

2021 FIRST CONSULTATION

1 July – 31 August 2021


Compiled comments for Draft Specification: Reorganization of Pest Risk Analysis Standards (2020-001)

Summary of comments

Participants

Name	Summary
Singapore	Singapore is supportive of this. Thanks.
South Africa	The National Plant Protection Organization of South Africa is in agreement with this standard.
Tonga	The Pest Risk Analysis document has been reviewed and I have no further comment.
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	<i>Category : SUBSTANTIVE</i> (114) Argentina (1 Sep 2021 12:44 AM) Argentina supports comments from COSAVE
2	G	(General Comment)	C	<i>Category : TECHNICAL</i> (112) Paraguay (31 Aug 2021 8:08 PM) Paraguay apoya los comentarios de COSAVE
3	G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (111) Colombia (31 Aug 2021 7:44 PM) Colombia is in agreement with the proposed guidelines.
4	G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (93) EPP0 (31 Aug 2021 6:09 PM) For consistency, we believe that some links to ISPM 21 should be considered in this reorganization and in the new Standard as it is not clear whether this is the plan.
5	G	(General Comment)	C	<i>Category : EDITORIAL</i> (71) South Africa (31 Aug 2021 11:22 AM) The National Plant Protection Organization of South Africa is in agreement with this standard.
6	G	(General Comment)	C	<i>Category : SUBSTANTIVE</i>  Mexico (70) Mexico (31 Aug 2021 12:29 AM) Mexico agrees and supports approval of this Draft Specification of ISPM and do not have major comments.
7	G	(General Comment)	C	<i>Category : TECHNICAL</i> (69) Brazil (30 Aug 2021 10:27 PM) Brazil supports the COSAVE's comments

8	G	(General Comment)	C	<p><i>Category : EDITORIAL</i> (64) Nepal (29 Aug 2021 6:28 AM) Nepal has no comments and is in support of DRAFT SPECIFICATION FOR ISPM: Reorganization of pest risk analysis standards (2020-001)</p>
9	G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i> (39) New Zealand (13 Aug 2021 5:39 AM) Given the importance of pest risk communication in the process there is an opportunity to elaborate on this within the revised standard. It is noted that there is already a guidance document on this IPPC guide to pest risk communication - A guide for national plant protection organizations on communicating with stakeholders about pest risks (fao.org) from which could be used to develop an annex on risk communication to this ISPM. for transparency purpose, risk communication is a key part of risk analysis when NPPO communicate and consult the outcomes of risk assessment and risk management with trading partners and industry stakeholders etc.</p>
10	G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i> (46) Bahamas (19 Aug 2021 3:53 AM) The Bahamas supports the reorganization of the pest risk analysis standards.</p>
11	G	(General Comment)	C	<p><i>Category : TECHNICAL</i> (45) Congo (18 Aug 2021 5:34 PM) i agree with this specification and i have nothing to add.</p>
12	G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i> (38) New Zealand (13 Aug 2021 5:38 AM) GENERAL COMMENT: This annex says that no substantial revisions are expected [paragraph 54] and if they are identified they will be used for future reference [paragraph 62]. Given the importance of this standard it would be worthwhile increasing the scope of the revision to include substantial improvements if identified by the EWG.</p>
13	G	(General Comment)	C	<p><i>Category : SUBSTANTIVE</i> (18) United States of America (9 Aug 2021 7:18 PM) It is a good idea to consolidate ISPMs related to PRA. However, the option with separate annexes seems to be artificial because the PRA is a continuous process and all 3 stages belong together. E.g., Risk Management (RM) would send the reader back to the risk assessment stage to monitor the effectiveness of the RM. It seems redundant to refer people to the Annexes instead of flowing through the solid process which is a continuum.</p>
14	24	Reorganization of pest risk analysis standards (2020-001).	C	<p><i>Category : SUBSTANTIVE</i> (95) COSAVE (31 Aug 2021 6:48 PM) The proposal implies revocation of ISPM 2 and revision of ISPM 11, therefore this goes beyond a simple reorganization of standards</p>
15	24	Reorganization and revision of pest risk analysis standards (2020-001).	P	<p><i>Category : TECHNICAL</i> (94) COSAVE (31 Aug 2021 6:48 PM) The proposal implies recocation of , ISPM 2 and revision of ISPM 11, therefore this goes beyond a simple reorganization of standards</p>
16	24	Reorganization and revision of pest risk analysis standards (2020-001).	P	<p><i>Category : TECHNICAL</i> (2) Uruguay (9 Aug 2021 5:00 PM)</p>

