



## 2020 FIRST CONSULTATION

1 July – 30 September 2020

### Compiled comments for Draft PT Irradiation treatment for *Sternochetus frigidus* (2017-036)

#### Summary of comments

Name	Summary	SC Response
Cuba	No hay comentarios al documento propuesto.	<b>Noted</b>
European Union	The comments have been introduced by the European Commission on behalf of the European Union and its Member States.	<b>Noted</b>
Myanmar	Agree with the document	<b>Noted</b>
OIRSA	Revisión Completa	<b>Noted</b>
Singapore	Singapore is supportive of this.	<b>Noted</b>
Viet Nam	Viet Nam would like to support agreement with this draft	<b>Noted</b>

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

FAO sequential number	Para	Text	T	Comment	SC Response
1	G	(General Comment)	C	<b>Guyana</b> Guyana has no reservation regarding the draft document at this point. <i>Category : SUBSTANTIVE</i>	<b>Noted</b>
2	G	(General Comment)	C	<b>Australia</b> Australia has reviewed this phytosanitary treatment and is supportive of this treatment and the respective text. <i>Category : TECHNICAL</i>	<b>Noted</b>
3	G	(General Comment)	C	<b>Costa Rica</b> no comment <i>Category : SUBSTANTIVE</i>	<b>Noted</b>
4	G	(General Comment)	C	<b>European Union</b> The comments by the EU are provided without prejudice to the European Union food safety legislation imposing limitations on the acceptance of irradiated goods. <i>Category : SUBSTANTIVE</i>	<b>Noted</b>
5	G	(General Comment)	C	<b>Paraguay</b> Paraguay agrees with Cosave's comments <i>Category : TECHNICAL</i>	<b>Noted</b>
6	G	(General Comment)	C	<b>Slovenia</b> Slovenia would like to formally endorse the	<b>Noted</b>

				EPPO comments submitted via the IPPC Online Comment System. <i>Category : TECHNICAL</i>	
7	G	(General Comment)	C	<b>Argentina</b> We have no comments on this phytosanitary treatment <i>Category : SUBSTANTIVE</i>	<b>Noted</b>
8	G	(General Comment)	C	<b>OIRSA</b> No momentous comments for this document. <i>Category : SUBSTANTIVE</i>	<b>Noted</b>
9	G	(General Comment)	C	<b>Barbados</b> Barbados has no changes to make to this draft ISPM. <i>Category : SUBSTANTIVE</i>	<b>Noted</b>
10	G	(General Comment)	C	<b>Korea, Republic of</b> Republic of Korea does not support to adopt this standards because 1) percentage of oviposition not less than 99.88684 is low 2) the number of pests to be experimented(2274 adult female) is too small. <i>Category : SUBSTANTIVE</i>	<b>Considered, but not incorporated.</b> Although the level of efficacy achieved may be low for some countries, others may accept it. Countries would be free to use this treatment as they see fit.  The counts of treated insects indicate an efficacy of 99.8684% using 150 Gy. However, results of the confirmatory test using this dose indicate that no eggs were laid. The overall maximum applied dose during the test was 164.1 Gy. As an additional safeguard, to increase the margin of safety, the maximum dose measured during confirmatory testing becomes the minimum absorbed dose for quarantine treatment in commercial applications (in this case nominally 165 Gy) (Heather 2004, Follett and Neven 2006).
11	G	(General Comment)	C	<b>Mexico</b> Mexico supports the DRAFT ANNEX TO ISPM:28: Irradiation treatment for <i>Sternochetus frigidus</i> (2017-036) <i>Category : SUBSTANTIVE</i>	<b>Noted</b>
12	G	(General Comment)	C	<b>Myanmar</b> Agree with the document <i>Category : TECHNICAL</i>	<b>Noted</b>
13	G	(General Comment)	C	<b>Uruguay</b> We agree with the document as it is <i>Category : TECHNICAL</i>	<b>Noted</b>
14	G	(General Comment)	C	<b>Qatar</b> We don't have any comment <i>Category : SUBSTANTIVE</i>	<b>Noted</b>
15	G	(General Comment)	C	<b>Malawi</b> We agree with annex <i>Category : SUBSTANTIVE</i>	<b>Noted</b>
16	G	(General Comment)	C	<b>United States of America</b> The US supports this treatment, see note in line 43.	<b>Noted</b>

