2021 SECOND CONSULTATION

1 July – 30 September 2021

Compiled comments for Draft PT: Irradiation treatment for *Sternochetus frigidus* (2017-036) with Treatment lead's response

Summary

Name	Summary
EPPO Σ	A 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 this draft.
South Africa	The NPPOZA is in agreement with this draft and has no further comments
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	SC response
1	G	(General Comment)	C	**Guyana** Guyana has no objection at this time. *Category : SUBSTANTIVE*	**Noted**
2	G	(General Comment)	C	**Costa Rica** we have no comments *Category : SUBSTANTIVE*	**Noted**
3	G	(General Comment)	C	**Nepal** Nepal has no comments on DRAFT ANNEX TO ISPM 28: Irradiation treatment for Sternochetus frigidus on Mangifera indica *Category : EDITORIAL*	**Noted**
4	G	(General Comment)	C	**Mexico** I support the document as it is and I have no comments *Category : SUBSTANTIVE*	**Noted**
5	G	(General Comment)	C	**Russian Federation** The Russian Federation would like to formally endorse the EPPO comments submitted via the IPPC Online Comment System *Category : SUBSTANTIVE*	**Noted**
6	G	(General Comment)	C	**European Union** The comments by the EU and its Member States are provided without prejudice to the European Union food safety legislation imposing limitations on the acceptance of irradiated goods. *Category : SUBSTANTIVE*	**Noted**

7	G	(General Comment)	C	**Australia** Australia has reviewed and is supportive of this current text. *Category : SUBSTANTIVE*	**Noted**
8	G	(General Comment)	C	**Colombia** In ISPM 18. 2003. Guidelines for the use of irradiation as a phytosanitary measure, published in 2019. It includes that: "Modified atmospheres may reduce treatment efficacy at a prescribed dose". However, in the new proposal for ISPM 18 [2021 First Consultation: Draft ISPM: Revision of ISPM 18 (2014-007)] this paragraph was not included but does appear in this proposed annex: [42]This treatment should not be applied to fruit of Mangifera indica stored in a modified atmosphere because the modified atmosphere may affect the treatment efficacy. It is not clear whether modified atmospheres affect the efficiency of irradiation treatment, but if so, it should have been included in the new proposal for ISPM 18.. *Category : SUBSTANTIVE*	**Considered, but not incorporated** This comment is relevant to ISPM 18 not to this treatement schedule.
9	G	(General Comment)	C	**Malawi** We support draft annex to ISPM 28: Irradiation treatment for Sternochetus frigidus on Mangifera indica (2017-036) *Category : SUBSTANTIVE*	**Noted**
10	G	(General Comment)	C	**Barbados** Barbados agrees with the proposal. *Category : SUBSTANTIVE*	**Noted**
11	G	(General Comment)	C	**United States of America** We supports this treatment and have no comments. *Category : SUBSTANTIVE*	**Noted**
12	G	(General Comment)	C	**Korea, Republic of** Republic of Korea does not support to adopt this standards because the number of pests to be experimented(2,274 adult female) is too small. Irradiation is resulted in sterilization and inactivation not in mortality of target pest. So sufficient size of sample should be used. *Category : EDITORIAL*	**Considered, but not incorporated** The recommendation is that mangoes are irradiated at 165 Gy which provides a significant margin of safety and should provide quarantine security for S. frigidus. Although the level of efficacy achieved may be low for some countries, others may accept it. Countries would be free to use this treatment as they see fit. It should also be considered that a treatment may be adopted as part of a systems approach to the management of pest risk, and the efficacy of the system as a whole including the treatment may be sufficient to meet the countries ALOP.