				17The proposal implies the revokation of ISPM 2 and revision of ISPM 11, therefore this goes beyond a simple reorganization of standards
17	25	Reason for the <u>reorganization and</u> revision of the standards	P	<i>Category : TECHNICAL</i> (96) COSAVE (31 Aug 2021 6:48 PM) See comment in paragraph 24. In addition consistency with paragraph 28.
18	25	Reason for the <u>reorganization and</u> revision of the standards	P	<i>Category : TECHNICAL</i> (3) Uruguay (9 Aug 2021 5:01 PM) See comment in paragraph 24. In addition consistency with paragraph 28
19	26	Pest risk analysis (PRA) is a core process within the scope of the IPPC and an important science-based evaluation tool for national plant protection organizations (NPPOs). It is used to determine quarantine pests and to identify the phytosanitary measures that are appropriate to manage the risk of pest introduction and spread in a specified PRA -area. Guidance for NPPOs on the evaluation of technical, scientific and economic evidence to justify their decisions is currently documented in ISPM 2 (<i>Framework for pest risk analysis</i> , adopted in 1995, revised in 2007) and ISPM 11 (<i>Pest risk analysis for quarantine pests</i> , adopted in 2001, revised in 2003, 2004 and 2013).	P	<i>Category : SUBSTANTIVE</i> (113) Malawi (31 Aug 2021 8:46 PM)
20	26	Pest risk analysis (PRA) is a core process within the scope of the IPPC and an important science-based evaluation tool for national plant protection organizations (NPPOs). It is used to determine quarantine pests and to identify the <u>options of</u> phytosanitary measures that are appropriate to manage the risk of pest introduction and spread in a specified PRA area. Guidance for NPPOs on the evaluation of technical, scientific and economic evidence to justify their decisions is currently documented in ISPM 2 (<i>Framework for pest risk analysis</i> , adopted in 1995, revised in 2007) and ISPM 11 (<i>Pest risk analysis for quarantine pests</i> , adopted in 2001, revised in 2003, 2004 and 2013).	P	<i>Category : TECHNICAL</i> (97) COSAVE (31 Aug 2021 6:48 PM) Consistency with ISPM 11
21	26	Pest risk analysis (PRA) is a core process within the scope of the IPPC and an important science-based evaluation tool for national plant protection organizations (NPPOs). It is used to determine-quarantine-identify pests <u>of quarantine concern</u> and to identify the <u>options for</u> phytosanitary measures that are appropriate to manage the risk of pest introduction and spread <u>of pests in a the</u> specified PRA area. Guidance for NPPOs on the evaluation of technical, scientific and economic evidence to justify their decisions is currently documented-provided in ISPM 2 (<i>Framework for pest risk analysis</i> , adopted in 1995, revised in 2007) and ISPM 11 (<i>Pest risk analysis for quarantine pests</i> , adopted in 2001, revised in 2003, 2004 and 2013).	P	<i>Category : EDITORIAL</i> (72) EPPO (31 Aug 2021 6:09 PM) More precise wording. More appropriate wording
22	26	Pest risk analysis (PRA) is a core process within the scope of the IPPC and an important science-based evaluation tool for national plant protection organizations (NPPOs). It is used to determine quarantine pests and to identify the <u>appropriate</u> phytosanitary measures that are appropriate to manage the risk	P	<i>Category : EDITORIAL</i> (65) Fiji (30 Aug 2021 5:53 AM)

		of pest introduction and spread in a specified PRA area. Guidance for NPPOs on the evaluation of technical, scientific and economic evidence to justify their decisions is currently documented in ISPM 2 (<i>Framework for pest risk analysis</i> , adopted in 1995, revised in 2007) and ISPM 11 (<i>Pest risk analysis for quarantine pests</i> , adopted in 2001, revised in 2003, 2004 and 2013).		
23	26	Pest risk analysis (PRA) is a core process within the scope of the IPPC and an important science-based evaluation tool for national plant protection organizations <u>National Plant Protection Organizations</u> (NPPOs). It is used to determine quarantine pests and to identify the phytosanitary measures that are appropriate to manage the risk of pest introduction and spread in a specified PRA area. Guidance for NPPOs on the evaluation of technical, scientific and economic evidence to justify their decisions is currently documented in ISPM 2 (<i>Framework for pest risk analysis</i> , adopted in 1995, revised in 2007) and ISPM 11 (<i>Pest risk analysis for quarantine pests</i> , adopted in 2001, revised in 2003, 2004 and 2013).	P	Category : EDITORIAL (56) China (26 Aug 2021 10:58 AM) Typo.
24	26	Pest risk analysis (PRA) is a core process within the scope of the IPPC and an important science-based evaluation tool for national plant protection organizations (NPPOs). It is used to determine quarantine pests and to identify the <u>options of</u> phytosanitary measures that are appropriate to manage the risk of pest introduction and spread in a specified PRA area. Guidance for NPPOs on the evaluation of technical, scientific and economic evidence to justify their decisions is currently documented in ISPM 2 (<i>Framework for pest risk analysis</i> , adopted in 1995, revised in 2007) and ISPM 11 (<i>Pest risk analysis for quarantine pests</i> , adopted in 2001, revised in 2003, 2004 and 2013).	P	Category : TECHNICAL (4) Uruguay (9 Aug 2021 5:03 PM) Consistency with ISPM 11
25	27	ISPM 2 describes the overall process of PRA for pests of plants <u>PRA</u> , with a particular focus on the initiation stage (Stage 1 of the PRA process). ISPM 11 describes the factors to consider when conducting a PRA to determine if a pest qualifies as a quarantine pest. The emphasis in ISPM 11 is on the integrated process for pest risk assessment and guidance on selection of pest risk management options (Stages 2 and 3, respectively, of the PRA process). In addition, this ISPM includes guidance on the analysis of risks posed by pests to the environment and biological diversity, the evaluation of potential risks to plants and plant products posed by living modified organisms, and the conduct of PRA for plants as quarantine pests.	P	Category : EDITORIAL (98) COSAVE (31 Aug 2021 6:48 PM) For simplification and better reading.
26	27	ISPM 2 describes the overall process of PRA for pests of plants <u>pests</u> , with a particular focus on the initiation stage (Stage 1 of the PRA process). ISPM 11 describes the factors to consider when conducting a PRA to determine if a pest qualifies as a quarantine pest. The emphasis in ISPM 11 is on the integrated process <u>to be used</u> for pest risk assessment and guidance as well as on the selection of pest risk management options (Stages 2 and 3, respectively, of the	P	Category : TECHNICAL (73) EPPO (31 Aug 2021 6:09 PM) Please see the definition of "pest" in ISPM 5. More precise wording to reflect the scope of ISPM 11 which is the integrated processes of risk assessment and risk management

