

2021 SECOND CONSULTATION

1 July – 30 September 2021

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

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.
Singapore	Singapore is supportive of draft ISPM with attached comments.
South Africa	The NPPOZA is in agreement with this draft and has no further comments
Trinidad and Tobago	In agreement with comments made in the CAHFSA Group
Venezuela	No tenemos opinión alguna sobre la norma.

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

FAO sequential number	Para	Text	T	Comment
1	G	(General Comment)	C	Mexico Mexico supports OIRSA's comments <i>Category : TECHNICAL</i>
2	G	(General Comment)	C	Argentina We support the comments submitted by COSAVE <i>Category : SUBSTANTIVE</i>
3	G	(General Comment)	C	Trinidad and Tobago In agreement with comments made in the CAHFSA Group <i>Category : SUBSTANTIVE</i>
4	G	(General Comment)	C	Nepal Nepal has no comments on DRAFT ISPM: Commodity-based standards for phytosanitary measures <i>Category : EDITORIAL</i>
5	G	(General Comment)	C	Canada Canada supports the draft Commodity-based standards for phytosanitary measures. A few comments are submitted for consideration <i>Category : SUBSTANTIVE</i>
6	G	(General Comment)	C	Switzerland Switzerland would like to formally endorse the EPPO comments submitted via the IPPC Online Comment System <i>Category : TECHNICAL</i>

7	G	(General Comment)	C	Jamaica Jamaica supports the comments from the IPPC Caribbean Regional Workshop. <i>Category : SUBSTANTIVE</i>
8	G	(General Comment)	C	Colombia No se tienen comentarios adicionales sobre el particular. Siempre y cuando todo este basado en los análisis de riesgo de plagas. <i>Category : SUBSTANTIVE</i>
9	G	(General Comment)	C	Barbados This is a good first step in cataloguing available and proven phytosanitary measures that can be used in mitigating the risk of pest infestation/infection of a commodity. The cost of the measure will be of vital importance particularly for SIDS and therefore careful analysis must be the order of the day. <i>Category : SUBSTANTIVE</i>
10	G	(General Comment)	C	Congo i agree with the draft ISPM, i have no comments to add <i>Category : SUBSTANTIVE</i>
11	G	(General Comment)	C	Malawi We support draft ISPM: commodity based standards phytosanitary measures (2019-008) <i>Category : SUBSTANTIVE</i>
12	G	(General Comment)	C	United States of America This document seemingly will draw on *existing* measures that are already in use in trade, AND the language says "should be considered" in developing import requirements. As a result, this standard will effectively PREVENT the development of new least trade restrictive measures. This basically will hurtle the phytosanitary community back 30 years in making progress towards more refined and appropriate measures based on actual risk. We KNOW that many of our measures are overkill but they are nonetheless widely used in trade without a lot of question. SO – this standard will basically codify the use of MORE-trade restrictive measures that are not consistent with risk. Seems like that is opposite of the intent of ISPM 1, the Convention itself and the SPS agreement. <i>Category : SUBSTANTIVE</i>
13	G	(General Comment)	C	United States of America 1. The ISPM (or any ISPM) should not be trying to convince CPs about the benefits. Particularly, when we only can consider here the "supposed" benefits. This info doesn't provide any useful info. 2. Having including measures that are not technically justified is of questionable value for harmonization purposes that ISPMs are intended to serve; historically used measures often don't have technical justification. 3. The above approach will impede any further development of SPS based risk management. 4. If countries are not to use these commodity standards,

				<p>e.g., based on the above concerns on technical justification of measures, what is the point of harmonization?</p> <p>5. Were there any discussions with OIE and Codex about their standards?</p> <p>6. Another likely issue is looking at pests associated with the plant rather than commodity, so these pests may never end up in the pathway but CPs might require measures against these pests.</p> <p>7. There is little substance with the requirements in such a broad approach to ISPMs.</p> <p>8. Treatments should include those that are more environment friendly.</p> <p>9. The details how this concept will be implemented is a challenge.</p> <p>10. Ideally, criteria for level of the efficacy of measures should be developed the first.</p> <p><i>Category : SUBSTANTIVE</i></p>
14	G	(General Comment)	C	<p>Caribbean Agricultural Health and Food Safety Agency T&T endorses Commodity-based standards for phytosanitary measures - To support the development of phytosanitary import requirements that facilitate safe trade</p> <p><i>Category : SUBSTANTIVE</i></p>
15	G	(General Comment)	C	<p>Caribbean Agricultural Health and Food Safety Agency We support the document and we have no issues with the adoption of the standard.</p> <p><i>Category : SUBSTANTIVE</i></p>
16	G	(General Comment)	C	<p>Caribbean Agricultural Health and Food Safety Agency Guyana has no objection to this draft standard.</p> <p><i>Category : SUBSTANTIVE</i></p>
17	G	(General Comment)	C	<p>Caribbean Agricultural Health and Food Safety Agency A relevant standard that will be useful to developing countries that do not have a structured Pest Risk Analysis mechanism.</p> <p><i>Category : SUBSTANTIVE</i></p>
18	G	(General Comment)	C	<p>Caribbean Agricultural Health and Food Safety Agency Okay with the amendments to the draft.</p> <p><i>Category : TECHNICAL</i></p>
19	G	(General Comment)	C	<p>Caribbean Agricultural Health and Food Safety Agency This is a good first step in cataloguing available and proven phytosanitary measures that can be used in mitigating the risk of pest infestation/infection of a commodity. The cost of the measure will be of vital importance particularly for SIDS and therefore careful analysis must be the order of the day.</p> <p><i>Category : SUBSTANTIVE</i></p>
20	G	(General Comment)	C	<p>Caribbean Agricultural Health and Food Safety Agency The Bahamas supports the adoption of commodity based standards for phytosanitary measures.</p> <p><i>Category : SUBSTANTIVE</i></p>

21	G	(General Comment)	C	Thailand Thailand has no objection on the Draft ISPM: Commodity-based standards for phytosanitary measures. <i>Category : SUBSTANTIVE</i>
22	G	(General Comment)	C	Saint Vincent and The Grenadines Okay with the proposed amendments. <i>Category : TECHNICAL</i>
23	1	DRAFT ISPM: Commodity-based <u>Commodity-specific</u> standards for phytosanitary measures (2019-008)	P	PPPO Consider changing the title of this standard to commodity-specific standards to align better with wording in the text regarding commodity standards being specific to a particular commodity to avoid any potential misunderstanding or ambiguity. We also note that commodity is defined not just cover plants and plant products, but also other articles being traded. we are seeking clarification if commodity based ISPMs only deal with plant and plant product commodities, not other non-plant articles. if so it would be good to make it clear that this standard is about utilising Phytosanitary measures for facilitating safe trade in specific plant and plant product commodities. <i>Category : EDITORIAL</i>
24	1	DRAFT ISPM: Commodity-based <u>Commodity-specific</u> standards for phytosanitary measures (2019-008)	P	European Union The Technical Panel for the Glossary (TPG) thought that the term "commodity-based standards" should not be used, because it sounds as though the standard is drawn from the commodity, and noted that the term "commodity-specific standards" is used in the IPPC Strategic Framework 2020-2030 (please see paragraph 27 of the report of the TPG virtual meeting of 15-16 December 2020 and 18-22 January 2021). This change is also suggested for consistency within the standard, please see: - paragraph 44: "Each commodity standard is specific to a particular commodity and intended use..." - paragraph 49: "The IPPC Strategic Framework 2020-2030 (IPPC Secretariat, 2021) includes the development of ISPMs for specific commodities...". Please note that only the title and paragraph 35 need to be modified if this change is accepted. <i>Category : TECHNICAL</i>
25	1	DRAFT ISPM: Commodity-based <u>Commodity-specific</u> standards for phytosanitary measures (2019-008)	P	Korea, Republic of Propose changing the title of this standard to commodity-specific standards in order to clarify that this standard is about utilising Phytosanitary measures for facilitating safe trade in specific plant and plant product commodities. <i>Category : SUBSTANTIVE</i>
26	1	DRAFT ISPM: Commodity-based <u>Commodity-specific</u> standards for phytosanitary measures (2019-008)	P	EPPO The Technical Panel for the Glossary (TPG) thought that the term "commodity-based standards" should not be used, because it

				<p>sounds as though the standard is drawn from the commodity, and noted that the term "commodity-specific standards" is used in the IPPC Strategic Framework 2020-2030 (please see paragraph 27 of the report of the TPG virtual meeting of 15-16 December 2020 and 18-22 January 2021).</p> <p>This change is also suggested for consistency within the standard, please see:</p> <ul style="list-style-type: none"> - paragraph 44: "Each commodity standard is specific to a particular commodity and intended use..." - paragraph 49: "The IPPC Strategic Framework 2020-2030 (IPPC Secretariat, 2021) includes the development of ISPMs for specific commodities..." <p>Please note that only the title and paragraph 35 need to be modified if this change is accepted.</p> <p><i>Category : TECHNICAL</i></p>
27	1	DRAFT ISPM: Commodity-based Commodity-specific standards for phytosanitary measures (2019-008)	P	<p>Singapore</p> <p>Propose to change from "based" to "specific" to be consistent in this document. Commodity is defined as not just to cover plants and plant products but also other articles being traded. Therefore, drafting this standard should bear in mind of what "commodity" covers.</p> <p><i>Category : SUBSTANTIVE</i></p>
28	12	2018-12 CPM Bureau recommended adding to the work programme.	C	<p>IPPC Regional Workshop Africa</p> <p>Commodity as defined in under ISPM 5 is any plant and plant product or other article being moved for trade and other purposes. Traded commodities, and commodity standards for that matter, would therefore be in their hundreds. How would these commodity standards be accommodated in an annex of a commodity standards.</p> <p><i>Category : SUBSTANTIVE</i></p>
29	18	2020-06 CPM Bureau added topic <i>Commodity-based standards for phytosanitary measures to work programme</i> to work programme, on behalf of CPM, with priority 1 (subsequently confirmed by CPM-15 (2021)).	P	<p>European Union</p> <p>Duplicated phrase.</p> <p><i>Category : EDITORIAL</i></p>
30	18	2020-06 CPM Bureau added topic <i>Commodity-based standards for phytosanitary measures to work programme</i> to work programme, on behalf of CPM, with priority 1 (subsequently confirmed by CPM-15 (2021)).	P	<p>EPPO</p> <p>Duplicated phrase.</p> <p><i>Category : EDITORIAL</i></p>
31	22	2019-07 Focus Group on Commodity and Pathway Standards; 2020-09 SC Samuel BISHOP (GB, Lead Steward)	P	<p>European Union</p> <p>Two typos: a parenthesis deleted and two distinct paragraphs.</p> <p><i>Category : EDITORIAL</i></p>
32	22	2019-07 Focus Group on Commodity and Pathway Standards; 2020-09 SC Samuel BISHOP (GB, Lead Steward)	P	<p>EPPO</p> <p>Two typos: a parenthesis deleted and two distinct paragraphs.</p> <p><i>Category : EDITORIAL</i></p>
Scope				
33	35	This standard provides guidance on the purpose, use, content, publication and review of commodity-based commodity-specific standards for plant and plant	P	<p>PPPO</p> <p>this change will only be appropriate if it is agreed that the title of the ISPM is changed.</p>