13	G	(General Comment)	C	**Thailand** Thailand has no objection on the Draft PT: Irradiation treatment for Sternochetus frigidus. *Category : SUBSTANTIVE*	**Noted**
DRAFT ANNEX TO ISPM 28: Irradiation treatment for Sternochetus frigidus on Mangifera indica (2017-036)					
14	1	**DRAFT ANNEX TO ISPM 28: Irradiation treatment for *Sternochetus frigidus* on *Mangifera indica* (2017-036)**	C	**Viet Nam** VN agrees with this draft annex to ISPM 28. Irradiation treatment for Sternochitus frigidus on Mangifera indica *Category : SUBSTANTIVE*	**Noted**
15	1	**DRAFT ANNEX TO ISPM 28: Irradiation treatment for *Sternochetus ~~frigidus~~ frigidus~~on Mangifera indica~~* (2017-036)**	P	**China** For the sake of conformity and consistency of irradiation treatment standards recommended to delete "on Mangifera indica *Category : SUBSTANTIVE*	**INCORPORATED** The name of the target regulated article was added previously to the title (different to other irradiation treatments) because this pest is monofagous and only infests *Mangifera indica*. However it is recognised that irradiation treatments are accepted as efficacious on all the hosts of the target pest, so the TPPT agrees to align the title with other irradiation treatments.
16	1	**DRAFT ANNEX TO ISPM 28: Irradiation treatment for *Sternochetus frigidus* on *Mangifera indica* (2017-036)**	C	**Uruguay** We agree with the document as it is, no comments *Category : TECHNICAL*	**Noted**
Treatment description					
17	37	**Target regulated article** Fruit of *Mangifera indica*	P	**Canada** Consistent with the Scope of the Treatment. *Category : TECHNICAL*	**Modified**
18	37	**Target regulated article** Fruit of *Mangifera indica*	P	**Japan** Specify the part of the plant targeted for the treatment like other PTs. *Category : EDITORIAL*	**Modified**
Other relevant information					
19	44	Because irradiation may not result in outright mortality, inspectors may encounter live but non-viable *Sternochetus frigidus* (eggs, larvae, pupae or adults) during the inspection process. This does not imply a failure of the treatment.	C	**Colombia** In the text: "Because irradiation may not result in outright mortality, inspectors may encounter live but non-viable Sternochetus frigidus (eggs, larvae, pupae or adults) during the inspection process. This does not imply a failure of the treatment.", the alternatives to follow should be included to clearly define when the treatment was or was not effective. Live insects of Sternochetus frigidus are assumed to be non-viable, but this condition would have to be assessed to confirm or disprove it.	**Considered, but not incorporated** Live target pests may be found after treatment, but this should not result in the refusal to issue a phytosanitary certificate Where mortality is not the required response, it is more likely that live target pests may persist in the treated consignment; in such cases, phytosanitary certification should be based on confirmation from the normal validation programme that the required response is achieved for the specific commodity and treatment conditions concerned.

				If the event that live pests are found, the NPPO would have to consider taking an emergency treatment and initiate the assessment of the viability of the pests found alive. It is not clear what would be the reference to evaluate the effectiveness or not of the treatment by the inspectors. What could be lent for misinterpretations in the result of the treatment. *Category : TECHNICAL*	Actions to be taken when live insects are found should be negotiated between the involved NPPOs
20	45	The Technical Panel on Phytosanitary Treatments based its evaluation of this treatment on the research reported by Obra *et al.* (2014), which determined the efficacy of irradiation of *Sternochetus frigidus* ~~*S. frigidus*~~ on mangoes.	P	**Japan** Suggest full scientific name to be shown in consistent with other annexes of ISPM28. *Category : EDITORIAL*	**Incorporated**
21	46	The efficacy of this schedule was calculated based on a total of 2 274 adult females treated with no egg production; the control egg production was 397 eggs per female.	C	**Colombia** The number of 2,274 females treated to validate the treatment is too low to be considered as a large-scale trial. With the number of individuals evaluated in the reference study, one might think that this is a small-scale test. should be around 100,000 treated individuals, finding a mortality of 99.9968% (Probit level 9) (Couey and Chew 1986). However, in this case it is irradiation and the response to treatment is validated by the viability or not of the insect after being treated, so it is not clear what would be the appropriate number of insects to treat with a favorable response to treatment. *Category : TECHNICAL*	**Considered, but not incorporated** (see response to comment 12)
22	46	The efficacy of this schedule was calculated based on a total of 2 274 adult females treated with no egg production; the control egg production was 397 eggs per female.	C	**New Zealand** seeking clarification. Is it 2 trials? Or is the addition of an the extra 2 an error? Or is it 2274 and the space in between the 2s is an error? *Category : EDITORIAL*	**Considered, but not incorporated** It is 2274
References					
23	48	The present annex ~~may refer~~ refers to ISPMs. ISPMs are available on the International Phytosanitary Portal (IPP) at .	P	**European Union** The present annex refers to ISPMs 28 and 18. There is no reason to write "may refer". We understand that this is a general statement for all PTs and this comment may apply to other already adopted PTs. *Category : EDITORIAL*	**CONSIDERED BUT NOT INCORPORATED** Keep standard language.

24	48	The present annex refers to ISPMs. ISPMs are available on the International Phytosanitary Portal (IPP) at ~~The present annex may refer to ISPMs. ISPMs are available on the International Phytosanitary Portal (IPP) at~~ .	P	**EPPO** The present annex refers to ISPMs 28 and 18. There is no reason to write "may refer". We understand that this is a general statement for all PTs and this comment may apply to other already adopted PTs. *Category : EDITORIAL*	**CONSIDERED BUT NOT INCORPORATED** Keep standard language.