> We would like to propose to use the term "Delimitation" instead of the term "identification" in order to be complied with the context under this section. <i>Category : EDITORIAL</i>
191	73	<b>1.3 Identification of the area</b>	C	<b>Uruguay</b> We suggest to move this section before section 1.2. See comment in paragraph 71 <i>Category : TECHNICAL</i>
192	74	The area being considered for pest freedom should be described specifically enough to allow it to be readily identified. <del>This is important when NPPOs are providing evidence to support the claim that the</del>	P	<b>Costa Rica</b> For simplification. To reiterate that it can be considered with PFA, as it was proposed to delete from section 1.1. <i>Category : SUBSTANTIVE</i>

		<del>The area is free of may be the pestentire country, but also when NPPOs are subsequently reporting the pest status a part of the PFA and when raising public awarenessa country, or all or part of several countries.</del>		
193	74	<u>The area may be the entire country, a part of a country, or all or part of several countries.</u> The area being considered for pest freedom should be described specifically enough to allow it to be readily identified. This is important when NPPOs are providing evidence to support the claim that the area is free of the pest, but also when NPPOs are subsequently reporting the pest status of the PFA and when raising public awareness.	P	<b>European Union</b> This is an important consideration which needs to be in the standard as a separate paragraph and is suggested to be deleted from paragraph 70. <i>Category : TECHNICAL</i>
194	74	The area being considered for pest freedom should be described specifically enough to allow it to be readily identified. <u>This is important when NPPOs are providing evidence to support the claim that the</u> <del>The area is free of may be the pestentire country, but also when NPPOs are</del>	P	<b>COSAVE</b> For simplification. This section describes the requirements for the initiation of PFA in relation to the identification of the area. Last sentence moved from paragraph 70 <i>Category : TECHNICAL</i>

		<u>subsequently reporting the pest status a part of the PFA and when raising public awareness a country, or all or part of several countries.</u>		
195	74	<u>The area may be the entire country, a part of a country, or all or part of several countries.</u> The area being considered for pest freedom should be described specifically enough to allow it to be readily identified. This is important when NPPOs are providing evidence to support the claim that the area is free of the pest, but also when NPPOs are subsequently reporting the pest status of the PFA and when raising public awareness.	P	<b>EPPO</b> This is an important consideration which needs to be in the standard as a separate paragraph and is suggested to be deleted from paragraph 70. <i>Category : TECHNICAL</i>
196	74	The area being considered for pest freedom should be described specifically enough to allow it to be readily identified. <del>This is important when NPPOs are providing evidence to support the claim that the</del> <u>The area is free of may be the pestentire country, but also when NPPOs are subsequently reporting the pest status a part of the PFA and when raising</u>	P	<b>Uruguay</b> For simplification. This section describes the requirements for the initiation of PFA in relation to the identification of the area. Last sentence moved from paragraph 70 <i>Category : TECHNICAL</i>

		<u>public awareness</u> <u>country, or all or part of</u> <u>several countries.</u>		
197	74	El área para la que se esté considerando la condición de área libre de plagas se debería describir con el grado de detalle suficiente para que pueda identificarse fácilmente. Esto es importante cuando las ONPF aportan <u>datos empíricos-evidencia científica</u> que <u>confirman</u> <u>confirma</u> que el área está libre de plagas, pero también cuando posteriormente notifican la condición del ALP respecto de la plaga y cuando realizan tareas de sensibilización pública.	P	<b>Panama</b> Los países se basan en evidencias científicas o técnicas y no en datos empíricos <i>Category : SUBSTANTIVE</i>
198	74	El área para la que se esté considerando la condición de área libre de plagas se debería describir con el grado de detalle suficiente para que pueda identificarse fácilmente. Esto es importante cuando las ONPF aportan <u>datos empíricos-evidencia</u> que confirman que el área está libre de plagas, pero también cuando posteriormente notifican la condición del ALP respecto de la plaga y	P	<b>Colombia</b> El término de "datos empíricos" no es pertinente en el contexto de la norma. En la versión en inglés se emplea la palabra "evidence" que correspondería a "evidencia", término que en todo caso es más pertinente en el contexto de la norma. <i>Category : TRANSLATION</i>

		cuando realizan tareas de sensibilización pública.		
199	74	El área para la que se esté considerando la condición de área libre de plagas se debería describir con el grado de detalle suficiente para que pueda identificarse fácilmente. Esto es importante cuando las ONPF aportan <del>datos empíricos</del> <u>evidencia científica</u> que confirman que el área está libre de plagas, pero también cuando posteriormente notifican la condición del ALP respecto de la plaga y cuando realizan tareas de sensibilización pública.	P	<b>OIRSA</b> Los países se basan en evidencia científica o técnica y no en datos empíricos <i>Category : TECHNICAL</i>
200	75	Pest free areas may be delimited by natural barriers such as bodies of water, mountains, deserts or other geographical features that prevent pest movement from one area to another. <u>The NPPO should describe, with the use of supporting maps, the boundaries of the PFA</u>	P	<b>Uruguay</b> Same text copied from section on buffer zones <i>Category : TECHNICAL</i>
201	75	<del>Pest-free</del> Pest-free areas may be delimited by natural barriers such as bodies of water, mountains, deserts or other geographical features that prevent pest	P	<b>PPPO</b> <i>Category : EDITORIAL</i>



		movement from one area to another.		
202	75	Pest free areas may be delimited by natural barriers such as bodies of water, mountains, deserts or other geographical features that prevent pest movement from one area to another. <a href="#">The NPPO should describe, with the use of supporting maps, the boundaries of the PFA.</a>	P	<b>COSAVE</b> Same text copied from the section of buffer zones <i>Category : TECHNICAL</i>
203	75	Pest free areas may be delimited by natural barriers such as bodies of water, mountains, deserts or other geographical features that prevent pest movement from one area to another. <a href="#">(Put [75] at the end of [70].)</a>	P	<b>China</b> The requirements of the area for PFA could be put together. <i>Category : SUBSTANTIVE</i>
204	75	Las ALP podrán estar delimitadas por barreras naturales como masas de agua, montañas, desiertos u otros <a href="#">accidentes geográficos</a> que impidan el movimiento de plagas de un área a otra.	P	<b>Panama</b> Uso correcto de términos <i>Category : EDITORIAL</i>
205	75	Las ALP podrán estar delimitadas por barreras naturales como masas de agua, montañas, desiertos u <del>otros accidentes geográficos</del> <a href="#">otras</a>	P	<b>OIRSA</b> Uso correcto de términos <i>Category : TRANSLATION</i>

		<u>características geográficas</u> que impidan el movimiento de plagas de un área a otra.		
2.1 Surveillance activities before establishment				
206	77	<b>2.1 Surveillance activities before establishment</b> <b>Determination of pest status in the area</b>	P	<b>COSAVE</b> Although this section describe surveillance activities, the main objective is the determination of the pest status in the area as mentioned in paragraph 78 <i>Category : TECHNICAL</i>
207	77	<b>2.1 Determination of pest status in the area</b> <b>Surveillance activities before establishment</b>	P	<b>Uruguay</b> Although this section describes surveillance activities, the main objective is the determination of the pest status in the area as mentioned in paragraph 78 <i>Category : TECHNICAL</i>
208	78	Once the target pest has been characterized and the area identified, the NPPO should determine the pest status in the <del>area</del> . <del>To do this, the NPPO should conduct area by</del> <u>conducting</u> surveillance in accordance with the requirements outlined in both ISPM 6 ( <i>Surveillance</i> ) and ISPM 8 ( <i>Determination of pest status in an area</i> ). These standards describe how surveillance should be conducted and how to establish the evidence necessary to determine the status of a pest in an area.	P	<b>Japan</b> editorial change <i>Category : EDITORIAL</i>

209	78	Once the <del>target</del> pest has been characterized and the area identified, the NPPO should determine the pest status in the area. To do this, the NPPO should conduct surveillance in accordance with the requirements outlined in both ISPM 6 ( <i>Surveillance</i> ) and ISPM 8 ( <i>Determination of pest status in an area</i> ). These standards describe how surveillance should be conducted and how to establish the evidence necessary to determine the status of a pest in an area.	P	<b>European Union</b> Please see paragraph 70. <i>Category : EDITORIAL</i>
210	78	Once the target pest has been characterized and the area identified, the NPPO should determine the pest status in the area. To do this, the NPPO should conduct surveillance in accordance with the requirements outlined in <del>both</del> ISPM 6 ( <i>Surveillance</i> ) <del>and</del> <u>ISPM 8 (<i>Determination of pest status in an area</i>) or ISPM 26 (<i>Establishment of pest free areas for fruit flies (Tephritidae)</i>) where</u>	P	<b>PPPO</b> ISPM 26 provide requirements for fruit fly PFA establishment and suggest to be referenced. this could potentially be an implementation issue. Guidance on when and which standard of ISPM 8 and 26 should be used for fruit fly PFA will be helpful, in particular, for a fruit fly freedom country between the period of fruit fly incursion and reinstatement of fruit fly country freedom status. ISPM 27 is also relevant when designing a surveillance system, especially when considering how to detect asymptomatic pests. We understand there is proposal that ISPM 4 to be made into an overarching standard with ISPM 26 being an Annex under ISPM 4. New Zealand supports this approach as this would potentially make it clearer and could be a good solution on when to use each standard. <i>Category : SUBSTANTIVE</i>

		<u>appropriate, and ISPM 27 (Diagnostic protocols for regulated pests)</u> . These standards describe how surveillance should be conducted and how to establish the evidence necessary to determine the status of a pest in an area.		
211	78	<p>Once the target pest has been characterized and the area identified, the NPPO should determine the pest status in the area. To do this, the NPPO should conduct surveillance in accordance with the requirements outlined in both ISPM 6 (<i>Surveillance</i>) and ISPM 8 (<i>Determination of pest status in an area</i>).<sup>1</sup></p> <p><u>ISPM26(Establishment of pest free areas for fruit flies ),</u></p> <p><u>ISPM27( Diagnostic protocols for regulated pests)</u>. These standards describe how surveillance should be conducted and how to establish the evidence necessary to determine the status of a pest in an area.</p>	P	<p><b>Korea, Republic of</b>  Add a relevant ISPMs  Category : <i>SUBSTANTIVE</i></p>

212	78	Once the target pest has been characterized and the area identified, the NPPO should determine the pest status in the area. To do this, the NPPO should conduct surveillance in accordance with the requirements outlined in both ISPM 6 ( <i>Surveillance</i> ) and ISPM 8 ( <i>Determination of pest status in an area</i> ). These standards describe how surveillance should be conducted and how to <del>establish the evidence necessary to</del> determine the status of a pest in an area.	P	<b>COSAVE</b> It is better to just refer to "pest", it is unnecessary to use the qualifier "target". Text deleted in the last sentence for consistency with ISPM 8 <i>Category : TECHNICAL</i>
213	78	Once the <del>target</del> pest has been characterized and the area identified, the NPPO should determine the pest status in the area. To do this, the NPPO should conduct surveillance in accordance with the requirements outlined in both ISPM 6 ( <i>Surveillance</i> ) and ISPM 8 ( <i>Determination of pest status in an area</i> ). These standards describe how surveillance should be conducted and how to	P	<b>EPPO</b> Please see paragraph 70. <i>Category : EDITORIAL</i>

		establish the evidence necessary to determine the status of a pest in an area.		
214	78	Once the <del>target</del> pest has been characterized and the area identified, the NPPO should determine the pest status in the area. To do this, the NPPO should conduct surveillance in accordance with the requirements outlined in both ISPM 6 ( <i>Surveillance</i> ) and ISPM 8 ( <i>Determination of pest status in an area</i> ). These standards describe how surveillance should be conducted and how to <del>establish the evidence necessary to</del> determine the status of a pest in an area.	P	<b>Uruguay</b> It is better to just refer to "pest", it is unnecessary to use the qualifier "target". Text deleted in the last sentence for consistency with ISPM 8 <i>Category : TECHNICAL</i>
215	78	Una vez <del>caracterizada</del> <u>definida</u> la plaga objetivo y determinada el área, la ONPF debería determinar la condición de la plaga en el área. Para hacerlo, debería llevar a cabo tareas de vigilancia de conformidad con los requisitos establecidos en la NIMF 6 ( <i>Vigilancia</i> ) y la NIMF 8 ( <i>Determinación de la</i>	P	<b>Panama</b> Uso correcto de los términos técnicos <i>Category : EDITORIAL</i>

		<del>condición situación de una plaga en un área</del> ). En estas normas se describe cómo se debería realizar la vigilancia y cómo se establecen <del>los datos empíricos necesarios la evidencia científica necesaria</del> para determinar la situación de la una plaga en un área.		
216	78	Una vez caracterizada la plaga objetivo y determinada el área, la ONPF debería determinar la condición de la plaga en el área. Para hacerlo, debería llevar a cabo tareas de vigilancia de conformidad con los requisitos establecidos en la NIMF 6 ( <i>Vigilancia</i> ) y la NIMF 8 ( <i>Determinación de la condición de una plaga en un área</i> ). En estas normas se describe cómo se debería realizar la vigilancia y cómo se <del>establecen los datos empíricos establece la evidencia</del> necesarios para determinar la situación de la una plaga en un área.	P	<b>Colombia</b> El término de "datos empíricos" no es pertinente en el contexto de la norma. En la versión en inglés se emplea la palabra "evidence" que correspondería a "evidencia", término que en todo caso es más pertinente en el contexto de la norma. <i>Category : TRANSLATION</i>
217	78	Una vez <del>caracterizada definida</del> la plaga objetivo y <del>determinada</del> el área, la ONPF debería determinar	P	<b>OIRSA</b> Uso de los términos correctos <i>Category : TECHNICAL</i>

		<p>la <del>condición-situación</del> de la plaga en el área. Para hacerlo, debería llevar a cabo tareas de vigilancia de conformidad con los requisitos establecidos en la NIMF 6 (<i>Vigilancia</i>) y la NIMF 8 (<i>Determinación de la <del>condición-situación</del> de una plaga en un área</i>). En estas normas se describe cómo se debería realizar la vigilancia y cómo se establecen <del>los datos empíricos necesarios la evidencia científica necesaria</del> para determinar la situación de <del>la</del> una plaga en un área.</p>		
218	79	<p><del>In certain cases, such as for the establishment of a pest free country, general surveillance as referred to in ISPM 6 may be sufficient if the NPPO has concluded that the information is reliable and relevant.</del></p>	P	<p><b>Japan</b> Delete Para 79 as it is redundant and the content is already covered by para 78. Category : <i>SUBSTANTIVE</i></p>
219	79	<p>In certain cases, such as for the establishment of a pest free country, general surveillance as referred to in ISPM 6 may be sufficient if the NPPO has concluded that the information is reliable and</p>	P	<p><b>European Union</b> It is good to connect to 3.2 because this aspect is further worked out in 3.2. Category : <i>TECHNICAL</i></p>



		<a href="#">relevant</a> relevant (see <a href="#">section 3.2</a> ).		
220	79	<u>In certain cases, such as for the establishment of a pest free country, general surveillance as referred to in ISPM 6 may be sufficient if the NPPO has concluded that the information is reliable and relevant. General surveillance information may be obtained from sources including:</u> <u>· scientific and trade journals</u> <u>· public and industry reporting</u> <u>· unpublished historical data</u> <u>· contemporary observations from government and non-government agencies, industry and the general public</u> <del>In certain cases, such as for the establishment of a pest free country, general surveillance as referred to in ISPM 6 may be sufficient if the NPPO has concluded that the information is reliable and relevant.</del>	P	<b>PPPO</b> Created by merging other changes together Category : <i>SUBSTANTIVE</i>
221	79	In certain cases, such as for the establishment of a pest free country, general	P	<b>Korea, Republic of</b> Improve clarity Category : <i>SUBSTANTIVE</i>

		surveillance as referred to in ISPM 6 may be sufficient if the NPPO has concluded that the information is reliable and <del>relevant</del> <u>relevant and recognized by NPPOs of import country.</u>		
222	79	In certain cases, such as for the establishment of a pest free country, general surveillance as referred to in ISPM 6 may be sufficient if the NPPO has concluded that the information is reliable and relevant. <u>General surveillance information may be obtained from sources including:• scientific and trade journals• public and industry reporting• unpublished historical data• contemporary observations from government and non-government agencies, industry and the general public</u>	P	<b>Australia</b> Justification: Re-inclusion of text from the current ISPM 4 (Part 1.2.1) and with reference to ISPM6 (Part 2.1.1), to provide examples of where general surveillance information may be obtained or sourced. <i>Category : SUBSTANTIVE</i>
223	79	In certain cases, such as for the establishment of a pest free country, general surveillance as referred to in ISPM 6 may be sufficient if the NPPO has concluded that the information is reliable and	P	<b>EPPO</b> It is good to connect to 3.2 because this aspect is further worked out in 3.2. <i>Category : TECHNICAL</i>

		<del>relevant</del> relevant (see section 3.2).		
224	80	Where more reliable evidence is needed to demonstrate pest absence in an area, specific surveillance should be established. The level of surveillance should be based on the results of a pest risk assessment, and a delimiting survey <u>should be</u> conducted to justify the area that is being proposed as a PFA.	P	<b>European Union</b> For clarity. <i>Category : EDITORIAL</i>
225	80	Where more reliable evidence is needed to demonstrate pest absence in an area, specific surveillance should be established. The level of surveillance should be based on the results of a pest risk assessment, and a delimiting <u>or a detection</u> survey conducted to justify the area that is being proposed as a PFA.	P	<b>European Union</b> Not only a delimiting survey should be considered but also a detection survey could be conducted. A delimiting survey is used to determine the extent of spread by a pest, while a detection survey is used to determine if a pest is present or absent. <i>Category : TECHNICAL</i>
226	80	Where more reliable evidence is needed to demonstrate pest absence in an area, specific surveillance should be established. The level of surveillance should be based on the results of a pest risk assessment, and a delimiting survey	P	<b>Japan</b> Para 94 mentions "When...eradication of the pest from the prospective PFA is achieved for the first time (according to ISPM 9 (Guidelines for pest eradication programmes)), the NPPO should make a national declaration that the area is free from the pest". However, there is no description in this ISPM about the action to be taken when the pest presence is confirmed by surveillance for establishment of PFA. So, insert a sentence to provide a guidance for NPPO in considering the development of a pest eradication programme. <i>Category : SUBSTANTIVE</i>

		conducted to justify the area that is being proposed as a PFA. <u>If pest presence is confirmed in the area as the result of surveillance, the NPPO may consider the development of a pest eradication programme according to ISPM 9 (Guidelines for pest eradication programmes).</u>		
227	80	Where more reliable evidence is needed to demonstrate pest absence in an area, specific surveillance should be established. The level of <u>surveillance</u> <u>surveillance(e.g. level of confidence, number of samples, selection and number of sites, frequency of sampling)</u> should be based on the <del>results-assessment</del> of a <del>pest risk assessment</del> <u>detection survey</u> , and a delimiting survey conducted to justify the area that is being proposed as a PFA.	P	<p><b>Japan</b> Add examples to "the level of surveillance" to provide complementary information for ISPM readers on dealing with "the level of surveillance."</p> <p>In the last line of this paragraph, delete "results of a pest risk" and add "of a detection survey", in order to avoid the confusion of interpretations between the meaning of the words in this paragraph and the definition in ISPM5. The meaning of "pest risk assessment" in this paragraph does not apply to the definitions of "pest risk assessment (for quarantine pests)" and "pest risk assessment (for regulated non-quarantine pests)" specified in ISPM5. The level of surveillance may be considered based on the assessment of a pest risk in a general sense but not pest risk assessment defined in ISPM5. <i>Category : SUBSTANTIVE</i></p>
228	80	<u>Where more reliable evidence is needed to demonstrate pest absence in an area, specific surveillance should be established. The level of</u>	P	<p><b>PPPO</b> Justification: Pest Risk Assessment (PRA) has a specific meaning and may not be required or appropriate in all cases. The proposed text makes it clear what the specific assessment should aim to achieve.</p> <p>to align with the description of a delimiting survey in ISPM 6. <i>Category : TECHNICAL</i></p>