		<u>products</u> (hereafter referred to as “commodity standards”) for phytosanitary measures. Such standards, presented as annexes to this overarching concept standard, apply to commodities being moved in international trade and identify pests associated with these commodities and options for relevant phytosanitary measures to be considered by contracting parties. The pests and measures identified are not intended to be exhaustive.		The definition of commodity includes a type of plant, plant product or other article moved in trade (ISPM 5). We assume it is unlikely that annexes will include articles such as tiles or tyres and therefore it would be appropriate to specify that commodity standards are only for plant and plant products. <i>Category : TECHNICAL</i>
34	35	This standard provides guidance on the purpose, use, content, publication and review of <u>commodity-based-commodity-specific</u> standards (hereafter referred to as “commodity standards”) for phytosanitary measures. Such standards, presented as annexes to this overarching concept standard, apply to commodities being moved in international trade and identify pests associated with these commodities and options for relevant phytosanitary measures to be considered by contracting parties. The pests and measures identified are not intended to be exhaustive.	P	European Union Please see the comment made for the same change in the title. <i>Category : TECHNICAL</i>
35	35	This standard provides guidance on the purpose, use, content, publication and review of commodity-based standards (hereafter referred to as “commodity standards”) for phytosanitary measures. Such standards, presented as annexes to this overarching concept standard, apply to commodities being moved in international trade and identify pests associated with these commodities and options for relevant phytosanitary measures to be considered by contracting parties. The <u>lists of</u> pests and <u>options for phytosanitary</u> measures identified are not intended to be <u>exhaustive</u> <u>exhaustive and are subject to review and amendment</u> .	P	European Union Precisions given. <i>Category : TECHNICAL</i>
36	35	This standard provides guidance on the purpose, use, content, publication and review of <u>commodity-based-commodity-specific</u> standards (hereafter referred to as “commodity standards”) for phytosanitary measures. Such standards, presented as annexes to this overarching concept standard, apply to commodities being moved in international trade and identify pests associated with these commodities and options for relevant phytosanitary measures to be considered by contracting parties. The pests and measures identified are not intended to be exhaustive.	P	Korea, Republic of For the consistency with the change of title. <i>Category : SUBSTANTIVE</i>
37	35	This standard provides guidance on the purpose, use, content, publication and review of <u>commodity-based-commodity-specific</u> standards (hereafter referred to as “commodity standards”) for phytosanitary measures. Such standards, presented as annexes to this overarching concept standard, apply to commodities being moved in international trade and identify pests associated with these commodities and options for relevant phytosanitary measures to be considered by contracting parties. The pests and measures identified are not intended to be exhaustive.	P	EPPO Please see the comment made for the same change in the title. <i>Category : TECHNICAL</i>
38	35	This standard provides guidance on the purpose, use, content, publication and review of commodity-based standards (hereafter referred to as “commodity standards”) for phytosanitary measures. Such standards, presented as annexes to	P	EPPO Precisions given. <i>Category : EDITORIAL</i>

		this overarching concept standard, apply to commodities being moved in international trade and identify pests associated with these commodities and options for relevant phytosanitary measures to be considered by contracting parties. The <u>lists of pests and options for phytosanitary measures identified are not intended to be exhaustive and are subject to review and amendment.</u>		
39	35	This standard provides guidance on the purpose, use, content, publication and review of commodity-based standards (hereafter referred to as “commodity standards”) for phytosanitary measures. Such standards, <u>presented as annexes to this overarching concept standard</u> , apply to commodities being moved in international trade and identify pests associated with these commodities and options for relevant phytosanitary measures to be considered by contracting parties. The pests and measures identified are not intended to be exhaustive.	C	United States of America This is repeated 5+ times in the draft? Is this needed multiple times throughout the document? Suggest to just have in the scope, and maybe in the Requirements chapeau. <i>Category : TECHNICAL</i>
40	35	This standard provides guidance on the purpose, use, content, publication and review of <u>commodity-based-commodity-specific</u> standards (hereafter referred to as “commodity standards”) for phytosanitary measures. Such standards, presented as annexes to this overarching concept standard, apply to commodities being moved in international trade and identify pests associated with these commodities and options for relevant phytosanitary measures to be considered by contracting parties. The pests and measures identified are not intended to be exhaustive.	P	Singapore Propose to amend "based" to "specific". The definition of commodity includes a type of plant, plant product or other articles moved in trade (ISPM 5). It may be more appropriate to specify that commodity standards are only for plants and plant products to guide the annexes from this overarching document for clarity. <i>Category : SUBSTANTIVE</i>
41	44	Contracting parties should consider available commodity standards when developing phytosanitary import requirements. Each commodity standard is specific to a particular commodity and intended use, and contains a list of pests and corresponding options for phytosanitary measures to manage them. The list of pests includes pests that may infest the commodity being traded and that may pose a risk to the importing country when the commodity is used for the intended use specified in the commodity standard. The options for phytosanitary measures listed are those that satisfy minimum criteria for inclusion in the standard; and are categorized according to confidence in the measures. The lists of pests and options for phytosanitary measures are not intended to be exhaustive and are subject to review and amendment.	P	Japan The definition of confidence is quite unclear, so it is difficult to categorize the measures based on confidence. Please see the comments for section 4 in details. <i>Category : SUBSTANTIVE</i>
42	44	<u>Contracting parties should consider available commodity standards when developing phytosanitary import requirements. Each commodity standard is specific to a particular commodity and intended use, and contains a list of pests and corresponding options for phytosanitary measures to manage them. The list of pests includes those that infest the traded commodity and may pose a risk to an importing country when the commodity is used as specified in the standard. The options for phytosanitary measures listed are those that satisfy minimum criteria for inclusion in the standard</u> Contracting parties should consider available	P	PPPO Suggest deleting reference to ‘confidence in measures’ as per a later proposal by New Zealand to delete section 3. The rationale for deleting this is that if a measure meets a minimum criterion then there is a high level of confidence in the measure’s ability to manage a pest. Measures that have a lower level of confidence should not be included in annexes. simplify the long sentence <i>Category : EDITORIAL</i>

		commodity standards when developing phytosanitary import requirements. Each commodity standard is specific to a particular commodity and intended use, and contains a list of pests and corresponding options for phytosanitary measures to manage them. The list of pests includes pests that may infest the commodity being traded and that may pose a risk to the importing country when the commodity is used for the intended use specified in the commodity standard. The options for phytosanitary measures listed are those that satisfy minimum criteria for inclusion in the standard,¹ and are categorized according to confidence in the measures. The lists of pests and options for phytosanitary measures are not intended to be exhaustive and are subject to review and amendment.		
43	44	Contracting parties should consider available commodity standards when developing phytosanitary import requirements. Each commodity standard is specific to a particular commodity and intended use, and contains a list of pests and corresponding options for phytosanitary measures to manage them. The list of pests includes pests that may infest the commodity being traded and that may pose a risk to the importing country when the commodity is used for the intended use specified in the commodity standard. The options for phytosanitary measures listed are those that satisfy minimum criteria for inclusion in the standard, ¹ and they are categorized according to confidence in the measures. The lists of pests and options for phytosanitary measures are not intended to be exhaustive and are subject to review and amendment.	P	European Union For more clarity. Category : <i>EDITORIAL</i>
44	44	Contracting parties should consider available commodity standards when developing phytosanitary import requirements. Each commodity standard is specific to a particular commodity and intended use, and contains a list of pests and corresponding options for phytosanitary measures to manage them their pest risk . The list of pests includes pests that may infest the commodity being traded and that may pose a risk to the importing country when the commodity is used for the intended use specified in the commodity standard. The options for phytosanitary measures listed are those that satisfy minimum criteria for inclusion in the standard, ¹ and are categorized according to confidence in the measures. The lists of pests and options for phytosanitary measures are not intended to be exhaustive and are subject to review and amendment.	P	COSAVE Phytosanitary measures are applied to manage pest risk and not to manage pests Category : <i>TECHNICAL</i>
45	44	Contracting parties should consider available commodity standards when developing phytosanitary import requirements. Each commodity standard is specific to a particular commodity and intended use, and contains a list of pests and corresponding options for phytosanitary measures to manage them. The list of pests includes pests that may infest the commodity being traded and that may pose a risk to the importing country when the commodity is used for the intended use specified	P	EPPO For more clarity. Category : <i>EDITORIAL</i>

		in the commodity standard. The options for phytosanitary measures listed are those that satisfy minimum criteria for inclusion in the standard, ¹ and <u>they</u> are categorized according to confidence in the measures. The lists of pests and options for phytosanitary measures are not intended to be exhaustive and are subject to review and amendment.		
46	44	Contracting parties should consider available commodity standards when developing phytosanitary import requirements. Each commodity standard is specific to a particular commodity and intended use, and contains a list of pests and corresponding options for phytosanitary measures to manage them <u>their pest risk</u> . The list of pests includes pests that may infest the commodity being traded and that may pose a risk to the importing country when the commodity is used for the intended use specified in the commodity standard. The options for phytosanitary measures listed are those that satisfy minimum criteria for inclusion in the standard, ¹ and are categorized according to confidence in the measures. The lists of pests and options for phytosanitary measures are not intended to be exhaustive and are subject to review and amendment.	P	Uruguay Phytosanitary measures are applied to manage pest risk and not to manage pests Category : <i>TECHNICAL</i>
47	45	The inclusion of a measure in the annexes to this ISPM does not create any obligation for a contracting party to approve it, register it or adopt it for use in its territory.	P	Korea, Republic of Delete this sentence because conflict with outline. Category : <i>EDITORIAL</i>
48	45	The inclusion of a measure in the annexes to this ISPM does not create any obligation for a contracting party to approve it, register it or adopt it for use in its territory.	C	China Put this sentence at the end of the paragraph [44]. This note should be an important principle of the standard and should be placed in the text. Category : <i>EDITORIAL</i>
Background				
49	47	BACKGROUND	C	United States of America Propose to delete this paragraph and replace with a paragraph that explains the true problem we are trying to solve/ harmonize? This paragraph doesn't really say anything. Paragraph 50 alludes to the problem, but could be strengthened by identifying the problem. For example, refer to how this is written in ISPM 28; it quotes the IPPC, states facts, is succinct, etc. Category : <i>SUBSTANTIVE</i>
50	48	The IPPC aims at protecting plants and plant products against pests without causing unjustified impediments to trade. Trade supports economic growth and development, helping to reduce poverty around the world. Significant advances in the facilitation of safe trade can be made through the development and adoption of international commodity standards for phytosanitary measures.	P	PPPO This sentence isn't necessary as it is repeated in specific detail in paragraphs 51-57. Category : <i>EDITORIAL</i>
51	48	The IPPC aims at protecting plants to prevent the introduction and plant products against spread of pests without causing unjustified impediments to trade. Trade	P	European Union The aim of the IPPC is not to protect plants against pests but

