

## 2021 FIRST CONSULTATION

1 July – 30 September 2021

### Compiled comments for Draft CPM Recommendation: Reduce the incidence of contaminating pests (2019-002)

#### 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.
Myanmar	Myanmar is supportive to the documents.
Nepal	No comments
Singapore	Singapore is supportive of these changes.
South Africa	The NPPOZA is in agreement with this draft and has no further comments
Venezuela	La parte técnica del Organismo Fitosanitario de Venezuela, al analizar el proyecto de NIMF:concluyo estar de acuerdo con lo planteado por el Grupo de debate sobre normas

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

FAO sequential number	Para	Text	T	Comment
1	G	(General Comment)	C	<b>Argentina</b> We support the comments submitted by COSAVE <i>Category : SUBSTANTIVE</i>
2	G	(General Comment)	C	<b>Guyana</b> Guyana has no objection at this moment. <i>Category : SUBSTANTIVE</i>
3	G	(General Comment)	C	<b>secretariat-ichca</b> CARGO INTEGRITY GROUP Joint statement by partners in the Cargo Integrity Group on the avoidance of visible pest contamination of freight containers and their cargoes.  Addressed to the national and international plant protection agencies and other agencies responsible for facilitating international trade.  The partners in the Cargo Integrity Group are the Container Owners Association (COA), the Global Shippers Forum (GSF), the International Cargo Handling Co-ordination Association (ICHCA),

			<p>the TT Club and the World Shipping Council (WSC).</p> <p>We work as a group on improving awareness of the need for the safe and secure packing, handling and transport of cargo transport units, including intermodal freight containers, and promoting use of the guidance contained in the 'Code of Practice for the Packing of Cargo Transport Units' published by the IMO, the UNECE and the ILO (the CTU Code).</p> <p>We jointly make the following statement on behalf of our respective memberships:</p> <ol style="list-style-type: none"> <li>1. We share a collective ambition that international trade be conducted in a safe, secure and environmentally sustainable manner and are working to develop, improve and raise awareness of applicable standards and practices that contribute to that goal.</li> <li>2. We recognise the risks to natural resources, forestry and agricultural industries, and to national economies reliant on them, arising from the transfer of invasive pests between different natural ecosystems. We further recognise that the international movement of goods can present a potential route for the transfer of such pests between countries. However, this is just one of many potential means of transfer and the vast majority of trade takes place in environments where these risks do not arise or are insignificant.</li> <li>3. Liner ships transport approximately 60 percent of the value of seaborne trade or more than USD 4 trillion worth of goods annually, through multiple interactions between different parties around the world. Addressing the risks of transfer of invasive pests requires an understanding of the workings and interdependencies of these supply chains to ensure they remain effective and efficient for the conduct of world trade. This is especially true given the traumatic impacts of the recent global public health emergency on national economies.</li> <li>4. Our collective goal remains to raise awareness of these risks amongst the parties involved in the preparation, packing, handling, storage and transport of containerised goods and to support and encourage preventative action to avoid the movement of goods or containers contaminated by visible pest infestation. To that end we have developed a range of communications in multiple formats and languages.</li> <li>5. In addition, we are active participants in collaborative</li> </ol>
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			<p>efforts partnering with governments in the IPPC’s Sea Container Task Force (SCTF) and the North American Sea Container Initiative (NASCI). Our efforts here have been to develop and support programmes to raise awareness of the risk of pest contamination of sea containers and the availability of advice and guidance on its avoidance. These are significant communications challenges that continue to be hindered by the global health emergency.</p> <p>6. We are opposed to any new global requirement that all freight containers and their cargoes must be certified clean as a condition for ship loading because there is no risk-based evidence to support such a monumental change. The compliance and enforcement costs of such measures would be disproportionate to the benefits obtained from mandatory certification of every container and its cargo. We estimate these additional costs to be in the order of at least USD 20 billion a year and that this burden would fall disproportionately on exporting countries. Spreading scarce resources across the totality of the approximately 230 million containers moved internationally each year, not supported by science and proper risk assessments, would be unproductive and not accomplish the desired outcome.</p> <p>7. Furthermore, a requirement for mandatory certification of container cleanliness would not provide assurance against visible pest contamination as re-infestation could occur at subsequent points in the supply chain. Mandatory controls instituted at one point in the movement of goods would likely breed complacency and a presumption of compliance elsewhere in the supply chain. Constant vigilance on the part of all stakeholders involved should be the desired outcome.</p> <p>8. The development of any control measures regarding containers and their cargoes moving internationally must be undertaken in full consultation with other appropriate bodies, in particular the international agencies responsible for the governance of world trade and for the regulation of different modes of transport, as well as all the supply chain stakeholders.</p> <p>9. The partners in the Cargo Integrity Group call upon the international plant protection community to:</p> <ol style="list-style-type: none"> <li>a. Recognise the commitment and goodwill of the partners in the Cargo Integrity Group to addressing the risks of visible pest contamination of freight containers and their cargoes in international trade;</li> <li>b. Recognise the immense on-costs to governments and</li> </ol>
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				<p>industry of implementing, resourcing and enforcing a global requirement that all containers must be inspected and certified clean as a condition for export by ship;</p> <p>c. Recognise the sensitivity of world trade to the disruptive effects of intrusive measures to inspect, certify and communicate the cleanliness of sea containers;</p> <p>d. Focus their efforts and available budgets instead on targeting actions against specific high-risk pests in specific trade lanes where demonstrable threats to natural resources and economic interests are identified and quantifiable;</p> <p>e. Seek further funding to support and sustain a greater awareness of the risks of transfer of invasive species commensurate with the scale of this task; and</p> <p>f. Work co-operatively with industry partners to leverage the impact and effectiveness of the resources and knowledge so far developed in pursuit of these goals.</p> <p><i>Category : TECHNICAL</i></p>
4	G	(General Comment)	C	<p><b>Nepal</b></p> <p>Nepal has no comments on the draft cpm- Reduce the incidence of contaminating pests associated with regulated articles and unregulated goods to protect plant health and facilitate trade.</p> <p><i>Category : EDITORIAL</i></p>
5	G	(General Comment)	C	<p><b>Russian Federation</b></p> <p>The Russian Federation would like to formally endorse the EPPO comments submitted via the IPPC Online Comment System</p> <p><i>Category : SUBSTANTIVE</i></p>
6	G	(General Comment)	C	<p><b>Japan</b></p> <p>Japan would like to seek a clarification on the nature of a CPM recommendation.</p> <p>Is this recognized as "international standards, guidelines and recommendations" stipulated in paragraph 3 (C) of the ANNEX A "Definition" of the SPS Agreement?</p> <p><i>Category : SUBSTANTIVE</i></p>
7	G	(General Comment)	C	<p><b>PPPO</b></p> <p>Solomon Islands endorses the draft documents and therefore has no objections with it moving forward</p> <p><i>Category : SUBSTANTIVE</i></p>
8	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>
9	G	(General Comment)	C	<p><b>Jamaica</b></p> <p>Jamaica supports the comments from the IPPC Caribbean Regional Workshop.</p> <p><i>Category : SUBSTANTIVE</i></p>

10	G	(General Comment)	C	<p><b>Barbados</b> This is an extremely worthwhile document and the CPM and NPPOs must be commended for having this draft. It is hoped that work can now continue apace to educate the stakeholders as to risk involved in the movement of contaminating pest as well as in the gathering of information data relating to this. <i>Category : SUBSTANTIVE</i></p>
11	G	(General Comment)	C	<p><b>Uruguay</b> We highlight the importance of having better translation into Spanish in order to be consistent with the English version. In addition we suggest that this Recommendation be revised by th Spanish Review Group <i>Category : TRANSLATION</i></p>
12	G	(General Comment)	C	<p><b>COSAVE</b> We highlight the importance of having better traslation into Spanish in order to be consistent with the English version. In addition, we suggest that this recomendation be revised by the Spanish Review Group.  Se destaca la importancia de contar con traducciones al español que reflejen mejor el contenido de la versión en inglés. Adicionalmente se sugiere que esta recomendación sea revisada por el grupo de revisión de español. <i>Category : TRANSLATION</i></p>
13	G	(General Comment)	C	<p><b>Malawi</b> We support the draft CPM recommendation <i>Category : SUBSTANTIVE</i></p>
14	G	(General Comment)	C	<p><b>Caribbean Agricultural Health and Food Safety Agency</b> T&amp;T endorses this draft CPM recommendation. This recommendation provides a platform for more effectively managing contaminating pests to enhance food security and protect the world's biodiversity. to contribute to discussions during the session. <i>Category : SUBSTANTIVE</i></p>
15	G	(General Comment)	C	<p><b>Caribbean Agricultural Health and Food Safety Agency</b> Excellent initiative, but in the present mandate of NPPOs it will be difficult to implement. Further discussions are surely needed, but the text now looks like it is a start only waiting for further developments. So.. we support the document. <i>Category : SUBSTANTIVE</i></p>
16	G	(General Comment)	C	<p><b>Caribbean Agricultural Health and Food Safety Agency</b> No objections at this time. <i>Category : SUBSTANTIVE</i></p>
17	G	(General Comment)	C	<p><b>Caribbean Agricultural Health and Food Safety Agency</b> This topic would be an important pest management consideration</p>

				given the fact that contaminating pests could prove to be invasive species and/or pests of quarantine significance in the importing country as well as in countries of transit. <i>Category : SUBSTANTIVE</i>
18	G	(General Comment)		<b>C Caribbean Agricultural Health and Food Safety Agency</b> A good recommendation that could further benefit from the inclusion of a table regarding types of contaminants and where they may be found (including life stages) <i>Category : SUBSTANTIVE</i>
19	G	(General Comment)		<b>C Caribbean Agricultural Health and Food Safety Agency</b> This is crucial especially in emergency situations as in the case of a disaster. Very often the NPPO is not consulted in the haste to accept or provide assistance. The challenge would be to convince the government ministers/ ministries making these decisions of the phytosanitary risks and the need to follow phytosanitary procedures. <i>Category : TECHNICAL</i>
20	G	(General Comment)		<b>C Caribbean Agricultural Health and Food Safety Agency</b> This is an extremely worthwhile document and the CPM and NPPOs must be commended for having this draft. It is hoped that work can now continue apace to educate the stakeholders as to risk involved in the movement of contaminating pest as well as in the gathering of information data relating to this. <i>Category : SUBSTANTIVE</i>
21	G	(General Comment)		<b>C Caribbean Agricultural Health and Food Safety Agency</b> The Bahamas supports the adoption of the CPM recommendation to reduce the incidence of contaminating and underscores the need to raise an awareness on the pest risks associated with the movement of regulated commodities and outside of those that are not regulated. <i>Category : SUBSTANTIVE</i>
22	G	(General Comment)		<b>C Kenya</b> Kenya accepts the draft. No comment <i>Category : TECHNICAL</i>
23	G	(General Comment)		<b>C United States of America</b> We support this Recommendation - this is an important issue and is already being worked on by various international groups (e.g., SCTF, NASCI). <i>Category : SUBSTANTIVE</i>
24	G	(General Comment)		<b>C China</b> It is suggested to add definitions of "unregulated goods" and "regulated and unregulated goods. ISPM 5 only defines "regulated articles", but the meaning of "unregulated goods" is unclear. It is suggested to clarify the definitions of "unregulated goods" and "regulated and unregulated goods"