		PRA process). In addition, this ISPM includes guidance on the analysis of risks posed by pests to the environment and biological diversity, the evaluation of potential risks to plants and plant products posed by living modified organisms, and the conduct of PRA for plants as quarantine pests.		
27	27	ISPM 2 describes the overall process of PRA for pests of plants, with a particular focus on the initiation stage (Stage 1 of the PRA process). ISPM 11 describes the factors to consider when conducting a PRA to determine if a pest qualifies as a quarantine pest. The emphasis in ISPM 11 is on the integrated process for pest risk assessment and guidance on selection of selecting pest risk management options (Stages 2 and 3, respectively, of the PRA process). In addition, this ISPM includes guidance on the analysis of risks posed by pests to the environment and biological diversity, the evaluation of potential risks to plants and plant products posed by living modified organisms, and the to conduct of PRA for plants as quarantine pests.	P	Category : EDITORIAL (66) Fiji (30 Aug 2021 5:53 AM)
28	27	ISPM 2 describes the overall process of PRA for pests of plants, with a particular focus on the initiation stage (Stage 1 of the PRA process). ISPM 11 describes the factors to consider when conducting a PRA to determine if a pest qualifies as a quarantine pest. The emphasis in ISPM 11 is on the integrated process for pest risk assessment and guidance on selection of pest risk management options (Stages 2 and 3, respectively, of the PRA process). In addition, this ISPM <u>11</u> includes guidance on the analysis of risks posed by pests to the environment and biological diversity, the evaluation of potential risks to plants and plant products posed by living modified organisms, and the conduct of PRA for plants as quarantine pests.	P	Category : EDITORIAL (47) Australia (26 Aug 2021 8:54 AM) Clarifying that this point refers to ISPM 11
29	27	ISPM 2 describes the overall process of PRA for pests of plants PRA, with a particular focus on the initiation stage (Stage 1 of the PRA process). ISPM 11 describes the factors to consider when conducting a PRA to determine if a pest qualifies as a quarantine pest. The emphasis in ISPM 11 is on the integrated process for pest risk assessment and guidance on selection of pest risk management options (Stages 2 and 3, respectively, of the PRA process). In addition, this ISPM includes guidance on the analysis of risks posed by pests to the environment and biological diversity, the evaluation of potential risks to plants and plant products posed by living modified organisms, and the conduct of PRA for plants as quarantine pests.	P	Category : EDITORIAL (5) Uruguay (9 Aug 2021 5:04 PM) For simplification and better reading
30	28	The revision and reorganization of the standards related to PRA was proposed following discussions on the draft ISPM on <i>Pest risk management for quarantine pests</i> (2014-001). The following aspects were identified:	C	Category : SUBSTANTIVE (19) United States of America (9 Aug 2021 7:23 PM) It is difficult to comment on this because we didn't see the current draft on Risk Management.
31	29	the need to strengthen the draft ISPM with appropriate requirements guidance on pest risk management;	P	Category : EDITORIAL (48) Australia (26 Aug 2021 8:55 AM)

				ISPMs should not be prescriptive as countries require flexibility for proper implementation. 'Guidance' is therefore more accurate.
32	31	The Commission on Phytosanitary Measures (CPM) Bureau discussed the revision of PRA standards and recommended that they be integrated into one overarching standard on the PRA process, with an annex for each stage of PRA. ¹ This approach is considered the best because it will ensure that PRA is viewed as a conceptual process composed of three different stages (each supported by a more comprehensive annex), and it will establish a framework that enables NPPOs to conduct PRA appropriately <u>facilitate the PRA process</u> .	P	<i>Category : TECHNICAL</i> (99) COSAVE (31 Aug 2021 6:48 PM) The aim is for the ISPM revision to support and facilitate NPPOs in the development of PRAs rather than conducting them appropriately.
33	31	The Commission on Phytosanitary Measures (CPM) Bureau discussed the revision of PRA standards <u>for quarantine pests</u> and recommended that they be integrated into one overarching standard on the PRA process, with an annex for each stage of PRA. ¹ This approach is considered the best because it will ensure that PRA is viewed as a conceptual process composed of three different stages (each supported by a more comprehensive annex), and it will establish a framework that enables NPPOs to conduct PRA appropriately.	P	<i>Category : EDITORIAL</i> (74) EPPO (31 Aug 2021 6:09 PM) For better consistency within the specification (including with paragraph 38).
34	31	The Commission on Phytosanitary Measures (CPM) Bureau discussed the revision of PRA standards and recommended that they <u>should</u> be integrated into one overarching standard on the PRA process, with an annex for each stage of PRA. ¹ This approach is considered the best because it will ensure that PRA is viewed as a conceptual process composed of three different stages (each supported by a more comprehensive annex), and it will establish a framework that enables NPPOs to conduct PRA appropriately.	P	<i>Category : EDITORIAL</i> (57) China (26 Aug 2021 11:00 AM) Grammar.
35	31	The Commission on Phytosanitary Measures (CPM) Bureau discussed the revision of PRA standards and recommended that they be integrated into one overarching standard on the PRA process, with an annex for each stage of PRA. ¹ This approach is considered the best because it will ensure that PRA is viewed as a conceptual process composed of three different stages (each supported by a more comprehensive annex), and it will establish a framework that enables NPPOs to conduct PRA appropriately.	C	<i>Category : TECHNICAL</i> (20) United States of America (9 Aug 2021 7:24 PM) This para seems redundant.
36	31	The Commission on Phytosanitary Measures (CPM) Bureau discussed the revision of PRA standards and recommended that they be integrated into one overarching standard on the PRA process, with an annex for each stage of PRA. ¹ This approach is considered the best because it will ensure that PRA is viewed as a conceptual process composed of three different stages (each supported by a more comprehensive annex), and it will establish a framework that enables NPPOs to conduct <u>facilitate the PRA</u> appropriately <u>process</u> .	P	<i>Category : TECHNICAL</i> (6) Uruguay (9 Aug 2021 5:06 PM) The aim is for the ISPMs revision to support and facilitate NPPOs in the development of PRAs rather than conducting them appropriately
37	35	General guidance on the PRA process should be provided in the core text of the standard and detailed guidance on each stage of PRA (Stage 1. initiation,	P	<i>Category : TECHNICAL</i> (67) Canada (30 Aug 2021 8:48 PM) The inclusion of a reference to ISPM 1 in the scope of the