		<p><u>surveillance should be based on the results of an assessment of the potential for entry and establishment of the pest in the area.</u><del>Where more reliable evidence is needed- and a delimiting survey conducted to demonstrate pest absence in an area, specific surveillance should be established. The level of surveillance should be based on establish the results-boundaries of the area that is being proposed as a pest risk assessment,PFA- and a delimiting survey conducted to justify the area that is being proposed as a PFA.</del></p>		
229	80	<p>Where more reliable evidence is needed to demonstrate pest absence in an area, specific surveillance should be established. The level of surveillance should be based on the results of <del>a</del> <u>an assessment of the potential for entry and establishment of the pest risk assessmentin the area</u>, and a delimiting survey conducted to</p>	P	<p><b>Australia</b>  Justification: Pest Risk Assessment (PRA) has a specific meaning and may not be required or appropriate in all cases. The proposed text makes it clear what the specific assessment should aim to achieve.  Category : <i>SUBSTANTIVE</i></p>

		justify the area that is being proposed as a PFA.		
230	80	Where more reliable evidence is needed to demonstrate pest absence in an area, specific surveillance should be established. <del>The level of surveillance</del> Surveillance should be based on the results of a pest risk assessment, and a delimiting survey conducted to justify the area that is being proposed as a PFA.	P	<b>COSAVE</b> It is not appropriate to talk about levels of surveillance. <i>Category : TECHNICAL</i>
231	80	Where more reliable evidence is needed to demonstrate pest absence in an area, specific surveillance should be established. The level of surveillance should be based on the results of a pest risk assessment, and a delimiting <del>or detection</del> survey <del>should be</del> conducted to justify the area that is being proposed as a PFA.	P	<b>EPPO</b> Not only a delimiting survey should be considered but also a detection survey could be conducted. A delimiting survey is used to determine the extent of spread by a pest, while a detection survey is used to determine if a pest is present or absent.  'should be' added for clarity <i>Category : TECHNICAL</i>
232	80	Where more reliable evidence is needed to demonstrate pest absence in an area, specific surveillance should be established. <del>The level of surveillance</del> Surveillance should be based on the	P	<b>Uruguay</b> It is not appropriate to talk about levels of surveillance. <i>Category : TECHNICAL</i>

		results of a pest risk assessment, and a delimiting survey conducted to justify the area that is being proposed as a PFA.		
233	80	Se debería establecer una vigilancia específica cuando se necesiten datos más fiables para demostrar la ausencia de una plaga en un área. <del>El nivel de</del> La vigilancia se debería basar en los resultados de la evaluación de riesgos de plagas y la prospección de delimitación que se realicen en el área para justificar que esta se proponga como ALP.	P	<b>Panama</b> La vigilancia no se define en niveles <i>Category : EDITORIAL</i>
234	81	If the pest status is “absent: pest not recorded” as defined in ISPM 8 and this is supported by current scientific evidence – such as from continued surveillance for pest absence in the area, the results of which are made available on request – then establishing <del>an official a</del> PFA should not be <del>required</del> required by the importing country.	P	<b>European Union</b> The expression "then establishing an official PFA should not be required" is not clear. We have proposed amendments to better reflect the intention. <i>Category : SUBSTANTIVE</i>
235	81	If the pest status is “absent: pest not	P	<b>PPPO</b> to align with wording in ISPM 6 (section 3 para 4).

		recorded” as defined in ISPM 8 and this is supported by <u>reliable and</u> current scientific evidence – such as from continued surveillance for pest absence in the area, the results of which are made available on request – then establishing an official PFA should not be required.		<i>Category : TECHNICAL</i>
236	81	If the pest status is “absent: pest not recorded” as defined in ISPM 8 and this is supported by current scientific <u>evidence</u> <u>evidence, including</u> <u>historical absence</u> – such as from continued surveillance for pest absence in the area, the results of which are made available on request – then establishing an official PFA should not be required.	P	<b>Australia</b> Consider that historical absence should be included as this information can be used to determine the pest status. <i>Category : EDITORIAL</i>
237	81	If the pest status is “absent: pest not recorded” as defined in ISPM 8 and this is supported by current scientific evidence – such as from continued surveillance for pest absence in the area, the results of which are made	P	<b>COSAVE</b> A PFA is by definition official <i>Category : TECHNICAL</i>



		available on request – then establishing <del>an official a</del> PFA should not be required.		
238	81	<del>If the pest status is “absent: pest not recorded” as defined in ISPM 8 and this is supported by current scientific evidence – such as from continued surveillance for pest absence in the area, the results of which are made available on request – then establishing an official PFA should not be required.</del>	P	<b>United States of America</b> This para was moved above, under 1.1. with the explanation therein. <i>Category : SUBSTANTIVE</i>
239	81	If the pest status is “absent: pest not recorded” as defined in ISPM 8 and this is supported by current scientific evidence – such as from continued surveillance for pest absence in the area, the results of which are made available on request – then establishing <del>an official a</del> PFA should not be required.	P	<b>Uruguay</b> A PFA is by definition official <i>Category : TECHNICAL</i>
240	81	If the pest status is “absent: pest not recorded” as defined in ISPM 8 and this is supported by current scientific evidence – such	C	<b>Norway</b> It-s not so clar what is meant by this sentence <i>Category : EDITORIAL</i>

		as from continued surveillance for pest absence in the area, the results of which are made available on request – then establishing an official PFA should not be required.		
241	81	<del>Si la condición de una plaga es “Ausente: la plaga no se ha registrado” según se define en la NIMF 8, y esto está respaldado por datos empíricos actuales (como los obtenidos a partir de la vigilancia continua para confirmar la ausencia de la plaga en el área, cuyos resultados se facilitan previa solicitud) no debería ser necesario establecer un ALP oficial.</del> <u>Si la situación de una plaga es “Ausente: la plaga no se ha registrado” según se define en la NIMF 8, y esto está respaldado por evidencia científica actual (tales como, los obtenidos a partir de la vigilancia continua para confirmar la ausencia de la plaga en el área, cuyos resultados están disponibles previa solicitud) no debería ser necesario establecer un ALP oficial.</u>	P	<b>Panama</b> Uso correcto de términos <i>Category : EDITORIAL</i>
242	81	Si la condición de una plaga es “Ausente: la plaga no se ha registrado”	P	<b>Colombia</b> El término de “datos empíricos” no es pertinente en el contexto de la norma. En la versión en inglés se emplea “scientific evidence” que correspondería a “evidencia científica”, término que en todo caso es más pertinente en el contexto de la norma.

		según se define en la NIMF 8, y esto está respaldado <del>por datos empíricos con evidencia científica actual</del> actuales (como los obtenidos a partir de la vigilancia continua para confirmar la ausencia de la plaga en el área, cuyos resultados se facilitan previa solicitud) no debería ser necesario establecer un ALP oficial.		<i>Category : TRANSLATION</i>
243	81	Si la <del>condición-situación</del> de una plaga es “Ausente: la plaga no se ha registrado” según se define en la NIMF 8, y esto está respaldado por <del>datos empíricos actuales (como evidencia científica actual (tales como,</del> los obtenidos a partir de la vigilancia continua para confirmar la ausencia de la plaga en el área, cuyos resultados <del>se facilitan están disponibles</del> previa solicitud) no debería ser necesario establecer un ALP oficial.	P	<b>OIRSA</b> Uso de términos correctos <i>Category : TECHNICAL</i>
244	82	In addition to determining pest <del>presence or absence</del> <u>status</u> , surveillance in the context of PFAs may also be used to:	P	<b>Costa Rica</b> For consistency. In addition Glossary terms should be used when appropriate <i>Category : SUBSTANTIVE</i>

245	82	In addition to determining pest presence or absence, surveillance in the context of <u>establishing</u> PFAs may also be used to:	P	<b>PPPO</b> These paragraphs are only about using surveillance for establishing a PFA and this should be specified as such so it is not confused with surveillance for verifying a PFA has been maintained. <i>Category : TECHNICAL</i>
246	82	In addition to determining pest <del>presence or absence</del> <u>status</u> , surveillance in the context of PFAs may also be used to:	P	<b>COSAVE</b> For consistency. In addition Glossary terms should be used when appropriate <i>Category : TECHNICAL</i>
247	82	In addition to determining pest <del>presence or absence</del> <u>status</u> , surveillance in the context of PFAs may also be used to:	P	<b>Uruguay</b> For consistency. In addition Glossary terms should be used when appropriate <i>Category : TECHNICAL</i>
248	85	assess the effectiveness of pest eradication <del>measures</del> <u>activities</u> ;	P	<b>PPPO</b> Justification: As in the general comment at the beginning of this document, this alternate description, “activities”, is proposed to clarify the meaning and remove the seeming two levels/tiers of ‘phytosanitary measures’ <i>Category : TECHNICAL</i>
249	85	assess the effectiveness of pest eradication <del>measures</del> <u>activities</u> ;	P	<b>Australia</b> Justification: As described in the general comment at the beginning of the document, this alternate description, “activities”, is proposed to clarify the meaning and remove the seeming two levels/tiers of ‘phytosanitary measures’ referenced in this document. <i>Category : TECHNICAL</i>
<b>2.2 Controls on the movement of regulated articles</b>				
250	87	<b>2.2 Controls on the movement of regulated articles</b>	P	<b>PPPO</b> see comment below on movement control <i>Category : TECHNICAL</i>
251	88	To prevent the entry of the pest into the PFA, the <del>potential entry potential</del> pathways should be identified and appropriate controls on the movement of regulated articles should be established. The movement controls	P	<b>Costa Rica</b> To avoid redundancy. “Pathway” is a Glossary term defined as any means that allows the entry or spread of a pest <i>Category : SUBSTANTIVE</i>

		should depend on the assessed pest risk, including the probability of pest establishment. Such controls should include:		
252	88	To prevent the entry of the pest into the PFA, the potential entry pathways <u>on regulated articles</u> should be identified and appropriate controls <del>on the movement of regulated articles should be</del> established. The <del>movement</del> controls should depend on the assessed pest risk, including the probability of pest establishment. Such controls should include:	P	<b>PPPO</b> Suggestion to make this sentence clearer to read. Not all the controls listed are directly linked to the movement of regulated articles. <i>Category : TECHNICAL</i>
253	88	To prevent the entry of the pest into the PFA, the potential <del>entry</del> pathways should be identified and appropriate controls on the movement of regulated articles should be established. The movement controls should depend on the assessed pest risk, including the probability of pest establishment. Such controls should include:	P	<b>COSAVE</b> To avoid redundancy. "Pathway" is a Glossary term defined as any means that allows the entry or spread of a pest. <i>Category : TECHNICAL</i>

254	88	To prevent the entry of the pest into the PFA, the potential <del>entry</del> pathways should be identified and appropriate controls on the movement of regulated articles should be established. The movement controls should depend on the assessed pest risk, including the probability of pest establishment. Such controls should include:	P	<b>Uruguay</b> To avoid redundancy. "Pathway" is a Glossary term defined as any means that allows the entry or spread of a pest. <i>Category : TECHNICAL</i>
255	88	A fin de prevenir la entrada de la plaga en el ALP, se deberían determinar las <del>posibles</del> <u>potenciales</u> vías de entrada y establecer los adecuados mecanismos de control del movimiento de artículos reglamentados. Los mecanismos de control del movimiento deberían depender del riesgo de plagas evaluado, en especial de la probabilidad de que se establezca una plaga. Tales mecanismos de control deberían comprender:	P	<b>Panama</b> Uso correcto de términos <i>Category : EDITORIAL</i>
256	88	A fin de prevenir la entrada de la plaga en el ALP, se deberían determinar las <del>posibles</del>	P	<b>OIRSA</b> Uso de términos correctos <i>Category : TECHNICAL</i>

		<u>potenciales</u> vías de entrada y establecer los adecuados mecanismos de control del movimiento de artículos reglamentados. Los mecanismos de control del movimiento deberían depender del riesgo de plagas evaluado, en especial de la probabilidad de que se establezca una plaga. Tales mecanismos de control deberían comprender:		
257	90	regulation of the <del>import</del> <u>entry</u> pathways and articles that require control;	P	<b>China</b> Entry pathways can cover import pathways. Entry pathways should be controlled. <i>Category : SUBSTANTIVE</i>
258	91	imposition of domestic restrictions or other measures to control the movement <del>or transit</del> of regulated articles into or through the PFA;	P	<b>European Union</b> Transit is covered by "the movement of regulated articles through the PFA". <i>Category : TECHNICAL</i>
259	91	imposition of domestic restrictions or other measures to control the movement <del>or transit</del> of regulated articles into or through the PFA;	P	<b>Japan</b> Delete "or transit". The meaning of "the movement of regulated articles into or through the PFA" has already covered "transit". In addition, the content in paragraph 91 is the explanation about the restriction on the domestic movement of regulated articles. The term "transit" defined in ISPM5 is subject to international movement and phytosanitary measures. <i>Category : SUBSTANTIVE</i>
260	91	imposition of domestic restrictions or other measures to control the movement or transit of regulated articles ( <u>e.g. conveyances</u> ) into or through the PFA;	P	<b>PPPO</b> does this include conveyances, possibly infested produce? If so, some examples might be helpful. <i>Category : EDITORIAL</i>

261	91	imposition of domestic restrictions or other measures to control the movement or transit of regulated articles into or through the PFA;	C	<b>PPPO</b> does this include conveyances, possibly infested produce? If so, some examples might be helpful. <i>Category : TECHNICAL</i>
262	91	imposition of domestic restrictions or other measures to control the movement <del>or transit</del> of regulated articles into or through the PFA;	P	<b>EPPO</b> Transit is covered by "the movement of regulated articles through the PFA". <i>Category : TECHNICAL</i>
263	92	inspection of regulated articles, examination of <del>the relevant</del> <u>documentation documents associated with regulated articles</u> and, where necessary for cases of non-compliance, the application of appropriate phytosanitary measures.	P	<b>Japan</b> Replace "the relevant documentation" with "documents associated with regulated articles". It's a little unclear what kind of documentation "the relevant documentation" means. <i>Category : SUBSTANTIVE</i>
264	92	inspection of regulated articles, examination of the relevant documentation and, where necessary for cases of non-compliance, the application of appropriate <del>phytosanitary</del> measures. <u>development of national regulations that legally support the measures to achieve and maintain the PFAs</u>	P	<b>Uruguay</b> See general comment. Text added because is another point to be considered <i>Category : TECHNICAL</i>
265	92	inspection of regulated articles, examination of the relevant	P	<b>COSAVE</b> Another point to be considered <i>Category : TECHNICAL</i>



		documentation and, where necessary for cases of non-compliance, the application of appropriate phytosanitary measures. <a href="#">development of national regulations that legally support the measures to achieve and maintain the PFAs</a>		
266	92	inspection of regulated articles, examination of the relevant documentation and, where necessary for cases of non-compliance, the application of appropriate <del>phytosanitary</del> measures.	P	<b>COSAVE</b> See general comment Category : <i>TECHNICAL</i>
267	92	la inspección de artículos reglamentados, <del>el examen</del> <a href="#">revisión</a> de <del>la</del> documentación pertinente y, de ser necesario en casos de incumplimiento, la aplicación de las medidas fitosanitarias apropiadas.	P	<b>Panama</b> uso correcto de términos Category : <i>EDITORIAL</i>
268	92	la inspección de artículos reglamentados, <del>el examen</del> <a href="#">revisión</a> de <del>la</del> documentación pertinente <del>y, y</del> de ser necesario en casos de incumplimiento, la aplicación de las medidas fitosanitarias apropiadas.	P	<b>OIRSA</b> Uso de términos correctos Category : <i>TECHNICAL</i>
2.3 Establishment of buffer zones, if appropriate				

269	93	<b>2.3 Establishment of buffer zones, <del>if appropriate</del></b>	P	<b>PPPO</b> It is not necessary to include 'if appropriate' in the title of this section as the 'appropriate' circumstances for using buffer zones is discussed in para [94]. <i>Category : TECHNICAL</i>
270	93	<b>2.3 Establishment of buffer zones, <del>if appropriate</del></b>	P	<b>COSAVE</b> Inappropriate wording for a Title <i>Category : EDITORIAL</i>
271	93	<b>2.3 Establishment of buffer zones, <del>if appropriate</del></b>	P	<b>Uruguay</b> Inappropriate wording for a Title <i>Category : EDITORIAL</i>
272	94	Where the geographical isolation of the PFA is not considered adequate to prevent the natural spread of the pest into the area, the <del>implementation establishment</del> of a buffer zone should be considered. The population of the pest in the buffer zone should be maintained at or below a low pest <del>tolerance prevalence</del> level, which should be verified by surveillance. The extent of the zone is determined by the NPPO, based on the distance over which the likely natural spread of the pest population to the PFA could not occur during the growing season. The NPPO should describe, with the use of supporting maps, the boundaries of the buffer zone.	P	<b>Costa Rica</b> low pest prevalence level is the correct term and consistent with the adopted ISPMs <i>Category : SUBSTANTIVE</i>