				<i>Category : SUBSTANTIVE</i>
25	G	(General Comment)	C	<b>Colombia</b> No se tienen comentarios adicionales <i>Category : SUBSTANTIVE</i>
26	1	<b>Reduce the incidence of contaminating pests associated with regulated <del>articles</del> and unregulated <del>goods</del> <del>articles</del> to protect plant <del>health</del> <del>resources</del> and facilitate <u>safe</u> trade (2019-002)</b>	P	<b>European Union</b> Simplification and more appropriate wording. Please see the definition of "regulated articles" in ISPM 5 and note that the subheading of the IPPC Strategic framework for 2020-2030 ( <a href="http://www.fao.org/documents/card/en/c/cb3995en">http://www.fao.org/documents/card/en/c/cb3995en</a> ) is "Protecting global plant resources and facilitating safe trade" (and consistency with paragraph 27). <i>Category : SUBSTANTIVE</i>
27	1	<b>Reduce the incidence of contaminating pests associated with regulated articles and unregulated goods <u>and places</u> to protect plant health and facilitate trade (2019-002)</b>	P	<b>PPPO</b> adding places to be in line with coverage of topics in recommendation <i>Category : TECHNICAL</i>
28	1	<del>Reduce</del> <b>Reduction of</b> the incidence of contaminating pests associated with regulated articles and unregulated goods to protect plant health and facilitate trade (2019-002)	P	<b>EPPO</b> Better English <i>Category : EDITORIAL</i>
29	1	<b>Reduce the incidence of contaminating pests associated with regulated <del>articles</del> and unregulated <del>goods</del> <del>articles</del> to protect plant <del>health</del> <del>resources</del> and facilitate <u>safe</u> trade (2019-002)</b>	P	<b>EPPO</b> Simplification and more appropriate wording. Please see the definition of "regulated articles" in ISPM 5 and note that the subheading of the IPPC Strategic framework for 2020-2030 ( <a href="http://www.fao.org/documents/card/en/c/cb3995en">http://www.fao.org/documents/card/en/c/cb3995en</a> ) is "Protecting global plant resources and facilitating safe trade" (and consistency with paragraph 27). <i>Category : SUBSTANTIVE</i>
30	13	2019-09 <del>adjustments</del> <b>Adjustments</b> made following CPM-14 (call of experts made)	P	<b>European Union</b> Typo. <i>Category : EDITORIAL</i>
31	13	2019-09 <del>adjustments</del> <b>Adjustments</b> made following CPM-14 (call of experts made)	P	<b>EPPO</b> Typo. <i>Category : EDITORIAL</i>
32	23	<b>Background</b>	C	<b>United States of America</b> We propose using paragraphs 32 and 33 as the introductory text of the Background. We also suggest that the last sentence in paragraph 33 be the very first sentence of the Background section. <i>Category : SUBSTANTIVE</i>
33	24	Contracting parties, through the Commission on Phytosanitary Measures (CPM), have recognised pest risks associated with traded goods that are not regulated plant or plant products, as well as, conveyances, containers and <u>other</u> pathways.	P	<b>Canada</b> Plants, plant products, conveyances, containers , things that are not plants and plant products are pathways. Pathways are not

		Examples of this include the adoption of ISPM 41 ( <i>International movement of used vehicles, machinery and equipment</i> ) and actions to reduce the spread of pests on and in sea containers through the work of the Sea Container Task Force (SCTF). However, the awareness of the scope of the International Plant Protection Convention (IPPC) and the risks that pests associated with traded goods, packaging, storage places, conveyances, containers, soil and any other organism, object or material capable of harbouring or spreading plant pests pose to global plant health, remains low.		separate. Proposed change would allow for other pathways to be considered. Category : TECHNICAL
34	24	Contracting parties, through the Commission on Phytosanitary Measures (CPM), have recognised <del>pest the risks associated with traded goods posed by contaminating pests carried by commodities</del> that are not regulated plant or plant products, as well as, conveyances, containers and <del>other</del> pathways. <del>Examples of this include This has led to the adoption of ISPM 41 the International Standard for Phytosanitary Measures (ISPM) N°41</del> ( <i>International movement of used vehicles, machinery and equipment</i> ) and <del>to</del> actions to reduce the spread of <del>contaminating</del> pests on and in sea containers through the work of the Sea Container Task Force <del>(SCTF)(SCTF)</del> and the adoption of the CPM recommendation R-06 on Sea <del>containers</del> . However, the awareness of the scope of the International Plant Protection Convention (IPPC) and the risks that <del>contaminating</del> pests associated with <del>traded commodities</del> goods, packaging, storage places, conveyances, containers, soil and any other organism, object or material capable of harbouring or spreading <del>plant contaminating</del> pests pose to global plant health, remains low.	P	<b>European Union</b> The focus should be on contaminating pests. Please see the definitions of "contaminating pest" and "commodity" in ISPM 5. More precise wording. Category : TECHNICAL
35	24	Contracting parties, through the Commission on Phytosanitary Measures (CPM), have recognised pest risks associated with traded goods that are not regulated plant or plant products, as well <del>as, as pest risks associated with;</del> conveyances, containers and pathways. Examples of this include the adoption of ISPM 41 ( <i>International movement of used vehicles, machinery and equipment</i> ) and actions to reduce the spread of pests on and in sea containers through the work of the Sea Container Task Force (SCTF). However, the awareness of the scope of the International Plant Protection Convention (IPPC) and the risks that pests associated with traded goods, packaging, storage places, conveyances, containers, soil and any other organism, object or material capable of harbouring or spreading plant pests pose to global plant health, remains low.	P	<b>Australia</b> Improves readability of the sentence Category : EDITORIAL
36	24	Contracting parties, through the Commission on Phytosanitary Measures (CPM), have recognised pest risks associated with traded goods that are not <del>regulated</del> plant	P	<b>COSAVE</b> For simplicity and better reading



		or plant products, as well as, conveyances, containers and pathways. Examples of this include the adoption of ISPM 41 ( <i>International movement of used vehicles, machinery and equipment</i> ) and actions to reduce the spread of pests on and in sea containers through the work of the Sea Container Task Force (SCTF). However, the awareness of the scope of the International Plant Protection Convention (IPPC) and the risks that pests associated with traded goods, packaging, storage places, conveyances, containers, soil and any other organism, object or material capable of harbouring or spreading plant pests pose to global plant health, remains low.		<i>Category : TECHNICAL</i>
37	24	<del>Contracting parties, through the Commission on Phytosanitary Measures (CPM), have recognised the risks posed by contaminating pests carried by commodities that are not regulated plant or plant products, as well as, conveyances, containers and other pathways. This has led to the adoption of the International Standard for Phytosanitary Measures (ISPM) N°41 (Contracting parties, through the Commission on Phytosanitary Measures (CPM), have recognised pest risks associated with traded goods that are not regulated plant or plant products, as well as, conveyances, containers and pathways. Examples of this include the adoption of ISPM 41 (International movement of used vehicles, machinery and equipment) and to actions to reduce the spread of contaminating pests on and in sea containers through the work of the Sea Container Task Force (SCTF) and the adoption of the CPM recommendation R-06 on Sea containers.</del> However, the awareness of the scope of the International Plant Protection Convention (IPPC) and the risks that <u>contaminating</u> pests associated with <del>traded goods</del> <u>commodities</u> , packaging, storage places, conveyances, containers, soil and any other organism, object or material capable of harbouring or spreading <u>plant-contaminating</u> pests pose to global plant health, remains low.	P	<b>EPPO</b> The focus should be on contaminating pests. Please see the definitions of "contaminating pest" and "commodity" in ISPM 5. More precise wording. <i>Category : TECHNICAL</i>
38	24	<del>This recommendation encourages national plant protection organizations (NPPOs), regional plant protection organizations (RPPOs), and importing and exporting industries to work together to raise awareness of the pest risks associated with the trans-boundary movement of all goods and people, and identify and promote the adoption of good practices that minimise contaminating pest spread.</del> The purpose of this CPM recommendation is to encourage contracting parties (CPs) to reduce the occurrence of contaminating pests in articles, goods and places, protect plant health, biodiversity, food security and facilitate trade. In this recommendation, fomites (inanimate objects not associated with plants or plant products that are capable of harbouring or spreading contaminating pests) may be regulated or unregulated. Phytosanitary risks in plants and plant products should be managed based on pest risk analysis (PRA) in accordance with the IPPC Article VII 2(g) and relevant International Standards for Phytosanitary Measures (ISPMs). Pest Risk Analyses rarely consider pest risks associated with the processes of	P	<b>United States of America</b> The purpose should be concise, by adding additional information in this para, there is a lot of confusion about expectations from this Recommendation. Particular confusion is lumping regulated and unregulated pests together. The flow of the background can be modified and reduced for clarity as suggested. Need to start with the purpose (last sentence of para 33), introduce the concept (32 and 33), then start wide with the Convention (para 25-26), then go to the CPM (para 24). Then possibly move to the Strategic Framework 2020-30. We propose paragraphs 27-31 be deleted because this text does not provide added value to the background. There is a need to introduce a definition of "fomite" because this