		supports economic growth and development, helping to reduce poverty around the world. Significant advances in the facilitation of safe trade can be made through the development and adoption of international commodity standards for phytosanitary measures.		rather prevent the introduction and spread of pests - it also connects better to trade and spread of pests. <i>Category : TECHNICAL</i>
52	48	The IPPC aims at protecting plants and plant products against pests without causing unjustified impediments to trade. Trade supports economic growth and development, helping to reduce poverty around the world. Significant advances in the facilitation of safe trade can be made through the development and adoption of international commodity standards for phytosanitary measures. <u>Safe trade supports economic growth and development, helping to reduce poverty around the world.</u>	P	European Union For a better logical sequence. 'Safe' has also been added for precision. <i>Category : EDITORIAL</i>
53	48	The IPPC aims at protecting to prevent the introduction and spread of plants and plant products against pests without causing unjustified impediments to trade. Trade supports economic growth and development, helping to reduce poverty around the world. Significant advances in the facilitation of safe trade can be made through the development and adoption of international commodity standards for phytosanitary measures. <u>Safe trade supports economic growth and development, helping to reduce poverty around the world.</u>	P	EPPO 1) The aim of the IPPC is not to protect plants against pests but rather prevent the introduction and spread of pests - it also connects better to trade and spread of pests. 2) For a better logical sequence. 'Safe' has also been added for precision. <i>Category : TECHNICAL</i>
54	49	The IPPC Strategic Framework 2020–2030 (IPPC Secretariat, 2021) includes the development of ISPMs for specific commodities, with, as required, with accompanying diagnostic protocols, phytosanitary treatments and guidance to support implementation, simplify trade and expedite market-access negotiations, <u>when appropriate.</u>	P	European Union Better wording. <i>Category : EDITORIAL</i>
55	49	The IPPC Strategic Framework 2020–2030 (IPPC Secretariat, 2021) includes the development of ISPMs for specific commodities, with, as required, accompanying diagnostic protocols, phytosanitary treatments and guidance to support implementation, simplify trade and expedite market-access negotiations.	P	COSAVE For consistency with other ISPMs. References are listed in "References" section <i>Category : TECHNICAL</i>
56	49	<u>The IPPC Strategic Framework 2020–2030 (IPPC Secretariat, 2021) includes the development of ISPMs for specific commodities, with accompanying diagnostic protocols, phytosanitary treatments and guidance to support implementation, simplify trade and expedite market-access negotiations, when appropriate.</u> The IPPC Strategic Framework 2020–2030 (IPPC Secretariat, 2021) includes the development of ISPMs for specific commodities, with, as required, accompanying diagnostic protocols, phytosanitary treatments and guidance to support implementation, simplify trade and expedite market-access negotiations.	P	EPPO Better wording. <i>Category : EDITORIAL</i>
57	49	The <u>IPPC Strategic Framework 2020–2030</u> (IPPC Secretariat, 2021) includes the development of ISPMs for specific commodities, with, as required, accompanying	C	United States of America Propose deleting the reference to Strategic Framework, no other standards have a reference to the Strategic Plan/Framework, and therefore this standard would need to be revised once the SF is revised or expires, and not because of any technical necessity/

		diagnostic protocols, phytosanitary treatments and guidance to support implementation, simplify trade and expedite market-access negotiations.		updates. Again, needs to state the true problem that will be solved via harmonization - See US comment on Paragraph 48. <i>Category : SUBSTANTIVE</i>
58	49	The IPPC Strategic Framework 2020–2030 (IPPC Secretariat, 2021) includes the development of ISPMs for specific commodities, with, as required, accompanying diagnostic protocols, phytosanitary treatments and guidance to support implementation, simplify trade and expedite market-access negotiations.	C	China It is hoped that the relationship with published standards. Such as ISPM 32, can be supplemented. <i>Category : TECHNICAL</i>
59	49	The IPPC Strategic Framework 2020–2030 (IPPC Secretariat, 2021) includes the development of ISPMs for specific commodities, with, as required, accompanying diagnostic protocols, phytosanitary treatments and guidance to support implementation, simplify trade and expedite market-access negotiations.	P	Uruguay For consistency with other ISPMs. References are listed in "References" section <i>Category : TECHNICAL</i>
60	51	The intended benefits of using <u>international</u> commodity standards <u>for phytosanitary measures</u> may include the following:	P	PPPO Suggest additional words to compensate for the proposed deletion in paragraph [48] <i>Category : EDITORIAL</i>
61	51	The intended benefits of using commodity standards the ISPM may include the following:	P	Korea, Republic of Improve clarity <i>Category : SUBSTANTIVE</i>
62	51	The intended benefits of using commodity standards <u>may include</u> the following:	C	United States of America We don't need unproven, hypothetical benefits to become part of the harmonization instrument, i.e. an ISPM. <i>Category : SUBSTANTIVE</i>
63	52	<u>They may support forming a common basis for</u> the development of phytosanitary import requirements.	P	European Union 1) Too many "mays" (editorial) and 2) better wording proposed to encourage the development of possibly harmonised phytosanitary import requirements. <i>Category : TECHNICAL</i>
64	52	<u>forming a common basis for</u> They may support the development of phytosanitary import requirements.	P	EPPO 1) Too many "mays" (editorial) and 2) better wording proposed to encourage the development of possibly harmonised phytosanitary import requirements. <i>Category : TECHNICAL</i>
65	52	They <u>may</u> support the development of phytosanitary import requirements.	C	United States of America "may" is already in the chapeau, and then each bullet includes "they may". This needs to be resolved <i>Category : EDITORIAL</i>
66	53	<u>They may facilitate facilitating</u> market-access discussions.	P	European Union Too many 'mays'. <i>Category : EDITORIAL</i>
67	53	<u>They may facilitate facilitating</u> market-access discussions.	P	EPPO Too many "mays" <i>Category : EDITORIAL</i>
68	54	<u>They may facilitate facilitating</u> safe trade.	P	European Union Too many 'mays'. <i>Category : EDITORIAL</i>

69	54	They may facilitate <u>facilitating</u> safe trade.	P	EPPO Too many "mays". <i>Category : EDITORIAL</i>
70	55	They may help <u>helping</u> national plant protection organizations (NPPOs) optimize the use of their resources.	P	European Union Too many 'mays'. <i>Category : EDITORIAL</i>
71	55	They may help <u>helping</u> national plant protection organizations (NPPOs) optimize the use of their resources.	P	EPPO Too many "mays". <i>Category : EDITORIAL</i>
72	56	They identify, identifying and may therefore increase <u>increasing</u> awareness of, of the measures available to manage the pest risk associated with the movement of commodities in international trade.	P	European Union Too many 'mays'. <i>Category : EDITORIAL</i>
73	56	They identify, identifying and may therefore increase <u>increasing</u> awareness of, of the measures available to manage the pest risk associated with the movement of commodities in international trade.	P	EPPO Too many "mays". <i>Category : EDITORIAL</i>
74	57	They identify, and may therefore increase awareness of, the <u>commodity-associated</u> pests of the commodities that are commonly managed by NPPOs.	P	European Union Clearer. <i>Category : EDITORIAL</i>
75	57	They identify, identifying and may therefore increase <u>increasing</u> awareness of, of the pests of the commodities commonly managed by NPPOs.	P	European Union Too many 'mays'. <i>Category : EDITORIAL</i>
76	57	They identify, and may therefore increase awareness of, of the pests of the commodities commonly managed by NPPOs.	P	IPPC Regional Workshop Africa <i>Category : SUBSTANTIVE</i>
77	57	They identify, and may therefore increase awareness of, the <u>pests-pest risks</u> of the commodities commonly managed by NPPOs.	P	COSAVE They may increase awareness of the pest risks associated with commodities <i>Category : TECHNICAL</i>
78	57	They identify, identifying and may therefore increase <u>increasing</u> awareness of, the <u>pests</u> of the commodities <u>commodity-associated pests that are</u> commonly managed by NPPOs.	P	EPPO Clearer. Too many "mays". <i>Category : EDITORIAL</i>
79	57	They identify, and may therefore increase awareness of, the <u>pests-pest risks</u> of the commodities commonly managed by NPPOs.	P	Uruguay They may increase awareness of the pest risks associated with commodities <i>Category : TECHNICAL</i>
IMPACTS ON BIODIVERSITY AND THE ENVIRONMENT				
80	60	Commodity standards provide guidance on options for phytosanitary measures. Such measures may help preserve biodiversity by managing the pest risk posed by commodities that are moved internationally, including the pest risk posed by <u>invasive alien species</u> .	P	EPPO Invasive alien species is a term defined in the Convention on Biological Diversity (CBD). The IPPC deals with the invasive alien species that are pests (please see supplement 2 to ISPM 5). <i>Category : SUBSTANTIVE</i>
81	60	Commodity standards provide guidance on options for phytosanitary measures. Such measures may help preserve biodiversity by managing the pest risk posed by	P	China Impact on the environmental is mentioned in the title [59], but no relevant content appears in [60].

		commodities that are moved internationally, including the pest risk posed by invasive alien species. <u>This protects plant health, which in turn reduces negative environmental impacts and benefits biodiversity.</u>		<i>Category : SUBSTANTIVE</i>
PRINCIPLES IN RELATION TO COMMODITY STANDARDS				
82	61	PRINCIPLES IN RELATION TO COMMODITY STANDARDS	C	United States of America Suggest to use the format of other overarching standards, i.e., ISPMs 27 & 28. Neither one is using the the bulk language like this. Suggest to add in the Background a quote from the IPPC and a simple paragraph, instead of this section. <i>Category : SUBSTANTIVE</i>
83	63	The sovereign rights of contracting parties, to prescribe and adopt phytosanitary measures to protect plant health within their territories and determine the appropriate level of protection for plant health <u>health (Article VII 1. of the IPPC)</u> , are not affected by commodity standards.	P	PPPO Adding reference to sovereign rights <i>Category : EDITORIAL</i>
84	63	The sovereign rights of contracting parties, to prescribe and adopt phytosanitary measures to protect plant health within prevent the introduction and spread of pests into their territories-territories. and therefore to determine the appropriate level of protection for plant health <u>their phytosanitary import requirements</u> , are not affected by commodity standards.	P	European Union 1) Article VII 1. of the IPPC text. 2) The term "appropriate level of protection" is not defined in the Glossary but in the WTO Agreement on the Application of Sanitary and Phytosanitary Measures (SPS Agreement). According to the "General recommendations on consistency" in the "IPPC Style Guide (https://assets.ippc.int/static/media/files/publication/en/2019/05/IPPCStyleGuide_2019-05-31.pdf), this term "should only be used in ISPMs when referring to the SPS context, and with the precise wording of the SPS Agreement. Otherwise, in the phytosanitary context, it is preferable to state that exporting countries have to meet the "phytosanitary import requirements" of importing countries, not their "appropriate level of protection". It is therefore suggested to use "phytosanitary import requirements" rather than "appropriate level of protection". <i>Category : TECHNICAL</i>
85	63	The sovereign rights <u>authority</u> of contracting parties, to prescribe and adopt phytosanitary measures to protect plant health within their territories and determine the appropriate level of protection for plant health, are not affected by commodity standards.	P	COSAVE For consistency with IPPC text and ISPM 1 (Sovereignty) <i>Category : TECHNICAL</i>
86	63	The sovereign rights of contracting parties, to prescribe and adopt phytosanitary measures to protect plant health within prevent the introduction and spread of pests into their territories-territories. and therefore to determine the appropriate level of protection for plant health <u>their phytosanitary import requirements</u> , are not affected by commodity standards.	P	EPPO 1) Article VII 1. of the IPPC text. 2) The term "appropriate level of protection" is not defined in the Glossary but in the WTO Agreement on the Application of Sanitary and Phytosanitary Measures (SPS Agreement). According to the "General recommendations on consistency" in the "IPPC Style Guide (https://assets.ippc.int/static/media/files/publication/en/2019/05/