273	94	Where the geographical isolation of the PFA is not considered adequate to prevent the natural spread of the pest into the area, the implementation of a buffer zone should be considered. The population of the pest in the buffer zone should be maintained at or below a low pest tolerance level, which should be verified by surveillance. The extent of the <a href="#">buffer</a> zone <del>is-should be</del> determined by the NPPO, based on the distance over which the likely natural spread of the pest population to the PFA could not occur during the growing <del>season</del> <a href="#">season (see ISPM 10)</a> . The NPPO should describe, with the use of supporting maps, the boundaries of the buffer zone.	P	<b>European Union</b> More precise wording and reference given. <i>Category : TECHNICAL</i>
274	94	Where the geographical isolation of the PFA is not considered adequate to prevent the natural spread of the pest into the area, the implementation of a buffer zone should be considered. The population of the pest in the buffer zone should be	P	<b>Japan</b> It is not only the growing season of the host plants that concerns the population of the targeted pest in the buffer zone. Some pests may be mainly involved in the stages of the fruit. Therefore, it is better not to refer to only a specific stage of host plants. <i>Category : SUBSTANTIVE</i>

		maintained at or below a low pest tolerance level, which should be verified by surveillance. The extent of the zone is determined by the NPPO, based on the distance over which the likely natural spread of the pest population to the PFA could not occur during the <u>appropriate season (e.g., the growing season, the season when hosts are present)</u> . The NPPO should describe, with the use of supporting maps, the boundaries of the buffer zone.		
275	94	Where the geographical isolation of the PFA is not <del>considered</del> adequate to prevent the natural spread of the pest into the area, the implementation of a buffer zone should be considered. The population of the pest in the buffer zone should be maintained at or below a <u>defined</u> low pest tolerance level, which should be verified by surveillance. The extent of the zone is determined by the NPPO, based on the distance over which the likely natural spread of the pest	P	<p><b>PPPO</b> Delete 'considered' as this makes this sentence vague. The geographical isolation of a PFA is either adequate or not to prevent natural spread as demonstrated by surveillance results.</p> <p>What is the reference on how to establish a pest tolerance? by whom and how? Does this 'low' tolerance need to be defined – and does this relate exclusively to fruit flies (ISPM 26)? if it is not limit to fruit fly, would ISPM 8 and 11 also need to be referenced?</p> <p>There is an implementation issue on establishing buffer zone, and pest tolerance level, guidance will be helpful. <i>Category : SUBSTANTIVE</i></p>

		population to the PFA could not occur during the growing season. The NPPO should describe, with the use of supporting maps, the boundaries of the buffer zone.		
276	94	Where the geographical isolation of the PFA is not considered adequate to prevent the natural spread of the pest into the area, the <a href="#">implementation establishment</a> of a buffer zone should be considered. The population of the pest in the buffer zone should be maintained at or below a low pest <a href="#">tolerance prevalence</a> level, which should be verified by surveillance. The extent of the <a href="#">buffer</a> zone is determined by the NPPO, based on the distance over which the likely natural spread of the pest <a href="#">population</a> to the PFA could not occur during the growing season. The NPPO should describe, with the use of supporting maps, the boundaries of the buffer zone.	P	<b>COSAVE</b> For consistency Category : <i>TECHNICAL</i>
277	94	Where the geographical isolation of the PFA is not considered adequate to	P	<b>EPPO</b> More precise wording and reference given. Category : <i>TECHNICAL</i>

		prevent the natural spread of the pest into the area, the implementation of a buffer zone should be considered. The population of the pest in the buffer zone should be maintained at or below a low pest tolerance level, which should be verified by surveillance. The extent of the <u>buffer</u> zone <u>is should be</u> determined by the NPPO, based on the distance over which the likely natural spread of the pest population to the PFA could not occur during the growing <u>seasonseason (see ISPM 10)</u> . The NPPO should describe, with the use of supporting maps, the boundaries of the buffer zone.		
278	94	Where the geographical isolation of the PFA is not considered adequate to prevent the natural spread of the pest into the area, the <u>implementation establishment</u> of a buffer zone should be considered. The population of the pest in the buffer zone should be maintained at or below a low pest <u>tolerance</u>	P	<b>Uruguay</b> For consistency Category : <i>TECHNICAL</i>

		<p><u>prevalence</u> level, which should be verified by surveillance. The extent of the <u>buffer</u> zone is determined by the NPPO, based on the distance over which the likely natural spread of the pest <del>population</del> to the PFA could not occur during the growing season. The NPPO should describe, with the use of supporting maps, the boundaries of the buffer zone.</p>		
279	94	<p>Cuando se considere que el aislamiento geográfico del ALP no es suficiente para prevenir la dispersión natural de la plaga en el área, se debería considerar la posibilidad de establecer una zona tampón. La población de la plaga en la zona tampón se debería mantener en un nivel bajo de <u>tolerancia-prevalencia</u> o por debajo del mismo, lo que se debería verificar mediante vigilancia. La extensión de la zona <u>tampón</u> la determinará la ONPF considerando la distancia a la que no pueda llegar la probable dispersión natural de la plaga al ALP durante la</p>	P	<p><b>Panama</b> Para ser consistente con los términos fitosanitarios <i>Category : TECHNICAL</i></p>

		temporada de crecimiento. La ONPF debería describir, utilizando mapas de apoyo, los límites de la zona tampón.		
280	94	<p>Cuando se considere que el aislamiento geográfico del ALP no es suficiente para prevenir la dispersión natural de la plaga en el área, se debería considerar la posibilidad de establecer una zona tampón. La población de la plaga en la zona tampón se <del>debería</del> <u>debe</u> mantener <del>en un nivel</del> <u>en un nivel</u> <del>o inferior al nivel</del> <u>o inferior al nivel</u> <del>bajo de</del> <u>bajo de</u> tolerancia <del>o por debajo del mismo de la plaga</del>, lo que se debería verificar mediante vigilancia. La extensión de la zona la determinará la ONPF considerando la distancia a la que no pueda llegar la probable dispersión natural de la plaga al ALP durante la temporada de crecimiento. La ONPF debería describir, utilizando mapas de apoyo, los límites de la zona tampón.</p>	P	<p><b>Colombia</b> La redacción no es clara. Se sugiere mejorar la redacción para dar mayor claridad, teniendo en cuenta además la definición de la NIMF 5 del término "nivel de tolerancia (de una plaga <i>Category : EDITORIAL</i></p>
2.4 National declaration of the pest free area				



281	95	<b>2.4</b> <del>National</del> <u>Official</u> declaration of the pest free area	P	<b>European Union</b> More precise wording as it is not clear what a 'national declaration' is. <i>Category : TECHNICAL</i>
282	95	<b>2.4</b> National declaration of the pest <del>free area</del> <u>freedom</u>	P	<b>Japan</b> Change section title. The content of Section 2.4 is not the declaration of a PFA but a declaration of pest freedom in the area. <i>Category : EDITORIAL</i>
283	95	<b>2.4</b> National declaration of the <del>pest free-pest-free</del> area	P	<b>PPPO</b> <i>Category : EDITORIAL</i>
284	95	<b>2.4</b> <del>Official</del> <u>National</u> declaration of the pest free area	P	<b>Korea, Republic of</b> "Official" is more appropriate because declaration of the pest free area should be performed by NPPO. <i>Category : SUBSTANTIVE</i>
285	95	<b>2.4</b> <del>Official</del> <u>National</u> declaration of the pest free area	P	<b>EPPO</b> More precise wording as it is not clear what a 'national declaration' is. <i>Category : TECHNICAL</i>
286	95	<b>2.4</b> <del>Official</del> <u>National</u> declaration of the pest free area	P	<b>Thailand</b> We would like to propose to use the term "Official" instead of the term "National". The term "Official" will be clearly specified that the declaration of the pest free area should be performed by NPPO. <i>Category : SUBSTANTIVE</i>
287	96	When the pest status is confirmed as absent (according to ISPM 8), or eradication of the pest from the prospective PFA is achieved for the first time (according to ISPM 9 ( <i>Guidelines for pest eradication programmes</i> )), the NPPO should make a national declaration that the area is free from the pest. <u>If the declared area is established as a PFA, the</u>	P	<b>Japan</b> Under the present requirements of Section 2.4, just declaring pest freedom in the area could be interpreted as establishing a PFA in the area. Under the actual process of establishing PFA, the area achieved as pest-free status based on Section 2.1 (surveillance) can be recognised as establishing PFA only after the area fulfils the requirements of sections 2.2 (controls on the movement of regulated articles) and 2.3 (establishment of buffer zones, if appropriate).  The terms "measures" and "phytosanitary measures" should be distinguished to use depending on the situation, to interpret the requirements of this ISPM correctly. If the measures are for establishing and maintaining a PFA, "measures" should be used, because the measures to control domestic pests (i.e. other than the phytosanitary purposes) may also be applied to establish and maintain the PFA. On the other hand, the term "phytosanitary measure" is used for phytosanitary perspective like a case as "PFA is used as a phytosanitary measure for trade." <i>Category : SUBSTANTIVE</i>

		area should meet the requirements in sections 2.2 and 2.3 in addition to declaring pest freedom in the area. All internal management procedures and phytosanitary measures to maintain the PFA (see section 3) should be in place before this declaration is made.		
288	96	When the pest status is confirmed as absent (according to ISPM 8), or eradication of the pest from the prospective PFA is achieved for the first time (according to ISPM 9 ( <i>Guidelines for pest eradication programmes</i> )), the NPPO should make a national-an official declaration that the area is free from the pest. All internal management procedures and phytosanitary measures to maintain the PFA (see section 3) should be in place before this declaration is made.	P	<b>European Union</b> 1. Why "for the first time"? 2. More precise wording as it is not clear what a 'national declaration' is. <i>Category : TECHNICAL</i>
289	96	When the pest status is confirmed as absent (according to ISPM 8), or eradication of the pest from the prospective PFA target area is achieved for the first time (according	P	<b>Japan</b> It is unclear what the prospective PFA exactly means. So, modify it to target area. <i>Category : EDITORIAL</i>

		to ISPM 9 ( <i>Guidelines for pest eradication programmes</i> )), the NPPO should make a national declaration that the area is free from the pest. All internal management procedures and phytosanitary measures to maintain the PFA (see section 3) should be in place before this declaration is made.		
290	96	When the pest status is confirmed as absent (according to ISPM 8), or eradication of the pest from the prospective PFA is achieved for the first time (according to ISPM 9 ( <i>Guidelines for pest eradication programmes</i> )), the NPPO should make a national declaration that the area is free from the pest. All internal management procedures and phytosanitary <del>measures</del> <u>procedures</u> to maintain the PFA (see section 3) should be in place before this declaration is made.	P	<b>PPPO</b> as per comment on para [51]. If a PFA is a standalone phytosanitary measure then phytosanitary procedures are taken to meet the measure. <i>Category : TECHNICAL</i>
291	96	When the pest status is confirmed as absent (according to ISPM 8), or eradication of the pest from the prospective PFA	P	<b>Korea, Republic of</b> improve clarity <i>Category : SUBSTANTIVE</i>

		is achieved for the first time (according to ISPM 9 ( <i>Guidelines for pest eradication programmes</i> ))) <u>in target area</u> , the NPPO should make a national declaration that the area is free from the pest. All internal management procedures and phytosanitary measures to maintain the PFA (see section 3) should be in place before this declaration is made.		
292	96	When the pest status is confirmed as absent (according to ISPM 8), or eradication of the pest from the prospective PFA is achieved for the first time (according to ISPM 9 ( <i>Guidelines for pest eradication programmes</i> )), the NPPO should make a <del>national</del> <u>official</u> declaration that the area is free from the pest. All internal management procedures and phytosanitary <del>measures-procedures</del> to maintain the PFA (see section 3) should be in place before this declaration is made.	P	<b>Korea, Republic of</b> "official" and "procedures" is more appropriate Category : <i>SUBSTANTIVE</i>

293	96	When the pest status is confirmed as absent (according to ISPM 8), or eradication of the pest from the prospective PFA is achieved for the first time (according to ISPM 9 ( <i>Guidelines for pest eradication programmes</i> )), the NPPO should make a national declaration that the area is free from the pest. All internal management procedures and phytosanitary <del>measures</del> <u>activities</u> to maintain the PFA (see section 3) should be in place before this declaration is made.	P	<b>Australia</b> Justification: As described in the general comment at the beginning of the document, this alternate description, "activities", is proposed to clarify the meaning and remove the seeming two levels/tiers of 'phytosanitary measures' referenced in this document. Category : <i>TECHNICAL</i>
294	96	When the pest status is <del>confirmed</del> <u>determined</u> as absent (according to ISPM 8), or eradication of the pest from the prospective PFA is achieved for the first time (according to ISPM 9 ( <i>Guidelines for pest eradication programmes</i> )), the NPPO should make a national declaration that the area is free from the pest. All internal management procedures and <del>phytosanitary</del> measures to maintain the PFA (see	P	<b>COSAVE</b> "confirmed" replaced by "determined" for consistency with ISPM 8, 2. See general comment Category : <i>TECHNICAL</i>

		section 3) should be in place before this declaration is made.		
295	96	When the pest status is confirmed as absent (according to ISPM 8), or eradication of the pest from the prospective PFA is achieved <del>for the first time</del> (according to ISPM 9 ( <i>Guidelines for pest eradication programmes</i> )), the NPPO should make <del>a national-an official</del> declaration that the area is free from the pest. All internal management procedures and phytosanitary measures to maintain the PFA (see section 3) should be in place before this declaration is made.	P	<b>EPPO</b> More precise wording as it is not clear what a 'national declaration' is.  Why "for the first time"? <i>Category : TECHNICAL</i>
296	96	When the pest status is <del>confirmed-determined</del> as absent (according to ISPM 8), or eradication of the pest from the prospective PFA is achieved for the first time (according to ISPM 9 ( <i>Guidelines for pest eradication programmes</i> )), the NPPO should make a national declaration that the area is free from the pest. All internal management	P	<b>Uruguay</b> 1) "confirmed" replaced by "determined" for consistency with ISPM 8. 2) See general comment <i>Category : TECHNICAL</i>

		procedures and <del>phytosanitary</del> measures to maintain the PFA (see section 3) should be in place before this declaration is made.		
297	96	Cuando se confirma la condición de ausencia de la plaga (de acuerdo con la NIMF 8) o se erradica la plaga de la futura ALP por primera vez (de acuerdo con la NIMF 9, <i>Directrices para los programas de erradicación</i> <del>erradicación</del> <i>de plagas</i> ), la ONPF debería hacer una declaración nacional de que el área está libre de la plaga. Antes de hacer la declaración, se debería contar con todos los procedimientos internos de gestión y las medidas fitosanitarias para mantener el ALP (véase la sección 3).	P	<b>OIRSA</b> Nombre correcto de la NIMF <i>Category : EDITORIAL</i>
298	96	Cuando se confirma la <del>condición-situación</del> de ausencia de la plaga (de acuerdo con la NIMF 8) o se erradica la plaga de la futura ALP por primera vez (de acuerdo con la NIMF 9, <i>Directrices para los programas de erradicación</i> ), la ONPF	P	<b>OIRSA</b> Uso de términos correctos <i>Category : TECHNICAL</i>

		debería hacer una declaración nacional de que el área está libre de la plaga. Antes de hacer la declaración, se debería contar con todos los procedimientos internos de gestión y las medidas fitosanitarias para mantener el ALP (véase la sección 3).		
299	96	Quand l'absence (d'après la NIMP 8) ou l'éradication de l'organisme nuisible dans la zone envisagée comme ZE est confirmée pour la première fois (conformément à la NIMP 9 [ <i>Directives pour les programmes d'éradication des organismes nuisibles</i> ]), l'ONPV devrait faire une déclaration nationale indiquant que la zone est exempte de l'organisme nuisible. Les procédures de gestion interne et les mesures phytosanitaires visant à maintenir la ZE (voir section 3) devraient être <u>mises</u> en place <u>avant</u> que la déclaration ne soit établie.	P	<b>Congo</b> <i>Category : EDITORIAL</i>
3. Maintenance of the pest free area				



300	97	<b>3. Maintenance of the <del>pest-free</del> <u>pest-free</u> area</b>	P	<b>PPPO</b> <i>Category : EDITORIAL</i>
301	98	A <del>risk-based</del> programme to ensure maintenance of the PFA should be based on at least the following elements: a legal framework to control the movement of regulated articles; routine pest monitoring and collection of relevant data to inform the management of the PFA, including outbreak management; and contingency plans for corrective action in the event of an outbreak, with associated rules for suspension and reinstatement of the PFA.	P	<b>European Union</b> The elements listed in the sentence are not in relation with the risk. <i>Category : TECHNICAL</i>
302	98	A risk-based programme to ensure maintenance of the PFA should be based on at least the following elements: <del>a legal</del> <u>regulatory</u> framework to control the movement of regulated articles; <del>routine pest monitoring</del> <u>surveys</u> and collection of relevant data to inform the management of the PFA, including outbreak management; and <del>contingency plans for</del>	P	<b>PPPO</b> Replace 'legal' with 'regulatory' as administrative measure can also provide the necessary power for movement control. This comment applies to paragraphs [98] and [100]. The use of terms 'monitoring' and 'surveys' should be consistent throughout the document. Do these both mean the same thing? Are they different from the surveillance described in 2.1 ([82] – [86])? for easy reading, break the lists within the paragraph into bullet points. <i>Category : SUBSTANTIVE</i>

		corrective action in the event of an outbreak, with associated rules for suspension and reinstatement of the PFA.		
303	98	A risk-based programme to ensure maintenance of the PFA should be based on at least the following elements: a <del>legal</del> <u>regulatory</u> framework to control the movement of regulated articles; routine pest monitoring and collection of relevant data to inform the management of the PFA, including outbreak management; and contingency plans for corrective action in the event of an outbreak, with associated rules for suspension and reinstatement of the PFA.	P	<b>Korea, Republic of</b> 'regulatory' is more appropriate because administrative measure can also provide the necessary power for movement control. <i>Category : SUBSTANTIVE</i>
304	98	A risk-based programme to ensure maintenance of the PFA should be based on at least the following elements: a legal framework to control the movement of regulated articles; routine <del>pest</del> monitoring <u>survey</u> and collection of relevant data to inform the management of the PFA, including outbreak management; and contingency plans for	P	<b>COSAVE</b> In this context the Glossary term "monitoring survey" is more appropriate than the Glossary term "monitoring" <i>Category : TECHNICAL</i>

		corrective action in the event of an outbreak, with associated rules for suspension and reinstatement of the PFA.		
305	98	A <del>risk-based</del> programme to ensure maintenance of the PFA should be based on at least the following elements: a legal framework to control the movement of regulated articles; routine pest monitoring and collection of relevant data to inform the management of the PFA, including outbreak management; and contingency plans for corrective action in the event of an outbreak, with associated rules for suspension and reinstatement of the PFA.	P	<b>EPPO</b> The elements listed in the sentence are not in relation with the risk. <i>Category : TECHNICAL</i>
306	98	A risk-based programme to ensure maintenance of the PFA should be based on at least the following elements: a legal framework to control the movement of regulated articles; routine <del>pest</del> monitoring <u>surveys</u> and collection of relevant data to inform the management of the PFA, including outbreak management; and contingency plans for	P	<b>Uruguay</b> In this context the Glossary term "monitoring survey" is more appropriate than the Glossary term "monitoring" <i>Category : TECHNICAL</i>