		Stage 2. pest risk assessment, Stage 3. pest risk management) should be consolidated in the annexes to the standard: one annex for each stage. <u>The general guidance should include clear references to the importance of facilitation of safe trade, selecting risk management measures with the least impact, and ensuring that measures are no more restrictive than necessary. In this regard, prominent references to ISPM 1, Phytosanitary principles for the protection of plants and the application of phytosanitary measures in international trade, should be included.</u>		specification is crucial to highlight the importance of facilitation of safe trade and the selection of risk management measures that the least impact.
38	36	The standard should include general guidance on pest risk management, such as criteria related to the rational relationship between the pest risk and the strength of phytosanitary measures, harmonization, and equivalence of phytosanitary measures (as in ISPM 1 (Phytosanitary principles for the protection of plants and the application of phytosanitary measures in international trade) and ISPM 24 (Guidelines for the determination and recognition of equivalence of phytosanitary measures)).	P	Category : TECHNICAL (100) COSAVE (31 Aug 2021 6:48 PM) General guidance on pest risk management is included in the general guidance mentioned in paragraph 35. Criteria related to the relationship between pest risk and strength of measures is mentioned in the purpose section
39	36	The standard should include general guidance on pest risk management, such as criteria related to the rational relationship between the pest risk and the strength of phytosanitary measures, harmonization, and equivalence of phytosanitary measures (as in ISPM 1 (Phytosanitary principles for the protection of plants and the application of phytosanitary measures in international trade) and ISPM 24 (Guidelines for the determination and recognition of equivalence of phytosanitary measures)).	P	Category : TECHNICAL (7) Uruguay (9 Aug 2021 5:09 PM) General guidance on pest risk management is included in the general guidance mentioned in paragraph 35. Criteria related to the relationship between pest risk and strength of measures is mentioned in the purpose section
40	37	Guidance on the analysis of <u>pest</u> risks posed by pests to the environment and biological diversity, the evaluation of potential <u>pest</u> risks to plants and plant products posed by living modified organisms, and the conduct of PRA for plants as quarantine pests should also be included in the standard.	P	Category : TECHNICAL (101) COSAVE (31 Aug 2021 6:48 PM) Glossary terms.
41	37	Guidance on the analysis of risks posed by pests <u>and living modified organisms</u> to the environment and biological diversity, the evaluation of potential risks to plants and plant products posed by living modified organisms, and the conduct of PRA for plants as quarantine pests should also be included in the standard.	P	Category : SUBSTANTIVE (58) China (26 Aug 2021 11:04 AM) Effects of genetically modified organisms on environment and biodiversity and the effects of pests on plants and plant products should be included.
42	37	Guidance on the analysis of <u>pest</u> risks posed by pests to the environment and biological diversity, the evaluation of potential <u>pest</u> risks to plants and plant products posed by living modified organisms, and the conduct of PRA for plants as quarantine pests should also be included in the standard.	P	Category : TECHNICAL (8) Uruguay (9 Aug 2021 5:10 PM) Glossary terms

43	40	The purpose of this standard is to facilitate harmonization of the different stages of the PRA process – initiation, pest risk assessment and identification of appropriate pest risk management options – and to support the rational relationship between the pest risk identified through pest risk assessment and the strength of the corresponding phytosanitary measures identified through pest risk management.	P	<i>Category : TECHNICAL</i> (102) COSAVE (31 Aug 2021 6:48 PM) Paragraph refers to the 3 stages of PRA process, being "pest risk management" the third stage.
44	40	The purpose of this standard is to facilitate harmonization of the different stages of the PRA process – initiation, pest risk assessment and identification of appropriate pest risk management options – and to support the rational relationship between the pest risk identified through pest risk assessment and the strength of the corresponding options for phytosanitary measures identified through pest risk management.	P	<i>Category : EDITORIAL</i> (75) EPPO (31 Aug 2021 6:09 PM) More precise wording. The pest risk management stage identifies risk management options.
45	40	The purpose of this standard is to facilitate harmonization of consolidate the content relating to the different stages of the PRA process – initiation, pest risk assessment and identification of appropriate pest risk management options – and to support the rational relationship between the pest risk identified through pest risk assessment and the strength of the corresponding phytosanitary measures identified through pest risk management.	P	<i>Category : EDITORIAL</i> (49) Australia (26 Aug 2021 8:56 AM) The purpose is to amalgamate the text, not to substantially revise the content. Consider that the proposed new wording is clearer on this point.
46	40	The purpose of this standard the reorganization is to facilitate harmonization streamlining and aligning the concepts of ISPMs No. 2 and No. 11. It will harmonize the different stages of the PRA process – initiation, pest risk assessment and identification of appropriate pest risk management options – and to support the rational relationship between the pest risk identified through pest risk assessment and the strength of the corresponding phytosanitary measures identified through pest risk management.	P	<i>Category : EDITORIAL</i> (21) United States of America (9 Aug 2021 7:27 PM) More clarity.
47	40	The purpose of this standard is to facilitate harmonization of the different stages of the PRA process – initiation, pest risk assessment and identification of appropriate pest risk management options – and to support the rational relationship between the pest risk identified through pest risk assessment and the strength of the corresponding phytosanitary measures identified through pest risk management.	P	<i>Category : TECHNICAL</i> (9) Uruguay (9 Aug 2021 5:12 PM) Paragraph refers to the 3 stages of PRA process, being "pest risk management" the third stage
48	41	This will be achieved by reorganizing revising where relevant and ISPM 2, ISPM 11 and the draft ISPM on <i>Pest risk management for quarantine pests</i> (2014-001) into one standard. Revised text to improve guidance on the risk analysis process should be included where relevant.	P	<i>Category : TECHNICAL</i> (103) COSAVE (31 Aug 2021 6:48 PM) See comment in paragraph 24
49	41	This will be achieved by reorganizing ISPM 2, ISPM 11 and the draft ISPM on <i>Pest risk management for quarantine pests</i> (2014-001) into one standard. Revised text to improve guidance on the risk analysis process should be	P	<i>Category : SUBSTANTIVE</i> (52) Australia (26 Aug 2021 9:00 AM) Confirms redundant/repeated text can be removed for readability/understanding but that substantive content must remain.