				IPPCStyleGuide_2019-05-31.pdf), this term "should only be used in ISPMs when referring to the SPS context, and with the precise wording of the SPS Agreement. Otherwise, in the phytosanitary context, it is preferable to state that exporting countries have to meet the "phytosanitary import requirements" of importing countries, not their "appropriate level of protection". It is therefore suggested to use "phytosanitary import requirements" rather than "appropriate level of protection". <i>Category : TECHNICAL</i>
87	63	The sovereign rights of contracting parties, to prescribe and adopt phytosanitary measures to protect plant health within their territories and determine the appropriate level of protection for plant health, are not affected by commodity standards.	C	United States of America The IPPC states "sovereign authority" not "Sovereign rights". See article VII. I think the phrasing and terminology here needs to be checked out. "Right/s" is only used twice in the IPPC, so need to be careful here. <i>Category : TECHNICAL</i>
88	63	The sovereign rights of contracting parties, to prescribe and adopt phytosanitary measures to protect plant health (Article VII 1. of the IPPC) within their territories and determine the appropriate level of protection for plant health, are not affected by commodity standards.	P	Singapore Supportive of NZ' s addition of reference to sovereign rights. <i>Category : SUBSTANTIVE</i>
89	63	The sovereign rights rights-authority of contracting parties, to prescribe and adopt phytosanitary measures to protect plant health within their territories and determine the appropriate level of protection for plant health, are not affected by commodity standards.	P	Uruguay For consistency with IPPC text and ISPM 1 (Sovereignty) <i>Category : TECHNICAL</i>
90	65	Additional obligations are not imposed on importing countries by commodity standards, over and above the obligations already identified in the IPPC IPPC (Article VII 2. (g)).	P	PPPO adding reference to least restrictive measures <i>Category : EDITORIAL</i>
91	65	Additional obligations are not imposed on importing countries by commodity standards, over and above the obligations already identified in the IPPC IPPC (Article VII 2 (g)).	P	Singapore Supportive of NZ's comment to add reference to least restrictive measures. <i>Category : SUBSTANTIVE</i>
92	66	The regulation of any pests listed in commodity standards remains subject to technical justification using a pest risk analysis (PRA) or, where applicable, another comparable examination and evaluation of available scientific information (Articles II and (Articles VI and VII (g) of the IPPC).	P	PPPO Remove ref to Article II as it is terminology which is not necessary. is citing Article Vi intended for technical justification? if so can keep this, otherwise remove Art VI. ref to pest risk is in Article VII (g) <i>Category : EDITORIAL</i>
93	66	The regulation of any pests listed in commodity standards remains subject to technical justification using a pest risk analysis (PRA) or, where applicable, another comparable examination and evaluation of available scientific information (Articles II and (Articles VI and VII(g) of the IPPC).	P	Singapore Supportive of NZ's comment to change to Article VI instead of Article II. <i>Category : SUBSTANTIVE</i>
94	67	Options for phytosanitary measures presented in commodity standards are not intended to be exhaustive; alternative technically justified measures may be	P	PPPO this sentence is potentially ambiguous and suggests that a CP needs to have technical justification to use a measure that differs

		implemented by contracting parties, if technically justified (Article VII.2(h) VII 2. (g) of the IPPC), and may be proposed for inclusion in revisions of commodity standards standards (Article VII 2. (h) of the IPPC) .		from the standard. The proposed change emphasizes that any measure used needs technical justification. The correct reference for technical justification is Article VII 2. (g) Article VII 2. (h) is about modifying or removing phyto measures <i>Category : EDITORIAL</i>
95	67	Options for phytosanitary measures presented in commodity standards are not intended to be exhaustive; alternative measures may be implemented by contracting parties, if technically justified (Article VII. 2(h) 2(g and h) of the IPPC), and may be proposed for inclusion in revisions of commodity standards.	P	European Union Technical justification is in Article VII.2.g. <i>Category : TECHNICAL</i>
96	67	Options for phytosanitary measures presented in commodity standards are not intended to be exhaustive; alternative-other measures may be implemented by contracting parties, if technically justified (Article VII.2(h) of the IPPC), and may be proposed for inclusion in revisions of commodity standards.	P	COSAVE For clarification because alternative measures could be interpreted as equivalent measures. Therefore to avoid wrong interpretation we suggest to keep the sentence more general and refer to other measures <i>Category : TECHNICAL</i>
97	67	Options for phytosanitary measures presented in commodity standards are not intended to be exhaustive; alternative measures may be implemented by contracting parties, if technically justified (Article VII. 2(h) 2(g and h) of the IPPC), and may be proposed for inclusion in revisions of commodity standards.	P	EPPO Technical justification is in Article VII.2.g. <i>Category : TECHNICAL</i>
98	67	Options for phytosanitary measures presented in commodity standards are not intended to be exhaustive; alternative technically justified measures may be implemented by contracting parties, if technically justified (Article VII. 2(h) 2(g) of the IPPC), and may be proposed for inclusion in revisions of commodity standards.	P	Singapore Supportive of NZ's comment to add in "technically justified" to make it clearer. And to change (h) to (g) as (h) is about modifying or removing phyto measures. <i>Category : SUBSTANTIVE</i>
99	67	Options for phytosanitary measures presented in commodity standards are not intended to be exhaustive; alternative-other measures may be implemented by contracting parties, if technically justified (Article VII.2(h) of the IPPC), and may be proposed for inclusion in revisions of commodity standards.	P	Uruguay For clarification because alternative measures could be interpreted as equivalent measures. Therefore to avoid wrong interpretation we suggest to keep the sentence more general and refer to other measures <i>Category : TECHNICAL</i>
1. Purpose and use of commodity standards				
100	70	The purpose of commodity standards is to support the development of phytosanitary import requirements that are technically justified and facilitate safe trade by reducing the pest risk to the importing country to an acceptable level trade.	P	COSAVE To simplify and better reflect the purpose of commodity standards <i>Category : TECHNICAL</i>
101	70	The purpose of commodity standards is to support the development of phytosanitary import requirements that are technically justified and facilitate safe trade by reducing the pest risk to the importing country to an acceptable level trade.	P	Uruguay To simplify and better reflect the purpose of commodity standards <i>Category : TECHNICAL</i>
102	71	Phytosanitary import requirements established by importing countries should be technically justified according to international obligations. Pest lists and options for phytosanitary measures contained within commodity standards should be considered by the importing countries when developing phytosanitary import requirements. The relevance of the pest lists and options for phytosanitary	P	European Union For better clarity. <i>Category : EDITORIAL</i>

		measures should be evaluated for each country of origin and imported commodity (where a commodity standard is available for that commodity and intended use). Commodity standards may serve to facilitate the evaluation of such measures in PRA (or other comparable examination and evaluation).		
103	71	Phytosanitary import requirements established by importing countries should be technically justified according to international obligations. Pest lists and options for phytosanitary measures contained within commodity standards should be considered when developing phytosanitary import requirements. The relevance of the pest lists and options for phytosanitary measures should be evaluated for each country of origin and imported commodity (where a commodity standard is available for that commodity and intended use). Commodity standards may serve to facilitate the evaluation of such measures in PRA (or other <u>technically</u> comparable examination and evaluation).	P	Australia Additional text to clarify other examinations/evaluations need to be technically sound. <i>Category : EDITORIAL</i>
104	71	Phytosanitary import requirements established by importing countries should be technically justified according to international obligations. Pest lists and options for phytosanitary measures contained within commodity standards should be considered <u>by the importing countries</u> when developing phytosanitary import requirements. The relevance of the pest lists and options for phytosanitary measures should be evaluated for each country of origin and imported commodity (where a commodity standard is available for that commodity and intended use). Commodity standards may serve to facilitate the evaluation of such measures in PRA (or other comparable examination and evaluation).	P	EPPO For better clarity. <i>Category : EDITORIAL</i>
105	72	Commodity standards are not developed <u>in the following circumstances</u> <u>when</u> :	P	United States of America to simplify the language and avoid the repetition. <i>Category : EDITORIAL</i>
106	73	when no effective phytosanitary measures are available;	C	IPPC Regional Workshop Africa Where no known effective phytosanitary measures are available <i>Category : SUBSTANTIVE</i>
107	73	when no effective phytosanitary measures are available;	P	United States of America see comment above <i>Category : EDITORIAL</i>
108	73	when no effective phytosanitary measures are available;	C	Kenya Propose to read, where no known effective phytosanitary measures are available <i>Category : TECHNICAL</i>
109	74	when an existing ISPM already provides sufficient guidance;	P	United States of America no need to repete "when" in every bullet. <i>Category : EDITORIAL</i>
110	75	when a commodity should not be considered a regulated article (e.g. when a commodity is processed to the point where it is no longer capable of being infested	P	Canada It is relevant to add ISPM 32 reference <i>Category : TECHNICAL</i>

		with pests), as described in ISPM 32 (Categorization of commodities according to their pest risk)...		
111	75	when a commodity should not be considered a regulated article (e.g. when a commodity is processed to the point where it is no longer capable of being infested with pests) pests (see ISPM 32).	P	United States of America Category : EDITORIAL
2. Scope and content of commodity standards				
112	76	2. Scope and content Content of commodity standards	P	COSAVE To align with the context of the section Category : TECHNICAL
113	76	2. Scope and content Content of commodity standards	P	Uruguay To align with the content of the section Category : TECHNICAL
114	77	The commodity standards that form the annexes to this overarching concept standard are arranged according to presented in the following sections format:	P	PPPO Category : EDITORIAL
115	78	Scope of commodity standards <u>Scope</u>	P	Costa Rica Category : EDITORIAL
116	78	Scope of <u>the</u> commodity standards <u>ISPM</u>	P	PPPO to improve clarity. An annex will be a single plant or plant product ISPM e.g. mango fruit for human consumption, therefore should be singular not plural Category : EDITORIAL
117	78	Scope of <u>the</u> commodity standards <u>standard</u>	P	European Union More precise wording (singular) and consistency with the two following paragraphs. Category : EDITORIAL
118	78	Scope of commodity standards <u>specific ISPM</u>	P	Korea, Republic of Improve clarity Category : SUBSTANTIVE
119	78	Scope of commodity standards <u>Scope</u>	P	COSAVE To avoid redundancy Category : TECHNICAL
120	78	Scope of <u>the</u> commodity standards <u>standard</u>	P	EPPO More precise wording (singular) and consistency with the two following paragraphs. Category : EDITORIAL
121	78	Scope of commodity standards <u>Scope</u>	P	Uruguay To avoid redundancy Category : TECHNICAL
122	83	The content of these sections is described below, together with the basis on which pests (section 2.3) and <u>options for phytosanitary</u> measures (sections 2.4 and 3) are included in the standards.	P	European Union More precise wording. Category : EDITORIAL
123	83	The content of these sections is described below, together with the basis on which pests (<u>section 2.3</u>) and measures (<u>sections 2.4 and 3</u>) are included in the standards.	P	COSAVE Consequential change of comments in paragraph 84