		corrective action in the event of an outbreak, with associated rules for suspension and reinstatement of the PFA.		
307	98	El programa basado en el riesgo dirigido a <del>garantizar</del> <u>asegurar</u> el mantenimiento del ALP debería contar, como mínimo, con los siguientes elementos: un marco jurídico para controlar el movimiento de artículos reglamentados; actividades periódicas de monitoreo de la plaga y recopilación de datos pertinentes para fundamentar la gestión del ALP, incluida la gestión de brotes, y planes de contingencia que permitan adoptar medidas correctivas frente a un brote, con las correspondientes reglas para suspender y restablecer el ALP.	P	<b>OIRSA</b> Uso de términos correctos <i>Category : TECHNICAL</i>
308	98	Un programme fondé sur les risques visant à assurer le maintien de la ZE devrait être instauré et comporter au moins les éléments suivants: un cadre juridique visant à contrôler les	P	<b>IPPC Regional Workshop Africa</b> <i>Category : TECHNICAL</i>

		déplacements d'articles réglementés; un <del>suivi régulier-plan</del> de <u>suivi de</u> l'organisme nuisible et la collecte de données pertinentes susceptibles d'éclairer la gestion de la ZE, y compris en cas d'apparition de foyers; des plans d'urgence prévoyant des actions correctives en cas d'apparition d'un foyer, assortis de règles encadrant la suspension ou le rétablissement d'une ZE.		
309	98	Un programme fondé sur les risques visant à assurer le maintien de la ZE devrait être instauré et comporter au moins les éléments suivants: un cadre juridique visant à contrôler les déplacements d'articles réglementés; un <del>suivi régulier-plan</del> de <u>suivi de</u> l'organisme nuisible et la collecte de <del>données</del> <u>données</u> pertinentes susceptibles d'éclairer la gestion de la ZE, y compris en cas d'apparition de foyers; des plans d'urgence prévoyant des actions correctives en cas	P	<b>Congo</b> <i>Category : TECHNICAL</i>

		d'apparition d'un foyer, assortis de règles encadrant la suspension ou le rétablissement d'une ZE.		
310	98	Un programme fondé sur les risques visant à assurer le maintien de la ZE devrait être instauré et comporter au moins les éléments suivants: un cadre juridique visant à contrôler les déplacements d'articles réglementés; un suivi régulier de l'organisme nuisible et la collecte de données pertinentes susceptibles d'éclairer la gestion de la ZE, y compris <del>en</del> les cas d'apparition de foyers; des plans d'urgence prévoyant des actions correctives en cas d'apparition d'un foyer, assortis de règles encadrant la suspension ou le rétablissement d'une ZE.	P	<b>Congo</b> <i>Category : EDITORIAL</i>
<b>3.1 Legal framework</b>				
311	99	<b>Legal framework</b>	C	<b>Japan</b> Although the title is "Legal framework", it is unclear about the relationship between the title and the contents of para 100 – 101 (e.g. movement of regulated articles, early detection, trace-back of regulated articles, notification of pest detections). It may be better to change the title or clarify better the relationship of them. <i>Category : SUBSTANTIVE</i>
312	99	<del>- Regulatory</del> <b>Legal framework authority</b>	P	<b>PPPO</b> this is an alternative rewording to regulatory framework, and this is aligned with ISPM 7. the framework can be either legal or administrative

				<i>Category : SUBSTANTIVE</i>
313	99	<del>- Regulatory</del> <b>Legal framework</b>	P	<b>Korea, Republic of</b> For the consistency with the section 3. <i>Category : SUBSTANTIVE</i>
314	99	<b>Legal framework</b>	C	<b>Caribbean Agricultural Health and Food Safety Agency</b> More clarification needed. The wording suggests guidelines for the NPPO and not so much outline the legal framework. <i>Category : EDITORIAL</i>
315	99	<del>Legal framework</del>	P	<b>Thailand</b> We would like to propose to delete section 3.1 because the title of the legal framework should not be required only for the maintenance step. In addition, requirements related to the legal framework have already been defined in paragraph 61. <i>Category : SUBSTANTIVE</i>
316	99	<b>Legal framework</b>	C	<b>Singapore</b> The title 3.1 Legal framework suggested the elaboration of the requirements of legal levers required to support the maintenance of the PFA but the content seemed to say otherwise i.e repeat of buffer zones, rules for intensified surveys, trace-back etc but not the legal levers. Suggestion if the intention is as such: "The PFA should be defined by national legislation as an official phytosanitary measures to provide the NPPO the legal authority and responsibilities to do so etc." However, phytosanitary measures may not be listed in national legislation as such - may need to be reworded accordingly. <i>Category : SUBSTANTIVE</i>
317	100	The pest should be regulated in such a way that it may not be brought into the PFA through movement of regulated articles (see section 2.2). Where appropriate, buffer zones may be established with rules for intensified surveys to ensure early detection of natural spread of the pest into the vicinity of the PFA. The phytosanitary measures should also allow <del>trace-back</del> <u>traceability</u> of regulated articles introduced into the PFA or moving within the PFA, so that the appropriate corrective	P	<b>Japan</b> Traceability covers both trace-back and trace-forward, so it seems to be more appropriate to use traceability to cover a wider range of cases. <i>Category : EDITORIAL</i>

		actions can be taken in a timely manner.		
318	100	<del>Regulatory framework should be established to enforce destination of PFA, surveillance, restrict of movement of regulated articles, traceability, corrective action, pest reporting and engagement of stakeholders. The pest should be regulated in such a way that it may not be brought into the PFA through movement of regulated articles (see section 2.2). Where appropriate, buffer zones may be established with rules for intensified surveys to ensure early detection of natural spread of the pest into the vicinity of the PFA. The phytosanitary measures should also allow trace-back of regulated articles introduced into the PFA or moving within the PFA, so that the appropriate corrective actions can be taken in a timely manner.</del>	P	<b>Korea, Republic of</b> Improve clarity Category : SUBSTANTIVE
319	100	The <del>regulation of the</del> pest should be <del>regulated in such a way that it may not be brought sufficient to prevent its entry</del> into the	P	<b>PPPO</b> Suggestion to make the wording of this sentence clearer. as per comment on para [51]. If a PFA is a standalone phytosanitary measure then phytosanitary procedures are taken to meet the measure. By including 'natural spread' it limits the scope – what about other forms of spread (human, mechanical etc). Also



		PFA through <u>the controls of the</u> movement of regulated articles (see section 2.2). Where appropriate, buffer zones may be established with rules for intensified surveys to ensure early detection of <del>natural</del> <u>the</u> spread of the pest into the vicinity of the PFA. The phytosanitary <del>measures</del> <u>procedures</u> should also allow trace-back of regulated articles introduced into the PFA or moving within the PFA, so that the appropriate corrective actions can be taken in a timely manner.		the types of surveys i.e. detection if pest is wind borne and doesn't cover introduction by human activities (as noted in paragraph [120]). <i>Category : TECHNICAL</i>
320	100	The pest should be regulated in such a way that it may not be brought into the PFA through movement of regulated articles (see section 2.2). Where appropriate, buffer zones may be established with rules for intensified surveys to ensure early detection of natural spread of the pest into the vicinity of the PFA. The phytosanitary <del>measures</del> <u>activities</u> should also allow trace-back of regulated articles	P	<b>Australia</b> Justification: As described in the general comment at the beginning of the document, this alternate description, "activities", is proposed to clarify the meaning and remove the seeming two levels/tiers of 'phytosanitary measures' referenced in this document. <i>Category : TECHNICAL</i>

		introduced into the PFA or moving within the PFA, so that the appropriate corrective actions can be taken in a timely manner.		
321	100	The pest should be regulated in such a way that it may not be brought into the PFA through movement of regulated articles (see section 2.2). Where appropriate, buffer zones may be established with rules for intensified surveys to ensure early detection of natural spread of the pest into the vicinity of the PFA. The phytosanitary measures should also allow trace-back of regulated articles introduced into the PFA or moving within the PFA, so that the appropriate corrective actions can be taken in a timely manner.	C	<b>Barbados</b> More clarification needed. The wording suggests guidelines for the NPPO and not so much outline the legal framework. <i>Category : SUBSTANTIVE</i>
322	100	The pest should be regulated in such a way that it may not be brought into the PFA through movement of regulated articles (see section 2.2). Where appropriate, buffer zones may be established with rules for intensified surveys to ensure early	C	<b>South Africa</b> without controls on the movement of regulated <i>Category : TECHNICAL</i>

		detection of natural spread of the pest into the vicinity of the PFA. The phytosanitary measures should also allow trace-back of regulated articles introduced into the PFA or moving within the PFA, so that the appropriate corrective actions can be taken in a timely manner.		
323	100	<del>The pest should be regulated in such a way that it may not be brought into the PFA through movement of regulated articles (see section 2.2). Where appropriate, buffer zones may be established with rules for intensified surveys to ensure early detection of natural spread of the pest into the vicinity of the PFA. The phytosanitary measures should also allow trace-back of regulated articles introduced into the PFA or moving within the PFA, so that the appropriate corrective actions can be taken in a timely manner.</del>	P	<b>Thailand</b>  <i>Category : SUBSTANTIVE</i>
324	101	<del>Pest-</del> <u>The legal framework should ensure that pest detections or cases of suspected presence of the</u>	P	<b>European Union</b> This sentence is not clear as regards its intended meaning. It reflects an NPPO requirement and Standards are directed to NPPOs. <i>Category : TECHNICAL</i>

		<u>pest</u> in the PFA <del>should be</del> <u>are</u> immediately notified to the NPPO (or other competent authority delegated by the NPPO).		
325	101	Pest detections in the PFA should be immediately notified to the NPPO (or other competent authority delegated by the <del>NPPO</del> NPPO)(see section 3.4).	P	<b>Japan</b> To be as the same way as the previous paragraph. <i>Category : EDITORIAL</i>
326	101	Pest detections in the PFA should be immediately notified to the NPPO (or other competent authority delegated by the NPPO).	C	<b>PPPO</b> Agree with Thailand's comment of moving this para to 3.4 <i>Category : EDITORIAL</i>
327	101	Pest detections in the PFA should be immediately notified to the NPPO (or <u>through</u> other competent authority delegated by the NPPO).	P	<b>COSAVE</b> The NPPO should always be notified. <i>Category : TECHNICAL</i>
328	101	<del>Pest</del> The legal framework should ensure that pest detections <u>or cases of</u> <u>suspected presence of the</u> <u>pest</u> in the PFA <del>should be</del> <u>are</u> immediately notified to the NPPO (or other competent authority delegated by the NPPO).	P	<b>EPPO</b> This sentence is not clear as regards its intended meaning. It reflects an NPPO requirement and Standards are directed to NPPOs. <i>Category : TECHNICAL</i>
329	101	Pest detections in the PFA should be immediately notified to the NPPO (or other competent authority delegated by the NPPO).	C	<b>Thailand</b> We would like to propose to move this sentence to be under section 3.4 Notification of detection of the pest as it is more appropriated. <i>Category : SUBSTANTIVE</i>

330	101	<del>Pest detections in the PFA should be immediately notified to the NPPO (or other competent authority delegated by the NPPO).</del>	P	<b>Thailand</b> <i>Category : SUBSTANTIVE</i>
331	101	Pest detections in the PFA should be immediately notified to the NPPO (or <del>through</del> other competent authority delegated by the NPPO).	P	<b>Uruguay</b> The NPPO should always be notified. <i>Category : TECHNICAL</i>
3.2 Surveillance for the maintenance of the PFA				
332	102	<b>3.2 <u>1</u> Surveillance for the maintenance of the PFA</b>	P	<b>Thailand</b> <i>Category : EDITORIAL</i>
333	102	<b>3.2 <u>Surveillance Plan de suivi de l'organisme nuisible pour les besoins du maintien de la ZE</u></b>	P	<b>IPPC Regional Workshop Africa</b> le titre "plan de suivi de l'organisme nuisible" proposé à la section 3 et parag 3.2 se justifie du fait que: l'établissement d'une ZE fait partie des mesures phytosanitaires, il serait judicieux de parler d'un plan de suivi de l'organisme nuisible(paraissant plus contraignant et va en adéquation avec cette mesure phytosanitaire), assorti des activités de surveillance, planifiées dans le temps et selon le cycle biologique et de vie de l'ON <i>Category : TECHNICAL</i>
334	102	<b>3.2 <u>Surveillance pour les besoins du maintien-2 Plan de la ZE suivi de l'organisme nuisible</u></b>	P	<b>Congo</b> le titre "plan de suivi de l'organisme nuisible" proposé la section 3 et parag 3.2 se justifie du fait que: l'établissement d'une ZE fait partie des mesures phytosanitaires, il serait judicieux de parler d'un plan de suivi de l'organisme nuisible(paraissant plus contraignant et va en adéquation avec cette mesure phytosanitaire), assorti des activités de surveillance, planifiées dans le temps et selon le cycle biologique et de vie de l'ON <i>Category : TECHNICAL</i>
335	103	Surveillance <del>should be conducted</del> on a regular basis <del>should be conducted</del> to verify that the absence of the pest from the PFA is maintained.	P	<b>Australia</b> To improve clarity of the sentence <i>Category : EDITORIAL</i>
336	103	Surveillance on a <b>regular</b> basis should be conducted to verify that the absence	C	<b>IPPC Regional Workshop Africa</b> Duration for regular not specified ( Monthly, annually etc) <i>Category : TECHNICAL</i>

		of the pest from the PFA is maintained.		
337	103	Surveillance on a <b>regular</b> basis should be conducted to verify that the absence of the pest from the PFA is maintained.	C	<b>Kenya</b> Duration for regular not specified ( Monthly, annually etc) <i>Category : TECHNICAL</i>
338	104	The decision about whether general surveillance for the pest is sufficient or specific surveillance is needed should be based on the <u>results-biology of a pest risk assessment</u> the pest, the relevant pathways and the characteristics of the PFA.	P	<b>European Union</b> The proposed wording is more appropriate, correct and coherent with ISPM 8. <i>Category : TECHNICAL</i>
339	104	The decision about whether general surveillance for the pest is sufficient or specific surveillance is needed should be based on the <u>results-assessment of a pest risk assessment</u> surveillance data and protocols. .	P	<b>Japan</b> To avoid the confusion of interpretations between the meaning of the words in this paragraph and the definition in ISPM5. The words "pest risk assessment" here may be used as a general sense, but whether general surveillance for the pest is sufficient or specific surveillance is needed is not evaluated based on pest risk assessment defined in ISPM5. It is evaluated based on the assessment of surveillance data and protocols. <i>Category : EDITORIAL</i>
340	104	The decision about whether general surveillance for the pest is sufficient or specific surveillance is needed should be based on the results of <u>a-an assessment of the potential for entry and establishment of the</u>	P	<b>PPPO</b> Justification: As above, Pest Risk Assessment (PRA) has a specific meaning and may not be required or appropriate in all cases. The proposed text makes it clear what the specific assessment should aim to achieve. <i>Category : SUBSTANTIVE</i>

		pest <del>risk assessment</del> <u>in the area.</u>		
341	104	The decision about whether general surveillance for the pest is sufficient or specific surveillance is needed should be based on the results of <del>a</del> <u>an assessment of the potential for entry and establishment of the pest</u> <del>risk assessment</del> <u>in the area.</u>	P	<b>Australia</b> Justification: As above, Pest Risk Assessment (PRA) has a specific meaning and may not be required or appropriate in all cases. The proposed text makes it clear on what the specific assessment should aim to achieve. <i>Category : SUBSTANTIVE</i>
342	104	The decision about whether general surveillance for the pest is sufficient or specific surveillance is needed should be based on the <del>results biology of a pest risk assessment</del> <u>the pest, the relevant pathways and the characteristics of the PFA.</u>	P	<b>EPPO</b> The proposed wording is more appropriate, correct and coherent with ISPM 8. <i>Category : TECHNICAL</i>
343	105	<del>General surveillance may be sufficient in cases where the pest has never been introduced into the PFA, nor in the surrounding areas, and there have been no records of the pest's presence in the PFA.</del>	P	<b>United States of America</b> Deleted as is inconsistent with para 70bis where the PFA requirements are described in general. <i>Category : SUBSTANTIVE</i>
344	105	General surveillance may be sufficient in cases where the pest has never been introduced into the PFA, nor in the	P	<b>China</b> If the result is negative after some period specific surveillance, general surveillance may be sufficient. <i>Category : SUBSTANTIVE</i>

		surrounding areas, and there have been <u>either</u> no records of the pest's presence <u>or no more new record of the pest's presence after some period (such as several years depending on the pest's biology) specific surveillance</u> in the PFA.		
345	105	<del>La vigilancia general puede ser suficiente en caso de que la plaga nunca haya entrado en el ALP ni en las zonas circundantes y no existan registros de su presencia en el ALP.</del>	P	<b>Colombia</b> Va en contravía del párrafo 81 en el cual se indica que no es necesario declarar un ALP para plagas con condición de "Ausente: la plaga no se ha registrado" según se define en la NIMF 8, y esto está respaldado por datos empíricos actuales. <i>Category : SUBSTANTIVE</i>
346	106	Specific surveillance to detect possible incursions of the pest at an early stage should be the standard procedure in all other cases. The type and frequency of the surveys should be based on a pest risk assessment and should allow detection of <u>low levels of infestation of</u> the pest with an appropriate level of confidence.	P	<b>European Union</b> This makes it even clearer that the surveys carried out must ensure that a low density of infestation is already detected. <i>Category : TECHNICAL</i>
347	106	Specific surveillance to detect possible incursions of the pest at an early stage should be the standard procedure in all other cases. The type and	P	<b>PPPO</b> Justification: As above, Pest Risk Assessment (PRA) has a specific meaning and may not be required or appropriate in all cases. The proposed text makes it clear what the specific assessment should aim to achieve. <i>Category : SUBSTANTIVE</i>



		frequency of the surveys should be based on <del>a pest risk-an</del> assessment <u>of the potential for entry</u> and <u>establishment of the pest in the area</u> and should allow detection of the pest with an appropriate level of confidence.		
348	106	Specific surveillance to detect possible incursions of the pest at an early stage should be the standard procedure in all other cases. The type and frequency of the surveys should be based on <del>a pest risk-an</del> assessment <u>of the potential for entry</u> and <u>establishment of the pest in the area</u> and should allow detection of the pest with an appropriate level of confidence.	P	<b>Australia</b> Justification: As above, Pest Risk Assessment (PRA) has a specific meaning and may not be required or appropriate in all cases. The proposed text makes it clear what the specific assessment should aim to achieve. <i>Category : SUBSTANTIVE</i>
349	106	Specific surveillance to detect possible <del>incursions</del> <u>outbreaks</u> of the pest at an early stage should be the standard procedure in all other cases. The type and frequency of the surveys should be based on a pest risk assessment and should allow detection of the pest with an appropriate level of confidence.	P	<b>COSAVE</b> For consistency throughout the draft, and according ISPM 5 the term "outbreak" includes "incursion" <i>Category : TECHNICAL</i>