		<p><del>moving the commodity in trade, or pathways outside of commercial trade. This recommendation provides a platform for more effectively managing contaminating pests to enhance food security and protect the world's biodiversity. This recommendation also provides a basis for further work that may help with managing contaminating pests in commercial trade as well as in passenger, mail, and courier pathways. The IPPC aims to protect global plant resources and facilitate safe trade by minimising the risk of spread of plant pests and effectively managing their impacts within countries. The scope of the Convention also provides for managing the contaminating pests associated with goods and places capable of harbouring or spreading contaminating pests, which pose a risk to global plant health. Contracting parties, through the Commission on Phytosanitary Measures (CPM), have recognised pest risks associated with traded goods that are not plant products, conveyances, and other pathways. Examples of this include the adoption of ISPM 41 (Contracting parties, through the Commission on Phytosanitary Measures (CPM), have recognised pest risks associated with traded goods that are not regulated plant or plant products, as well as, conveyances, containers and pathways. Examples of this include the adoption of ISPM 41 (International movement of used vehicles, machinery and equipment) and actions to reduce the spread of pests on and in sea containers through the work of the Sea Container Task Force (SCTF). However, the awareness of the scope of the International Plant Protection Convention (IPPC) and the risks that pests associated with traded goods, packaging, storage places, conveyances, containers, soil and any other organism, object or material capable of harbouring or spreading plant pests with fomites pose to global plant health, remains low.</del></p>		<p>term is concise and simplifies the construction of any sentence: "Articles and materials that are capable of transmitting pests." "Any inanimate object that maybe contaminated with an infectious agent and can transmit the pest" (Mer-Web). <i>Category : SUBSTANTIVE</i></p>
39	24	<p>Contracting parties, through the Commission on Phytosanitary Measures (CPM), have recognised pest risks associated with traded goods that are not <del>regulated</del> plant or plant products, as well as, conveyances, containers and pathways. Examples of this include the adoption of ISPM 41 (<i>International movement of used vehicles, machinery and equipment</i>) and actions to reduce the spread of pests on and in sea containers through the work of the Sea Container Task Force (SCTF). However, the awareness of the scope of the International Plant Protection Convention (IPPC) and the risks that pests associated with traded goods, packaging, storage places, conveyances, containers, soil and any other organism, object or material capable of harbouring or spreading plant pests pose to global plant health, remains low.</p>	P	<p><b>Uruguay</b> For simplicity and better reading <i>Category : TECHNICAL</i></p>
40	25	<p><del>The IPPC aims to protect global plant resources and facilitate safe trade. It does this by minimising the risk of spread of plant pests and effectively managing their impacts within countries. Contracting parties are working to develop and maintain the capacity to implement harmonised measures to prevent pest introductions and</del></p>	P	<p><b>European Union</b> This paragraph is not specific to contaminating pests and could be deleted. <i>Category : SUBSTANTIVE</i></p>

		<del>spread, and minimise the impacts of pests on food security, trade, economic growth and the environment.</del>		
41	25	The IPPC aims to protect global plant resources and facilitate safe trade. It does this by minimising the risk of spread of plant pests and effectively managing their impacts within countries. Contracting parties are working to develop and maintain the capacity to implement harmonised measures to prevent pest introductions and spread, and minimise the impacts of pests on food security, trade, economic growth and the <del>environment</del> environment (IPPC Article 1 paragraph 4).	P	<b>PPPO</b> add reference to Article 1 in International Plant Protection convention <i>Category : EDITORIAL</i>
42	25	The IPPC aims to protect global plant resources and facilitate safe trade. It does this by minimising the risk of spread of plant pests and effectively managing their impacts within countries. Contracting parties are working to develop and maintain the capacity to implement harmonised measures to prevent pest introductions and spread, and minimise the impacts of pests on food security, trade, economic growth and the <del>environment</del> environment(IPPC Article 1 Paragraph 4).	P	<b>Korea, Republic of</b> Add reference of detail article in International Plant Protection Convention. <i>Category : SUBSTANTIVE</i>
43	25	The IPPC aims to protect global plant resources and facilitate safe trade. It does this by minimising the risk of spread of plant pests <del>and effectively managing their reducing</del> impacts <del>within-on</del> countries. Contracting parties are working to develop and maintain the capacity to implement harmonised measures to prevent pest introductions and spread, and minimise the impacts of pests on food security, trade, economic growth and the environment.	P	<b>Australia</b> The IPPC focuses on the reduction of pest risk with traded goods rather than managing the impact of pests once they are introduced into a country. Alternative wording provided clarifies this point. <i>Category : EDITORIAL</i>
44	25	The IPPC aims to protect global plant resources and facilitate safe trade. It does this by minimising the risk of spread of plant pests and effectively managing their impacts within <del>and between countries</del> countries. Contracting parties are working to develop and maintain the capacity to implement harmonised measures to prevent pest introductions and spread, and minimise the impacts of pests on food security, trade, economic growth and the environment.	P	<b>Syrian Arab Republic</b> within and between countries <i>Category : EDITORIAL</i>
45	25	The IPPC aims to protect global plant resources and facilitate safe trade. It does this by minimising the risk of spread of plant pests and effectively managing their impacts within countries. Contracting parties are working to develop and maintain the capacity to implement harmonised <del>phytosanitary</del> measures to prevent pest introductions and spread, and minimise the impacts of pests on food security, trade, economic growth and the environment.	P	<b>COSAVE</b> Glossary terms should be used when appropriate <i>Category : TECHNICAL</i>
46	25	<del>The IPPC aims to protect global plant resources and facilitate safe trade. It does this by minimising the risk of spread of plant pests and effectively managing their impacts within countries. Contracting parties are working to develop and maintain</del>	P	<b>EPPO</b> This paragraph is not specific to contaminating pests and could be deleted.

		<del>the capacity to implement harmonised measures to prevent pest introductions and spread, and minimise the impacts of pests on food security, trade, economic growth and the environment.</del>		<i>Category : SUBSTANTIVE</i>
47	25	The IPPC aims to protect global plant resources and facilitate safe trade. It does this by minimising the risk of spread of plant pests and effectively managing their impacts within countries. Contracting parties are working to develop and maintain the capacity to implement harmonised measures to prevent pest introductions and spread, and minimise the impacts of pests on food security, trade, economic growth and the <del>environment</del> <u>environment and world's biodiversity</u> .	P	<b>China</b> The world biodiversity is mentioned in paragraph [32]. <i>Category : SUBSTANTIVE</i>
48	25	The IPPC aims to protect global plant resources and facilitate safe trade. It does this by minimising the risk of spread of plant pests and effectively managing their impacts within countries. Contracting parties are working to develop and maintain the capacity to implement harmonised <u>phytosanitary</u> measures to prevent pest introductions and spread, and minimise the impacts of pests on food security, trade, economic growth and the environment.	P	<b>Uruguay</b> Glossary terms should be used when appropriate <i>Category : TECHNICAL</i>
49	26	IPPC supports actions by contracting parties to significantly reduce the international movement of plant pests associated with plants and plant products. However, the scope of the Convention also provides for managing the contaminating pests associated with goods and places capable of harbouring or spreading contaminating pests, which pose a risk to global plant health. Contracting parties have been working to reduce the spread of contaminating pests independently or through bilateral negotiations for a number of years.	C	<b>Canada</b> The definition of the term "contaminating" pest should be included earlier in the text to avoid any potential confusion for the reader <i>Category : SUBSTANTIVE</i>
50	26	<del>IPPC supports actions by contracting parties to significantly reduce the international movement of plant pests associated with plants and plant products. However, the scope of the Convention also provides for managing the contaminating pests associated with goods and places capable of harbouring or spreading contaminating pests, which pose a risk to global plant health. Contracting parties have been working to reduce the spread of contaminating pests independently or through bilateral negotiations for a number of years.</del>	P	<b>European Union</b> This paragraph could be deleted because it does not bring new ideas compared to paragraph 24. <i>Category : SUBSTANTIVE</i>
51	26	IPPC supports actions by contracting parties to significantly reduce the international movement of plant pests associated with plants and plant products. However, the scope of the Convention <del>also not only</del> provides for <del>managing the management of plant pests, which pose a risk to global plant health that infest plants and plant products, but also for the association with</del> contaminating pests <del>of non-plant product articles of trade (e.g tiles, tyres), packaging, storage places (e.g.</del>	P	<b>PPPO</b> to emphasis the aspect of contaminating pests. <i>Category : TECHNICAL</i>

		seed silos), conveyances (e.g. trucks, trains, planes, ships, barges), soil, or any other organism or material capable of harbouring or spreading pests (e.g. mail, parcels, passengers). associated with goods and places capable of harbouring or spreading contaminating pests, which pose a risk to global plant health. Contracting parties have been working to reduce the spread of contaminating pests independently or through bilateral negotiations for a number of years.		
52	26	IPPC supports actions by contracting parties to significantly reduce the international movement of plant pests associated with plants and plant products. However, the scope of the Convention also provides for managing the risk of contaminating pests associated with goods and places capable of harbouring or spreading contaminating pests, which pose a risk to global plant health. Contracting parties have been working to reduce the spread of contaminating pests independently or through bilateral negotiations for a number of years.	P	<b>COSAVE</b> 1) Redundant, 2) for consistency Category : TECHNICAL
53	26	<del>IPPC supports actions by contracting parties to significantly reduce the international movement of plant pests associated with plants and plant products. However, the scope of the Convention also provides for managing the contaminating pests associated with goods and places capable of harbouring or spreading contaminating pests, which pose a risk to global plant health. Contracting parties have been working to reduce the spread of contaminating pests independently or through bilateral negotiations for a number of years.</del>	P	<b>EPPO</b> This paragraph could be deleted because it does not bring new ideas compared to paragraph 24. Category : SUBSTANTIVE
54	26	IPPC supports actions by contracting parties to significantly reduce the international movement of plant pests associated with plants and plant products. However, the scope of the Convention also provides for managing the risk of contaminating pests associated with goods and places capable of harbouring or spreading contaminating pests, which pose a risk to global plant health. Contracting parties have been working to reduce the spread of contaminating pests independently or through bilateral negotiations for a number of years.	P	<b>Uruguay</b> 1) Redundant, 2) for consistency Category : TECHNICAL
55	26	IPPC supports actions by contracting parties to significantly reduce the international movement of plant pests associated with plants and plant products. However, the scope of the Convention also provides for managing the contaminating pests associated with goods and places capable of harbouring or spreading contaminating pests, which pose a risk to global plant health. Contracting parties have been working to reduce the spread of contaminating pests independently or through bilateral negotiations for a number of years.	C	<b>Iran</b> a defined period of time. Category : EDITORIAL