				<i>Category : TECHNICAL</i>
124	83	The content of these sections is described below, together with the basis on which pests (section 2.3) and <u>options for phytosanitary</u> measures (sections 2.4 and 3) are included in the standards.	P	EPPO More precise wording. <i>Category : EDITORIAL</i>
125	83	The content of these sections is described below, together with the basis on which pests (section 2.3) and measures (sections 2.4 and 3) are included in the standards.	P	Uruguay Consequential change of comments in paragraph 84 <i>Category : TECHNICAL</i>
2.1 Scope of commodity standards				
126	84	2.1 Scope of commodity standards <u>Scope</u>	P	Costa Rica <i>Category : EDITORIAL</i>
127	84	2.1 Scope of <u>the</u> commodity standards <u>standard</u>	P	European Union Please see comment made on paragraph 78. <i>Category : EDITORIAL</i>
128	84	2.1 <u>_Scope of commodity standards</u>	P	COSAVE To avoid confusion between the titles of sections of commodity standards (Annexes) and the titles of sections of this concept standard we suggest that subheadings under section 2 can be presented in italics and not numbered. See comment in paragraph 78 <i>Category : TECHNICAL</i>
129	84	2.1 Scope of <u>the</u> commodity standards <u>standard</u>	P	EPPO Please see comment made on paragraph 78. <i>Category : EDITORIAL</i>
130	84	2.1 Scope of commodity standards	C	United States of America "Clearly" – redundant here. Is this a template/boiler plate language? Suited more to be an Executive Summary than scope? This needs to be clarified. <i>Category : TECHNICAL</i>
131	84	2.1 <u>_____Scope of commodity standards</u>	P	Uruguay To avoid confusion between the titles of sections of commodity standards (Annexes) and the titles of sections of this concept standard we suggest that subheadings under section 2 can be presented in italics and not numbered. See comment in paragraph 78 <i>Category : TECHNICAL</i>
132	85	This commodity standard <u>section of the annex</u> clearly describes the commodity (including including plant scientific name-name, the plant part that is specifically traded, and its intended uses) and covers uses. <u>The description is intended to provide sufficient information to allow the identification of a focused list of pests associated with this commodity and related associated options for phytosanitary measures. The intended use of the commodity is included because of the influence</u>	P	PPPO to improve clarity re. suggested deletion: The current way this is worded suggests that a list of pests and measures will be incorporated into the scope section which would pre-empt the contents of the standard. This level of detail is detailed in sections 2.3 and 2.4. the proposed addition incorporates the contents of section 2.2 into the scope to align with the structure of other commodity standards e.g. ISPM 38-41.

		<u>it has on the pest risk posed by the commodity, as described in ISPM 32 (Categorization of commodities according to their pest risk).</u>		<i>Category : TECHNICAL</i>
133	85	This commodity standard clearly describes <u>section identifies</u> the commodity (including plant scientific name and its intended uses) and covers use <u>for which</u> a list of pests <u>associated with this commodity pests</u> and related options for phytosanitary measures <u>measures are identified</u> .	P	European Union 1) "Section": For consistency with sections 2.2 to 2.5. 2) "Identifies": The detailed description of the commodity is given in section 2.2. 3) Other suggested changes: More precise wording. <i>Category : EDITORIAL</i>
134	85	This <u>The scope of a</u> commodity standard clearly describes the <u>is specific to a particular</u> commodity (including plant scientific name and its intended uses) <u>use</u> and covers a list of pests associated with this commodity and related options for phytosanitary measures.	P	COSAVE To better describe the content of the "scope" of a commodity standard as mentioned in paragraph 83 <i>Category : TECHNICAL</i>
135	85	This commodity standard clearly describes <u>section identifies</u> the commodity (including plant scientific name and its intended uses) and covers use <u>for which</u> a list of pests <u>associated with this commodity pests</u> and related options for phytosanitary measures <u>measures are identified</u> .	P	EPPO 1) "Section": For consistency with sections 2.2 to 2.5. 2) "Identifies": The detailed description of the commodity is given in section 2.2. 3) Other suggested changes: More precise wording. <i>Category : EDITORIAL</i>
136	85	This commodity standard clearly describes the commodity (including plant scientific name and its intended uses) and covers a list of pests associated with this commodity and related options for phytosanitary measures.	P	United States of America unnecessary word <i>Category : EDITORIAL</i>
137	85	This commodity standard clearly describes the commodity (including plant scientific name and its intended uses) and covers a list of pests associated with this commodity and related options for phytosanitary measures.	P	China For some commodities, like peat, it's difficult to identify the related species. <i>Category : SUBSTANTIVE</i>
138	85	This scope of a commodity standard clearly describes the <u>is specific of a particular</u> commodity (including plant scientific name and its intended uses) <u>use</u> and covers a list of pests associated with this commodity and related options for phytosanitary measures.	P	Uruguay To better describe the content of the "scope" of a commodity standard as mentioned in paragraph 83 <i>Category : TECHNICAL</i>
2.2 Description of the commodity and its intended use				
139	86	2.2 Description of the commodity and its intended use	P	PPPO There is very little distinction between this section and the scope. Other commodity standards such as ISPM 38, 39, 40, 41 do not have a separate section for description of the commodity but instead incorporate it into scope. Therefore, NZ suggests that the information in section 2.2 is incorporated into section 2.1 to align with the structure of other commodity standards and to prevent duplication of information. <i>Category : TECHNICAL</i>
140	86	2.2 Description of the commodity and its intended use	P	COSAVE See comment in paragraph 84 <i>Category : TECHNICAL</i>
141	86	2.2 <u>_____</u> Description of the commodity and its intended use	P	Uruguay See comment in paragraph 84

				Category : <i>TECHNICAL</i>
142	87	This section clearly describes the commodity, such as the plant part that is specifically being traded. The description is intended to provide sufficient information to allow the identification of a focused list of pests and associated options for phytosanitary measures. The intended use of the commodity is given because of the influence it has on the pest risk posed by the commodity, as described in ISPM 32 (32 <i>Categorization of commodities according to their pest risk</i>).	P	Canada Editorial. ISPM 32 reference - first citation moved to para 75. Category : <i>EDITORIAL</i>
143	87	This section clearly describes the commodity, such as the plant part that is specifically being traded. The description is intended to provide sufficient information to allow the identification of a focused list of pests and associated options for phytosanitary measures. The intended use of the commodity is given because of the influence it has on the pest risk posed by the commodity, as described in ISPM 32 (Categorization of commodities according to their pest risk).	P	PPPO There is very little distinction between this section and the scope. Other commodity standards such as ISPM 38, 39, 40, 41 do not have a separate section for description of the commodity but instead incorporate it into scope. Therefore, NZ suggests that the information in section 2.2 is incorporated into section 2.1 to align with the structure of other commodity standards and to prevent duplication of information. Category : <i>TECHNICAL</i>
144	87	This section clearly describes the commodity, such as the plant part that is specifically being traded <i>traded and its intended use</i> . The description is intended to provide sufficient information to allow the identification of a focused list of pests and associated options for phytosanitary measures. The intended use of the commodity is given because of the influence it has on the pest risk posed by the commodity, as described in ISPM 32 (<i>Categorization of commodities according to their pest risk</i>).	P	European Union Important precision to be given in the first sentence (please see the title of section 2) and not only in the last sentence of the paragraph. Category : <i>EDITORIAL</i>
145	87	This section clearly describes the commodity, such as the plant part or variety of technically justification(ex) Hass Avocado that is specifically being traded. The description is intended to provide sufficient information to allow the identification of a focused list of pests and associated options for phytosanitary measures. The intended use of the commodity is given because of the influence it has on the pest risk posed by the commodity, as described in ISPM 32 (<i>Categorization of commodities according to their pest risk</i>).	P	Korea, Republic of Added example of commodity Category : <i>SUBSTANTIVE</i>
146	87	This section clearly describes the commodity <i>commodity (including plant scientific name)</i> , such as the plant part that is specifically being traded, <i>and its intended use</i> . The description is intended to provide sufficient information to allow the identification of a focused list of pests and associated options for phytosanitary measures. The intended use of the commodity is given because of the influence it has on the pest risk posed by the commodity, as described in ISPM 32 (<i>Categorization of commodities according to their pest risk</i>).	P	COSAVE See comment in paragraph 85. Text added was moved from paragraph 85 Category : <i>TECHNICAL</i>
147	87	This section clearly describes the commodity, such as the plant part that is specifically being traded <i>traded and its intended use</i> . The description is intended to	P	EPPO Important precision to be given in the first sentence (please see

		provide sufficient information to allow the identification of a focused list of pests and associated options for phytosanitary measures. The intended use of the commodity is given because of the influence it has on the pest risk posed by the commodity, as described in ISPM 32 (<i>Categorization of commodities according to their pest risk</i>).		the title of section 2) and not only in the last sentence of the paragraph. <i>Category : EDITORIAL</i>
148	87	This section clearly describes the commodity, such as the plant part that is specifically being traded. The description is intended to provide sufficient information to allow the identification of a focused list of pests and associated options for phytosanitary measures. The intended use of the commodity is given because of the influence it has on the pest risk posed by the commodity, as described in ISPM 32 (<i>Categorization of commodities according to their pest risk</i>).	P	United States of America unnecessary word <i>Category : EDITORIAL</i>
149	87	This section clearly describes the commodity commodity (including plant scientific name), such as the plant part that is specifically being traded traded and its intended use. The description is intended to provide sufficient information to allow the identification of a focused list of pests and associated options for phytosanitary measures. The intended use of the commodity is given because of the influence it has on the pest risk posed by the commodity, as described in ISPM 32 (<i>Categorization of commodities according to their pest risk</i>).	P	Uruguay See comment in paragraph 85. Text added was moved from paragraph 85 <i>Category : TECHNICAL</i>
2.3 List of pests associated with the commodity				
150	88	2.3 List of pests associated with the commodity	P	COSAVE See comments in paragraph 84 and 86 <i>Category : TECHNICAL</i>
151	88	2.3 _____List of pests associated with the commodity	P	Uruguay See comments in paragraphs 84 and 86 <i>Category : TECHNICAL</i>
152	89	This section includes a list of pests or groups of pests that are known to be associated with the commodity described. A criterion for inclusion of a pest is that it is regulated by at least one contracting party based on the availability of evidence, such as reliable scientific data, a PRA, or other technical justification.	P	PPPO It is not necessary or relevant to include this sentence here as this section is about the content/structure of the commodity standard annexes rather than how pests are selected. the second sentence of para 90 states this more clearly. <i>Category : EDITORIAL</i>
153	89	This section includes a list of pests or groups of pests that are known to be associated with the commodity described. A criterion for inclusion of a pest is that it is regulated by at least one contracting party based on the availability of evidence, such as reliable scientific data, a PRA, or other technical justification.	P	European Union Simplification. "Technically justified" is defined in Article II.1 as: "justified on the basis of conclusions reached by using an appropriate pest risk analysis or, where applicable, another comparable examination and evaluation of available scientific information." <i>Category : EDITORIAL</i>
154	89	This section includes a list of pests or groups of pests that are known to be associated with the commodity described. A criterion for inclusion of a pest is that it is regulated by at least one contracting party based on the availability of evidence, such as reliable scientific data, a PRA, or other technical justification.	P	EPPO Simplification. "Technically justified" is defined in Article II.1 as: "justified on the basis of conclusions reached by using an appropriate pest risk analysis or, where applicable, another