350	106	Specific surveillance to detect possible incursions of the pest at an early stage should be the standard procedure in all other cases. The type and frequency of the surveys should be based on a pest risk assessment and should allow detection of <u>low levels of infestation</u> of the pest with an appropriate level of confidence.	P	<b>EPPO</b> This makes it even clearer that the surveys carried out must ensure that a low density of infestation is already detected. <i>Category : TECHNICAL</i>
351	106	Specific surveillance to detect possible <del>incursions</del> <u>outbreaks</u> of the pest at an early stage should be the standard procedure in all other cases. The type and frequency of the surveys should be based on a pest risk assessment and should allow detection of the pest with an appropriate level of confidence.	P	<b>Uruguay</b> For consistency throughout the draft, and according ISPM 5 the term "outbreak" includes "incursion" <i>Category : TECHNICAL</i>
<b>3.3 Data collection and record keeping</b>				
352	107	<b>3.3 Data collection and record keeping</b>	P	<b>Japan</b> Paragraph 108 of "3.3 Data collection and record keeping" should be moved from Section 3 to Section 5 and change section title of section 5 to "5 Data collection, documentation and record-keeping" The content of data collection and record keeping in section 3.3 is a requirement not only for maintaining a PFA but also for establishing a PFA, so the information is not only for section 3. <i>Category : SUBSTANTIVE</i>
353	107	<b>3.3 Data collection and record keeping</b>	P	<b>PPPO</b> delete the heading as it is part of the surveillance activities <i>Category : TECHNICAL</i>

354	107	<b>3.3 2 Data collection and record keeping</b>	P	<b>Thailand</b> <i>Category : EDITORIAL</i>
355	107	<b>3.3 Recopilación de datos y <del>mantenimiento</del> de registros</b>	P	<b>Colombia</b> Se sugiere la eliminación de la palabra mantenimiento debido a que el párrafo 130 es específico para el mantenimiento. <i>Category : EDITORIAL</i>
356	108	The data from the surveillance (e.g. time of surveillance, number and type of plants inspected, number of samples taken for inspection, number of samples taken for laboratory analysis, analytical methods used, results of the <del>analysis</del> <u>analyses</u> ) should be stored and kept available for a sufficient time to ensure the possibility of trace-back and verification.	P	<b>European Union</b> Plural for consistency. <i>Category : EDITORIAL</i>
357	108	<del>The data from the surveillance (e.g. time of surveillance, number and type of plants inspected, number of samples taken for inspection, number of samples taken for laboratory analysis, analytical methods used, results of the analysis) should be stored and kept available for a sufficient time to ensure the possibility of trace-back and verification.</del>	P	<b>Japan</b> See the comment to previous paragraph from Japan. <i>Category : SUBSTANTIVE</i>

358	108	The data from the surveillance (e.g. time of surveillance, number and type of plants inspected, number of samples taken for inspection, number of samples taken for laboratory analysis, analytical methods used, results of the analysis) should be stored and kept available for a sufficient time to ensure the possibility of trace-back and <del>verification</del> <u>verification</u> (see Section 5).	P	<b>PPPO</b> We suggest adding an indication that people should see section 5 of the same document. Referencing section 5 helps with understanding that while paragraph 108 says sufficient time, section 5 gives an indication of the minimum time (24 months). <i>Category : EDITORIAL</i>
359	108	The data from the surveillance (e.g. time of surveillance, number and type of plants inspected, number of samples taken for inspection, number of samples taken for laboratory analysis, analytical methods used, results of the analysis) should be stored and kept available for a <b>sufficient time</b> to ensure the possibility of trace-back and verification.	C	<b>Barbados</b> (minimum ... time f.i. 2 years???)..sufficient time needs clarification by stating a defined period <i>Category : SUBSTANTIVE</i>
360	108	The data from the surveillance (e.g. time of surveillance, number and type of plants inspected, number of samples taken for inspection, number of	P	<b>EPPO</b> Plural for consistency. <i>Category : EDITORIAL</i>

		samples taken for laboratory analysis, analytical methods used, results of the <del>analysis</del> <del>analyses</del> ) should be stored and kept available for a sufficient time to ensure the possibility of trace-back and verification.		
361	108	The data from the surveillance (e.g. time of surveillance, number and type of plants inspected, number of samples taken for inspection, number of samples taken for laboratory analysis, analytical methods used, results of the analysis) should be stored and kept available for a <b>sufficient time</b> to ensure the possibility of trace-back and verification.	C	<b>Caribbean Agricultural Health and Food Safety Agency</b> (minimum ... time f.i. 2 years???) <i>Category : TECHNICAL</i>
362	108	The data from the surveillance (e.g. time of surveillance, number and type of plants inspected, number of samples taken for inspection, number of samples taken for laboratory analysis, analytical methods used, results of the analysis) should be stored and kept available for a <del>sufficient time</del> <u>minimum of 24 months</u> to ensure the	P	<b>United States of America</b> For consistency with Section 5. <i>Category : TECHNICAL</i>

		possibility of trace-back and verification.		
363	108	The data from the surveillance (e.g. time of surveillance, <u>place of surveillance</u> , number and type of plants inspected, number of samples taken for inspection, number of samples taken for laboratory analysis, analytical methods used, results of the analysis) should be stored and kept available for a sufficient time to ensure the possibility of trace-back and verification.	P	<b>China</b> Different monitoring sites can reflect the coverage and representativeness of monitoring work. <i>Category : SUBSTANTIVE</i>
364	108	Los datos obtenidos a partir de la vigilancia (por ejemplo, el momento en que se lleva a cabo, el número y el tipo de plantas inspeccionadas, el número de muestras <del>extraídas-tomadas</del> para la <del>inspección, el número de muestras extraídas</del> <u>inspección y</u> para el análisis de laboratorio, los métodos analíticos utilizados o los resultados del análisis) se deberían almacenar y mantener disponibles el tiempo suficiente para poderlos rastrear y verificar.	P	<b>OIRSA</b> Clarificar el párrafo <i>Category : EDITORIAL</i>

## 3.4 Notification of detection of the pest

365	109	<b>3.4 <u>3</u></b> <b>Notification of detection of the pest</b>	P	<b>Thailand</b> <i>Category : EDITORIAL</i>
366	110	A reporting framework should be established to ensure that detections of the pest, <del>including interceptions, incursions and outbreaks,</del> are immediately notified to the NPPO (or other competent authority delegated by the NPPO) and confirmed.	P	<b>Costa Rica</b> simplifies the text and implies that any detection of the pest must be notified <i>Category : EDITORIAL</i>
367	110	A reporting framework should be established to ensure that detections of the pest, including interceptions, <u>and</u> incursions and <u>other</u> outbreaks, are immediately notified to the NPPO (or other competent authority delegated by the NPPO) and <u>officially</u> confirmed.	P	<b>European Union</b> 1) According to ISPM 5, an incursion ("An isolated population of a pest recently detected in an area, not known to be established, but expected to survive for the immediate future") is a type of outbreak ("A recently detected pest population, including an incursion, or a sudden significant increase of an established pest population in an area").  2) Precision given (the NPPO has to confirm the detection). <i>Category : TECHNICAL</i>
368	110	A reporting framework should be established to ensure that <del>detections of the pest, including interceptions, incursions and outbreaks, are immediately notified to the NPPO</del> <u>or RPPO</u> (or other competent authority delegated by the NPPO) <u>is immediately notified of</u>	P	<b>PPPO</b> Suggested rewording to improve clarity. Also adding RPPO if the PFA concerns a number of countries. <i>Category : EDITORIAL</i>

		<u>the detection of the pest, including interceptions, incursions and confirmed outbreaks.</u>		
369	110	A reporting framework should be established to ensure that detections of the pest, including interceptions, incursions and outbreaks, are immediately notified to the NPPO (or other competent authority delegated by the NPPO) and confirmed. <u>If confirmed, the NPPO should communicate with relevant stakeholders.</u>	P	<b>Korea, Republic of</b> Add a sentence that NPPO can communicate with stakeholders <i>Category : SUBSTANTIVE</i>
370	110	A reporting framework should be established to ensure that detections of the pest, including <u>interceptions, incursions</u> <del>interceptions</del> and outbreaks, are immediately notified to the NPPO (or other competent authority delegated by the NPPO) and confirmed.	P	<b>Australia</b> Justification: 'Incursion' is included in the definition of 'outbreak' in ISPM 5, so consider both terms are not required here. <i>Category : EDITORIAL</i>
371	110	A reporting framework should be established to ensure that detections of the pest, <u>including interceptions, incursions and including</u> outbreaks, are immediately notified to the NPPO (or <u>other</u>	P	<b>COSAVE</b> ISPM5 defines "interception (of a pest)" as the detection of a pest during inspection and testing of an imported consignment, therefore in relation to consignments. Outbreak includes incursion and is used throughout the draft. See comment in paragraph 101 <i>Category : TECHNICAL</i>



		<a href="#">through</a> competent authority delegated by the NPPO) and confirmed.		
372	110	A reporting framework should be established to ensure that detections of the pest, including interceptions, <a href="#">and</a> incursions and <a href="#">other</a> outbreaks, are immediately notified to the NPPO (or other competent authority delegated by the NPPO) and <a href="#">officially</a> confirmed.	P	<p><b>EPPO</b></p> <p>1) According to ISPM 5, an incursion ("An isolated population of a pest recently detected in an area, not known to be established, but expected to survive for the immediate future") is a type of outbreak ("A recently detected pest population, including an incursion, or a sudden significant increase of an established pest population in an area").</p> <p>2) Precision given (the NPPO has to confirm the detection).  Category : <i>TECHNICAL</i></p>
373	110	A reporting framework should be established to ensure that detections of the pest, including interceptions, incursions and outbreaks, are immediately notified to the NPPO (or other competent authority delegated by the NPPO) and confirmed. <a href="#">Pest detections in the PFA should be immediately notified to the NPPO (or other competent authority delegated by the NPPO).</a>	P	<p><b>Thailand</b></p> <p>We would like to add a new sentence which was previously stated under section 3.1.  Category : <i>SUBSTANTIVE</i></p>
374	110	A reporting framework should be established to ensure that detections of the pest, including interceptions, incursions and outbreaks, are immediately notified to	P	<p><b>China</b></p> <p>If confirmed detection of related pest, NPPO should immediately notify trade related or other concerned NPPO to whom could take emergency phytosanitary measures to protect domestic agriculture.  Category : <i>SUBSTANTIVE</i></p>

		the NPPO (or other competent authority delegated by the NPPO) and confirmed. <u>If confirmed, NPPO should immediately notify trade related or other concerned NPPO.</u>		
375	110	A reporting framework should be established to ensure that detections of the pest, including <del>interceptions, incursions</del> and outbreaks, are immediately notified to the NPPO (or <del>other</del> <u>through</u> competent authority delegated by the NPPO) and confirmed.	P	<b>Uruguay</b> ISPM5 defines "interception (of a pest)" as the detection of a pest during inspection and testing of an imported consignment, therefore in relation to consignments. Outbreak includes incursion and is used throughout the draft. See comment in paragraph 101 <i>Category : TECHNICAL</i>
376	110	Se debería establecer un marco de notificación para asegurar que toda detección de la <del>plaga —intercepciónplaga, incursiones y brotes—</del> <u>incluido los brotes,</u> se notifique inmediatamente a la ONPF (o a otra autoridad competente en que la ONPF haya delegado sus funciones) y se confirme.	P	<b>Panama</b> <i>Category : TECHNICAL</i>
377	110	Se debería establecer un <del>marco-sistema</del> de notificación para asegurar que toda detección de la plaga <del>—intercepción—incluida</del>	P	<b>OIRSA</b> Uso de términos correctos <i>Category : TECHNICAL</i>

		las intercepciones, incursiones y brotes— se notifique inmediatamente a la ONPF (o a otra autoridad competente en que la ONPF haya delegado sus funciones) y se confirme <u>previa confirmación</u> .		
<b>3.5 Corrective action plans, including response to an outbreak</b>				
378	111	<b>3.5 <del>Corrective</del> <u>action-Eradication</u> plans, including response to an outbreak</b>	P	<b>Singapore</b> See reason to change to eradication plans instead of corrective action plans. <i>Category : SUBSTANTIVE</i>
379	111	<b>3.5 Corrective action plans, including response to an outbreak</b>	C	<b>Singapore</b> Proposed to change "Corrective action plans" to "Eradication plans" as the content for following paragraphs referred to eradication plans instead of corrective action plans. Clarification on the definition of corrective action plans under Section 3.5 - is this only referring to the eradication programme or there are other corrective action plans. The Section 3.5 seemed to focus on the eradication programme i.e. 3.5.1, 3.5.2, 3.5.3 & 3.5.4. Paragraph 113 focused on preparedness response to an outbreak i.e. contingency plan, simulation exercises - are these corrective action plans as well? <i>Category : SUBSTANTIVE</i>
380	111	<b>3.5 <u>4</u> <del>Corrective</del> action plans, including response to an outbreak</b>	P	<b>Thailand</b> <i>Category : EDITORIAL</i>
381	112	In the event of the pest being detected in the PFA, the NPPO should determine, based on ISPM <del>6 and 6</del> , ISPM 8, <u>or ISPM 26</u> , the type of corrective action to be taken. An eradication programme should be activated, unless the pest	P	<b>PPPO</b> This should also mention ISPM 26 where the PFA is specifically for fruit flies.  An additional scenario for actioning an eradication programme in a PFA is if the pest could only form a temporary breeding population during a favourable time period and the pest could infest a host that is traded during that time. For example, a polyphagous tropical pest could feed and breed during summer in a temperate climate and dies out in winter. During the summer the pest could infest a commodity that was then exported thus spreading the pest by trade. Therefore, the suggested wording reflects that if a pest couldn't be spread then an eradication programme would not be necessary. <i>Category : SUBSTANTIVE</i>

		can be eliminated immediately or evidence indicates that there is no risk of the pest <del>establishing</del> <u>establishing</u> <del>or, the pest cannot spread</del> <u>by infested regulated articles.</u>		
382	112	In the event of the pest being detected in the PFA, the NPPO should determine, based on ISPM 6 and ISPM 8, <u>ISPM26</u> , the type of corrective action to be taken. An eradication programme should be activated, unless the pest can be eliminated immediately or evidence indicates that there is no risk of the pest establishing.	P	<b>Korea, Republic of</b> Add a relevant ISPM <i>Category : SUBSTANTIVE</i>
383	112	In the event of the pest being detected in the PFA, the NPPO should determine, based on ISPM 6 and ISPM 8, the type of corrective action to be taken. An eradication programme should be <del>activated</del> <u>implemented</u> , unless the pest can be eliminated immediately or evidence indicates that there is no risk of the pest establishing.	P	<b>IPPC Regional Workshop Africa</b> <i>Category : SUBSTANTIVE</i>

384	112	In the event of the pest being detected in the PFA, the NPPO should determine, based on ISPM 6 and ISPM 8, the type of corrective action to be taken. An eradication programme should be activated, unless the pest can be <del>eliminated</del> <u>eradicated</u> immediately or evidence indicates that there is no risk of the pest establishing.	P	<b>COSAVE</b> ISPM5 defines "interception (of a pest)" as the detection of a pest during inspection and testing of an imported consignment, therefore in relation to consignments. Outbreak includes incursion and is used throughout the draft. See comment in paragraph 101 <i>Category : TECHNICAL</i>
385	112	In the event of the pest being detected in the PFA, the NPPO should determine, based on ISPM 6 and ISPM 8, the type of corrective action to be taken. An eradication programme should be activated, unless the pest can be <u>eliminated immediately</u> or evidence indicates that there is no risk of the pest establishing.	C	<b>United States of America</b> eliminated immediately" is open to interpretation <i>Category : TECHNICAL</i>
386	112	In the event of the pest being detected in the PFA, the NPPO should determine, based on <u>ISPM 2</u> , ISPM 6 and ISPM 8, the type of corrective action to be taken. An eradication programme should be	P	<b>Thailand</b> We would like to add "ISPM 2" in the first sentence as it is an obliged reference standard for pest risk assessment. <i>Category : SUBSTANTIVE</i>

		activated, unless the pest can be eliminated immediately or evidence indicates that there is no risk of the pest establishing.		
387	112	In the event of the pest being detected in the PFA, the NPPO should determine, based on ISPM 6 and ISPM 8, the type of corrective action to be taken. An eradication programme should be activated, unless the pest can be <del>eliminated</del> <u>eradicated</u> immediately or evidence indicates that there is no risk of the pest establishing.	P	<b>Uruguay</b> More appropriate wording <i>Category : TECHNICAL</i>
388	112	En caso de que se detecte la plaga en el ALP, la ONPF debería determinar, de conformidad con la NIMF 6 y la NIMF 8, el tipo de medida correctiva que se debe adoptar. A menos que la plaga se pueda eliminar de forma inmediata o <del>los datos indiquen la evidencia</del> <u>indique</u> que no existe el riesgo de que se establezca, se debería activar un programa de erradicación.	P	<b>OIRSA</b> consistencia con el ingles <i>Category : TRANSLATION</i>

389	113	Preparedness for rapid intervention may be ensured by developing a contingency plan in advance, including plans for rapid technical assessment of the situation, mobilizing financial and human resources, the roles and responsibilities of <b>executive services</b> , and the operational activities that are likely to be needed (in the form of a draft action plan). Regular simulation exercises may ensure that the contingency plan is effective and remains current.	C	<b>Canada</b> Unclear on what "executive services" means? Does this refer "decision makers"? If yes, "decision makers" would be more appropriate. <i>Category : TECHNICAL</i>
390	113	Preparedness for rapid intervention may be ensured by developing a contingency plan in advance, including plans for rapid technical assessment of the situation, mobilizing financial and human resources, the roles and responsibilities of executive services, and the operational activities that are likely to be needed (in the form of a draft action plan). <del>Regular</del> <b>To assist in preparedness,</b>	P	<b>PPPO</b> Suggest re-wording for clarity. <i>Category : EDITORIAL</i>