		included where relevant. <u>Redundant and repetitious text may be removed but the substantive guidance should remain.</u>		
50	41	This will be achieved by reorganizing ISPM 2, ISPM 11 and the draft ISPM on <i>Pest risk management for quarantine pests</i> (2014-001) into one standard. Revised text to improve <u>guidance on the risk analysis process readability and flow</u> should be included where relevant.	P	<i>Category : SUBSTANTIVE</i> (51) Australia (26 Aug 2021 8:59 AM) The purpose is to amalgamate the text, not to substantially revise the content. Consider that the proposed new wording is clearer on this point.
51	41	This will be achieved by reorganizing ISPM 2, ISPM 11 and the draft ISPM on <i>Pest risk management for quarantine pests</i> (2014-001) <u>(in development)</u> into one standard. Revised text to improve guidance on the risk analysis process should be included where relevant.	P	<i>Category : EDITORIAL</i> (50) Australia (26 Aug 2021 8:58 AM) Clarifying text is in development
52	41	This will be achieved by reorganizing ISPM 2, ISPM 11 and the draft ISPM on <i>Pest risk management for quarantine pests</i> (2014-001) into one standard. Revised text to improve guidance on the risk analysis process should be included where relevant.	C	<i>Category : TECHNICAL</i> (24) United States of America (9 Aug 2021 7:30 PM) This para is redundant; suggest deleting.
53	41	This will be achieved by <u>revising where relevant and</u> reorganizing ISPM 2, ISPM 11 and the draft ISPM on <i>Pest risk management for quarantine pests</i> (2014-001) into one standard. <u>Revised text to improve guidance on the risk analysis process should be included where relevant.</u>	P	<i>Category : TECHNICAL</i> (10) Uruguay (9 Aug 2021 5:14 PM) See comment on paragraph 24.
54	42	The new, <u>reorganized-reorganized and revised</u> guidance on the PRA process will help NPPOs to <u>improve their implementation of this concept</u> conduct PRAs.	P	<i>Category : TECHNICAL</i> (104) COSAVE (31 Aug 2021 6:48 PM) See comment on paragraph 24 and 40. It is expected that the draft provides guidance for conducting PRAs.
55	42	The new, reorganized guidance on the PRA process will help NPPOs to improve <u>their implementation of this concept</u> its implementation.	P	<i>Category : TECHNICAL</i> (76) EPPO (31 Aug 2021 6:09 PM) More appropriate wording (is PRA a concept?)
56	42	The new, reorganized guidance on the PRA process will help NPPOs to improve their implementation of <u>this concept</u> pest risk analysis.	P	<i>Category : EDITORIAL</i> (55) Australia (26 Aug 2021 9:03 AM) Clarifies that PRA is a robust process, more than a concept.
57	42	The new, reorganized guidance on the PRA process will help NPPOs to improve <u>their</u> implementation of this concept.	P	<i>Category : EDITORIAL</i> (54) Australia (26 Aug 2021 9:02 AM) Simplifying text
58	42	The <u>new</u> , reorganized guidance on the PRA process will help NPPOs to improve their implementation of this concept.	P	<i>Category : SUBSTANTIVE</i> (53) Australia (26 Aug 2021 9:01 AM) As the text will be a combination of existing text from ISPM 2, ISPM 11 and the draft ISPM <i>Pest risk management for quarantine pests</i> , there should be no 'new' guidance developed. Task no. 3 also confirms that there should be no 'new' guidance provided in this ISPM. Thus, removal of 'new' clarifies the purpose of this specification as simply a 'reorganization' of the existing material.
59	42	<u>The new, reorganized guidance on the PRA process will help NPPOs to improve their implementation of this concept.</u>	C	<i>Category : TECHNICAL</i> (23) United States of America (9 Aug 2021 7:29 PM) This para is not needed. Delete.
60	42	The new, reorganized <u>and revised</u> guidance on the PRA process will help NPPOs to <u>improve their implementation of this concept</u> conduct PRAs.	P	<i>Category : TECHNICAL</i> (11) Uruguay (9 Aug 2021 5:16 PM)

				See comment on paragraph 24. It is expected that the draft provides guidance for conducting PRAs
61	45	Integrate pertinent sections of ISPM 2 and ISPM 11, and the <u>two versions of the draft ISPM on Pest risk management for quarantine pests (2014-001)(2014-001) developed by the EWG and SC</u> , into one overarching standard outlining the main concepts of the IPPC framework on pest risk analysis, with more comprehensive guidance provided in annexes to the standard (one annex for each stage of the PRA process). Refer to the following outline as a proposed starting point for EWG discussion and drafting:	P	<i>Category : SUBSTANTIVE</i> (60) Australia (27 Aug 2021 2:39 AM) Need to be clear regarding which version of the draft ISPM Pest risk management for quarantine pests will be used. There are a number of different versions of the draft ISPM for PRM (those of the EWG and the SC). A number of perspectives and issues were considered through the development of both of these versions and consider that both should be used as references by the newly established EWG, with both versions holding the same status or weight, as neither have been globally consulted).
62	45	Integrate pertinent the sections <u>relevant to the three stages of the PRA of ISPM 2 and ISPM 11</u> , and the draft ISPM on <i>Pest risk management for quarantine pests</i> (2014-001), into one overarching standard outlining the main concepts of the IPPC framework on pest risk analysis, with more comprehensive guidance provided in annexes to the standard (one annex for each stage of the PRA process). Refer to the following outline as a proposed starting point for EWG discussion and drafting:	P	<i>Category : SUBSTANTIVE</i> (59) Australia (27 Aug 2021 2:38 AM) Text added to clarify which sections are "pertinent", given that no criteria for which sections should be included are proposed for the EWG here.
63	45	Integrate pertinent sections of ISPM 2 and ISPM 11, and the draft ISPM on <i>Pest risk management for quarantine pests</i> (2014-001), into one overarching standard outlining the main concepts of the IPPC framework on pest risk analysis, with more comprehensive guidance provided in annexes to the standard (one annex for each stage of the PRA process). Refer to the following outline as a proposed starting point for EWG discussion and <u>drafting</u> :	C	<i>Category : TECHNICAL</i> (27) United States of America (9 Aug 2021 7:34 PM) A flowchart would be very helpful to an EWG in navigating the proposed revisions as presented in CPM2018-08 doc. (Related to reorganization of ISPMs on fruit flies).
64	45	Integrate pertinent sections of ISPM 2 and ISPM 11, and the draft ISPM on <i>Pest risk management for quarantine pests</i> (2014-001), into one overarching standard outlining the main concepts of the IPPC framework on pest risk analysis, with more comprehensive guidance provided in <u>annexes</u> to the standard (one annex for each stage of the PRA process). Refer to the following outline as a proposed starting point for EWG discussion and drafting:	C	<i>Category : SUBSTANTIVE</i> (26) United States of America (9 Aug 2021 7:32 PM) See our General comments about consolidating all stages in one ISPM.
65	45	Integrate <u>pertinent sections</u> of ISPM 2 and ISPM 11, and the draft ISPM on <i>Pest risk management for quarantine pests</i> (2014-001), into one overarching standard outlining the main concepts of the IPPC framework on pest risk analysis, with more comprehensive guidance provided in annexes to the standard (one annex for each stage of the PRA process). Refer to the following outline as a proposed starting point for EWG discussion and drafting:	C	<i>Category : TECHNICAL</i> (25) United States of America (9 Aug 2021 7:31 PM) Delete "pertinent sections" - not needed here.
66	46	Core text of the standard: <u>the</u> overarching framework for <u>PRAPRA should</u> :	P	<i>Category : EDITORIAL</i> (77) EPPO (31 Aug 2021 6:09 PM) to improve readability