				comparable examination and evaluation of available scientific information.” <i>Category : TECHNICAL</i>
155	89	This section includes a list of pests or groups of pests that are known to be associated with the commodity described. A criterion for inclusion of a pest is that it is regulated by at least one contracting party based on the availability of evidence, such as reliable scientific data, a PRA , or other technical justification.	C	United States of America What evidence it would be? (scientific publications, NPPO reports, etc., reflecting pest's association with the commodity being traded, distribution and other relevant information?) Explain that the PRA will be conducted by the country developing their import requirements (as opposed to “a PRA” developed for other purposes). <i>Category : TECHNICAL</i>
156	90	Inclusion of a pest-pests in a commodity standard does not constitute technical justification for its-their regulation. The determination of whether to regulate these pests is at the discretion of the importing country, based on technical justification using either a PRA or, where applicable, another comparable examination and evaluation of available scientific information.	P	European Union For consistency within the paragraph. <i>Category : EDITORIAL</i>
157	90	Inclusion of a pest-pests in a commodity standard does not constitute technical justification for its-their regulation. The determination of whether to regulate these pests is at the discretion of the importing country, based on technical justification using either a PRA or, where applicable, another comparable examination and evaluation of available scientific information.	P	EPPO For consistency within the paragraph. <i>Category : EDITORIAL</i>
158	91	The list of pests is not intended to be exhaustive.	C	PPPO would be better to say what was intended. List of major pests? Common pests found in most countries where plant is grown? Those pests that commonly restrict trade ? Pest that have been found on the phytosanitary importing requirements of a number of countries? <i>Category : SUBSTANTIVE</i>
2.4 Options for phytosanitary measures				
159	92	2.4 _Options for phytosanitary measures	P	COSAVE See comments in paragraphs 84, 86 and 88 <i>Category : TECHNICAL</i>
160	92	2.4 _____Options for phytosanitary measures	P	Uruguay See comments in paragraphs 84, 86 and 88 <i>Category : TECHNICAL</i>
161	93	This section presents options for phytosanitary measures, including measures adopted in ISPMs or ISPMs, technically justified measures currently used in trade, and conditions under which a measure may be applied. Individual or combinations of measures may be provided for each pest and may relate to any point of production and handling of the commodity before import.	P	PPPO Phytosanitary measures used in trade should be technically justified. Unjustified measures can be inadequate or be additional barriers to trade. <i>Category : TECHNICAL</i>
162	93	This section presents options for phytosanitary measures, including measures adopted in ISPMs or currently used in trade, and conditions under which a measure may be applied. Individual <u>measures</u> or combinations of measures may be provided	P	European Union Easier to read. <i>Category : EDITORIAL</i>

		for each pest and may relate to any point of production and handling of the commodity before import.		
163	93	This section presents options for phytosanitary measures, including measures adopted in ISPMs, technically justified measures currently used in trade, and conditions under which a measure may be applied. This section presents options for phytosanitary measures, including measures adopted in ISPMs or currently used in trade, and conditions under which a measure may be applied. Individual or combinations of measures may be provided for each pest and may relate to any point of production and handling of the commodity before import.	P	Australia Added text reinforces phytosanitary measures used in trade should be technically justified. <i>Category : TECHNICAL</i>
164	93	This section presents options for phytosanitary measures, including measures adopted in ISPMs or currently used in trade, and conditions under which a measure may be applied. Individual measures or combinations of measures may be provided for each pest and may relate to any point of production and handling of the commodity before import.	P	EPPO Easier to read. <i>Category : EDITORIAL</i>
165	93	This section presents options for phytosanitary measures, including measures adopted in ISPMs or currently used in trade , and conditions under which a measure may be applied. Individual or combinations of measures may be provided for each pest and may relate to any point of production and handling of the commodity before import.	C	United States of America Being used in trade doesn't constitute technical justification. See also our general comment. <i>Category : SUBSTANTIVE</i>
166	94	Although commodity standards only present options for phytosanitary measures that may be applied up to the point of entry, post-entry measures may also be considered by contracting parties, as described in ISPM 20 (<i>Guidelines for a phytosanitary import regulatory system</i>).	P	European Union For consistency. <i>Category : EDITORIAL</i>
167	94	Although commodity standards only present options for phytosanitary measures that may be applied up to the point of entry, post-entry measures may also be considered by contracting parties, as described in ISPM 20 (<i>Guidelines for a phytosanitary import regulatory system</i>).	P	COSAVE Consistency with paragraph 58 <i>Category : TECHNICAL</i>
168	94	Although commodity standards only present options for phytosanitary measures that may be applied up to the point of entry, post-entry measures may also be considered by contracting parties, as described in ISPM 20 (<i>Guidelines for a phytosanitary import regulatory system</i>).	P	EPPO For consistency. <i>Category : EDITORIAL</i>
169	94	Although commodity standards only present options for phytosanitary measures that may be applied up to the point of entry, post-entry measures may also be considered by contracting parties, as described in ISPM 20 (<i>Guidelines for a phytosanitary import regulatory system</i>).	P	Uruguay Consistency with paragraph 58 <i>Category : TECHNICAL</i>
170	96	The measures are presented in the list of pests known to be associated with the commodity; with each measure being listed against the corresponding pest or pests	P	PPPO Including an estimate of confidence here will tie in with Criteria for

		that it manages . A description of each measure, sufficient to indicate its use and practical application, is provided. When necessary, additional information on the measures may be included in an appendix.		inclusion and Confidence in measures concepts later in the standard. <i>Category : SUBSTANTIVE</i>
171	96	The measures are presented in-together with the list of pests known to be associated with the commodity, with each measure being listed against the corresponding pest or pests that it manages. A description of each measure, sufficient to indicate its use and practical application, is provided. When necessary, additional information on the measures may be included in an appendix.	P	European Union Easier to understand. <i>Category : EDITORIAL</i>
172	96	The measures are presented in the list of pests known to be associated with the commodity, with each measure being listed against the corresponding pest or pests that whosw pest risk it manages. A description of each measure, sufficient to indicate its use and practical application, is provided. When necessary, additional information on the measures may be included in an appendix.	P	COSAVE Measures are for pest risk management and not for pest management <i>Category : TECHNICAL</i>
173	96	The measures are presented together with the list of pests known to be associated with the commodity, each measure being listed against the corresponding pest or pests that it manages. A description of each measure, sufficient to indicate its use and practical application, is provided. When necessary, additional information on the measures may be included in an appendix. The measures are presented in the list of pests known to be associated with the commodity, with each measure being listed against the corresponding pest or pests that it manages. A description of each measure, sufficient to indicate its use and practical application, is provided. When necessary, additional information on the measures may be included in an appendix.	P	EPPO Easier to understand <i>Category : EDITORIAL</i>
174	96	The measures are presented in the list of pests known to be associated with the commodity, with each measure being listed against the corresponding pest or pests that it manages. A description of each measure, sufficient to indicate its use and practical application, is provided. When necessary, additional information on the measures may be included in an appendix .	C	United States of America To this standard, or to the annexes in this standard, or in another standard? Please clarify. <i>Category : TECHNICAL</i>
175	96	The measures are presented in the list of pests known to be associated with the commodity, with each measure being listed against the corresponding pest or pests that-whose pest risk it manages. A description of each measure, sufficient to indicate its use and practical application, is provided. When necessary, additional information on the measures may be included in an appendix.	P	Uruguay Measures are for pest risk management and not for pest management <i>Category : TECHNICAL</i>
2.5 The References section of commodity standards				
176	97	2.5 The References section of the commodity standards standard	P	European Union Please see comment made on paragraph 78. <i>Category : EDITORIAL</i>
177	97	2.5 The References section of commodity standards	P	COSAVE For consistence with paragraph 82 <i>Category : EDITORIAL</i>

178	97	2.5 The References section of the commodity standards <u>standard</u>	P	EPPO Please see comment made on paragraph 78. <i>Category : EDITORIAL</i>
179	97	2.5 The References section of commodity standards <u>References</u>	P	Uruguay For consistency with paragraph 82 <i>Category : TECHNICAL</i>
180	98	All <u>sources of</u> information presented on pests and measures in the standard is referenced <u>are presented</u> in the References section.	P	PPPO Although 'referenced in the References section' is grammatically correct it sounds a bit odd. <i>Category : EDITORIAL</i>
181	98	All information presented on pests and measures in the <u>commodity</u> standard is referenced in the References section.	P	European Union More precise wording. <i>Category : EDITORIAL</i>
182	98	All information presented on pests and <u>options for phytosanitary</u> measures in the standard is referenced in the References section.	P	COSAVE Consistency with paragraph 58 <i>Category : TECHNICAL</i>
183	98	All information presented on pests and measures in the <u>commodity</u> standard is referenced in the References section.	P	EPPO More precise wording. <i>Category : EDITORIAL</i>
184	98	All information presented on pests and <u>options for phytosanitary</u> measures in the standard is referenced in the References section.	P	Uruguay Consistency with paragraph 58 <i>Category : TECHNICAL</i>
3. Criteria for inclusion of measures in commodity standards				
185	99	3. Criteria for inclusion of measures in commodity standards	C	PPPO The criteria for inclusion of measures in a commodity standard is directly linked to how confident the TPCS are that a measure will manage a pest. Therefore, the text of section 4 should be removed and incorporated into section 3. This would reduce significant redundancy in the text. <i>Category : SUBSTANTIVE</i>
186	99	3. Criteria for inclusion of measures in commodity standards	C	United States of America Suggest to focus on discussing necessity, managed risk, measuring efficacy. See also our general comment. <i>Category : SUBSTANTIVE</i>
187	100	A measure can be considered for inclusion in a commodity standard by the Technical Panel for Commodity Standards (TPCS) <u>for inclusion in a commodity standard</u> when it is, or has been, set as a phytosanitary import requirement by at least one contracting party and hence in operation between at least two contracting parties. Inclusion in the standard is further supported if one or more of the following criteria are met:	P	European Union For more clarity. <i>Category : EDITORIAL</i>
188	100	A measure can <u>may</u> be considered for inclusion in a commodity standard by the Technical Panel for Commodity Standards when it is, or has been, set as a phytosanitary import requirement by at least one contracting party and hence in operation between at least two contracting parties. Inclusion in the standard is further supported if one or more of the following criteria are met:	P	European Union More appropriate. <i>Category : TECHNICAL</i>

