

2021 FIRST CONSULTATION

1 July – 30 September 2021

Addendum 1: PPPO Compiled comments for "2021 First Consultation: 2021 Draft Amendments of ISPM 5 (1994-001)"

Summary

Name	Summary
Guam	No comments.
Micronesia	Have no comment to share

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

Para	Text	T	Comment
G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i> (3) New Zealand (19 Aug 2021 5:11) There seems to be a trend with the newly proposed definitions that instead of the definitions being standalone explanations of the terms, they often reference a number of other IPPC terms. This can lead to a seemingly endless chain of referencing to correctly understand the meaning of the single term. This is required in some circumstances; however, the preference should be to define the term with as little reference to other terms as possible.</p>
1	DRAFT 2021 AMENDMENTS TO ISPM 5: GLOSSARY OF PHYTOSANITARY TERMS (1994-001)	C	<p><i>Category : SUBSTANTIVE</i> (14) Guam (29 Aug 2021 10:54) No comments.</p>
34	In contrast, descriptions provided in the phytosanitary certificate sections on ‘ <i>Number and description of packages</i> ’ and ‘ <i>Distinguishing marks</i> ’ may certainly be helpful for the practical spotting of one particular consignment among others, but are not considered part of the consignment’s identity;	C	<p><i>Category : SUBSTANTIVE</i> (4) New Zealand (19 Aug 2021 5:26) Suggest to align this para with ISPM 12. The current statement is inconsistent with ISPM 12 which states “Distinguishing marks on packages (e.g. lot numbers, serial numbers or brand names) and conveyance identification numbers or names (e.g. container and railcar identification numbers or vessel name in the case of bulk shipments) should be included if necessary for the identification of the consignment”</p>
43	The components of a consignment as covered by its phytosanitary certificate and described in the sections “name of produce and quantity declared”, “botanical name of plants ” and “place of origin”, <u>and "distinguishing marks"</u> .	P	<p><i>Category : SUBSTANTIVE</i> (5) New Zealand (19 Aug 2021 5:29) The definition could be simplified to "The components of a consignment as described by its Phytosanitary Certificate." if the definition is not simplified as we suggest, we propose to include 'distinguishing mark' at least. The distinguishing marks field plays a key role in helping NPPOs distinguish a consignment from others as stated in ISPM 12. There may be a number of phytosanitary certificates which have the same “name of produce and quantity declared”, “botanical name of plants”, and “place of origin” – however by including “Distinguishing marks”, this significantly reduces the likelihood of misidentifying an consignment. If the purpose of performing identity checks is to “reassure that exactly those specimens of plants, plant products or other articles (i.e. components from a particular place of origin) that are about to be</p>

			imported are exclusively those that had been certified" [paragraph 31] then the proposed definition of identity (of a consignment) that does not include distinguishing marks is insufficient to achieve this. our proposed implication (above) also takes into account the comment made by Japan.
56	general surveillance	P	<i>Category : SUBSTANTIVE</i> (16) Australia (1 Sep 2021 8:55) Australia does not consider that this definition is required as lack of clarity around this term has not been raised by a Contracting Party as a hinderance in the implementation of ISPM 6. General surveillance is well described in ISPM 6 and it is too broad a concept to be defined in one sentence. Additionally, this proposed definition is inconsistent with the descriptions provided in ISPM 6 that Contracting Parties and the IPPC have been using for a long period. There is no requirement in ISPM 6 (or ISPM 4) for general surveillance to be "official", as demonstrated by the various approaches and elements described in Part 2.1 of ISPM 6. Alongside this, the guidance document that has been under development within the IC for an extended period, and is about to be published, uses the concept of general surveillance as described in ISPM 6 and will be rendered out-of-date and incorrect if this definition proceeds. The description provided for data and information in the explanation states – ["data" refers to the raw collected material, which then becomes "information" once it has been analysed and verified]. Australia agrees that the process of analysis and verification can be "official" but it is not necessary for the collection of the raw data as in the proposed definition. If the proposed definition is not removed, significant revision will be required to address these concerns. In addition adopting this definition may unnecessarily and inappropriately restrict the data and information that a Contracting Party may be relying on or wish to rely on to support phytosanitary conditions.
57	An official process whereby data on pests in an area are collected from various sources other than surveys, analysed and verified. <u>A process whereby data on pests in an area are collected and analysed and, officially verified. The data may be collected from various sources, other than from surveys.</u>	P	<i>Category : TECHNICAL</i> (10) New Zealand (19 Aug 2021 5:52) the sentence would read better as two sentences. we also propose the removal of 'official' from process, as data can be collected and analysed unofficially, but need to be verified officially. proposed revision: "A process whereby data on pests in an area are collected and analysed and, officially verified. The data may be collected from various sources, other than from surveys."
67	specific surveillance	P	<i>Category : SUBSTANTIVE</i> (18) Australia (1 Sep 2021 8:56) Australia does not consider that this definition is required as lack of clarity around this term has not been raised by a Contracting Party as a hinderance in the implementation of ISPM 6. ISPM 6 already describes the three types of specific surveillance in Part 2.2 as follows: "Three types of surveys may be utilized by NPPOs depending on the objectives of the specific surveillance programme: - detection survey: conducted in an area to determine if pests are present (or absent) - delimiting survey: conducted to establish the boundaries of an area considered to be infested by or free from a pest - monitoring survey: ongoing survey to verify the characteristics of a pest population." As such, it is considered that either this proposed definition should be removed or the definition should be significantly revised to refer to the text and description already provided in ISPM 6, to avoid confusion.