67	47	includes-include current Background and section 3 (Aspects common to all PRA stages) of ISPM 2 and other pertinent sections of ISPM 2,	P	Category : EDITORIAL (78) Eppo (31 Aug 2021 6:09 PM) to improve readability
68	48	includes current Annex 1 (Comments on the scope of the IPPC in regard to environmental risks), Annex 2 (Comments on the scope of the IPPC in regard to pest risk analysis for living modified organisms), and Annex 3 (Determining the potential for a living modified organism to be a pest) to ISPM 11, Includes "introduction" and "plants as pests" of current Annex 4 (Pest risk analysis for plants as quarantine pests)	P	Category : TECHNICAL (105) COSAVE (31 Aug 2021 6:48 PM) This text of current Annex 4 should also be considered to be included in the core text.
69	48	includes-include current Annex 1 (Comments on the scope of the IPPC in regard to environmental risks), Annex 2 (Comments on the scope of the IPPC in regard to pest risk analysis for living modified organisms), and Annex 3 (Determining the potential for a living modified organism to be a pest) to ISPM 11,	P	Category : EDITORIAL (79) Eppo (31 Aug 2021 6:09 PM) Deletion of an unnecessary comma. to improve readability
70	48	includes current Annex 1 (Comments on the scope of the IPPC in regard to environmental risks), Annex 2 (Comments on the scope of the IPPC in regard to pest risk analysis for living modified organisms), and Annex 3 (Determining the potential for a living modified organism to be a pest) to ISPM 11, - includes "introduction" and "plants as pests" of current Annex 4 (Pest risk analysis for plants as quarantine pests)	P	Category : TECHNICAL (12) Uruguay (9 Aug 2021 5:19 PM) This text of current Annex 4 should also be considered to be included in the core text
71	49	seeks to maintain the original intent of the text but with streamlined descriptions (the original text being modified where needed in line with the structure of this reorganized standard, but without substantially revising the original requirements and guidance);	P	Category : EDITORIAL (80) Eppo (31 Aug 2021 6:09 PM) to improve readability
72	49	seeks to maintain the original intent of the text but with streamlined descriptions (the original text being modified where needed in line with the structure of this reorganized standard, but without substantially revising the original requirements and guidance);	C	Category : TECHNICAL (29) United States of America (9 Aug 2021 7:38 PM) Move para 49 above para 46 because - this is an important task. Or, instead, move para 49 to the Introductory section or Purpose.
73	50	(New) Annex 1. The PRA Stage 1 (Initiation) (Initiation) should:	P	Category : EDITORIAL (81) Eppo (31 Aug 2021 6:09 PM) to improve readability
74	51	combines-combine section 1 of ISPM 2 and section 1 of ISPM 11,	P	Category : EDITORIAL (82) Eppo (31 Aug 2021 6:09 PM) to improve readability
75	53	expected to involve no substantial revision of the original requirements and guidance of Stage 1 (the revision instead focusing on modification of the text for proper alignment with the structure of the new annex);	P	Category : EDITORIAL (83) Eppo (31 Aug 2021 6:09 PM) to improve readability
76	54	(New) Annex 2. The PRA Stage 2 (Pest risk assessment) assessment should:	P	Category : EDITORIAL (84) Eppo (31 Aug 2021 6:09 PM) to improve readability
77	55	combines-combine section 2.2 of ISPM 2 and section 2 of ISPM 11, - include Stage 2 of current Annex 4 to ISPM 11	P	Category : EDITORIAL (85) Eppo (31 Aug 2021 6:09 PM) Suggest to move from the last indent for consistency with the other

				tasks. to improve readability
78	56	seeks to maintain the original intent of the text of ISPM 2 and 11 but with streamlined descriptions (the revision instead focusing on modification of the text for proper alignment with the structure of the new annex, with no substantial revision of the original requirements and guidance of Stage 2 expected),	P	<i>Category : TECHNICAL</i> (86) Eppo (31 Aug 2021 6:09 PM) to improve readability to improve clarity
79	56	seeks to maintain the original intent of the text but with streamlined descriptions (the revision instead focusing on modification of the text for proper alignment with the structure of the new annex, with no substantial revision of the original requirements and guidance of Stage 2 expected),	C	<i>Category : SUBSTANTIVE</i> (40) New Zealand (13 Aug 2021 5:40 AM) See general comments on the scope and risk communication
80	56	seeks to maintain the original intent of the text but with streamlined descriptions (the revision instead is focusing on modification of the text for proper alignment with the structure of the new annex, with no substantial revision of the original requirements and guidance of Stage 2 expected),	P	<i>Category : EDITORIAL</i> (30) United States of America (9 Aug 2021 7:39 PM) better language
81	57	includes Stage 2 of current Annex 4 to ISPM 11;	P	<i>Category : EDITORIAL</i> (87) Eppo (31 Aug 2021 6:09 PM) Suggest to move as the second indent for consistency with the other tasks.
82	58	(New) Annex 3. The PRA Stage 3 (Pest risk management)management) should:	P	<i>Category : EDITORIAL</i> (88) Eppo (31 Aug 2021 6:09 PM) to improve readability
83	59	aligns-align elements of section 2.3 of ISPM 2, section 3 of ISPM 11 and the draft ISPM on <i>Pest risk management for quarantine pests</i> (2014-001) (Specification 63) considering the discussion points of the Standards Committee (SC) regarding the latter draft,	P	<i>Category : EDITORIAL</i> (89) Eppo (31 Aug 2021 6:09 PM) to improve readability
84	59	aligns elements of section 2.3 of ISPM 2, section 3 of ISPM 11 and the draft documents related to the ISPM on <i>Pest risk management for quarantine pests</i> (2014-001) (Specification 63) considering the discussion points of the Standards Committee (SC) regarding the latter draft both draft documents,	P	<i>Category : SUBSTANTIVE</i> (61) Australia (27 Aug 2021 2:42 AM) Text added to make it clear that there are two versions of the draft ISPM and both should be considered.
85	60	includes-include Stage 3 of current Annex 4 to ISPM 11.	P	<i>Category : EDITORIAL</i> (90) Eppo (31 Aug 2021 6:09 PM) to improve readability
86	60	includes Stage 3 of current Annex 4 to ISPM 11. <u>Contracting parties have gained much experience with concepts and measures that were relatively new when the PRA standards were first developed, e.g., equivalence and the use of systems approaches. Contracting parties now have increased confidence in these measures based on their widespread usage and evidence that they are effective. In the technical content of the revised standard that provides guidance on selecting measures, appropriate guidance on the full</u>	P	<i>Category : TECHNICAL</i> (68) Canada (30 Aug 2021 9:32 PM) It is important to highlight the experience that NPOs have gained over the years on the use of system approaches for risk management.