56	27	The <del>endorsed</del> -IPPC Strategic Framework 2020-2030 <del>and identifies</del> the <del>associated five-year investment plan approved by the CPM identify the management of need to manage</del> contaminating pests directly and indirectly to protect global plant resources and facilitate safe trade. Some relevant 2030 key result areas identified for the three strategic objectives progressed by the Framework include:	P	<b>European Union</b> Simplification. <i>Category : EDITORIAL</i>
57	27	The endorsed IPPC Strategic Framework 2020-2030 and the associated five-year investment plan approved by the CPM <del>identify</del> <del>identifies</del> the <del>management of need to manage</del> contaminating pests directly and indirectly to protect global plant resources and facilitate safe trade. Some relevant 2030 key result areas identified for the three strategic objectives progressed by the Framework include:	P	<b>Australia</b> Improves readability of the sentence and clarifies the outcome of the strategic framework. <i>Category : EDITORIAL</i>
58	27	The endorsed IPPC Strategic Framework 2020-2030 and the associated five-year investment plan approved by the CPM identify the <del>risk</del> management of contaminating pests directly and indirectly to protect global plant resources and facilitate safe trade. Some relevant 2030 key result areas identified for the three strategic objectives progressed by the Framework include:	P	<b>COSAVE</b> For consistency with IPPC Strategic Framework <i>Category : TECHNICAL</i>
59	27	The <del>endorsed</del> -IPPC Strategic Framework 2020-2030 <del>and identifies</del> the <del>associated five-year investment plan approved by the CPM identify the management of need to manage</del> contaminating pests directly and indirectly to protect global plant resources and facilitate safe trade. Some relevant 2030 key result areas identified for the three strategic objectives progressed by the Framework include:	P	<b>EPPO</b> Simplification. <i>Category : EDITORIAL</i>
60	27	<del>The endorsed IPPC Strategic Framework 2020-2030 and the associated five-year investment plan approved by the CPM identify the management of contaminating pests directly and indirectly to protect global plant resources and facilitate safe trade. Some relevant 2030 key result areas identified for the three strategic objectives progressed by the Framework include:</del>	P	<b>United States of America</b> This is not relevant information. Delete para 27-31 as adding no value to the Recommendation <i>Category : TECHNICAL</i>
61	27	The endorsed IPPC Strategic Framework 2020-2030 and the associated five-year investment plan approved by the CPM identify the management of contaminating pests directly and indirectly to protect global plant resources and <del>biodiversity and</del> facilitate safe trade. Some relevant 2030 key result areas identified for the three strategic objectives progressed by the Framework include:	P	<b>China</b> To emphasize the importance <i>Category : SUBSTANTIVE</i>
62	27	The endorsed IPPC Strategic Framework 2020-2030 and the associated five-year investment plan approved by the CPM identify the <del>risk</del> management of contaminating pests directly and indirectly to protect global plant resources and facilitate safe trade. Some relevant 2030 key result areas identified for the three strategic objectives progressed by the Framework include:	P	<b>Uruguay</b> For consistency with IPPC Strategic Framework <i>Category : TECHNICAL</i>

63	28	<del>Pest risk prevention is integrated throughout the production, processing and trade chain of plants and plant products (Enhance global food security and increase sustainable agricultural productivity).</del>	P	<b>United States of America</b> See our comment below <i>Category : TECHNICAL</i>
64	28	<b>Pest risk prevention is integrated throughout the production, processing and trade chain of plants and plant products (Enhance global food security and increase sustainable agricultural productivity).</b>	C	<b>United States of America</b> Para 27-31 are proposed for deletion as this text doesn't add any value to the substance of this Recommendation. <i>Category : TECHNICAL</i>
65	29	Contracting parties have mechanisms in place to control the spread of environmental contaminating pests on non-plant trade pathways (e.g. invasive ants on vehicles and machinery, or gypsy moth egg masses on <u>sea-marine vessels</u> , containers and <del>vessels</del> -cargo) (Protect the environment from the impacts of plant pests).	P	<b>Canada</b> More accurate description of the places to find AGM egg mass. <i>Category : TECHNICAL</i>
66	29	<del>Contracting parties have mechanisms in place to control the spread of environmental contaminating pests on non-plant trade pathways (e.g. invasive ants on vehicles and machinery, or gypsy moth egg masses on sea containers and vessels) (Protect the environment from the impacts of plant pests).</del>	P	<b>United States of America</b> See our comment above. <i>Category : TECHNICAL</i>
67	30	<del>NPPOs have built capacity and been supported to establish phytosanitary export assurance and phytosanitary certification systems that are robust and are trusted by trading partners, and;</del>	P	<b>United States of America</b> see our comments above <i>Category : TECHNICAL</i>
68	30	NPPOs have built capacity and been supported to establish phytosanitary export assurance and phytosanitary certification systems that are robust and are trusted by trading partners, <del>and;</del>	P	<b>China</b> typo <i>Category : EDITORIAL</i>
69	31	<del>Detections of pests in trade pathways are declining as exporting countries take more responsibility for managing the pest risk associated with exports, and importing countries report detections more quickly and more consistently (Facilitate safe trade, development and economic growth).</del>	P	<b>United States of America</b> see our comments above <i>Category : TECHNICAL</i>
70	32	The purpose of this CPM recommendation is to reduce the occurrence of contaminating pests specifically occurring in regulated and unregulated articles, goods and places, to protect plant health, biodiversity, food security and facilitate trade. In this recommendation, goods and places refer to traded goods, conveyances, containers, packaging, storage places, soil and any other organism, material or articles which are not associated with plants or plant products that are capable of harbouring or spreading contaminating pests that may be regulated or unregulated. Phytosanitary risks in plants and plant products should be managed on the basis of pest risk analysis (PRA) in accordance with the IPPC Article VII 2(g)	C	<b>Canada</b> Soil or the other items listed are not an organism. It is odd to have "any other organism" in the same phrase, which is intended to clarify what "goods and places" refer to. The sentence is too long and confusing, and should be re-worded. <i>Category : TECHNICAL</i>

		and relevant International Standards for Phytosanitary Measures (ISPMs). Pest Risk Analyses rarely consider pest risks associated with the processes of moving the commodity in trade, or pathways outside of commercial trade. This recommendation provides a platform for more effectively managing contaminating pests to enhance food security and protect the world's biodiversity.		
71	32	The purpose of this CPM recommendation is to reduce the occurrence of contaminating pests specifically occurring in regulated and unregulated articles, goods and places, to protect plant health, biodiversity, food security and facilitate trade. In this recommendation, goods and places refer to traded goods, conveyances, containers, packaging, storage places, soil and any other organism, material or articles which are not associated with plants or plant products that are capable of harbouring or spreading contaminating pests that may be regulated or unregulated. Phytosanitary risks in plants and plant products should be managed on the basis of pest risk analysis (PRA) in accordance with the IPPC Article VII 2(g) and relevant International Standards for Phytosanitary Measures (ISPMs). Pest Risk Analyses rarely consider pest risks associated with the processes of moving the commodity in trade, or pathways outside of commercial trade. This recommendation provides a platform for more effectively managing contaminating pests to enhance food security and protect the world's biodiversity.	C	<b>Canada</b> This sentence is confusing. Is the unregulated or regulated status referring to the pests or to the goods and places? Text should be re-drafted to correct the intent <i>Category : TECHNICAL</i>
72	32	<del><u>Pest risks posed by plants and plant products should be managed on the basis of pest risk analysis (PRA) in accordance with the IPPC Article VII 2(g) and relevant ISPMs. PRAs do not always consider pest risks associated with the processes of moving the commodities in trade, or pathways outside of commercial trade. This recommendation encourages more effective management of contaminating pests to enhance food security and protect the world's biodiversity. The purpose of this CPM recommendation is to reduce the occurrence of contaminating pests specifically occurring in regulated and unregulated articles, goods and places, to protect plant health, biodiversity, food security and facilitate trade. In this recommendation, goods and places refer to traded goods, conveyances, containers, packaging, storage places, soil and any other organism, material or articles which are not associated with plants or plant products that are capable of harbouring or spreading contaminating pests that may be regulated or unregulated. Phytosanitary risks in plants and plant products should be managed on the basis of pest risk analysis (PRA) in accordance with the IPPC Article VII 2(g) and relevant International Standards for Phytosanitary Measures (ISPMs). Pest Risk Analyses</u></del>	P	<b>European Union</b> 1) The two deleted first sentences repeat what is said in paragraph 24. 2) "Pest risk" is defined in ISPM 5. 3) ISPM 41 is referred to in paragraph 24. 4) Acronym "PRA" to be used. 5) "not always" corresponds better to what is done in practice. 6) Better wording suggested for the beginning of the last sentence. <i>Category : TECHNICAL</i>



		<del>rarely consider pest risks associated with the processes of moving the commodity in trade, or pathways outside of commercial trade. This recommendation provides a platform for more effectively managing contaminating pests to enhance food security and protect the world's biodiversity.</del>		
73	32	The purpose of this CPM recommendation is to reduce the occurrence of contaminating pests specifically occurring in regulated and unregulated articles, goods and places, to protect plant health, biodiversity, food security and facilitate trade. In this recommendation, goods and places refer to traded goods, conveyances, containers, packaging, storage places, soil and any other organism, material or articles which are not associated with plants or plant products <del>that-but</del> are capable of harbouring or spreading contaminating pests that may be regulated or unregulated. <del>Phytosanitary-Pest</del> risks in plants and plant products should be managed on the basis of pest risk analysis (PRA) in accordance with the IPPC Article VII 2(g) and relevant International Standards for Phytosanitary Measures (ISPMs). Pest Risk Analyses rarely consider pest risks associated with the processes of moving the commodity in trade, or pathways outside of commercial trade, <u>so this is considered in this recommendation</u> . This recommendation provides a platform for more effectively managing contaminating pests to enhance food security and protect the world's biodiversity.	P	<b>PPPO</b> Adds stress the difference of these traded article, conveyances etc... 'Phytosanitary risk' should be 'pest risk' The aspect of the movement of traded articles that this recommendation deals with could be stressed a little more with an addition, or something like this, to this sentence ..." Pest Risk Analyses rarely consider pest risks associated with the processes of moving the commodity in trade, or pathways outside of commercial trade, so this is considered in this recommendation". <i>Category : TECHNICAL</i>
74	32	The purpose of this CPM recommendation is to reduce the occurrence of contaminating pests specifically occurring in regulated <del>and unregulated</del> articles, <u>unregulated</u> goods and places, to protect plant health, biodiversity, food security and facilitate trade. In this recommendation, goods and places refer to traded goods, conveyances, containers, packaging, storage places, soil and any other organism, material or <del>articles which are not associated with plants or plant products</del> <u>material</u> that are capable of harbouring or spreading contaminating pests that may be regulated or unregulated. <del>Phytosanitary-Pest</del> risks in plants and plant products should be managed on the basis of pest risk analysis (PRA) in accordance with the IPPC Article VII 2(g) and relevant International Standards for Phytosanitary Measures (ISPMs). Pest Risk Analyses rarely consider pest risks associated with the processes of moving the commodity in trade, or pathways outside of commercial trade. This recommendation provides a platform for more effectively managing contaminating pests to enhance food security and protect the world's biodiversity.	P	<b>COSAVE</b> 1) For consistency with the title, 2) Text deleted to clarify and avoid confusion with regulated articles, 3) For consistency <i>Category : TECHNICAL</i>