		<u>regular</u> simulation exercises <del>may ensure that can be used to review the effectiveness of the contingency plan is effective and remains current plan.</del>		
391	113	Preparedness for rapid intervention may be ensured by developing a contingency plan in advance, including plans for rapid technical assessment of the situation, <del>mobilizing financial and human resources</del> , the roles and responsibilities of executive services, and the operational activities that are likely to be needed (in the form of a draft action plan). Regular simulation exercises may ensure that the contingency plan is effective and remains current.	P	<b>Australia</b> Justification: Do not consider this is required in an ISPM. Category : <i>EDITORIAL</i>
392	113	A efectos de garantizar la preparación para la pronta intervención, se podrá elaborar por adelantado un plan de contingencia que comprenda planes para la evaluación rápida de la situación desde el punto de vista técnico, la movilización de recursos	P	<b>OIRSA</b> Uso de términos correctos Category : <i>TECHNICAL</i>



		financieros y humanos, las funciones y responsabilidades de los servicios ejecutivos y las actividades operacionales que probablemente se necesiten (en forma de un proyecto de plan de acción). Se podrán realizar <del>simulaciones periódicas-simulacros</del> <del>periódicos</del> para garantizar la eficacia y vigencia del plan de acción .		
393	114	<b>3.5.1</b> The eradication programme should include the following steps.	P	<b>PPPO</b> We propose the sentence 'The eradication programme should include the following steps.' be made into a title with its own number 3.5.1 and then have the following steps (that are all about eradication) as sub-headings under this section, i.e. 3.5.1.1 delimiting survey... 3.5.1.2 increased survey... 3.5.1.3 implementation of control measures <i>Category : EDITORIAL</i>
<b>3.5.1 Delimiting survey to demarcate the outbreak area</b>				
394	115	<b>3.5.1.1 Delimiting survey <del>to demarcate</del> of the outbreak area</b>	P	<b>PPPO</b> demarcate and delimiting mean the same thing, redundant. Delimiting is common verbiage and is in the glossary/ispm5. suggest removing demarcate throughout the document.  We propose the sentence 'The eradication programme should include the following steps.' be made into a title with its own number 3.5.1 and then have the following steps (that are all about eradication) as sub-headings under this section, i.e. 3.5.1.1 delimiting survey... 3.5.1.2 increased survey... 3.5.1.3 implementation of control measures <i>Category : TECHNICAL</i>
395	115	<b>3.5.1.1 Delimiting survey to demarcate the outbreak area</b>	P	<b>Thailand</b> <i>Category : EDITORIAL</i>
396	116	As soon as the pest has been confirmed in the PFA, a delimiting survey should be conducted to determine the <u>boundary of the</u> infested area. Based on this determination and a pest risk analysis identifying the suitability	P	<b>Canada</b> Delimiting surveys are conducted to determine boundaries of the infested area. <i>Category : TECHNICAL</i>

		of the infested area for pest establishment, an outbreak area within the PFA should be demarcated and the PFA status should be temporarily suspended therein. This demarcated outbreak area should consist of the infested area surrounded by a buffer zone, the size of which should depend on the biology of the pest, the presence of host plants and the environmental conditions.		
397	116	As soon as the <a href="#">detection of the</a> pest has been <a href="#">officially</a> confirmed in the PFA, a delimiting survey should be conducted to determine the infested area. Based on this determination and <del>a pest risk analysis identifying an assessment on the suitability biology of the infested area for pest establishment</del> <a href="#">pest, the relevant pathways and the characteristics of the PFA,</a> an outbreak area within the PFA should be demarcated and the PFA status should be temporarily suspended therein. This demarcated	P	<b>European Union</b> 1. More precise wording (see wording of paragraph 110, including suggested addition of "officially"). 2. As noted in the EU comment on paragraph 104. <i>Category : TECHNICAL</i>

		outbreak area should consist of the infested area surrounded by a buffer zone, the size of which should depend on the biology of the pest, the presence of host plants and the environmental conditions.		
398	116	As soon as the pest has been confirmed in the PFA, a delimiting survey should be conducted to determine the infested area. Based on this determination and a pest risk analysis identifying the suitability of the infested area for pest establishment, an outbreak area within the PFA should be <del>demarcated</del> <u>delimited</u> and the PFA status should be temporarily suspended therein. This <del>demarcated</del> <u>delimited</u> outbreak area should consist of the infested area surrounded by a buffer zone, the size of which should depend on the biology of the pest, the presence of host plants and the environmental conditions.	P	<b>PPPO</b> <i>Category : EDITORIAL</i>
399	116	As soon as the pest has been confirmed in the PFA, a delimiting survey	P	<b>COSAVE</b> For consistency with ISPM 8, the pest status is "absent", therefore the PFA was established <i>Category : TECHNICAL</i>

		should be conducted to determine the infested area. Based on this determination and a pest risk analysis identifying the suitability of the infested area for pest establishment, an outbreak area within the PFA should be demarcated and the PFA <del>status</del> should be temporarily suspended therein. This demarcated outbreak area should consist of the infested area surrounded by a buffer zone, the size of which should depend on the biology of the pest, the presence of host plants and the environmental conditions.		
400	116	As soon as the <u>detection of the</u> pest has been <u>officially</u> confirmed in the PFA, a delimiting survey should be conducted to determine the infested area. Based on this determination and <del>a pest risk analysis identifying an assessment on the suitability biology of the infested area for pest establishment</del> <u>pest, the relevant pathways and the characteristics of the</u>	P	<b>EPPO</b> More precise wording (see wording of paragraph 110, including suggested addition of "officially").  As noted in the EPPO comment on paragraph 104. <i>Category : TECHNICAL</i>

		PFA, an outbreak area within the PFA should be demarcated and the PFA status should be temporarily suspended therein. This demarcated outbreak area should consist of the infested area surrounded by a buffer zone, the size of which should depend on the biology of the pest, the presence of host plants and the environmental conditions.		
401	116	As soon as the pest has been confirmed in the PFA, a delimiting survey should be conducted to determine the infested area. Based on this determination and a pest risk analysis identifying the suitability of the infested area for pest establishment, an outbreak area within the PFA should be demarcated and the PFA <del>status</del> should be temporarily suspended therein. This demarcated outbreak area should consist of the infested area surrounded by a buffer zone, the size of which should depend on the biology of the pest,	P	<b>Uruguay</b> For consistency with ISPM 8, the pest status is "absent", therefore the PFA was established <i>Category : TECHNICAL</i>

		the presence of host plants and the environmental conditions.		
402	116	<p>Tan pronto como se confirme la plaga en el ALP, se debería realizar una prospección de delimitación para determinar el área infestada. A partir de <del>ello y del análisis de riesgo de plagas</del>ello, que determinará si el área infestada es idónea para el establecimiento de la plaga, dentro del ALP se debería demarcar el área afectada por el brote, en la que se debería suspender temporalmente la condición de ALP. Esta área demarcada debería contener el área del brote rodeada por una zona tampón, cuyo tamaño debería depender de las características biológicas de la plaga, la presencia de plantas hospedantes y las condiciones ambientales.</p>	P	<p><b>OIRSA</b> mejor comprensión del párrafo <i>Category : TECHNICAL</i></p>
<b>3.5.2 Increased surveillance in the demarcated outbreak area</b>				
403	117	<b>3.5.2 Increased surveillance in the demarcated outbreak area</b>	C	<p><b>PPPO</b> Increased surveillance of buffer zones should also be emphasized to monitor for escape and spread of pest <i>Category : SUBSTANTIVE</i></p>

404	117	<b>3.5.1.2</b> <b>Increased surveillance in the demarcated-delimited outbreak area</b>	P	<b>PPPO</b> We propose the sentence 'The eradication programme should include the following steps.' be made into a title with its own number 3.5.1 and then have the following steps (that are all about eradication) as sub-headings under this section, i.e. 3.5.1.1 delimiting survey... 3.5.1.2 increased survey... 3.5.1.3 implementation of control measures <i>Category : TECHNICAL</i>
405	117	<b>3.5.4.2 Increased surveillance in the demarcated outbreak area</b>	P	<b>Thailand</b> <i>Category : EDITORIAL</i>
406	118	An intensive detection survey should be <del>conducted</del> <u>used</u> in the demarcated outbreak area to determine and record the distribution of the pest and its population <u>dynamics in the demarcated area</u> <del>dynamics</del> , and to assess the effectiveness of the eradication measures. This intensive survey should be maintained until the pest is eradicated from the outbreak area.	P	<b>European Union</b> 1. Better wording. 2. The deleted words are not necessary because the survey is conducted in the demarcated area (please see the first line of the paragraph). <i>Category : EDITORIAL</i>
407	118	An intensive detection survey should be conducted in the <del>demarcated-delimited</del> outbreak area to determine and record the distribution of the pest and its population dynamics in the <del>demarcated</del> -area, and to assess the effectiveness of the eradication	P	<b>PPPO</b> Justification: As in the general comment at the beginning of this document, this alternate description, "activities", is proposed to clarify the meaning and remove the seeming two levels/tiers of 'phytosanitary measures' <i>Category : EDITORIAL</i>

		<del>measures</del> activities. This intensive survey should be maintained until the pest is eradicated from the outbreak area.		
408	118	An intensive detection survey should be conducted in the demarcated outbreak area to determine and record the distribution of the pest and its population dynamics in the demarcated area, and to assess the effectiveness of the eradication <del>measures</del> activities. This intensive survey should be maintained until the pest is eradicated from the outbreak area.	P	<b>Australia</b> Justification: As described in the general comment at the beginning of the document, this alternate description, "activities", is proposed to clarify the meaning and remove the seeming two levels/tiers of 'phytosanitary measures' referenced in this document. <i>Category : TECHNICAL</i>
409	118	An intensive detection survey should be conducted in the demarcated outbreak area to determine and record the distribution of the pest and its population dynamics in the demarcated area, and to assess the effectiveness of the eradication measures. This intensive <u>detection</u> survey should be maintained until the pest is eradicated from the outbreak area.	P	<b>COSAVE</b> Glossary term <i>Category : TECHNICAL</i>



410	118	An intensive detection survey should be <del>conducted-used</del> in the demarcated outbreak area to determine and record the distribution of the pest and its population <del>dynamics-in-the demarcated areadynamics</del> , and to assess the effectiveness of the eradication measures. This intensive survey should be maintained until the pest is eradicated from the outbreak area.	P	<b>EPPO</b> The deleted words are not necessary because the survey is conducted in the demarcated area (please see the first line of the paragraph).  Better wording <i>Category : EDITORIAL</i>
411	118	An intensive detection survey should be conducted in the demarcated outbreak area to determine and record the distribution of the pest and its population dynamics in the demarcated <u>outbreak</u> area, and to assess the effectiveness of the eradication measures. This intensive survey should be maintained until the pest is eradicated from the outbreak area.	P	<b>Thailand</b> for consistency. <i>Category : EDITORIAL</i>
412	118	An intensive detection survey should be conducted in the demarcated outbreak area to determine and record the distribution of the pest	P	<b>Uruguay</b> Glossary term <i>Category : TECHNICAL</i>

		and its population dynamics in the demarcated area, and to assess the effectiveness of the eradication measures. This intensive <a href="#">detection</a> survey should be maintained until the pest is eradicated from the outbreak area.		
<b>3.5.3 Implementation of control measures</b>				
413	119	<b>3.5.1.3 Implementation n of control measures</b>	P	<b>PPPO</b> We propose the sentence 'The eradication programme should include the following steps.' be made into a title with its own number 3.5.1 and then have the following steps (that are all about eradication) as sub-headings under this section, i.e. 3.5.1.1 delimiting survey... 3.5.1.2 increased survey... 3.5.1.3 implementation of control measures <i>Category : TECHNICAL</i>
414	119	<b>3.5.4.3 Implementation n of control measures</b>	P	<b>Thailand</b>  <i>Category : EDITORIAL</i>
415	120	Control measures should be applied to prevent the pest moving out of the demarcated outbreak area by human activities <a href="#">(movement (e.g. through the movement of infested host plants)-plants or plant products or contaminated means of conveyance)</a> or, to the extent that is reasonably achievable, by natural spread.	P	<b>European Union</b> Some added examples (and more precise wording). This should be done at the outset, as soon as you find the pest and then once you demarcate the area. It is therefore suggested to move this to the section on restrictions and measures. <i>Category : SUBSTANTIVE</i>
416	120	Control measures should be applied to prevent the pest moving out of the demarcated outbreak area by human activities	P	<b>PPPO</b> adding more examples <i>Category : EDITORIAL</i>

		<del>(movement (e.g. movement of host plants) plants or other regulated articles)</del> or, to the extent that is reasonably achievable, by natural spread.		
417	120	Control measures should be applied to prevent the pest moving out of the demarcated outbreak area by human activities (movement of host <del>plants</del> <u>plants, plant material and other regulated articles of appropriate</u> ) or, to the extent that is reasonably achievable, by natural spread.	P	<b>Korea, Republic of</b> Improve clarity <i>Category : SUBSTANTIVE</i>
418	120	Control measures should be applied to prevent the pest moving out of the demarcated outbreak area by human activities (movement of <del>host plants</del> <u>regulated articles for the pest</u> ) or, to the extent that is reasonably achievable, by natural spread.	P	<b>COSAVE</b> Not only host but also regulated articles associated with the pest should be considered. <i>Category : TECHNICAL</i>
419	120	Control measures should be applied to prevent the pest moving out of the demarcated outbreak area by human activities (movement of host plants) or, to the extent that is reasonably achievable, by natural spread.	C	<b>EPPO</b> This should be done at the outset, as soon as you find the pest and then once you demarcate the area. Move this to the section on restrictions and measures. <i>Category : TECHNICAL</i>

420	120	Control measures should be applied to prevent the pest moving out of the demarcated outbreak area by human activities ( <del>movement (e.g. through the movement of infested host plants)</del> <u>plants or plant products or contaminated means of conveyance</u> ) or, to the extent that is reasonably achievable, by natural spread.	P	<b>EPPO</b> Some added examples (and more precise wording). <i>Category : SUBSTANTIVE</i>
421	120	Control measures should be applied to prevent the pest moving out of the demarcated outbreak area by human activities (movement of host <del>plants</del> ) <u>plants plants or other regulated articles</u> ) or, to the extent that is reasonably achievable, by natural spread.	P	<b>United States of America</b> added as an important pathway based on its definition <i>Category : TECHNICAL</i>
422	120	Control measures should be applied to prevent the pest moving out of the demarcated outbreak area by human activities (movement of host <del>plants</del> ) <u>plants, plant products and other regulated articles</u> ) or, to the extent that is reasonably achievable, by natural spread.	P	<b>China</b> In some cases, plant products and other regulated articles also have risk of expanding the pest. <i>Category : SUBSTANTIVE</i>

423	121	Measures to eradicate the pest should be implemented. This may include <del>destruction of infested and possibly infested plants and plant products</del> <u>treatment and/or control measures specified in ISPM 9 (Guidelines for pest eradication programmes).</u>	P	<b>Japan</b> The measures to eradicate the pest are not only destruction of plants and plants products but also a wide range of measures specified in ISPM9 3.2.3 "Treatment and/or control measures" <i>Category : SUBSTANTIVE</i>
424	121	<del>Measures-Activities</del> to eradicate the pest should be implemented. This may include destruction of infested and possibly infested plants and plant products.	P	<b>PPPO</b> Justification: As in the general comment at the beginning of this document, this alternate description, "activities", is proposed to clarify the meaning and remove the seeming two levels/tiers of 'phytosanitary measures' <i>Category : TECHNICAL</i>
425	121	<del>Measures-Activities</del> to eradicate the pest should be implemented. This may include destruction of infested and possibly infested plants and plant products.	P	<b>Australia</b> Justification: As described in the general comment at the beginning of the document, this alternate description, "activities", is proposed to clarify the meaning and remove the seeming two levels/tiers of 'phytosanitary measures' referenced in this document. <i>Category : TECHNICAL</i>
3.5.4 Provisions for suspension, reinstatement or withdrawal of pest free area status				
426	122	<b>3.5.4 <u>2</u> Provisions for suspension, reinstatement or withdrawal of pest free area status</b>	P	<b>PPPO</b> this is not part of the eradication plan <i>Category : EDITORIAL</i>
427	122	<b>3.5.4 Provisions for suspension, reinstatement or withdrawal of <u>pest free area status</u> <u>PFA</u></b>	P	<b>COSAVE</b> For consistency <i>Category : EDITORIAL</i>

428	122	<b>3.5.4 Provisions for suspension, reinstatement or withdrawal of pest free area status</b>	P	<b>Thailand</b> <i>Category : EDITORIAL</i>
429	122	<b>3.5.4 Provisions for suspension, reinstatement or withdrawal of <del>pest free area status</del> <u>PFA</u></b>	P	<b>Uruguay</b> For consistency <i>Category : EDITORIAL</i>
430	123	Criteria for successful eradication in accordance with ISPM 9 should be established before the start of the eradication programme, including the intensity of the detection survey in the demarcated outbreak area and the minimum period that the demarcated <u>outbreak</u> area needs to be free from the pest before the suspension of its PFA status can be lifted.	P	<b>Korea, Republic of</b> Improve clarity <i>Category : SUBSTANTIVE</i>
431	123	Criteria for successful eradication in accordance with ISPM 9 should be established before the start of the eradication programme, including the intensity of the detection survey in the demarcated outbreak area and the minimum period that the demarcated area needs to be free from the pest	P	<b>COSAVE</b> PFA is not a pest status according ISPM 8 the pest status is "absent" <i>Category : TECHNICAL</i>

		before <a href="#">to lift</a> the suspension of its <del>PFA</del> <a href="#">status can be lifted</a> <del>PFA</del> .		
432	123	Criteria for successful eradication in accordance with ISPM 9 should be established before the start of the eradication programme, including the intensity of the detection survey in the demarcated outbreak area and the minimum period that the demarcated <a href="#">outbreak</a> area needs to be free from the pest before the suspension of its PFA status can be lifted.	P	<b>Thailand</b> for consistency. <i>Category : EDITORIAL</i>
433	123	Criteria for successful eradication in accordance with ISPM 9 should be established before the start of the eradication programme, including the intensity of the detection survey in the demarcated outbreak area and the minimum period that the demarcated area needs to be free from the pest before <a href="#">to lift</a> the suspension of its <del>PFA</del> <a href="#">status can be lifted</a> <del>PFA</del> .	P	<b>Uruguay</b> PFA is not a pest status according ISPM 8 the pest status is "absent" <i>Category : TECHNICAL</i>
434	124	If the criteria are fulfilled, then eradication may be officially declared successful and the temporary control and	P	<b>PPPO</b> Justification: As in the general comment at the beginning of this document, this alternate description, "activities", is proposed to clarify the meaning and remove the seeming two levels/tiers of 'phytosanitary measures' <i>Category : TECHNICAL</i>

		eradication <del>measures</del> <u>activities</u> may be lifted. The full PFA may then be reinstated.		
435	124	If the criteria are fulfilled, then eradication may be officially declared successful and the temporary control and eradication <del>measures</del> <u>activities</u> may be lifted. The full PFA may then be reinstated.	P	<b>Australia</b> Justification: As described in the general comment at the beginning of the document, this alternate description, "activities", is proposed to clarify the meaning and remove the seeming two levels/tiers of 'phytosanitary measures' referenced in this document. <i>Category : TECHNICAL</i>
436	125	If the criteria for eradication within the demarcated outbreak area cannot be fulfilled within a reasonable timeframe to be determined by the NPPO, then either the PFA <del>status</del> should be withdrawn or the delimitation of the PFA should be reviewed.	P	<b>COSAVE</b> See comment in paragraph 123 <i>Category : TECHNICAL</i>
437	125	If the criteria for eradication within the demarcated outbreak area cannot be fulfilled within a reasonable timeframe to be determined by the NPPO, then either the PFA <del>status</del> should be withdrawn or the delimitation of the PFA should be reviewed.	P	<b>Uruguay</b> See comment in paragraph 123 <i>Category : TECHNICAL</i>
4. Verification and regular review				