				<i>Category : SUBSTANTIVE</i>	
17	G	(General Comment)	C	<b>Singapore</b> Singapore is supportive of this ISPM. <i>Category : EDITORIAL</i>	<b>Noted</b>
18	G	(General Comment)	C	<b>Venezuela</b> La parte técnica del Organismo Fitosanitario de Venezuela, al analizar el proyecto de NIMF: concluyo estar de acuerdo con lo planteado por el Grupo de debate sobre normas <i>Category : TECHNICAL</i>	<b>Noted</b>
19	G	(General Comment)	C	<b>Myanmar</b> Agree with the document <i>Category : TECHNICAL</i>	<b>Noted</b>
<b>DRAFT ANNEX TO ISPM 28: Irradiation treatment for <i>Sternochetus frigidus</i> (2017-036)</b>					
20	1	<b>DRAFT ANNEX TO ISPM 28: Irradiation treatment for <i>Sternochetus frigidus</i> (2017-036)</b>	C	<b>Nepal</b> We have no comment on the document <i>Category : EDITORIAL</i>	<b>Noted</b>
21	1	<b>DRAFT ANNEX TO ISPM 28: Irradiation treatment for <i>Sternochetus frigidus</i> (2017-036)</b>	C	<b>Viet Nam</b> Viet Nam would like to support agreement with this draft <i>Category : SUBSTANTIVE</i>	<b>Noted</b>
22	13	2018-05 Standards Committee (SC) added the topic Irradiation treatment for <a href="#">Sternochetus frigidus</a> <a href="#">Sternochetus frigidus</a> (2017-036) to the TPPT work programme with priority 2.	P	<b>European Union</b> Typo: in italics. <i>Category : EDITORIAL</i>	<b>Incorporated</b>
23	13	2018-05 Standards Committee (SC) added the topic Irradiation treatment for <a href="#">Sternochetus frigidus</a> <a href="#">Sternochetus frigidus</a> (2017-036)	P	<b>EPPO</b> Typo: in italics. <i>Category : EDITORIAL</i>	<b>Incorporated</b>

		to the TPPT work programme with priority 2.			
24	20	2019-07 Mr Walther ENKERLIN (AT)(IAEA)	P	<b>European Union</b> Please see draft phytosanitary treatments 2015-015 and 2017-026. <i>Category : EDITORIAL</i>	<b>Incorporated</b>
25	20	2019-07 Mr Walther ENKERLIN (AT)(IAEA)	P	<b>EPPO</b> Please see draft phytosanitary treatments 2015-015 and 2017-026. <i>Category : EDITORIAL</i>	<b>Incorporated</b>
26	21	2008-03 <del>SC</del> -Mr Andrew PARKER (AT)(IAEA)	P	<b>European Union</b> Please see draft phytosanitary treatments 2015-015 and 2017-026. <i>Category : EDITORIAL</i>	<b>Incorporated</b>
27	21	2008-03 <del>SC</del> -Mr Andrew PARKER (AT)(IAEA)	P	<b>EPPO</b> Please see draft phytosanitary treatments 2015-015 and 2017-026. <i>Category : TECHNICAL</i>	<b>Incorporated</b>
28	27	This treatment describes the irradiation of fruit of <i>Mangifera indica</i> at 165 Gy minimum absorbed dose to prevent oviposition of <i>Sternochetus frigidus</i> at the stated efficacy <sup>1</sup> .	C	<b>China</b> Suggest to express the criteria for efficacy evaluation more clearly. The evaluating criterion of this standard is to prevent <i>Sternochetus frigidus</i> females from laying eggs, which is only for females but not for males. <i>Category : SUBSTANTIVE</i>	<b>Modified.</b> To be able to fit with proposed change by PPPO (#29)  Revised the para [27] in the draft under comment #29.
<b>Treatment schedule</b>					
29	36	Minimum absorbed dose of 165 Gy to prevent oviposition in <u>any female</u> <i>Sternochetus frigidus</i> <u>that may emerge from irradiated fruit.</u>	P	<b>PPPO</b> The suggested change would give more clarity on the expected outcome – that is prevention of ovipositing ability in any F1 generation adult females that may emerge from irradiated fruit. <i>Category : EDITORIAL</i>	<b>Modified.</b> To be able to fit with proposed change by China (#28) Note: The insects are not F1, but parent generation  Revised the para [36] in the draft.