75	32	<p><del>Pest risks posed by plants and plant products should be managed on the basis of pest risk analysis (PRA) in accordance with the IPPC Article VII 2(g) and relevant ISPMs. PRAs do not always consider pest risks associated with the processes of moving the commodities in trade, or pathways outside of commercial trade. This recommendation encourages more effective management of contaminating pests to enhance food security and protect the world's biodiversity. The purpose of this CPM recommendation is to reduce the occurrence of contaminating pests specifically occurring in regulated and unregulated articles, goods and places, to protect plant health, biodiversity, food security and facilitate trade. In this recommendation, goods and places refer to traded goods, conveyances, containers, packaging, storage places, soil and any other organism, material or articles which are not associated with plants or plant products that are capable of harbouring or spreading contaminating pests that may be regulated or unregulated. Phytosanitary risks in plants and plant products should be managed on the basis of pest risk analysis (PRA) in accordance with the IPPC Article VII 2(g) and relevant International Standards for Phytosanitary Measures (ISPMs). Pest Risk Analyses rarely consider pest risks associated with the processes of moving the commodity in trade, or pathways outside of commercial trade. This recommendation provides a platform for more effectively managing contaminating pests to enhance food security and protect the world's biodiversity.</del></p>	<p>P <b>EPPO</b></p> <ol style="list-style-type: none"> <li>1) The two deleted first sentences repeat what is said in paragraph 24.</li> <li>2) "Pest risk" is defined in ISPM 5.</li> <li>3) ISPM 41 is referred to in paragraph 24.</li> <li>4) Acronym "PRA" to be used.</li> <li>5) "not always" corresponds better to what is done in practice.</li> <li>6) Better wording suggested for the beginning of the last sentence.</li> </ol> <p>Category : <i>TECHNICAL</i></p>
76	32	<p><del>The purpose of this CPM recommendation is to reduce the occurrence of contaminating pests specifically occurring in regulated and unregulated articles, goods and places, to protect plant health, biodiversity, food security and facilitate trade. In this recommendation, goods and places refer to traded goods, conveyances, containers, packaging, storage places, soil and any other organism, material or articles which are not associated with plants or plant products that are capable of harbouring or spreading contaminating pests that may be regulated or unregulated. Phytosanitary risks in plants and plant products should be managed on the basis of pest risk analysis (PRA) in accordance with the IPPC Article VII 2(g) and relevant International Standards for Phytosanitary Measures (ISPMs). Pest Risk Analyses rarely consider pest risks associated with the processes of moving the commodity in trade, or pathways outside of commercial trade. This recommendation provides a platform for more effectively managing contaminating pests to enhance food security and protect the world's biodiversity.</del></p>	<p>P <b>United States of America</b></p> <p>This text is moved to the beginning of the Background</p> <p>Category : <i>TECHNICAL</i></p>

77	32	<p>The purpose of this CPM recommendation is to reduce the occurrence of contaminating pests specifically occurring in regulated and unregulated articles, goods and places, to protect plant health, biodiversity, food security and facilitate <a href="#">safe agricultural</a> trade. In this recommendation, goods and places refer to traded goods, conveyances, containers, packaging, storage places, soil and any other organism, material or articles which are not associated with plants or plant products that are capable of harbouring or spreading contaminating pests that may be regulated or unregulated. Phytosanitary risks in plants and plant products should be managed on the basis of pest risk analysis (PRA) in accordance with the IPPC Article VII 2(g) and relevant International Standards for Phytosanitary Measures (ISPMs). Pest Risk Analyses rarely consider pest risks associated with the processes of moving the commodity in trade, or pathways outside of commercial trade. This recommendation provides a platform for more effectively managing contaminating pests to enhance food security and protect the world's biodiversity.</p>	<p>P <b>Malawi</b></p> <p><i>Category : TECHNICAL</i></p>
78	32	<p>The purpose of this CPM recommendation is to reduce the occurrence of contaminating pests specifically occurring in regulated <del>and unregulated</del> <a href="#">unregulated</a> goods and places, to protect plant health, biodiversity, food security and facilitate trade. In this recommendation, goods and places refer to traded goods, conveyances, containers, packaging, storage places, soil and any other organism, <del>material or articles which are not associated with plants or plant products</del> <a href="#">material</a> that are capable of harbouring or spreading contaminating pests that may be regulated or unregulated. <del>Phytosanitary-Pest</del> risks in plants and plant products should be managed on the basis of pest risk analysis (PRA) in accordance with the IPPC Article VII 2(g) and relevant International Standards for Phytosanitary Measures (ISPMs). Pest Risk Analyses rarely consider pest risks associated with the processes of moving the commodity in trade, or pathways outside of commercial trade. This recommendation provides a platform for more effectively managing contaminating pests to enhance food security and protect the world's biodiversity.</p>	<p>P <b>Uruguay</b></p> <p>1) For consistency with the title, 2) Text deleted to clarify and avoid confusion with regulated articles, 3) For consistency</p> <p><i>Category : TECHNICAL</i></p>
79	33	<p>This recommendation provides a basis for further work that may be agreed for managing pests outside of the commercial trading framework for plants and plant products including passengers, mail, courier pathways and where outside the commercial trading framework. The recommendation encourages National Plant Protection Organizations (NPPOs), Regional Plant Protection Organizations (RPPOs), importing and exporting industries to work together to raise awareness</p>	<p>C <b>Canada</b></p> <p>What does "outside the commercial trading framework" mean? Text should be clarified.</p> <p><i>Category : TECHNICAL</i></p>

		of the pest risks associated with the trans-boundary movement of all goods and people, and identify and promote the adoption of good practices that minimise contaminating pest spread.		
80	33	This recommendation <del>provides a basis for further work that may be agreed for managing pests outside of the commercial trading framework for plants and plant products including passengers, mail, courier pathways and where outside the commercial trading framework.</del> The recommendation encourages National Plant Protection Organizations (NPPOs), Regional Plant Protection Organizations (RPPOs), importing and exporting industries to work together to raise awareness of the pest risks associated with the trans-boundary movement of all goods and people, and identify and promote the adoption of good practices that minimise contaminating pest spread.	P	<b>European Union</b> The first sentence partly repeats what was said in the previous paragraph. The suggested simplification makes the message easier to understand. <i>Category : EDITORIAL</i>
81	33	This recommendation provides a basis for further work that may be agreed for managing pests outside of the commercial trading framework for plants and plant products including passengers, mail, courier pathways and where outside the commercial trading framework. The recommendation encourages National Plant Protection Organizations (NPPOs), Regional Plant Protection Organizations (RPPOs), <u>and</u> importing and exporting industries to work together to raise awareness of the pest risks associated with the trans-boundary movement of all goods and people, and identify and promote the adoption of good practices that minimise contaminating pest spread.	P	<b>Australia</b> Improves readability of the sentence <i>Category : EDITORIAL</i>
82	33	This recommendation provides a basis for further work that may be agreed for managing pests outside of the commercial trading framework for plants and plant products including passengers, mail, courier pathways and where outside the commercial trading framework. The recommendation encourages <del>National Plant Protection Organizations national plant protection organizations</del> (NPPOs), <del>Regional Plant Protection Organizations regional plant protection organizations</del> (RPPOs), importing and exporting industries to work together to raise awareness of the pest risks associated with the trans-boundary movement of all goods and people, and identify and promote the adoption of good practices that minimise contaminating pest spread.	P	<b>Australia</b> Suggest change to lower case to achieve consistency with other IPPC documents <i>Category : EDITORIAL</i>
83	33	This recommendation provides a basis for further work that may be agreed for managing <del>pests-pest risks</del> outside of the commercial trading framework for plants and plant products including passengers, mail, courier <del>pathways and where outside the commercial trading framework</del> <u>pathways</u> . The recommendation encourages	P	<b>COSAVE</b> 1) For consistency and to avoid redundancy, 2) international movement is more commonly used <i>Category : TECHNICAL</i>

		National Plant Protection Organizations (NPPOs), Regional Plant Protection Organizations (RPPOs), importing and exporting industries to work together to raise awareness of the pest risks associated with the <del>trans-boundary-international</del> movement of all goods and people, and identify and promote the adoption of good practices that minimise contaminating pest spread.		
84	33	This recommendation <del>provides a basis for further work that may be agreed for managing pests outside of the commercial trading framework for plants and plant products including passengers, mail, courier pathways and where outside the commercial trading framework. The recommendation</del> encourages National Plant Protection Organizations (NPPOs), Regional Plant Protection Organizations (RPPOs), importing and exporting industries to work together to raise awareness of the pest risks associated with the trans-boundary movement of all goods and people, and identify and promote the adoption of good practices that minimise contaminating pest spread.	P	<b>EPPO</b> The first sentence partly repeats what was said in the previous paragraph. The suggested simplification makes the message easier to understand. <i>Category : EDITORIAL</i>
85	33	<del>This recommendation provides a basis for further work that may be agreed for managing pests outside of the commercial trading framework for plants and plant products including passengers, mail, courier pathways and where outside the commercial trading framework. The recommendation encourages National Plant Protection Organizations (NPPOs), Regional Plant Protection Organizations (RPPOs), importing and exporting industries to work together to raise awareness of the pest risks associated with the trans-boundary movement of all goods and people, and identify and promote the adoption of good practices that minimise contaminating pest spread.</del>	P	<b>United States of America</b> Moved in the beginning of the document. <i>Category : TECHNICAL</i>
86	33	This recommendation provides a basis for further work that may be agreed for managing pests outside of the commercial trading framework for plants and plant products including passengers, mail, courier <del>pathways and where outside the commercial trading framework. pathways.</del> The recommendation encourages National Plant Protection Organizations (NPPOs), Regional Plant Protection Organizations (RPPOs), importing and exporting industries to work together to raise awareness of the pest risks associated with the trans-boundary movement of all goods and people, and identify and promote the adoption of good practices that minimise contaminating pest spread.	P	<b>Caribbean Agricultural Health and Food Safety Agency</b> This phrase is redundant. It was already mentioned at the beginning of the sentence <i>Category : SUBSTANTIVE</i>
87	33	This recommendation provides a basis for further work that may be agreed for managing <del>pests-pest risks</del> outside of the commercial trading framework for plants and plant products including passengers, <del>mail, courier pathways-mail</del> and <del>where</del>	P	<b>Uruguay</b> 1) For consistency and to avoid redundancy, 2) international movement is more commonly used <i>Category : TECHNICAL</i>