438	126	<b>4. Verification</b> <b><u>that pest freedom has been attained or maintained and regular review</u></b>	P	<b>Japan</b> The content related to "verification that pest freedom has been achieved" in paragraph 55 is not described anywhere in the requirements of this standard, including "Section 4 Verification and regular and review". Therefore, section 4 should describe any information as the common requirements of "verification that pest freedom has been achieved" and "verification that pest freedom has been maintained". The section title should be revised accordingly. <i>Category : SUBSTANTIVE</i>
439	126	<b>4. Verificación y</b> <b><u>examen periódico</u></b> <b><u>revisión periódica</u></b>	P	<b>OIRSA</b> Uso de términos correctos <i>Category : TECHNICAL</i>
440	127	<b><u>Normally, pest freedom is attained or maintained based on verification from specific surveillance.</u></b> Once the PFA is established, a regular review of the performance of the PFA maintenance programme should be carried out. This review should allow the NPPO to find and correct deficiencies, incorporate any new and relevant information on the pest or associated pathways, and adjust and improve the <del>management</del> <u>maintenance</u> programmes accordingly.	P	<b>Japan</b> The amendment is related to the change of section title in paragraph 126. Add the content related to "verification that pest freedom has been achieved" in paragraph 55.  "The management programs" is the "the PFA maintenance programs" described in the 1st sentence implemented based on the requirements in section 3. <i>Category : SUBSTANTIVE</i>
441	127	Once the PFA is established, <del>a regular review of the</del> performance of the PFA maintenance programme should be <del>carried out</del> <u>regularly reviewed</u> . This review should allow the NPPO to find and correct deficiencies, incorporate	P	<b>Australia</b> Justification: Edited to simplify the sentence. <i>Category : EDITORIAL</i>

		any new and relevant information on the pest or associated pathways, and adjust and improve the management programmes accordingly.		
442	127	Una vez se haya establecido el ALP, se debería realizar un examen periódico de los resultados del programa de mantenimiento del área. Este examen debería permitir a la ONPF encontrar y corregir deficiencias, incorporar información nueva y pertinente sobre la plaga o las vías <del>asociadas</del> <u>asociadas</u> , y ajustar y mejorar los programas de gestión en consecuencia.	P	<b>Colombia</b> Uso de la coma (,) <i>Category : EDITORIAL</i>
443	127	Una vez se haya establecido el ALP, se debería realizar un examen periódico de los resultados del programa de mantenimiento del área. <del>Este examen-Esta</del> <u>revisión</u> debería permitir a la ONPF encontrar y corregir deficiencias, incorporar información nueva y pertinente sobre la plaga o las vías asociadas y ajustar y mejorar los programas de gestión en consecuencia.	P	<b>OIRSA</b> Uso de términos correctos <i>Category : TECHNICAL</i>

444	127	Una vez se haya establecido el ALP, se debería realizar <del>un</del> <del>examen periódico</del> <del>una</del> <u>revisión periódica</u> de los resultados del programa de mantenimiento del área. Este examen debería permitir a la ONPF encontrar y corregir deficiencias, incorporar información nueva y pertinente sobre la plaga o las vías asociadas y ajustar y mejorar los programas de gestión en consecuencia.	P	<b>OIRSA</b> Uso de términos correctos <i>Category : TECHNICAL</i>
445	128	The correct implementation of the programme, including the administrative activities, should be <del>verified by audit</del> <u>verified</u> .	P	<b>European Union</b> It is a decision of the NPPO if an audit is necessary or not. <i>Category : SUBSTANTIVE</i>
446	128	The correct implementation of the <u>PFA maintenance</u> programme, including the administrative activities, should be verified by audit.	P	<b>European Union</b> More precise wording (please see the previous paragraph). <i>Category : EDITORIAL</i>
447	128	The correct implementation of the programme, including the administrative activities, should be <del>verified by audit</del> <u>verified</u> .	P	<b>PPPO</b> verification can be by other means than audit <i>Category : TECHNICAL</i>
448	128	The correct implementation of the	P	<b>EPPO</b> It is a decision of the NPPO if an audit is necessary or not.

		<u>PFA maintenance</u> programme, including the administrative activities, should be <del>verified by audit</del> <u>verified</u> .		More precise wording (please see the previous paragraph). <i>Category : EDITORIAL</i>
449	129	Los procedimientos de <del>rastreo-rastreabilidad</del> del movimiento de artículos reglamentados deberían permitir verificar su origen y su conformidad con los requisitos fitosanitarios establecidos para el ALP.	P	<b>OIRSA</b> Uso de términos correctos <i>Category : TRANSLATION</i>
5. Documentation and record keeping				
450	130	<b>5. <u>Documentation</u></b> <b><u>Data collection, documentation and record keeping</u></b> <u>The data from the surveillance (e.g. time of surveillance, number and type of plants inspected, number of samples taken for inspection, number of samples taken for laboratory analysis, analytical methods used, results of the analysis) to establish and maintain a PFA should be stored and kept available for a sufficient time to ensure</u>	P	<b>Japan</b> "Paragraph 108 of "3.3 Data collection and record keeping" should be moved from Section 3 to Section 5 and change section title of section 5 to "5 Data collection, documentation and record-keeping" The content of data collection and record keeping in section 3.3 is a requirement for only maintaining a PFA but establishing a PFA, so the information is not only for section 3. <i>Category : SUBSTANTIVE</i>

		<u>the possibility of trace-back and verification.</u>		
451	130	<b>5. Documentation and record keeping</b>	C	<b>PPPO</b> this section is not clear on record keeping, suggest to separate requirements on documentation and record keeping <i>Category : SUBSTANTIVE</i>
452	131	The <del>phytosanitary</del> measures used for the establishment and maintenance of the PFA should be adequately documented. The documentation should be reviewed and updated regularly, and include any corrective actions taken. <del>National plant protection organizations-NPPO</del> should ensure that records are kept for a minimum of 24 months, or longer depending on the biology of the pest.	P	<b>Japan</b> National plant protection organizations ⇒ NPPOs  The terms "measures" and "phytosanitary measures" should be distinguished to use depending on the situation, to interpret the requirements of this ISPM correctly. If the measures are for establishing and maintaining a PFA, "measures" should be used, because, the measures to control domestic pests (i.e. other than the phytosanitary purposes) may also be applied to establish and maintain the PFA. On the other hand, the term "phytosanitary measure" is used for phytosanitary perspective like a case as "PFA is used as a phytosanitary measure for trade." <i>Category : SUBSTANTIVE</i>
453	131	The phytosanitary <del>measures-procedures</del> used <del>for the establishment to establish and maintenance of maintain</del> the PFA should be adequately documented. The documentation should be reviewed and updated regularly, and include <del>any corrective actions taken</del> <u>a record of amendments.</u> <del>National plant protection organizations-Records of the procedures to establish, maintain and</del>	P	<b>PPPO</b> to simplify sentence. a 'minimum' implies 'or longer', therefore both terms are not required. Use NPPO for consistency, meaning established at the start of the document. Clarify if this means the eradication corrective actions, as defined in 3.5, or if this refer to the improvements/ amendments made to the documentation. If the later then refer to them as something other than 'corrective actions'. <i>Category : SUBSTANTIVE</i>

		<u>implement corrective actions</u> should <del>ensure</del> <del>that records are be</del> kept by <u>NPPOs</u> for <del>a minimum of</del> 24 months, or longer depending on the biology of the pest.		
454	131	The phytosanitary <del>measures-procedures</del> used for the establishment and maintenance of the PFA should be adequately documented. The documentation should be reviewed and updated regularly, and include any corrective actions taken. National plant protection organizations should ensure that records are kept for a minimum of 24 months, or longer depending on the biology of the pest.	P	<b>Korea, Republic of</b> For the consistency with section 2.4 <i>Category : SUBSTANTIVE</i>
455	131	The phytosanitary measures used for the establishment and maintenance of the PFA should be adequately documented. The documentation should be reviewed and updated regularly, and include any corrective actions taken. National plant protection organizations should ensure that records are <u>stored and</u> kept <u>available</u>	P	<b>Australia</b> Justification: To make this requirement consistent with Part 3.3, the proposed text requires the maintenance of records for an "sufficient time" depending on the pest biology. <i>Category : SUBSTANTIVE</i>

		for a <del>minimum of 24 months</del> <u>sufficient time</u> , or <del>longer</del> depending on the biology of the pest.		
456	131	The phytosanitary measures used for the establishment and maintenance of the PFA should be adequately documented. The documentation should be reviewed <u>regularly</u> and updated <del>regularly</del> <u>as needed</u> , and include any corrective actions taken. National plant protection organizations should ensure that records are kept for a minimum of 24 months, or longer depending on the biology of the pest.	P	<b>Australia</b> Justification: Text edited to clarify that through the documentation should be reviewed regularly, it may not require regular updating <i>Category : EDITORIAL</i>
457	131	The <del>phytosanitary measures activities</del> used for the establishment and maintenance of the PFA should be adequately documented. The documentation should be reviewed and updated regularly, and include any corrective actions taken. National plant protection organizations should ensure that records are kept for a minimum of 24 months, or longer	P	<b>Australia</b> Justification: As described in the general comment at the beginning of the document, this alternate description, "activities", is proposed to clarify the meaning and remove the seeming two levels/tiers of 'phytosanitary measures' referenced in this document. <i>Category : TECHNICAL</i>

		depending on the biology of the pest.		
458	131	The <b>phytosanitary</b> measures used for the establishment and maintenance of the PFA should be adequately documented. The documentation should be reviewed and updated regularly, and include any corrective actions taken. National plant protection organizations should ensure that records are kept for a minimum of 24 months, or longer depending on the biology of the pest.	P	<b>COSAVE</b> See general comment, <i>Category : TECHNICAL</i>
459	131	The phytosanitary measures used for the establishment and maintenance of the PFA should be adequately documented. The documentation should be reviewed and updated regularly, and include any corrective actions taken. National plant protection organizations should ensure that records are kept for a minimum of 24 months, or longer depending on the biology of the pest.	C	<b>Singapore</b> Records maintained by NPPO may be subjected to NPPO's predetermined policy of record retention. Suggest to remove the minimum of 24 months as this is too prescriptive or can explain why the need for the minimum 24 months retention period for clarity? Propose to change NPPOs should ensure that records are appropriately maintained i.e. timeline may be depended on the biology of the pest. <i>Category : SUBSTANTIVE</i>
460	131	The <b>phytosanitary</b> measures used for the	P	<b>Uruguay</b> See general comment



		establishment and maintenance of the PFA should be adequately documented. The documentation should be reviewed and updated regularly, and include any corrective actions taken. National plant protection organizations should ensure that records are kept for a minimum of 24 months, or longer depending on the biology of the pest.		<i>Category : TECHNICAL</i>
461	131	The phytosanitary measures used for the establishment and maintenance of the PFA should be adequately documented. The documentation should be reviewed and updated regularly, and include any corrective actions taken. National plant protection organizations should ensure that records are kept for a minimum of 24 months, or longer depending on the biology of the pest.	C	<b>Bahrain</b> Remove this sentence and replace it with ( for enough time) <i>Category : TECHNICAL</i>
<b>6. Communication and stakeholder engagement</b>				
462	132	<b>6. Communication and stakeholder engagement</b>	P	<b>Japan</b> Move paragraph 135 to after paragraph 132 as the first paragraph in section 6. Para 135 is about of the common information of PFA regardless of the establishment and maintenance of PFA. <i>Category : SUBSTANTIVE</i>

		<u>Individuals, groups or organizations other than the NPPO of the country in which the PFA is situated can also affect, or be affected, by the actions of the NPPO. The NPPO should establish partnerships with stakeholders, which may include seeking contributions of resources.</u>		
463	132	<b>6. Communication and stakeholder engagement</b>	C	<p><b>Japan</b></p> <p>The contents of section 6, "Communication" of paragraphs 132-136, are:</p> <ul style="list-style-type: none"> <li>- Para 133 is the content when achieving the pest free status of an area and establishing PFA in the area.</li> <li>- Para 134 and 136 are the content when maintaining PFA</li> <li>- Para 135 is the content of the common information of PFA regardless of the establishment and maintenance of PFA.</li> </ul> <p>Paragraphs in section 6 need to be moved according to the process of establishing and maintaining PFA. And its texts need to be changed according to the purpose and situation of PFA (see each paragraph for proposed revisions).</p> <p><i>Category : SUBSTANTIVE</i></p>
464	132	<b>6. Communication and stakeholder engagement</b>	C	<p><b>PPPO</b></p> <p>Although no legal framework can be built around "unregulated goods and places, conveyances and packaging" that pose pest introduction risk, awareness of such with stakeholders can be mentioned in this section</p> <p><i>Category : SUBSTANTIVE</i></p>
465	132	<b>6. Communication and stakeholder engagement</b>	C	<p><b>PPPO</b></p> <p>also see comment on para 67 availability of information to importing country.</p> <p><i>Category : TECHNICAL</i></p>
466	133	To ensure transparency, information about the establishment of the PFA should be communicated to the NPPOs of <u>relevant</u>	P	<p><b>European Union</b></p> <ol style="list-style-type: none"> <li>1. It is not very clear what information should be communicated to support the claim and what information should be made available only on request.</li> <li>2. This is only relevant for those importing countries that have regulated the pest concerned.</li> <li>3. 'Relevant stakeholders' is clearer as 'interested' is an ambiguous term.</li> </ol> <p><i>Category : TECHNICAL</i></p>

		importing countries as part of the evidence provided to support the claim that the area is free from the pest. Information about the methodology, results of surveys and pest diagnostics, and other relevant information supporting the claim of pest freedom, should be made available on request to <a href="#">interested-relevant</a> stakeholders and NPPOs.		
467	133	To ensure transparency, information about the establishment of the PFA should be communicated to <del>the other</del> NPPOs of <del>importing countries</del> as part of the evidence provided to support the claim that the area is free from the pest. Information about the methodology, results of surveys and pest diagnostics, and other relevant information supporting the claim of pest freedom, should be made available on request to <del>interested stakeholders and other</del> NPPOs.	P	<b>Japan</b> Para 133 is the content when achieving the pest free status of an area and establishing PFA in the area. Delete "of importing countries" and add "other NPPOs" in the 1st sentence because providing the information of pest free status is not only to NPPOs of importing countries. Delete "interested stakeholders and" and add "other" in the 2nd sentence. The 2nd sentence is about the requirement of providing information from the country in which a PFA is established to other countries. Interested stakeholders can communicate with NPPOs in other countries through an NPPO in their country, so it is unnecessary to communicate with interested stakeholders in different countries directly. <i>Category : SUBSTANTIVE</i>
468	133	<a href="#">Information about the establishment and maintenance of the PFA should be made</a>	P	<b>COSAVE</b> First sentence moved from the next paragraph (the word "established" has been added). To simplify the text. <i>Category : TECHNICAL</i>

		<p><u>available on request to the NPPOs of importing countries</u><del>To ensure transparency,</del>  <u>Information about the methodology, results of surveys and pest diagnostics, and other relevant information supporting the claim of pest freedom, should be made available on request to interested stakeholders and NPPOs,</u><del>information about the establishment of the PFA should be communicated to the NPPOs of importing countries as part of the evidence provided to support the claim that the area is free from the pest. Information about the methodology, results of surveys and pest diagnostics, and other relevant information supporting the claim of pest freedom, should be made available on request to interested stakeholders and NPPOs.</del></p>		
469	133	<p>To ensure transparency, information about the establishment of the PFA should be communicated to the NPPOs of <b>relevant</b> importing countries as</p>	P	<p><b>EPPO</b></p> <p>1) It is not very clear what information should be communicated to support the claim and what information should be made available only on request.</p> <p>2) This is only relevant for those importing countries that have regulated the pest concerned.</p> <p>3) 'Relevant stakeholders' is clearer as 'interested' is an ambiguous term.</p>

		part of the evidence provided to support the claim that the area is free from the pest. Information about the methodology, results of surveys and pest diagnostics, and other relevant information supporting the claim of pest freedom, should be made available on request to <del>interested-relevant</del> stakeholders and NPPOs.		<i>Category : TECHNICAL</i>
470	133	<del>To ensure transparency, Information about the establishment and maintenance of the PFA should be made available on request to the NPPOs of importing countries. -information about the establishment of the PFA should be communicated to the NPPOs of importing countries as part of the evidence provided to support the claim that the area is free from the pest.</del> Information about the methodology, results of surveys and pest diagnostics, and other relevant information supporting the claim of pest freedom, should be made available on request	P	<b>Uruguay</b> First sentence moved from the next paragraph (the word "established" has been added). To simplify the text. <i>Category : TECHNICAL</i>

		to interested stakeholders and NPPOs.		
471	133	Con <del>vistas a</del> <u>el propósito</u> de garantizar la transparencia, la información relativa al establecimiento de las ALP se debería comunicar a las ONPF de los países importadores como parte de los datos objetivos que se les proporcionan para confirmar que el área está libre de la plaga. La información sobre la metodología, los resultados de las prospecciones y el diagnóstico de plaga, así como otros datos pertinentes que confirmen la ausencia de plagas, se deberían facilitar a las partes interesadas y las ONPF que lo soliciten.	P	<b>Colombia</b> Mejora de redacción y traducción <i>Category : TRANSLATION</i>
472	133	À des fins de transparence, les informations relatives à l'établissement de la ZE devraient être communiquées aux ONPV des pays importateurs parmi les éléments présentés à l'appui de la déclaration selon laquelle la zone est exempte de l'organisme	P	<b>Congo</b> <i>Category : EDITORIAL</i>

		nuisible. Des informations sur la méthodologie, les résultats des <del>prospections</del> <del>et-prospections</del> , la diagnose de l'organisme nuisible ainsi que d'autres informations pertinentes confirmant que la zone est exempte de l'organisme nuisible en <del>question</del> <del>question</del> , devraient être mises à <del>disposition</del> <del>disposition</del> , à la demande des parties intéressées et des ONPV.		
473	134	Information about the maintenance of the PFA status should be made available on request to the NPPOs of <del>relevant</del> <del>countries</del> <del>countries</del> . Maps and information about the measures applied to maintain the PFA status should be communicated to producers and stakeholders. Information about outbreaks should also be communicated to relevant stakeholders and contracting parties.	P	<b>European Union</b> 1. This is only relevant for those importing countries that have regulated the pest concerned. 2. Typo (editorial). Category : <i>TECHNICAL</i>
474	134	<del>Information about the maintenance of the PFA status should be made available on request to the NPPOs of importing countries.</del> Maps and	P	<b>Japan</b> - Partially modify the text in the original 1st sentence for export purposes and moved it to the last sentence. This is because the content for maintaining PFA in common, regardless of the purpose of using PFA, should be described at the beginning of this paragraph, and the content for export purposes should be described at the end. - As producers are included in stakeholders, which are modified as an example in the brackets. - Clarify that outbreaks are the outbreaks of the pest targeted in the PFA. - Not only information about outbreak but also information about corrective actions, suspension, reinstatement and