189	100	A measure may be considered by the Technical Panel for Commodity Standards (TPCS) for inclusion in a commodity standard when it is, or has been, set as a phytosanitary import requirement by at least one contracting party and hence in operation between at least two contracting parties. Inclusion in the standard is further supported if one or more of the following criteria are met: A measure can be considered for inclusion in a commodity standard by the Technical Panel for Commodity Standards when it is, or has been, set as a phytosanitary import requirement by at least one contracting party and hence in operation between at least two contracting parties. Inclusion in the standard is further supported if one or more of the following criteria are met:	P	EPPO For more clarity. More appropriate. <i>Category : TECHNICAL</i>
190	101	Experience from use in international trade indicates that the measure is effective. For example:	C	United States of America Specific, transparent, measurable criteria need to be developed by the TPCS and reviewed by the CPs during Consultation periods <i>Category : SUBSTANTIVE</i>
191	103	the measure has been successfully used to manage non-compliant consignments;	P	China The measure should be applied to consignments in trade but not only limited to non-compliant consignments. <i>Category : SUBSTANTIVE</i>
192	104	information from plant certification and accreditation schemes indicates that the measure is effective.	P	European Union It might not be clear for all CPs what "plant accreditation schemes" are. This concept is already covered under paragraph 108 for domestic use and it does not seem relevant for international trade. <i>Category : TECHNICAL</i>
193	104	information from <u>plant-phytosanitary</u> certification and accreditation schemes <u>systems</u> indicates that the measure is effective.	P	COSAVE What is intended to include as a criteria is the information from phytosanitary certification systems. If this is not the intention plant certification and accreditation schemes in the context of international trade should be clarified <i>Category : TECHNICAL</i>
194	104	information from plant certification and accreditation schemes indicates that the measure is effective.	P	EPPO It might not be clear for all CPs what "plant accreditation schemes" are. This concept is already covered under paragraph 108 for domestic use and it does not seem relevant for international trade. <i>Category : TECHNICAL</i>
195	104	information from <u>plant-phytosanitary</u> certification and accreditation schemes <u>systems</u> indicates that the measure is effective.	P	Uruguay What is intended to include as a criteria is the information from phytosanitary certification systems. If this is not the intention plant certification and accreditation schemes in the context of international trade should be clarified <i>Category : TECHNICAL</i>
196	105	Experience from domestic use indicates that the measure is effective. For example:	C	United States of America Specific, transparent, measurable criteria need to be developed by the TPCS and reviewed by the CPs during Consultation periods <i>Category : SUBSTANTIVE</i>

197	106	the measure has been used extensively in relation to domestic movement of commodities;- <u>the measure has been successfully used by the private sector or an authorized entity;</u>	P	PPPO Propose to incorporate this text from section 4 and delete section 4 to avoid redundancy. (see NZ comments below on section 4) <i>Category : SUBSTANTIVE</i>
198	106	the measure has been used extensively in relation to domestic movement of commodities;- <u>the measure has been successfully used by the private sector or an authorised entity;</u>	P	Singapore To add in a new bullet point here and to delete the sentence in Section 4 on history of the use of measures by private sector or an authorised entity. <i>Category : SUBSTANTIVE</i>
199	108	<u>information from plant certification and accreditation schemes indicates that the measure is effective;</u>	C	PPPO this is the same as para 104, and is there any difference of this information between international and domestic setting? <i>Category : TECHNICAL</i>
200	108	information from <u>domestic</u> plant certification and accreditation schemes indicates that the measure is effective;	P	European Union To avoid confusion and it might not not be clear for all CPs what "plant accreditation schemes" are. <i>Category : TECHNICAL</i>
201	108	information from <u>domestic</u> plant certification and accreditation schemes indicates that the measure is effective;	P	EPPO To avoid confusion and it might not not be clear for all CPs what "plant accreditation schemes" are. <i>Category : TECHNICAL</i>
202	109	<u>best management practices for the measure are available.</u>	C	United States of America What of the meaning of this? Please reword for clarity. <i>Category : TECHNICAL</i>
203	110	<u>Quantitative or qualitative</u> Experimental evidence indicates that the measure is effective.	P	PPPO Suggest to move this para to the top of the list. including both qualitative and quantitative evidence covers both experimental and other evidence that a measure is effective. This may be particularly important when independent measures in a systems approach are included as options in an annex as some measures are developed based on expert judgement rather than experimental evidence. <i>Category : SUBSTANTIVE</i>
204	110	Experimental evidence indicates that the measure is <u>effective</u> .	C	United States of America Needs elaboration for type of reference materials used. Rewording required. <i>Category : TECHNICAL</i>
205	111	Information from PRAs (pest risk management options) or, where applicable, from another comparable examination and evaluation of available scientific information, indicates that the measure is effective <u>effective for pest risk management</u> .	P	COSAVE To clarify <i>Category : TECHNICAL</i>
206	111	<u>Information from PRAs (pest risk management options)</u> or, where applicable, from another comparable examination and evaluation of available scientific information, indicates that the measure is effective.	C	United States of America Not clear who's PRA it would be? How relevant or different for CPs? Also not clear what is "comparable examination"; what would be an example of this? Is it NPPO reports or else? Not clear. <i>Category : TECHNICAL</i>

207	111	Information from PRAs (pest risk management options) or, where applicable, from another comparable examination and evaluation of available scientific information, indicates that the measure is effective <u>effective for pest risk management</u> .	P	Uruguay To clarify Category : <i>TECHNICAL</i>
208	112	<u>Adopted ISPMs exist that are relevant to the pests or commodities.</u>	C	United States of America Need examples of ISPMs here. Category : <i>TECHNICAL</i>
209	114	The practicality and feasibility of the measure is also taken into account when a measure is being considered for inclusion in a commodity standard. These factors and cost should also be considered by contracting parties when evaluating <u>and implementing</u> an option as a phytosanitary measure.	P	PPPO The inclusion of 'and implementing' in this sentence would capture a concept in para [115] thus meaning that [115] could be deleted to simplify the text. Category : <i>EDITORIAL</i>
210	114	The practicality and feasibility of the measure is also taken into account <u>by the TPCS</u> when <u>considering</u> a measure is being considered for inclusion in a commodity standard. These factors and cost should also be considered by contracting parties when evaluating an option as a phytosanitary measure.	P	European Union 1) For better clarity (for better distinguishing this paragraph from the following one). 2) Redundant with the following paragraph. Category : <i>EDITORIAL</i>
211	114	The practicality and practicality , feasibility <u>and cost</u> of the measure is also taken into account when a measure it is being considered for inclusion in a commodity standard. These factors and cost should also be considered by contracting parties when evaluating an option as a phytosanitary measure.	P	COSAVE Even if the cost can be considered included in the practicability and feasibility of the measure, it is better to mention it specifically as it is an important criteria to consider when selecting measures to include in the standard. Category : <i>TECHNICAL</i>
212	114	The practicality and feasibility of the measure is also taken into account <u>by the TPCS</u> when <u>considering</u> a measure is being considered for inclusion in a commodity standard. These factors and cost should also be considered by contracting parties when evaluating an option as a phytosanitary measure.	P	EPPO 1) For better clarity (for better distinguishing this paragraph from the following one). 2) Redundant with the following paragraph. Category : <i>EDITORIAL</i>
213	114	The practicality and <u>feasibility</u> of the measure is also taken into account when a measure is being considered for inclusion in a commodity standard. These factors and cost should also be considered by contracting parties when evaluating an option as a phytosanitary measure.	C	United States of America Unfeasible measures should not be included in the standard. Unless, this means feasibility related to technological capacity of the CP. Category : <i>TECHNICAL</i>
214	114	The practicality and feasibility of the measure is also taken into account when a measure is being considered for inclusion in a commodity standard. These factors and cost should also be considered by contracting parties when evaluating an option as a phytosanitary measure.	P	China overlaped and these two paragraph should integrated into one. Category : <i>SUBSTANTIVE</i>
215	114	The practicality and practicality , feasibility <u>and cost</u> of the measure is also taken into account when a measure it is being considered for inclusion in a commodity standard. These factors and cost should also be considered by contracting parties when evaluating an option as a phytosanitary measure.	P	Uruguay Even if the cost can be considered included in the practicability and feasibility of the measure, it is better to mention it specifically as it is an important criteria to consider when selecting measures to include in the standard. Category : <i>TECHNICAL</i>

216	115	The practicality, feasibility and cost of potential measures should also be considered by contracting parties when implementing a commodity standard and evaluating the suitability of the measures contained within it.	C	Japan There seems to be a duplication between the second half of para 114 and para 115. One of them is not necessary or they can be integrated to one sentence. <i>Category : SUBSTANTIVE</i>
217	115	The practicality, feasibility and cost of potential measures should also be considered by contracting parties when implementing a commodity standard Confidence depends on the rigour of any supporting analyses and may be increased if there are cumulative sources of evidence, such as information on usage or acceptance. and evaluating the suitability of the measures contained within it.	P	PPPO Delete this paragraph to simplify as this concept is already included in the preceding paragraph [114] and it is therefore redundant. move para 129 here to link the concepts of criteria and confidence. <i>Category : SUBSTANTIVE</i>
218	115	The practicality, feasibility and cost of <u>potential options for phytosanitary</u> measures should also be considered by contracting parties when implementing a commodity standard and evaluating the suitability of the measures <u>contained within it for establishing their phytosanitary import requirements.</u>	P	European Union More precise wording and precision given. <i>Category : TECHNICAL</i>
219	115	The practicality, feasibility and cost of potential measures should also be considered by contracting parties when implementing a commodity standard and evaluating the suitability of the measures contained within it.	P	COSAVE Deleted to avoid redundancy with paragraph 114 <i>Category : TECHNICAL</i>
220	115	The practicality, feasibility and cost of <u>potential options for phytosanitary</u> measures should also be considered by contracting parties when implementing a commodity standard and evaluating the suitability of the measures <u>contained within it for establishing their phytosanitary import requirements.</u>	P	EPPO More precise wording and precision given. <i>Category : TECHNICAL</i>
221	115	The practicality, feasibility and cost of potential measures should also be considered by contracting parties when implementing a commodity standard and evaluating the suitability of the measures contained within it.	C	United States of America This para and para 114 belong to the implementation guide more than in an ISPM. What harmonization issues are solved by this info? <i>Category : SUBSTANTIVE</i>
222	115	The practicality, feasibility and cost of potential measures should also be considered by contracting parties when implementing a commodity standard The practicality, feasibility and cost of potential measures of the measure should be taken into account when a measure is being considered for inclusion in a commodity standard, or when implementing a commodity standard and evaluating the suitability of the measures contained within it. and evaluating the suitability of the measures contained within it.	P	China overlapped and these two paragraph should integrated into one. <i>Category : SUBSTANTIVE</i>
223	115	The practicality, feasibility and cost of potential measures should also be considered by contracting parties when implementing a commodity standard and evaluating the suitability of the measures contained within it.	P	Uruguay Deleted to avoid redundancy with paragraph 114 <i>Category : TECHNICAL</i>
4. Confidence in measures				
224	116	4. <u>Confidence in Categorization of</u> measures	P	Japan 1 The definition of confidence is quite unclear, so it is difficult to categorize the measures based on confidence. It is not clear about what "Confidence" exactly means (e.g. in terms of intensity, effectiveness, practicability, feasibility or