		range of measures available and in use should be provided, in particular appropriate references to ISPM 14, The use of integrated measures in a systems approach for pest risk management.		
87	60	includes Stage 3 of current Annex 4 to ISPM 11. <u>- Consult members of the EWG for the draft ISPM Pest risk management for quarantine pests on the pest risk management section and address their comments prior to country consultation.</u>	P	<i>Category : SUBSTANTIVE</i> (62) Australia (27 Aug 2021 2:45 AM) Given the draft ISPM Pest risk management for quarantine pests has not been accepted it is suggested that the content inserted into Annex 3 from the draft ISPM is agreeable from a technical standpoint. It is suggested that a task be included for the previous EWG to review the pest risk management section to ensure alignment with previous EWG thinking.
88	60	includes Stage 3 of current Annex 4 to ISPM 11.	C	<i>Category : SUBSTANTIVE</i> (41) New Zealand (13 Aug 2021 5:48 AM) This is an opportunity to create an additional annex on Pest Risk Communication given that the specification is asking for expertise in pest risk communication.
89	61	Consider how the content of the current Annex 4 (Pest risk analysis for plants as quarantine pests) to ISPM 11 should be included in the reorganized standard. Options include incorporation into the body text, creation of an additional annex, or inclusion of an appendix or supplementary text that is referenced throughout (as per the references already used: “S1: the supplementary text on environmental risks” and “S2: the supplementary text on living modified organisms”).	P	<i>Category : SUBSTANTIVE</i> (106) COSAVE (31 Aug 2021 6:48 PM) Paragraphs 52, 57 and 60 provide that Annex 1, Annex 2 and Annex 3 include respectively Stage 1, 2 and 3 of current Annex 4 (Pest risk analysis for plants as quarantine pests) to ISPM 11. Therefore this task is contradictory with these paragraphs. In addition PRA for plants as quarantine pests should not be included as an Appendix, because appendixes are not a prescriptive part of the standard and PRA for plants as quarantine pests should be prescriptive part of the ISPM as it is currently.
90	61	Consider how the content of the current Annex 4 (Pest risk analysis for plants as quarantine pests) to ISPM 11 should be included in the reorganized standard. Options include incorporation into the body text, creation of an additional annex, or inclusion of an appendix or supplementary text that is referenced throughout (as per the references already used: “S1: the supplementary text on environmental risks” and “S2: the supplementary text on living modified organisms”).	C	<i>Category : SUBSTANTIVE</i> (91) EPPO (31 Aug 2021 6:09 PM) The order of tasks should be improved as it is not logic. e.g. this section (61) should become Task 1. The EWG should first decide what to do with Appendix 4 and then implement the decision. Sections 52, 57 and 60 should also be reworded adding 'depending on the outcome of discussion on task 1'
91	61	Consider how the content of the current Annex 4 (Pest risk analysis for plants as quarantine pests) to ISPM 11 should be included in the reorganized standard. Options include incorporation into the body <u>of the</u> text, creation of an additional annex, or inclusion of an appendix or supplementary text that is referenced throughout (as per the references already used: “S1: the supplementary text on environmental risks” and “S2: the supplementary text on living modified organisms”).	P	<i>Category : EDITORIAL</i> (42) New Zealand (13 Aug 2021 5:50 AM) To improve the flow of the text.
92	61	Consider how the content of the current Annex 4 (Pest risk analysis for plants as quarantine pests) to ISPM 11 should be included in the reorganized standard. Options include incorporation into the body text, creation of an	P	<i>Category : SUBSTANTIVE</i> (13) Uruguay (9 Aug 2021 5:23 PM) Paragraphs 52, 57 and 60 provide that Annex 1, Annex 2 and Annex