68	An official process whereby information on pests in an area is obtained through surveys.	P	Category : <i>SUBSTANTIVE</i> (19) Australia (1 Sep 2021 8:57) see previous comment
80	General surveillance, specific surveillance or a combination of both An official process which collects and records data on pest presence or absence by survey, monitoring or other procedures procedures The collection, analysis and verification of data on pests in an area as part of an official process.	P	Category : <i>SUBSTANTIVE</i> (6) New Zealand (19 Aug 2021 5:34) The definition proposed in the amendment provides no definition at all and instead it refers you to look up two other terms. This goes back to the general comment above. The current definition provides more clarity therefore we have proposed a tweaked current version of the definition and would recommend the two types of surveillance are referenced. proposed revision: " The collection, analysis and verification of data on pests in an area as part of an official process. This can be general surveillance, specific surveillance or a combination of both. "
98	Composition State of a consignment when its identity, is unchanged and any seals or and packaging are unchanged. packaging are undamaged as described by its phytosanitary certificate or other officially acceptable document, maintained without loss, addition or substitution	P	Category : <i>TECHNICAL</i> (7) New Zealand (19 Aug 2021 5:36) The word "undamaged" is too limiting as it doesn't include changed. We have suggested that "seals and packaging" also be included with identity. It will also need to be noted that this proposed definition will need to be revisited if the definition for "Identity (of a consignment)" changes.
105	'Maintenance of integrity' has been substituted to 'State...when...integrity has been maintained' to correctly reflect that phytosanitary security is a state, not an action (in analogy to the original and revised definition of 'integrity (of a consignment)');	C	Category : <i>SUBSTANTIVE</i> (8) New Zealand (19 Aug 2021 5:37) We don't believe "Phytosanitary Security" is a state, rather it a series of activities or processes which leads to the consignment being secure from a phytosanitary perspective.
111	Maintenance of the integrity of a consignment and prevention of its infestation and contamination by regulated pests, through the application of appropriate phytosanitary measures [CPM, 2009]	C	Category : <i>SUBSTANTIVE</i> (13) New Zealand (20 Aug 2021 1:49) support keeping the current definition
114	Maintenance of the integrity <u>Maintaining the State of a consignment when its integrity integrity of a consignment has been maintained</u> and prevention of <u>preventing</u> its infestation and contamination by regulated pests; <u>prevented</u> through the application of appropriate phytosanitary measures	P	Category : <i>SUBSTANTIVE</i> (9) New Zealand (19 Aug 2021 5:43) We reject the proposed revision and propose the current definition be kept. We don't believe "Phytosanitary Security" is a state, rather it a series of activities or processes which leads to the consignment being secure from a phytosanitary perspective. The definition and the draft specification on phytosanitary security procedure should be aligned
124	<u>Plants for planting, including seeds</u> intended for use in breeding or conservation programmes	P	Category : <i>TECHNICAL</i> (21) Australia (1 Sep 2021 9:11) It is noted that "germplasm" is included in the definition of "plants" and "plants" in the definition of "plants for planting", but the inclusion of the text "including seeds" is proposed here for ease of

			understanding, and to remove reliance on going back through two other ISPM5 terms to confirm that seeds are included in this definition.
124	Plants for planting intended for use in breeding or conservation programmes	C	<p><i>Category : SUBSTANTIVE</i> (2) New Zealand (16 Aug 2021 2:03) Retain current definition. We reject the proposed revision. Proposed revision is unhelpful. Plant germplasm includes material that is not intended "for planting" (e.g., pollen, protoplasts – both are not used, not suitable "for planting"). Also refer to "plant" and "plant for planting" New Zealand (7 Sep 2021 5:11) NZ supports Japan and Thailand on this</p>
201	Official non-visual examination of plants, plant products or other regulated articles , other than visual, to determine if pests are present, identify pests or determine compliance <u>verify conformity</u> with specific phytosanitary requirements	P	<p><i>Category : EDITORIAL</i> (11) New Zealand (19 Aug 2021 5:55) Editorial change proposed to improve flow and retain meaning.</p>