		<del>outside the commercial trading framework</del> courier pathways. The recommendation encourages National Plant Protection Organizations (NPPOs), Regional Plant Protection Organizations (RPPOs), importing and exporting industries to work together to raise awareness of the pest risks associated with the <del>trans-boundary international</del> movement of all goods and people, and identify and promote the adoption of good practices that minimise contaminating pest spread.		
88	35	Contracting parties, NPPOs, RPPOs and relevant industries involved in international trade including exporters, importers and <del>logistic-logistics</del> operators.	P	<b>Australia</b> Accurate use <i>Category : EDITORIAL</i>
89	35	Contracting parties, NPPOs, RPPOs and relevant industries involved in international trade including exporters, importers <u>Manufacturing</u> and <u>processing industry and</u> logistic operators.	P	<b>China</b> The manufacturing process is also very important <i>Category : SUBSTANTIVE</i>
90	37	<del>The IPPC is the global international treaty for protecting plant resources. The Convention provides a framework to protect the world's plant resources from damage caused by pests. The three strategic objectives of the Commission on Phytosanitary Measures (CPM) are to:</del>	P	<b>European Union</b> This paragraph is not relevant for the recommendation. It dilutes the message. <i>Category : SUBSTANTIVE</i>
91	37	<del>The IPPC is the global international treaty for protecting plant resources. The Convention provides a framework to protect the world's plant resources from damage caused by pests. The three strategic objectives of the Commission on Phytosanitary Measures (CPM) are to:</del>	P	<b>EPPO</b> This paragraph is not relevant for the recommendation. It dilutes the message. <i>Category : SUBSTANTIVE</i>
92	37	<del>The IPPC is the global international treaty for protecting plant resources. The Convention provides a framework to protect the world's plant resources from damage caused by pests. The three strategic objectives of the Commission on Phytosanitary Measures (CPM) are to:</del>	P	<b>United States of America</b> Propose deletion of paragraphs 37-41. No other adopted CPM recommendation has this in the "Recommendation section". This is not necessary. Usually is not included in CPM Recommendations. <i>Category : SUBSTANTIVE</i>
93	37	The IPPC is the global international treaty for protecting plant resources. The Convention provides a framework to protect the world's plant resources from damage caused by pests. The three strategic objectives of the <del>Commission on Phytosanitary Measures (CPM)</del> <u>CPM</u> are to:	P	<b>China</b> repetition. <i>Category : SUBSTANTIVE</i>
94	38	<del>Enhance food security and increase sustainable agricultural productivity</del>	P	<b>European Union</b> This paragraph is not relevant for the recommendation. It dilutes the message. <i>Category : SUBSTANTIVE</i>
95	38	<del>Enhance food security and increase sustainable agricultural productivity</del>	P	<b>EPPO</b> This paragraph is not relevant for the recommendation. It dilutes the message. <i>Category : SUBSTANTIVE</i>

96	38	<del>Enhance food security and increase sustainable agricultural productivity.</del>	P	<b>United States of America</b> See our comment above <i>Category : SUBSTANTIVE</i>
97	39	<del>Protect the environment from the impacts of plant pests.</del>	P	<b>European Union</b> This paragraph is not relevant for the recommendation. It dilutes the message. <i>Category : SUBSTANTIVE</i>
98	39	<del>Protect the environment from the impacts of plant pests.</del>	P	<b>EPPO</b> This paragraph is not relevant for the recommendation. It dilutes the message. <i>Category : SUBSTANTIVE</i>
99	39	<del>Protect the environment from the impacts of plant pests.</del>	P	<b>United States of America</b> see our comment above <i>Category : SUBSTANTIVE</i>
100	40	<del>Facilitate safe trade, development and economic growth.</del>	P	<b>European Union</b> This paragraph is not relevant for the recommendation. It dilutes the message. <i>Category : SUBSTANTIVE</i>
101	40	<del>Facilitate safe trade, development and economic growth.</del>	P	<b>EPPO</b> This paragraph is not relevant for the recommendation. It dilutes the message. <i>Category : SUBSTANTIVE</i>
102	40	<del>Facilitate safe trade, development and economic growth.</del>	P	<b>United States of America</b> see our comment above <i>Category : SUBSTANTIVE</i>
103	41	<del>Recognising that the</del> The Convention provides for the management of the pests associated with regulated and unregulated <del>goods and places</del> articles capable of harbouring or spreading <del>plant contaminating</del> pests, in addition to those <del>on infesting</del> plants and plant products.	P	<b>European Union</b> More appropriate wording (please see the comment made on the title of the recommendation and the definition of "infestation" in ISPM 5). <i>Category : TECHNICAL</i>
104	41	<del>Recognising that</del> <u>Recognize</u> the <del>Convention</del> <u>convention</u> provides for the management of <del>the pests</del> <u>pest</u> associated <u>not only</u> with <del>regulated plants</del> and <del>unregulated goods</del> <u>plant products</u> but also with <u>storage places, packaging, conveyances, containers, soil</u> and <del>places</del> <u>any other organism, object or material</u> capable of harbouring or spreading plant pests, <del>in addition to those on plants and plant products</del> <u>particularly where international transportation is involved (IPPC. I.4).</u>	P	<b>Korea, Republic of</b> Add reference of detail article in International Plant Protection Convention. <i>Category : SUBSTANTIVE</i>
105	41	Recognising that the Convention provides for the management of the pests associated with regulated and unregulated goods and places capable of harbouring or spreading plant pests, in addition to those <del>on</del> <u>that may infest</u> plants and plant products.	P	<b>PPPO</b> The difference between pests that infect and infest and contaminating pests that associate with but do not infect or infest goods or places is not made clear in this document. <i>Category : EDITORIAL</i>

106	41	Recognising that the Convention provides for the management of the <del>pests-pest risks</del> associated with regulated <del>articles</del> and unregulated goods and places capable of harbouring or spreading plant pests, in addition to those on plants and plant products.	P	<b>COSAVE</b> For consistency with the recommendation title <i>Category : TECHNICAL</i>
107	41	<del>Recognising that the</del> The Convention provides for the management of the pests associated with regulated and unregulated <del>goods and places-articles</del> capable of harbouring or spreading <del>plant-contaminating</del> pests, in addition to those <del>on-infesting</del> plants and plant products.	P	<b>EPPO</b> More appropriate wording (please see the comment made on the title of the recommendation and the definition of "infestation" in ISPM 5). <i>Category : TECHNICAL</i>
108	41	<del>Recognising that the Convention provides for the management of the pests associated with regulated and unregulated goods and places capable of harbouring or spreading plant pests, in addition to those on plants and plant products.</del>	P	<b>United States of America</b> see our comment above <i>Category : SUBSTANTIVE</i>
109	41	Recognising that the Convention provides for the management of the <del>pests-pest risks</del> associated with regulated <del>articles</del> and unregulated goods and places capable of harbouring or spreading plant pests, in addition to those on plants and plant products.	P	<b>Uruguay</b> For consistency with the recommendation title <i>Category : TECHNICAL</i>
110	42	The CPM encourages contracting parties to continue to, as appropriate, take necessary actions based on sufficient scientific evidence for the purpose of minimising the spread of contaminating pests on traded goods, conveyances, containers and other non-plant <del>regulated-non-regulated</del> articles. It encourages contracting parties to:	P	<b>Canada</b> This is important as some NPPOs regulate non-plant items and can take action on pests/contaminants and other NPPOs lack those authorities. Regardless, the actual risks to plant health exists. <i>Category : SUBSTANTIVE</i>
111	42	<del>The-Thus the</del> CPM encourages contracting parties to <del>continue to, as appropriate,</del> take necessary actions based on sufficient scientific evidence for <del>the purpose of</del> minimising the spread of contaminating pests on <del>traded goods</del> commodities, conveyances, containers and other <del>non-plant regulated</del> articles. It encourages contracting parties to:	P	<b>European Union</b> Simplification. Please see the definition of "commodity" in ISPM 5. <i>Category : TECHNICAL</i>
112	42	The CPM encourages contracting parties to continue to, as appropriate, take necessary actions based on sufficient scientific evidence for the purpose of minimising the spread of contaminating pests on traded goods, conveyances, <del>containers-containers, packaging</del> and other non-plant regulated articles. It encourages contracting parties to:	P	<b>Australia</b> Inclusion of packaging to match earlier text. <i>Category : EDITORIAL</i>
113	42	The CPM encourages contracting parties to continue to, as appropriate, take necessary actions based on <del>sufficient</del> scientific evidence for the purpose of minimising the spread of contaminating pests on traded goods, conveyances,	P	<b>COSAVE</b> It is not appropriate to qualify the scientific evidence, CP should take actions based on scientific evidence <i>Category : TECHNICAL</i>



		containers and other non-plant regulated articles. It encourages contracting parties to:		
114	42	<del>The</del> Thus the CPM encourages contracting parties to <del>continue to, as appropriate,</del> take necessary actions based on sufficient scientific evidence for <del>the purpose of</del> minimising the spread of contaminating pests on <del>traded goods</del> commodities, conveyances, containers and other <del>non-plant regulated</del> articles. It encourages contracting parties to:	P	<b>EPPO</b> Simplification. Please see the definition of "commodity" in ISPM 5. <i>Category : TECHNICAL</i>
115	42	The CPM encourages contracting parties to continue <del>to</del> taking necessary actions, as appropriate, <del>take necessary actions</del> based on sufficient scientific evidence for the purpose of minimising the spread of contaminating pests <del>on traded goods,</del> conveyances, containers and other non-plant regulated articles. It encourages contracting parties to: <del>by:</del>	P	<b>United States of America</b> More appropriate language, redundant text is removed. <i>Category : EDITORIAL</i>
116	42	The CPM encourages contracting parties to continue to, as appropriate, take necessary actions based on <del>sufficient</del> scientific evidence for the purpose of minimising the spread of contaminating pests on traded goods, conveyances, containers and other non-plant regulated articles. It encourages contracting parties to:	P	<b>Uruguay</b> It is not appropriate to qualify the scientific evidence, CP should take actions based on scientific evidence <i>Category : TECHNICAL</i>
117	43	<i>a.</i> raise awareness with governments, particularly departments for trade and transport and relevant industries of the risks and impacts of <del>quarantine</del> pests spreading internationally as contaminating pests on regulated and unregulated goods, mail and courier packages.	P	<b>Canada</b> Pests may be present but have not yet been evaluated for regulatory status i.e. new occurrences <i>Category : TECHNICAL</i>
118	43	<i>a.</i> raise awareness with governments, particularly departments for trade and transport and relevant industries of the risks and impacts of quarantine pests spreading internationally as contaminating pests on regulated and unregulated <del>goods</del> commodities, <del>mail and mail</del> , courier <del>packages</del> packages and conveyances.	P	<b>European Union</b> Traded goods are covered by "commodities" (defined in ISPM 5) and non-traded goods are covered by mail and courier packages. Conveyances are important to be referred to for transport industries (please see for example paragraphs 24 and 42). <i>Category : TECHNICAL</i>
119	43	<i>a.</i> raise awareness with governments, particularly departments for trade and transport and relevant industries of the risks and impacts of quarantine pests spreading internationally as contaminating pests on regulated and unregulated goods, <del>places</del> , mail and courier packages.	P	<b>PPPO</b> <i>Category : EDITORIAL</i>
120	43	<i>a.</i> raise awareness with governments, particularly departments for <del>trade</del> trade, foreign affairs and <del>diplomatic missions and</del> transport and relevant industries of the risks and impacts of quarantine pests spreading internationally as	P	<b>Australia</b> Inclusion of these additional categories to address other potential pathways on which awareness raising would be beneficial (as other agreements often prevent normal phytosanitary interventions)