				<p>efficiency?). Unless confidence is defined, it is difficult to categorize measures based on confidence in an objective manner. However, measures may be categorized based on fact-based information (such as the presence of the measure in an adopted ISPM or a regional standard, the history of the use of the measure by contracting parties). Such categorization is still useful for contracting parties to consider use of measures included in commodity standards.</p> <p>2 Criteria should be an ISPM if developed.</p> <p>Even if criteria for categorization of measures can be developed, it should be set up within ISPM which requires countries consultation because the criteria of categorization is one of the core elements of this international standard. The existing ISPMs do not have similar descriptions in which TPs can develop any criteria. Such a non-transparent precedent should be avoided for ISPMs. If the technical panel concludes, as the result of its discussion, that the criteria should be developed, the TP can suggest a revision of this ISPM with proposed criteria.</p> <p>3. For the reason above, suggest modification of the draft text.</p> <p><i>Category : SUBSTANTIVE</i></p>
225	116	4. Confidence in measures	P	<p>PPPO</p> <p>to delete this and incorporate text of section 4 into section 3 to avoid redundancy.</p> <p><i>Category : SUBSTANTIVE</i></p>
226	117	Options for phytosanitary measures are may be categorized according to confidence in the measures. Confidence in the measures is evaluated based on criteria developed and revised as necessary by the Technical Panel on Commodity Standards. Evaluation of confidence may be Standard based on on fact-based information available such as:	P	<p>Japan</p> <p>See the coment to paragaraph116 from Japan</p> <p><i>Category : SUBSTANTIVE</i></p>
227	117	Options for phytosanitary measures are categorized according to confidence in the measures. Confidence in the measures is evaluated based on criteria developed and revised as necessary by the Technical Panel on Commodity Standards. Evaluation of confidence may be based on:	P	<p>PPPO</p> <p>to delete from this sentence onward in this section as they are redundant with section 3</p> <p><i>Category : SUBSTANTIVE</i></p>
228	117	Options for phytosanitary measures are categorized according to confidence in the measures. Confidence in the measures is evaluated based on criteria developed and revised as necessary by the Technical Panel on Commodity Standards. Evaluation <u>For the development of confidence the criteria, some of the below parameters could be considered, in no particular order of importance. Other parameters may also be based on considered:</u>	P	<p>United States of America</p> <p>Verify if this task is included in the TOR for TPCS.</p> <p>The revision of the last sentence adds clarity about the importance of the parameters, their non-all inclusive list, etc.</p> <p><i>Category : TECHNICAL</i></p>
229	117	Options for phytosanitary measures are categorized according to confidence in the measures. Confidence in the measures is evaluated based on criteria developed and revised as necessary by the Technical Panel on Commodity Standards. Evaluation of confidence may be based on:	C	<p>Caribbean Agricultural Health and Food Safety Agency</p> <p>The ease with which the measure can be applied or implemented should be included in the list since this will have implications on which countries can use the measures.</p> <p><i>Category : SUBSTANTIVE</i></p>

230	118	the presence of the measure in an adopted ISPM;	P	PPPO this is redundant with para [112] section 3 and therefore does not need to be repeated. <i>Category : SUBSTANTIVE</i>
231	119	the presence of the measure in a regional standard;	P	PPPO this is redundant with para [113] section 3 and therefore does not need to be repeated. <i>Category : SUBSTANTIVE</i>
232	120	the history of the use of the measure by contracting parties;	P	PPPO this is redundant with para [101 and 102] section 3 and therefore does not need to be repeated. <i>Category : SUBSTANTIVE</i>
233	120	the history of the use of the measure by contracting parties;	C	United States of America Skipping the technical justification entirely? <i>Category : TECHNICAL</i>
234	121	the history of the use of the measure by the private sector or an authorized entity;	P	PPPO this concept is covered by para [105] 'Experience from domestic use indicates that the measure is effective'. <i>Category : SUBSTANTIVE</i>
235	121	the history of the use of the measure by the private sector or an authorized entity;	C	United States of America same comment as above <i>Category : TECHNICAL</i>
236	121	the history of the use of the measure by the private sector or an authorized entity;	P	Singapore To delete this sentence and to move this up to under Section 3 i.e new bullet point. <i>Category : SUBSTANTIVE</i>
237	122	the inclusion of the measure in a PRA;	P	PPPO This could be deleted as this concept is already covered by the point below i.e. the number of PRAs that include the measure. <i>Category : SUBSTANTIVE</i>
238	122	the inclusion of the measure in a PRA;	C	United States of America This contradicts the principle of sovereignty. Only technical evidence should be the grounds for including a measure, not a historical PRA developed by another CP for their particular purposes. A PRA developed by one CP is not considered a "technical justification" for another CP if the situation is not bilateral. <i>Category : TECHNICAL</i>
239	123	the number of PRAs that include the measure;	P	PPPO this is redundant with para [111] section 3 and therefore does not need to be repeated. <i>Category : SUBSTANTIVE</i>
240	123	the number of PRAs that include the measure;	C	United States of America see comment above <i>Category : TECHNICAL</i>
241	124	the number of years that the measure has been in use;	P	PPPO this concept is covered by para [102] section 3 and therefore does not need to be repeated.

				<i>Category : SUBSTANTIVE</i>
242	124	the number of years that the measure has been in use;	P	United States of America Delete, not justified by any means. <i>Category : TECHNICAL</i>
243	125	reports of success or failure of the measure, including interception <u>and non-compliance</u> data;	P	Canada Adds clarity. <i>Category : TECHNICAL</i>
244	125	reports of success or failure of the measure, including interception data;	P	PPPO this is potentially an ambiguous measure of confidence as interception data can be an indicator that a measure is not applied as intended rather than being ineffective. Therefore, this paragraph should be deleted as it is misleading. <i>Category : SUBSTANTIVE</i>
245	125	reports of success or failure of the measure, including interception data;	C	Australia Review/investigation should be undertaken prior to a contracting party implementing a measure based on this point. E.g. the report of a pest on a consignment may not necessarily be due to the failure of a measure. <i>Category : TECHNICAL</i>
246	125	<u>analysis of th</u> reports of success or failure of the measure, including interception data <u>data as a function of the volume or frequency of traded commodities subjected to the measure;</u>	P	United States of America <i>Category : TECHNICAL</i>
247	126	the volume or frequency of traded commodities subjected to the measure;	P	PPPO this concept is covered by para [102] section 3 and therefore does not need to be repeated. <i>Category : SUBSTANTIVE</i>
248	126	the volume or frequency of traded commodities subjected to the measure;	C	Australia Review/investigation should be undertaken prior to a contracting party implementing a measure based on this point. E.g. the report of a pest on a consignment may not necessarily be due to the failure of a measure. <i>Category : TECHNICAL</i>
249	126	the volume or frequency of traded commodities subjected to the measure;	P	United States of America combined with the previous bullet to reconcile technical issues with both paras <i>Category : TECHNICAL</i>
250	127	the availability of quantitative or qualitative analyses pertinent to the measure;	P	PPPO this concept is partly covered by para [110] and para [110] could be expanded to include qualitative evidence. <i>Category : SUBSTANTIVE</i>
251	127	the availability of quantitative or qualitative <u>data</u> analyses pertinent on use and any <u>relevant information</u> to the measure;	P	IPPC Regional Workshop Africa <i>Category : SUBSTANTIVE</i>
252	127	the availability of quantitative or qualitative analyses pertinent to the <u>measure</u> ;	C	United States of America More specifics need to be added to this statement <i>Category : TECHNICAL</i>

253	128	the number and diversity of countries applying the measures.	P	PPPO this concept is covered by para [101 and 102] and therefore does not need to be repeated. <i>Category : SUBSTANTIVE</i>
254	128	the number and diversity of countries applying the measures. <u>- the ease with which a measure can be applied or implemented</u>	P	Barbados The ease with which the measure can be applied or implemented should be included in the list since this will have implications on which countries can use the measures. <i>Category : SUBSTANTIVE</i>
255	128	<u>the number and diversity of countries applying the measures.</u>	C	United States of America This is not a very strong technical justification. Are we setting a precedent of "harmonizing" the unknown technical information? <i>Category : TECHNICAL</i>
256	128	the number and diversity of countries applying the measures. <u>-Less restrictive measure</u>	P	Caribbean Agricultural Health and Food Safety Agency <i>Category : SUBSTANTIVE</i>
257	128	the number and diversity of countries applying the measures. <u>- the extent to which different countries or regions transform the measures as national standards, such as focus on transforming and modifying the content.</u>	P	China The application degree of the measures in different countries or regions, or the evaluation of its effectiveness, may be directly reflected in the degree of selective transformation combined with the policies of the country or region. <i>Category : SUBSTANTIVE</i>
258	129	Confidence depends on the rigour of any supporting analyses and may be increased if there are cumulative sources of evidence, such as information on usage or acceptance.	P	Japan See the comment to paragraph 116 from Japan <i>Category : SUBSTANTIVE</i>
259	129	Confidence depends on the rigour of any supporting analyses and may be increased if there are cumulative sources of evidence, such as information on usage or acceptance.	P	PPPO Move to below paragraph [114] to link the concepts of criteria and confidence. <i>Category : SUBSTANTIVE</i>
6. Review and re-evaluations				
260	133	Contracting parties should submit to the IPPC Secretariat any new information related to technical or implementation issues that could have an impact on commodity standards currently adopted by the CPM. <u>Appropriate information should be provided to support any claims.</u> The Technical Panel on Commodity Standards will review the data and revise the pest lists and options for phytosanitary measures if necessary, following the Standard Setting Procedure.	P	COSAVE New information is provided by contracting parties and evaluated by the technical panel which will conclude if the information is or not appropriate. <i>Category : TECHNICAL</i>
261	133	Contracting parties should submit to the IPPC Secretariat any <u>new information related to technical information</u> or implementation issues that could have an impact on commodity standards currently adopted by the CPM. <u>Appropriate information</u> <u>The contracting party should be provided provide complete and accurate evidence to support any claims</u> <u>the new technical information or resolve the implementation issue.</u> The Technical Panel on Commodity Standards will review the data and	P	United States of America Suggest alternative wording to "technical issues". This could also include new data, new information. also. See proposed revision. Revised the following sentence to more accurately reflect what should be submitted, and to be consistent with other Technical Panels' working procedures. "IPPC" is added to clarify which SS procedure is to be followed. <i>Category : TECHNICAL</i>

		revise the pest lists and options for phytosanitary measures if necessary, following the IPPC Standard Setting Procedure.		
262	133	Contracting parties should submit to the IPPC Secretariat any new information related to technical or implementation issues that could have an impact on commodity standards currently adopted by the CPM. Appropriate information should be provided to support any claims. The Technical Panel on Commodity Standards will review the data and revise the pest lists and options for phytosanitary measures if necessary, following the Standard Setting Procedure.	P	Uruguay New information is provided by contracting parties and evaluated by the technical panel which will conclude if the information is or not appropriate. <i>Category : TECHNICAL</i>
263	135	This section is not part of the standard. To allow the Secretariat to gather information on any potential implementation issues related to this draft, please provide details of potential implementation issues and proposals on how to address them.	C	Guyana Potential implementation issues could include the following: 1. The availability of pest lists for specific commodities by Parties with limited or no resources to develop same. This could be addressed through technical assistance being offered to applicable, interested parties to develop such. 2. The political will to provide the required export measure-implementing facilities to NPPOs of importing countries that are primary importers. This could perhaps be addressed through a heavier reliance of such an importing country on pre-export certification measures; this may require additional training for technical staff in pre-export certification methodologies and options. 3. Cost of the measure particularly where infrastructure may have to be built will be of particular concern to SIDS. The availability of chemicals or other control agents and their costs will also have to be looked at. <i>Category : SUBSTANTIVE</i>
264	135	This section is not part of the standard. To allow the Secretariat to gather information on any potential implementation issues related to this draft, please provide details of potential implementation issues and proposals on how to address them.	C	Barbados The cost of the measure particularly where infrastructure may have to be built will be of particular concern to SIDS. The availability of chemicals or other control agents and their costs will also have to be looked at. <i>Category : SUBSTANTIVE</i>
265	135	This section is not part of the standard. To allow the Secretariat to gather information on any potential implementation issues related to this draft, please provide details of potential implementation issues and proposals on how to address them.	C	Caribbean Agricultural Health and Food Safety Agency The cost of the measure particularly where infrastructure may have to be built will be of particular concern to SIDS. The availability of chemicals or other control agents and their costs will also have to be looked at. <i>Category : SUBSTANTIVE</i>