		additional annex, or inclusion of an appendix or supplementary text that is referenced throughout (as per the references already used: “S1: the supplementary text on environmental risks” and “S2: the supplementary text on living modified organisms”).		3 include respectively Stage 1, 2 and 3 of current Annex 4 (Pest risk analysis for plants as quarantine pests) to ISPM 11. Therefore, this task is contradictory with these paragraphs. In addition PRA for plants as quarantine pests should not be included as an Appendix, because appendixes are not a prescriptive part of the standards and PRA for plants as quarantine pests should be prescriptive part of the ISPM as it is currently
93	62	If any parts of the original requirements and guidance on Stage-Stage 1 (Initiation) and 2 (Pest risk assessment) may require revision that is beyond the scope of this specification, identify the parts that need more clarity or improvement and propose a short outline of the review required, for future reference.	P	<i>Category : SUBSTANTIVE</i> (107) COSAVE (31 Aug 2021 6:48 PM) The original requirements and guidance of both stages requiring a revision beyond the scope of the specification should be noted for future revision, not only requirements on stage.
94	62	If any parts of the original requirements and guidance on Stage 2 (Pest risk assessment) may require revision that is beyond the scope of this specification, identify and address any substantial improvements to the parts that need more clarity or improvement requirements and propose a short outline guidance on PRA stages to enhance clarity for the implementation of the review required, for future reference <u>standard</u> .	P	<i>Category : SUBSTANTIVE</i> (43) New Zealand (13 Aug 2021 5:54 AM) Paragraph 62 contradicts paragraph 41. Paragraph 41 says 'Revised text to improve guidance on the risk analysis process should be included where relevant.' This revision provides an important opportunity for improvement to this fundamental standard and should not be saved for the future. It is suggested that this is reworded to: 'Identify and address any substantial improvements to the requirements and guidance on PRA stages to enhance clarity for the implementation of the standard'.
95	62	If any parts of the original requirements and guidance on Stage-Stage 1 (Initiation) and 2 (Pest risk assessment) may require revision that is beyond the scope of this specification, identify the parts that need more clarity or improvement and propose a short outline of the review required, for future reference.	P	<i>Category : TECHNICAL</i> (14) Uruguay (9 Aug 2021 5:26 PM) The original requirements and guidance of both stages requiring a revision beyond the scope of the specification should be noted for future revision, not only requirements on stage 2
96	63	<u>Consider implementation of the revised standard by contracting parties and identify potential operational and technical implementation issues. Provide information and possible recommendations on these issues to the SC.</u>	C	<i>Category : SUBSTANTIVE</i> (32) United States of America (9 Aug 2021 7:43 PM) Risk communication, where does this belong? Communication between CPs is not a guidance how to communicate risk a country). Currently is covered in ISPM 2.
97	64	Consider whether the revised standard could affect in a specific way (positively or negatively) the protection of biodiversity and the environment. If this is the case, the impact should be identified, addressed and clarified in the draft standard.	P	<i>Category : EDITORIAL</i> (92) EPPO (31 Aug 2021 6:09 PM) Typo (a dot added for consistency).
98	73	Experts with collective expertise in: <u>- the expert with good understanding of the role that risk analysis plays in World Trade Organization Agreement on the Application of Sanitary and Phytosanitary Measures (SPS Agreement) and phytosanitary regulation.</u>	P	<i>Category : SUBSTANTIVE</i> (35) United States of America (9 Aug 2021 7:53 PM) Elevate importance of this expertise and list is as No 1.
99	73	Experts with collective expertise <u>knowledge</u> in:	P	<i>Category : EDITORIAL</i> (31) United States of America (9 Aug 2021 7:40 PM) Better language for the sentence

100	73	Experts with collective expertise in:	C	Category : TECHNICAL (1) Egypt (18 Jul 2021 1:42 AM) - background in environmental impact would be an asset.
101	76	pest risk communication;	P	Category : TECHNICAL (108) COSAVE (31 Aug 2021 6:48 PM) For consistency
102	76	risk communication;	C	Category : SUBSTANTIVE (33) United States of America (9 Aug 2021 7:46 PM) See our comment in task (4) para 63 related to implementation.
103	76	pest risk communication;	P	Category : TECHNICAL (15) Uruguay (9 Aug 2021 5:27 PM) For consistency
104	77	the World Trade Organization Agreement on the Application of Sanitary and Phytosanitary Measures (SPS Agreement) and phytosanitary regulation.	P	Category : TECHNICAL (109) COSAVE (31 Aug 2021 6:48 PM) The experts in PRA have enough knowledge on SPS Agreement. There is not need for expert in such agreement to develop this draft.
105	77	the expert with good understanding of the role that risk analysis plays in World Trade Organization Agreement on the Application of Sanitary and Phytosanitary Measures (SPS Agreement) and phytosanitary regulation.	P	Category : SUBSTANTIVE (34) United States of America (9 Aug 2021 7:50 PM) Reworded for clarity. Elevate importance of this expertise and list is as No 1.
106	77	the World Trade Organization Agreement on the Application of Sanitary and Phytosanitary Measures (SPS Agreement) and phytosanitary regulation.	P	Category : TECHNICAL (16) Uruguay (9 Aug 2021 5:29 PM) The experts in PRA have enough knowledge on SPS Agreement. There is not need for an expert in such agreement to develop this draft
107	79	Eight to ten experts. A <u>At least one</u> former member of the EWG on Guidance on Pest Risk Management (2014-001) and an IC member <u>may should</u> be invited as invited experts. The Assistant Stewards may also be invited to participate.	P	Category : SUBSTANTIVE (63) Australia (27 Aug 2021 2:47 AM) It is considered that a large portion of the work will be focused on the substantive work of the draft ISPM Pest risk management for quarantine pests. As such, former EWG members should be included to provide continuity and background from previous work.
108	79	Eight to ten experts. A former member of the EWG on Guidance on Pest Risk Management (2014-001) and an IC member may be invited as invited experts. The Assistant Stewards may also be invited to participate.	C	Category : SUBSTANTIVE (44) New Zealand (13 Aug 2021 5:57 AM) It would be beneficial to have two small groups of 5 to work on this revision. One with expertise in risk assessment and another in risk management and risk communication, to revise stage 1 and 2 and, stage 3 respectively. The two small groups could initially work separately then come together to discuss and review the overall output. Given that the EWG is likely to work virtually, smaller groups could work more efficiently and effectively than one larger group.
109	85	ISPM 11. 2019. Pest risk analysis for quarantine pests. Rome, IPPC, FAO.	P	Category : TECHNICAL (17) Uruguay (9 Aug 2021 5:29 PM) To avoid confussions, the standard will not include guidance on regulated non quarantine pests
110	86	ISPM 21. 2019. Pest risk analysis for regulated non quarantine pests. Rome, IPPC Secretariat, FAO.	P	Category : TECHNICAL (110) COSAVE (31 Aug 2021 6:48 PM) To avoid confussions, the standard will not include guidance on regulated non quarantine pests.
111	87	ISPM 24. 2017. Guidelines for the determination and recognition of equivalence of phytosanitary measures. Rome, IPPC, FAO.	P	Category : TECHNICAL (37) United States of America (9 Aug 2021 7:54 PM) Recommended reference.

		WTO. 1995. Sanitary and Phytosanitary Agreement		
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