		contaminating pests on regulated and unregulated goods, mail and courier packages.		<i>Category : TECHNICAL</i>
121	43	<i>a.</i> <i>raise awareness</i> with governments, particularly departments for trade and transport and relevant industries of the risks and impacts of quarantine pests spreading internationally as contaminating pests on <del>regulated and unregulated trade goods, conveyances, containers and other non-plant regulated articles</del> mail and courier packages.	P	<b>COSAVE</b> For consistency with paragraph 42 <i>Category : TECHNICAL</i>
122	43	<i>a.</i> <i>raise awareness</i> with governments, particularly departments for trade and transport and relevant industries of the risks and impacts of quarantine pests spreading internationally as contaminating pests on regulated and unregulated <del>goods</del> <del>commodities</del> , <del>mail and mail</del> , courier <del>packages</del> <del>packages and conveyances</del> .	P	<b>EPPO</b> Traded goods are covered by "commodities" (defined in ISPM 5) and non-traded goods are covered by mail and courier packages. Conveyances are important to be referred to for transport industries (please see for example paragraphs 24 and 42). <i>Category : TECHNICAL</i>
123	43	<i>a.</i> <del><i>raise-raising awareness and promoting benefits with governments, particularly departments for trade and transport and relevant industries of managing</i></del> the risks and impacts of <del>quarantine pests spreading internationally as</del> contaminating pests on <del>regulated and unregulated goods</del> <del>various pathways, i.e., commercial trade, conveyances, passengers, mail and courier packages</del> <del>couriers</del> .	P	<b>United States of America</b> introducing gerund to align with the above text <i>Category : EDITORIAL</i>
124	43	<i>a.</i> <i>raise awareness</i> with governments, particularly departments for trade and transport and relevant industries of the risks and impacts of quarantine pests spreading internationally as contaminating pests on <del>regulated and unregulated</del> <del>traded</del> goods, <del>conveyances, containers and other non-plant regulated articles</del> , mail and courier packages.	P	<b>Uruguay</b> For consistency with paragraph 42 <i>Category : TECHNICAL</i>
125	44	<i>b.</i> <i>promote</i> the benefits of preventing traded goods, conveyances, containers, packaging and similar items that carry them or accompany them within and between countries from contamination by phytosanitary risk material such as soil, plant material and pest organisms, in terms of facilitating <del>safer trade</del> .	C	<b>Mexico</b> Safer trade should be translated into spanish as "comercio mas seguro" <i>Category : TRANSLATION</i>
126	44	<i>b.</i> <i>promote</i> the benefits of preventing traded goods, conveyances, containers, packaging and similar items that carry them or accompany them within and between countries from contamination by phytosanitary risk material such as soil, plant <del>material</del> <del>debris</del> and pest organisms, in terms of facilitating safer trade.	P	<b>Mexico</b> More appropriate term <i>Category : SUBSTANTIVE</i>
127	44	<i>b.</i> <i>promote</i> the benefits of preventing <del>traded goods</del> <del>commodities</del> , conveyances, containers, packaging and similar items that carry them or accompany them within and between countries from contamination by	P	<b>European Union</b> Please see ISPM 5. <i>Category : TECHNICAL</i>

		<del>phytosanitary-pest</del> risk material such as soil, <del>plants and</del> plant <del>material-products</del> and <del>pest-organismsby pests</del> , in terms of facilitating safer trade.		
128	44	<i>b.</i> <i>promote</i> the benefits of preventing traded goods, conveyances, containers, packaging and similar items that carry them or accompany them within and between countries from contamination by <del>phytosanitary-pest</del> risk material such as soil, plant material and pest organisms, in terms of facilitating safer trade.	P	<b>PPPO</b> pest risk is more appropriate in this context <i>Category : EDITORIAL</i>
129	44	<i>b.</i> <i>promote</i> the benefits of preventing traded goods, conveyances, containers, packaging and similar items that carry them or accompany them within and between countries from contamination by phytosanitary risk material such as soil, plant material and pest organisms, in terms of facilitating safer trade.	C	<b>COSAVE</b> Safer trade should be translated into spanish as "comercio mas seguro" <i>Category : TRANSLATION</i>
130	44	<i>b.</i> <i>promote</i> the benefits of preventing traded goods, conveyances, containers, packaging and similar items <del>that carry them or accompany them within and between countries</del> from contamination by <del>phytosanitary-pests and pest</del> risk material such as <del>soil, plant material-soil</del> and <del>pest-organismsplant material</del> , in terms of facilitating safer trade.	P	<b>COSAVE</b> 1) Simplification to highlight the recommendation of promoting the benefits of preventing items from pest risk materials. 2) Glossary term, 3) for consistency <i>Category : TECHNICAL</i>
131	44	<i>b.</i> <i>promote</i> the benefits of preventing <del>traded-goodscommodities</del> , conveyances, containers, packaging and similar items that carry them or accompany them within and between countries from contamination by <del>phytosanitary-pest</del> risk material such as soil, <del>plant material-plants</del> and <del>pest organismsplants products and by pests</del> , in terms of facilitating safer trade.	P	<b>EPPO</b> Please see ISPM 5. <i>Category : TECHNICAL</i>
132	44	<del><i>b.</i> <i>promote</i> the benefits of preventing traded goods, conveyances, containers, packaging and similar items that carry them or accompany them within and between countries from contamination by phytosanitary risk material such as soil, plant material and pest organisms, in terms of facilitating safer trade.</del>	P	<b>United States of America</b> This is now incorporated in the above bullet. <i>Category : EDITORIAL</i>
133	44	<i>b.</i> <i>promote</i> the benefits of preventing traded goods, conveyances, containers, packaging and similar items <del>that carry them or accompany them within and between countries</del> from contamination by <del>phytosanitary-pests and pest</del> risk material such as <del>soil, plant material-soil</del> and <del>pest-organismsplant material</del> , in terms of facilitating safer trade.	P	<b>Uruguay</b> 1) Simplification to highlight the recommendation of promoting the benefits of preventing items from pest risk materials. 2) Glossary term, 3) for consistency <i>Category : TECHNICAL</i>
134	44	<i>b.</i> <i>promote</i> the benefits of preventing traded goods, conveyances, containers, packaging and similar items that carry them or accompany them within and between countries from contamination by phytosanitary risk material such as soil, plant material and pest organisms, in terms of facilitating safer trade.	C	<b>Uruguay</b> "safer trade" should be translated into Spanish as "comercio más seguro" <i>Category : TRANSLATION</i>

135	44	<i>b.</i> <i>promover</i> los beneficios que comporta para la facilitación del comercio en <del>mejores</del> condiciones <del>de inocuidad más seguras</del> el evitar que los bienes intercambiados y los medios de transporte, contenedores y otros objetos que los transportan o acompañan dentro de un país y entre países se contaminen con materiales de riesgo fitosanitario, como suelo, materiales vegetales y organismos de plagas;	P	<b>Costa Rica</b> Safer trade should be translated into spanish as "comercio mas seguro" <i>Category : TRANSLATION</i>
136	44	<i>b.</i> <i>promover</i> los beneficios que comporta para la facilitación del comercio en mejores condiciones de inocuidad el evitar que los bienes intercambiados y los medios de transporte, contenedores y otros objetos que los transportan o acompañan dentro de un país y entre países se contaminen con materiales de riesgo fitosanitario, como suelo, materiales vegetales y organismos de plagas;	C	<b>Mexico</b> Safer trade should be translated into spanish as "comercio mas seguro" <i>Category : TECHNICAL</i>
137	45	<i>c.</i> <i>establish appropriate regulatory tools in the exporting country to manage regulated articles being exported that may harbour plant or environmental pests regulated by the importing country.</i> <i>d.</i> <i>gather</i> scientific information on the risks of contaminating pests moving in trade	P	<b>PPPO</b> We propose to add a new bullet point here. In contrast with NPPOs ability to regulate plant pests and traditional trade, an issue with regulating contaminating pests is that some exporting NPPOs may not have the necessary legislative or regulatory tools to regulate contaminating pests required by the importing NPPOs. Having appropriate legislative tools will enable NPPOs to implement the recommendation. <i>Category : SUBSTANTIVE</i>
138	45	<i>c.</i> <i>establish appropriate regulatory tools are available in the exporting country to manage regulated articles being exported that may harbour plant or environmental pests regulated by the importing country.</i> <i>d.</i> <i>gather</i> scientific information on the risks of contaminating pests moving in trade	P	<b>Korea, Republic of</b> Add a sentence that appropriate legislative tools will enable NPPOs to implement the recommendation. <i>Category : SUBSTANTIVE</i>
139	45	<i>c.</i> <i>gather</i> scientific information on the risks of contaminating pests moving in trade.	P	<b>Australia</b> For consistency with other dot points <i>Category : EDITORIAL</i>
140	45	<i>c.</i> <del>gather</del> <del>gathering scientific</del> information on <del>the risks of</del> contaminating pests moving in <del>trade</del> <u>commerce or by other means</u>	P	<b>United States of America</b> this is more appropriate language - all information needs to be gathered, not only scientific and then the risks are identified; also generalization on which pathways to gather information <i>Category : TECHNICAL</i>
141	46	<i>d</i> <i>conduct</i> pest risk analyses based on scientific information to <del>determine, as appropriate, identify</del> risk-based <del>actions in sufficient consultation with industries</del> <u>phytosanitary measures allowing</u> to reduce the <del>risks</del> <u>pest risk</u>	P	<b>European Union</b> More appropriate wording. <i>Category : TECHNICAL</i>
142	46	<i>d</i> <i>conduct</i> pest risk analyses based on scientific information to determine, as appropriate, risk-based actions in sufficient consultation with industries to reduce the risks.	P	<b>Australia</b> For consistency with other dot points <i>Category : EDITORIAL</i>

143	46	<i>d</i> <del>conduct</del> pest risk analyses based on scientific information to <del>determine, as appropriate, identify</del> risk-based <del>actions in sufficient consultation with industries</del> <del>phytosanitary measures allowing</del> to reduce the <del>risks</del> pest risk	P	<b>EPPO</b> More appropriate wording. Category : TECHNICAL
144	46	<i>d</i> <del>conduct</del> <del>conducting pathway</del> pest risk_ analyses <del>based on scientific information</del> to determine, as appropriate, risk-based actions in <del>sufficient</del> consultation with <del>industries to reduce the risks</del> <u>various stakeholders</u>	P	<b>United States of America</b> PRA is usually done for q-pests or RNQP, contaminating pests are assessed via pathway analyses. Category : TECHNICAL
145	47	<i>e.</i> <del>record and share</del> information about the experiences, case studies and effective <del>measures, measures</del> implemented by contracting parties in order to prevent the spread of contaminating pests, including effective practices and pest interception data.	P	<b>European Union</b> A comma suggested to be deleted for easier reading. Category : EDITORIAL
146	47	<i>e.</i> <del>record and share</del> information about the <del>experiences</del> <u>experiences (including interceptions and detections)</u> , case studies and effective measures, implemented by contracting parties in order to prevent the spread of contaminating pests, including effective practices and pest interception data.	P	<b>Australia</b> More specific wording to incorporate pest interception and detections as specific information on these may assist other contracting parties manage various relevant/affected pathways. Category : EDITORIAL
147	47	<i>e.</i> <del>record and share</del> information about the experiences, case studies and effective <del>measures, measures</del> implemented by contracting parties in order to prevent the spread of contaminating pests, including effective practices and pest interception data.	P	<b>EPPO</b> A comma suggested to be deleted for easier reading. Category : EDITORIAL
148	47	<del>dbis Ensuring that phytosanitary measures to prevent the spread of contaminating pests are consistent with the principles of ISPM 1</del> <i>e.</i> <del>record</del> <del>recording and share</del> <u>sharing</u> information about the experiences, case studies and effective measures, implemented by contracting <del>parties in order to prevent the spread of contaminating pests, including effective practices and pest interception data.</del> <u>parties.</u>	P	<b>United States of America</b> dbis para is a new recommendation. next bullet is also simplified. Category : TECHNICAL
149	48	<i>f.</i> <del>agree</del> actions between countries to reduce exposure of regulated and unregulated <del>goods and places</del> <u>articles</u> to contaminating pests, with supporting legislation as necessary.	P	<b>European Union</b> Please see the comment made for the title. Category : TECHNICAL
150	48	<i>f.</i> <del>agree</del> <u>on</u> actions between countries to reduce exposure of regulated and unregulated goods and places to contaminating pests, with supporting legislation as necessary.	P	<b>PPPO</b> Category : EDITORIAL
151	48	<i>f.</i> <del>agree</del> actions between countries to reduce exposure of regulated <u>articles</u> and unregulated goods and places to contaminating pests, with supporting legislation as necessary.	P	<b>COSAVE</b> For consistency with the title of the recommendation Category : TECHNICAL