30	36	Minimum absorbed dose of 165 Gy to prevent oviposition in <i>Sternochetus frigidus</i> .	C	<b>Egypt</b> Referring to a scientific review would be a good credit for reliability of the data provided <i>Category : EDITORIAL</i>	<b>Considered, but not incorporated.</b> Obra et al. (2014) has been included in the references.
31	37	There is 95% confidence that the treatment according to this schedule prevents oviposition in not less than 99.88684% of <u>young-aged</u> adult females of <i>Sternochetus frigidus</i> .	P	<b>China</b> young-aged female adults were used for conducting tests according to the research reports. <i>Category : SUBSTANTIVE</i>	<b>Considered but not incorporated.</b> There is no information of the age of female adults used in the experiment in Obra et al.(2014).
32	37	There is 95% confidence that the treatment according to this schedule prevents oviposition in not less than 99.88684% of adult females of <i>Sternochetus frigidus</i> .	C	<b>South Africa</b> We suggest that this should be at the Probit 9 level i.e. 99.9968%? <i>Category : TECHNICAL</i>	<b>Considered but not incorporated.</b> It is not necessary to achieve "probit 9" level efficacy in treatments.  Note- Same response as for comment #10.
33	39	This treatment should not be applied to fruit of <i>Mangifera indica</i> stored in a modified atmosphere because the modified	P	<b>PPPO</b> Modified Atmospheric Packaging (MAP) that ensure low oxygen conditions are banned by IPPC for irradiated produce. But this doesn't seem to have enough scientific evidence, as per Follett & Neven 2018. <i>Category : TECHNICAL</i>	<b>Considered but not incorporated.</b> No scientific evidence is available neither for low oxygen nor any other level of oxygen in terms of its effects on treatment efficacy for <i>Sternochetus frigidus</i> . The text on the draft treatment schedule is standard for irradiation treatments.

		atmosphere may affect the treatment efficacy.			
<b>Other relevant information</b>					
34	41	Because irradiation may not result in outright mortality, inspectors may encounter live but non-viable <i>Sternochetus frigidus</i> (eggs, larvae, pupae or adults) during the inspection process. This does not imply a failure of the treatment.	C	<p><b>Thailand</b></p> <p>Thailand has no objection on the proposed draft irradiation treatment for <i>Sternochetus frigidus</i>. However, we would like to seek more clarification on the treatment schedules and Other relevant information as follows:</p> <ol style="list-style-type: none"> <li>1. Treatment schedule indicates that this treatment is aimed to prevent oviposition in <i>Sternochetus frigidus</i> and other relevant information states that adult of <i>Sternochetus frigidus</i> may be encountered. This will cast doubt on inspector whether a pest risk of this pest has been managed at an appropriate level of protection or not. Although, the efficacy of this treatment has already been demonstrated in a reference but in practical term, how we can ensure that this pest will not be establish further.</li> <li>2. We would like to suggest to use a term "fertile" instead of a term "viable" in this paragraph.</li> </ol> <p>Category : <i>SUBSTANTIVE</i></p>	<p><b>Considered but not incorporated.</b></p> <p>The term viable is correct as fertility can only refer to the adult stage in this case. The most tolerant stage is the adult stage found inside the mango fruits. So, irradiated eggs, larvae and pupae that are inside the fruit will be non-viable.</p>
35	42	The Technical Panel on Phytosanitary Treatments based its evaluation of this treatment on the research reported by Obra <i>et al.</i> (2014), which determined the efficacy of irradiation as a treatment for this pest on	P	<p><b>European Union</b></p> <p>For consistency with the other phytosanitary treatments.</p> <p>Category : <i>EDITORIAL</i></p>	<p><b>Incorporated</b></p>

		<a href="#">Mangifera indica</a> <a href="#">Sternochetus frigidus</a> fruit in mangoes.			
36	42	The Technical Panel on Phytosanitary Treatments based its evaluation of this treatment on the research reported by Obra <i>et al.</i> (2014), which determined the efficacy of irradiation as a treatment for this pest on <a href="#">Mangifera indica</a> <a href="#">Sternochetus frigidus</a> fruit in mangoes.	P	<b>EPPO</b> For consistency with the other phytosanitary treatments. <i>Category : EDITORIAL</i>	<b>Incorporated</b>
37	43	The efficacy of this schedule was calculated based on a total of 2 274 adult females treated with no egg production; the control egg production was 397 eggs per female.	C	<b>United States of America</b> We propose adding a note here that this is unpublished data. This data is not found in Obra et al 2014. <i>Category : TECHNICAL</i>	<b>Considered but not incorporated</b> The calculation for total adult females assumes sex ratio 1:1 meaning that half the exposure count in table 1 in publication Obra et al. (2014) was female. The control reproduction was recalculated with figures provided by the submitter. For further details, please refer to TPPT report 2020-03: <a href="https://www.ippc.int/en/publications/88441/">https://www.ippc.int/en/publications/88441/</a>