		<p>information about the measures applied to maintain the PFA status should be communicated to <del>producers and stakeholders</del> <u>stakeholders (e.g. producers)</u>. Information about outbreaks <u>of the pest corrective actions, suspension, reinstatement or withdrawal of the PFA</u> should also be communicated to relevant stakeholders and <del>contracting parties</del> <u>other NPPOs</u>. If the PFA is used as a risk management option for plants, plant products and other regulated articles exported from the PFA, <u>information about the maintenance of the PFA status should be made available on request to the NPPOs of importing countries.</u></p>		<p>withdrawal of the PFA are important to be communicated to other countries  - Replace "contracting parties" with "other NPPOs" because "contracting parties" is used only here in this ISPM  Category : <i>SUBSTANTIVE</i></p>
475	134	<p>Information about the maintenance of the PFA status should be made available on request to the NPPOs of importing countries. Maps and information about the <del>measures</del> <u>activities</u> applied to maintain the PFA status should be</p>	P	<p><b>PPPO</b>  Justification: As in the general comment at the beginning of this document, this alternate description, "activities", is proposed to clarify the meaning and remove the seeming two levels/tiers of 'phytosanitary measures'  Category : <i>TECHNICAL</i></p>



		communicated to producers and stakeholders. Information about outbreaks should also be communicated to relevant stakeholders and contracting parties.		
476	134	Information about the maintenance of the PFA status should be made available on request to the NPPOs of importing countries. Maps and information about the <del>measures-activities</del> applied to maintain the PFA status should be communicated to producers and stakeholders. Information about outbreaks should also be communicated to relevant stakeholders and contracting parties.	P	<b>Australia</b> Justification: As described in the general comment at the beginning of the document, this alternate description, "activities", is proposed to clarify the meaning and remove the seeming two levels/tiers of 'phytosanitary measures' referenced in this document. <i>Category : TECHNICAL</i>
477	134	<del>Information about the maintenance of the PFA status should be made available on request to the NPPOs of importing countries.</del> Maps and information about the measures applied to maintain the PFA status should be communicated to producers and stakeholders. <del>Information about outbreaks should also be communicated to</del>	P	<b>COSAVE</b> First sentence moved to previous paragraph. Last sentence deleted because it is already an obligation under the IPPC. No need to reiterate it. <i>Category : TECHNICAL</i>

		<del>relevant stakeholders and contracting parties.</del>		
478	134	Information about the maintenance of the PFA status should be made available on request to the NPPOs of <del>relevant countries</del> <del>countries</del> . Maps and information about the measures applied to maintain the PFA status should be communicated to producers and stakeholders. Information about outbreaks should also be communicated to relevant stakeholders and contracting parties.	P	<b>EPPO</b> Typo  This is only relevant for those importing countries that have regulated the pest concerned. <i>Category : TECHNICAL</i>
479	134	Information about the maintenance of the PFA status should be made available on request to the NPPOs of importing countries. Maps and information about the measures applied to maintain the PFA status should be communicated to producers and stakeholders. Information about <del>detection and</del> outbreaks should <del>immediatly notify trade related or other concerned NPPO, which also could</del> be communicated <del>to with</del> <del>producers or other</del>	P	<b>China</b> If confirmed detection of related pest, NPPO should immediately notify trade related or other concerned NPPO to whom could take emergency phytosanitary measures to protect domestic agriculture. This is very important which need to list separately to emphasis. <i>Category : SUBSTANTIVE</i>

		relevant <del>stakeholders and contracting parties</del> stakeholders.		
480	134	<del>Information about the maintenance of the PFA status should be made available on request to the NPPOs of importing countries.</del> Maps and information about the measures applied to maintain the PFA status should be communicated to producers and stakeholders. <del>Information about outbreaks should also be communicated to relevant stakeholders and contracting parties.</del>	P	<b>Uruguay</b> First sentence moved to previous paragraph. Last sentence deleted because it is already an obligation under the IPPC. No need to reiterate it. <i>Category : TECHNICAL</i>
481	134	Des données sur le maintien du statut de la ZE devraient être mises à <del>disposition</del> <u>disposition</u> , à la demande des ONPV des pays importateurs. Des cartes et des informations concernant les mesures appliquées pour maintenir le statut de la ZE devraient être communiquées aux producteurs et aux parties prenantes. Des informations sur l'apparition de foyers devraient aussi être communiquées aux	P	<b>Congo</b> <i>Category : EDITORIAL</i>

		parties concernées et aux parties contractantes.		
482	135	Individuals, groups or organizations other than the NPPO of the country in which the PFA is situated can also affect, or be affected, by the actions of the NPPO. The NPPO <u>should-may</u> establish partnerships with stakeholders, which may include seeking contributions of resources.	P	<b>European Union</b> More appropriate term? <i>Category : SUBSTANTIVE</i>
483	135	<del>Individuals, groups or organizations other than the NPPO of the country in which the PFA is situated can also affect, or be affected, by the actions of the NPPO. The NPPO should establish partnerships with stakeholders, which may include seeking contributions of resources.</del>	P	<b>Japan</b> Move paragraph 135 to after paragraph 132 as the first paragraph in section 6. Para 135 is about the common information of PFA regardless of the establishment and maintenance of PFA. <i>Category : SUBSTANTIVE</i>
484	135	Individuals, groups or organizations other than the NPPO of the country in which the PFA is situated can also affect, or be affected, by the actions <del>of the NPPO to establish and maintain a PFA.</del> The NPPO <u>should-may</u> establish partnerships	P	<b>PPPO</b> Justification: The establishment of partnerships with stakeholders should not be a requirement in this ISPM, but is maintained as guidance that may support effective maintenance of a PFA.  Justification: Proposed new text to highlight that not only the NPPO actions to establish and maintain the PFA affect stakeholders. <i>Category : TECHNICAL</i>

		with stakeholders, which <del>may can</del> include seeking contributions of resources.		
485	135	Individuals, groups or organizations other than the NPPO of the country in which the PFA is situated can also affect, or be affected, by the actions of the NPPO. The NPPO should establish partnerships with stakeholders, which <del>may</del> <u>can</u> include seeking contributions of resources.	P	<b>Australia</b> Text updated to improve understanding <i>Category : EDITORIAL</i>
486	135	Individuals, groups or organizations other than the NPPO of the country in which the PFA is situated can also affect, or be affected, by the actions of the NPPO. The NPPO <del>should may</del> establish partnerships with stakeholders, which may include seeking contributions of resources.	P	<b>Australia</b> Justification: The establishment of partnerships with stakeholders should not be a requirement in this ISPM, but is maintained as guidance that may support effective maintenance of a PFA. <i>Category : SUBSTANTIVE</i>
487	135	Individuals, groups or organizations other than the NPPO of the country in which the PFA is situated can also affect, or be affected, by the actions <del>of the NPPO to establish and maintain a PFA</del> . The	P	<b>Australia</b> Justification: Proposed new text to highlight that not only the NPPO actions to establish and maintain the PFA affect stakeholders. <i>Category : TECHNICAL</i>

		NPPO should establish partnerships with stakeholders, which may include seeking contributions of resources.		
488	135	Individuals, groups or organizations other than the NPPO of the country in which the PFA is situated can also affect, or be affected, by the actions of the NPPO. The NPPO <del>should</del> <u>may</u> establish partnerships with stakeholders, which may include seeking contributions of resources.	P	<b>EPPO</b> More appropriate term <i>Category : SUBSTANTIVE</i>
489	135	Las personas, grupos y organizaciones que no sean la ONPF del país en el que se sitúa el ALP también pueden influir en las medidas adoptadas por la ONPF o verse influidos por ellas. La ONPF debería establecer asociaciones con partes interesadas, lo que puede comprender solicitar <del>la aportación</del> <u>aportes</u> de recursos.	P	<b>Colombia</b> Cambiar "aportaciones" por "aportes". Se sugiere el cambio por considerar que el término "aportes" tiene un mayor uso en el idioma que "aportaciones" <i>Category : EDITORIAL</i>
490	135	Las personas, grupos y organizaciones que no sean la ONPF del país en el que se sitúa el ALP también pueden influir en	P	<b>OIRSA</b> Uso de términos correctos <i>Category : TECHNICAL</i>

		las medidas adoptadas por la ONPF o verse influidos por ellas. La ONPF debería establecer <del>asociaciones alianzas</del> con partes interesadas, lo que puede comprender solicitar la aportación de recursos.		
491	136	<del>National plant protection organizations</del> <b>NPPOs</b> are encouraged to raise public awareness about PFAs in their territory, including the framework for reporting sightings of the pest, the <del>phytosanitary</del> measures <del>established</del> <u>established to maintain the PFA</u> , and the importance of maintaining the PFA status, to achieve the support of the community.	P	<b>Japan</b> Para 136 is the content when maintaining PFA. Delete "phytosanitary" because measures to maintain PFAs are not always for the purpose of phytosanitary. Add "to maintain the PFAs" after measures established" because it needs to be clarified that the measure is to maintain the PFAs. <i>Category : SUBSTANTIVE</i>
492	136	National plant protection organizations are encouraged to raise public awareness about PFAs in their territory, including the framework for reporting sightings of the pest, the phytosanitary measures <del>established</del> , <u>established</u> and the importance of maintaining the PFA status, to achieve the	P	<b>European Union</b> A comma proposed to be deleted, for ease of reading. <i>Category : EDITORIAL</i>

		support of the community.		
493	136	<del>National plant protection organizations</del> NPPOs are encouraged to raise public awareness about PFAs in their territory, including the framework for reporting sightings of the pest, the phytosanitary measures established, and the importance of maintaining the PFA status, to achieve the support of the community.	P	<b>PPPO</b> <i>Category : EDITORIAL</i>
494	136	<del>National plant protection organizations</del> NPPOs are encouraged to raise public awareness about PFAs in their territory, including the framework for reporting sightings of the pest, the phytosanitary measures established, and the importance of maintaining the PFA status, to achieve the support of the community.	P	<b>Korea, Republic of</b> Shortened as "NPPOs" in the outline of requirements <i>Category : SUBSTANTIVE</i>
495	136	National plant protection organizations are encouraged to raise public awareness about PFAs in their territory, including the framework for reporting sightings of the pest, the phytosanitary	P	<b>Australia</b> Additional text to highlight cooperation as an important goal of raising public awareness of PFA's <i>Category : EDITORIAL</i>



		measures established, and the importance of maintaining the PFA status, to achieve the support <u>and cooperation</u> of the community.		
496	136	National plant protection organizations are encouraged to raise public awareness about PFAs in their territory, including the framework for reporting sightings of the pest, the phytosanitary measures <del>established</del> <u>established</u> <u>including rules regarding the movement of regulated articles into and out of the area</u> , and the importance of maintaining the PFA status, to achieve the support of the community.	P	<b>Australia</b> Additional text highlighting how it would be beneficial to outline the rules regarding regulated articles to the public. <i>Category : SUBSTANTIVE</i>
497	136	National plant protection organizations are encouraged to raise public awareness about PFAs in their territory, including the framework for reporting sightings of the pest, the phytosanitary <del>measures-activities</del> established, and the importance of maintaining the PFA status, to achieve the	P	<b>Australia</b> Justification: As in the general comment at the beginning of this document, this alternate description, "activities", is proposed to clarify the meaning and remove the seeming two levels/tiers of 'phytosanitary measures' <i>Category : TECHNICAL</i>

		support of the community.		
498	136	National plant protection organizations are encouraged to raise public awareness about PFAs in their territory, including the <del>framework-process</del> for reporting sightings of the pest, the phytosanitary measures established, and the importance of maintaining the PFA status, to achieve the support of the community.	P	<b>Australia</b> Reworded for ease of understanding <i>Category : EDITORIAL</i>
499	136	National plant protection organizations are encouraged to raise public awareness about PFAs in their territory, including the framework for reporting sightings of the pest, the phytosanitary measures established, and the importance of maintaining the <del>PFA status</del> PFA, to achieve the support of the community.	P	<b>COSAVE</b> The pest status is absent according to ISPM 8 <i>Category : TECHNICAL</i>
500	136	National plant protection organizations are encouraged to raise public awareness about PFAs in their territory, including the framework for reporting sightings of the pest, the phytosanitary	P	<b>EPPO</b> A comma proposed to be deleted, for ease of reading. <i>Category : EDITORIAL</i>

		measures <del>established</del> , <u>established</u> and the importance of maintaining the PFA status, to achieve the support of the community.		
501	136	National plant protection organizations are encouraged to raise public awareness about PFAs in their territory, including the framework for reporting sightings of the pest, the phytosanitary measures established, and the importance of maintaining the <del>PFA status</del> <u>PFA</u> , to achieve the support of the community.	P	<b>Uruguay</b> The pest status is absent according to ISPM 8 <i>Category : TECHNICAL</i>
502	136	A fin de obtener el apoyo de la comunidad, se alienta a las ONPF a concienciar más a la opinión pública sobre las ALP de su territorio, en especial sobre el marco para notificar <del>avistamientos</del> <u>la detección</u> de la plaga, las medidas fitosanitarias establecidas y la importancia de mantener la condición de ALP.	P	<b>OIRSA</b> Uso de términos correctos <i>Category : TECHNICAL</i>

## 7. Recognition of pest free areas

503	137	<b>7. Recognition of pest free areas</b>	P	<b>European Union</b> Recognition is not always based on bilateral negotiations. It could also be multilateral negotiation or unilateral acceptance by the importing country. 'Bilateral negotiations' is too restrictive and not appropriate for a global standard. <i>Category : SUBSTANTIVE</i>
504	137	<b>7. Recognition of pest free areas</b>	P	<b>EPPO</b> Recognition is not always based on bilateral negotiations. It could also be multilateral negotiation or unilateral acceptance by the importing country. Bilateral negotiations is too restrictive and not appropriate for a global standard. <i>Category : SUBSTANTIVE</i>
505	138	<del>Recognition of PFAs based on bilateral negotiations should take place in accordance with ISPM 29 (Recognition of pest free areas and areas of low pest prevalence).</del>	P	<b>European Union</b> Recognition is not always based on bilateral negotiations. It could also be multilateral negotiation or unilateral acceptance by the importing country. Bilateral is too restrictive and not appropriate for a global standard. <i>Category : SUBSTANTIVE</i>
506	138	<del>Recognition of PFAs based on bilateral negotiations should take place in accordance with ISPM 29 (Recognition of pest free areas and areas of low pest prevalence).</del>	P	<b>EPPO</b> Recognition is not always based on bilateral negotiations. It could also be multilateral negotiation or unilateral acceptance by the importing country. Bilateral negotiations is too restrictive and not appropriate for a global standard. <i>Category : SUBSTANTIVE</i>
507	139	<b>Potential implementation issues</b>	C	<b>European Union</b> As regards paragraph 66 "the support from relevant stakeholders, such as domestic industries and local regulatory bodies;" more guidelines should be provided to CP to understand what kind of support can be provided or is expected. <i>Category : TECHNICAL</i>
508	139	<b>Potential implementation issues</b>	C	<b>EPPO</b> As regards paragraph 66 "the support from relevant stakeholders, such as domestic industries and local regulatory bodies;" more guidelines should be provided to CP to understand what kind of support can be provided or is expected. <i>Category : TECHNICAL</i>
509	140	This section is not part of the standard. The Standards Committee in May 2016 requested the Secretariat to gather information on any potential implementation issues related to this draft. Please provide details and proposals on how to address	C	<b>Barbados</b> This standard will facilitate trade. Unfortunately developing countries often do not have the requisite resources (personnel and facilities) to fully benefit from these standards. May also require collaboration with other agencies that do not see it as important. <i>Category : SUBSTANTIVE</i>

		these potential implementation issues.		
510	140	This section is not part of the standard. The Standards Committee in May 2016 requested the Secretariat to gather information on any potential implementation issues related to this draft. Please provide details and proposals on how to address these potential implementation issues.	C	<b>Caribbean Agricultural Health and Food Safety Agency</b> May require, lots of resources and require collaboration with other agencies <i>Category : SUBSTANTIVE</i>
511	140	This section is not part of the standard. The Standards Committee in May 2016 requested the Secretariat to gather information on any potential implementation issues related to this draft. Please provide details and proposals on how to address these potential implementation issues.	C	<b>Caribbean Agricultural Health and Food Safety Agency</b> This standard will facilitate trade. Unfortunately developing countries often do not have the requisite personnel and facilities to fully benefit from these standards. <i>Category : SUBSTANTIVE</i>
512	140	This section is not part of the standard. The Standards Committee in May 2016 requested the Secretariat to gather information on any potential implementation issues related to this draft. Please provide details and proposals on how to address these potential implementation issues.	C	<b>United States of America</b> There might need to be an update to the Manuals on PFAs and Pest status particularly where the trade is concerned. <i>Category : TECHNICAL</i>
513	140	Esta sección no es parte de la norma. En el mayo de 2016 el Comité de Normas pidió a la secretaría de la CIPF para reunir información sobre los	C	<b>Colombia</b> Disponibilidad de recursos, políticas agrarias internas, disponibilidad de tecnología, orden público. <i>Category : SUBSTANTIVE</i>

		posibles problemas de implementación relacionados con este proyecto. Le rogamos indicar los detalles y propuestas sobre cómo hacer frente a estos posibles problemas de implementación.		
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