152	48	<i>f.</i> agree actions between countries to reduce exposure of regulated and unregulated <del>goods and places</del> <u>articles</u> to contaminating pests, with supporting legislation as necessary.	P	<b>EPPO</b> Please see the comment made for the title. <i>Category : TECHNICAL</i>
153	48	<del><i>f.</i> agree actions between countries to reduce exposure of regulated and unregulated goods and places to contaminating pests, with supporting legislation as necessary.</del>	P	<b>United States of America</b> The meaning is not clear and is redundant as it is already covered in the previous bullet. <i>Category : TECHNICAL</i>
154	48	<i>f.</i> agree <u>on</u> actions between countries to reduce exposure of regulated and unregulated goods and places to contaminating pests, with supporting legislation as necessary.	P	<b>Caribbean Agricultural Health and Food Safety Agency</b> <i>Category : EDITORIAL</i>
155	48	<i>f.</i> agree actions between countries to reduce exposure of regulated <u>articles</u> and unregulated goods and places to contaminating pests, with supporting legislation as necessary.	P	<b>Uruguay</b> For consistency with the title of the recommendation <i>Category : TECHNICAL</i>
156	49	<i>g.</i> build <del>capacity to detect and respond to contaminating pests and share tools and technologies to support this.</del> <u>capacity to detect and manage contaminating pests and share tools and technologies to support this.</u>	P	<b>European Union</b> 1) "capacity" not in italics. 2) Better wording. <i>Category : EDITORIAL</i>
157	49	<i>g.</i> build capacity to detect and respond to contaminating <del>pests-pests,</del> and <u>subsequently</u> share tools and technologies to support this.	P	<b>PPPO</b> <i>Category : EDITORIAL</i>
158	49	<i>g.</i> build <del>capacity</del> <u>capacity</u> to detect and <del>respond</del> <u>manage</u> to contaminating pests and share tools and technologies to support this.	P	<b>EPPO</b> 1) "capacity" not in italics. 2) Better wording. <i>Category : EDITORIAL</i>
159	49	<i>g.</i> <del>build capacity supporting the development to detect and respond to contaminating pests and share of</del> tools and <del>technologies to support this.</del> <u>technologies to detect and respond to contaminating pests.</u>	P	<b>United States of America</b> more clarity <i>Category : EDITORIAL</i>
160	50	<i>h.</i> <del>collaborate</del> <u>collaborating</u> with importing and exporting <del>industries and industries,</del> logistics operators <u>and other stakeholders</u> to develop commercial practices to reduce the risk of spreading contaminating <del>pests associated with tradepests.</del>	P	<b>United States of America</b> more clarity <i>Category : EDITORIAL</i>
161	51	<i>i.</i> communicate with relevant international organizations through <u>IPPC, NPPO-IPPC</u> and RPPO secretariats <u>and NPPOs</u> about the risk of pest movement on regulated and unregulated goods and places, conveyances and packaging.	P	<b>European Union</b> More appropriate wording. <i>Category : EDITORIAL</i>
162	51	<i>i.</i> communicate with relevant international organizations through IPPC, NPPO and RPPO secretariats about the risk of pest movement on regulated <u>articles</u> and unregulated goods and places, conveyances and packaging.	P	<b>COSAVE</b> For consistency with the title of the recommendation <i>Category : TECHNICAL</i>

163	51	<i>i. communicate</i> with relevant international organizations through <b>IPPC, NPPO-IPPC</b> and RPPO secretariats <b>and NPPOs</b> about the risk of pest movement on regulated and unregulated goods and places, conveyances and packaging.	P	<b>EPPO</b> More appropriate wording. <i>Category : EDITORIAL</i>
164	51	<i>i. <del>communicate</del> exchanging information</i> with relevant international organizations through <b>IPPC NPPOs, NPPO and RPPO secretariats</b> <del>secretariats, and the IPPC Secretariat</del> about the risk of <del>pest movement on contaminating pests regulated and unregulated goods and places, conveyances and packaging.</del>	P	<b>United States of America</b> to clarify - NPPOs don't have Secretariats. <i>Category : EDITORIAL</i>
165	51	<i>i. communicate</i> with relevant international organizations through IPPC, NPPO and RPPO secretariats about the risk of pest movement on regulated <b>articles</b> and unregulated goods and places, conveyances and packaging.	P	<b>Uruguay</b> For consistency with the title of the recommendation <i>Category : TECHNICAL</i>
166	57	<del>Phytosanitary-Pest</del> risks in plants and plant products should be managed on the basis of pest risk analysis (PRA). The focus of the PRA is generally on pests associated with the commercially grown and traded commodity, where measures are applied by the importing country to reduce the pest risks to an acceptable level agreed through bilateral negotiation with the exporting country. These measures may be applied prior to export or on arrival in the importing country. The PRA rarely considers pest risks associated with the processes of moving the commodity in trade, or pathways outside of commercial trade.	P	<b>COSAVE</b> For consistency <i>Category : TECHNICAL</i>
167	57	<del>Phytosanitary-Pest</del> risks in plants and plant products should be managed on the basis of pest risk analysis (PRA). The focus of the PRA is generally on pests associated with the commercially grown and traded commodity, where measures are applied by the importing country to reduce the pest risks to an acceptable level agreed through bilateral negotiation with the exporting country. These measures may be applied prior to export or on arrival in the importing country. The PRA rarely considers pest risks associated with the processes of moving the commodity in trade, or pathways outside of commercial trade.	P	<b>Uruguay</b> For consistency <i>Category : TECHNICAL</i>
168	58	The International Plant Protection Convention (IPPC) clearly directs actions to prevent the international movement of pests through more than the management of <del>phytosanitary-pest</del> risks on plants and plant products. Contracting parties, through the Commission on Phytosanitary Measures (CPM), have recognised this with the adoption of international standards providing guidance on, for example, the <i>International movement of used vehicles, machinery and equipment</i> (ISPM 41), or with actions to reduce the spread of pests on sea containers through the work of the Sea Container Task Force (SCTF). However, the awareness of the scope of the Convention and the risks that pests associated with storage places, packaging,	P	<b>COSAVE</b> For consistency <i>Category : TECHNICAL</i>

		conveyances, containers, soil and any other organism, object or material capable of harbouring or spreading plant pests pose to global plant health remains low. A CPM recommendation would help to raise the profile of these risks and provide a stronger focus for addressing them.		
169	58	The International Plant Protection Convention (IPPC) clearly directs actions to prevent the international movement of pests through more than the management of <a href="#">phytosanitary-pest</a> risks on plants and plant products. Contracting parties, through the Commission on Phytosanitary Measures (CPM), have recognised this with the adoption of international standards providing guidance on, for example, the <i>International movement of used vehicles, machinery and equipment</i> (ISPM 41), or with actions to reduce the spread of pests on sea containers through the work of the Sea Container Task Force (SCTF). However, the awareness of the scope of the Convention and the risks that pests associated with storage places, packaging, conveyances, containers, soil and any other organism, object or material capable of harbouring or spreading plant pests pose to global plant health remains low. A CPM recommendation would help to raise the profile of these risks and provide a stronger focus for addressing them.	P	<b>Uruguay</b> For consistency Category : <i>TECHNICAL</i>
170	59	Recent experience in Australia indicates an increase in the number and type of phytosanitary and other risks associated with containers, conveyances and <a href="#">other</a> pathways, and with goods that are not regulated plants or plant products.	P	<b>Canada</b> Conveyances and containers are pathways Category : <i>TECHNICAL</i>
171	59	Recent experience in Australia indicates an increase in the number and type of <a href="#">phytosanitary-pest risk</a> and other risks associated with containers, conveyances and pathways, and with goods that are not regulated plants or plant products.	P	<b>COSAVE</b> Glossary term Category : <i>TECHNICAL</i>
172	59	Recent experience in Australia indicates an increase in the number and type of <a href="#">phytosanitary-pest risk</a> and other risks associated with containers, conveyances and pathways, and with goods that are not regulated plants or plant products.	P	<b>Uruguay</b> Glossary term Category : <i>TECHNICAL</i>
173	61	It is logical to assume that the same pests are moving between all countries by the same means, and that the global spread of pests, including contaminating pests, will continue. This poses a significant risk to production and natural ecosystems. The rapid inter- and trans-continental spread of the brown marmorated stink bug (BMSB), giant African land snail ( <del>(GAS)</del> -(GAS), <a href="#">khapra beetle</a> , and the Asian gypsy moth (AGM) highlight this risk and the significant impacts that can result from the establishment of serious pests in an area.	P	<b>Australia</b> Khapra beetle is a significant plant pest posing significant risk to production particularly to the grains industry. Khapra's survival tactics (diapause), preference for storage environments and the physical characteristics of shipping containers (including the current lack of effective hygiene processes) used to move host material, are highly suited to the international spread of Khapra beetle. Category : <i>TECHNICAL</i>
174	61	It is logical to assume that the same pests are moving between all countries by the same means, and that the global spread of pests, including contaminating pests,	P	<b>China</b> The common name in English of this animal is "giant African snail"



		will continue. This poses a significant risk to production and natural ecosystems. The rapid inter- and trans-continental spread of the brown marmorated stink bug (BMSB), giant African <del>land</del> -snail (GAS) and the Asian gypsy moth (AGM) highlight this risk and the significant impacts that can result from the establishment of serious pests in an area.		<i>Category : SUBSTANTIVE</i>
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