

Compiled comments for Draft Specification: Implementation of risk-based inspection for imported consignments, Guide (2018-022)


Summary of comments

Participants

Name	Summary
Singapore	Singapore supports this and has no further comment.

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

S (Status) - A = Accepted, C = Closed, O = Open, W = Withdrawn, M = Merged

Para	Text	T	Comment	S	Draft IC comments
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (62) Peru (31 Aug 2022 11:31 PM) Peru supports the comments presented by COSAVE	O	
G	(General Comment)	C	<i>Category : TECHNICAL</i> (61) Paraguay (31 Aug 2022 6:34 PM) Paraguay apoya los comentarios de COSAVE. Paraguay supports COSAVE comments.	O	
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (56) Argentina (31 Aug 2022 3:36 AM) We support the comments from COSAVE	O	
G	(General Comment)	C	<i>Category : EDITORIAL</i> (55) Barbados (30 Aug 2022 9:48 PM) Barbados has no objections to the development of this proposed guide.	O	
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i>  Mexico (44) Mexico (25 Aug 2022 3:03 AM) No comments from Mexico. Mexico supports the 2022 ICD Draft Specification: Implementation of risk-based inspection for imported consignments, Guide (2018-022)	O	
G	(General Comment)	C	<i>Category : TECHNICAL</i> (54) Mozambique (30 Aug 2022 2:55 PM) Mozambique fully supports the development of this guide expecting that the risk management of imported consignment will improve and will be harmonized specifically for the developing countries with limited	O	

			resources to perform phytosanitary actions		
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (53) Australia (30 Aug 2022 3:24 AM) Australia has reviewed and has no comment on this text at this time.	O	
G	(General Comment)	C	<i>Category : EDITORIAL</i> (47) South Africa (26 Aug 2022 3:02 PM) South Africa has no comments on this draft specification	O	
G	(General Comment)	C	<i>Category : TECHNICAL</i> (46) Nigeria (25 Aug 2022 9:37 PM) Added to item No. 6, i suggest that there should be a (description of how regional climate differences can or may affect risk based assessment)	O	
G	(General Comment)	C	<i>Category : SUBSTANTIVE</i> (45) Guyana (25 Aug 2022 8:00 PM) Guyana has no objections at this time.	O	
G	(General Comment)	C	<i>Category : EDITORIAL</i> (19) Korea, Republic of (23 Aug 2022 2:24 PM) Since this specification mainly focuses on the mitigation of quarantine through risk-base inspection, Korea think it is necessary to mention the case of strengthening inspection(e.g. plants for planting).	O	
G	(General Comment)	C	<i>Category : EDITORIAL</i> (18) Nepal (22 Aug 2022 4:33 AM) Nepal is okay with the "Implementation of risk-based inspection for imported consignments, Guide (2018-022)" and has no comments on it.	O	
G	(General Comment)	C	<i>Category : TRANSLATION</i> (10) Uruguay (19 Aug 2022 2:34 PM) Translation comments to this draft are made in the Spanish version of the OCS	O	
4. Scope					
38	This IPPC Guide is designed to facilitate the implementation of relevant principles and standards of the IPPC to improve phytosanitary inspection based on risks from the international trade of plants, plant products and other regulated articles. It is limited by the agreed definition of inspection and the scope of relevant ISPMs.	C	<i>Category : SUBSTANTIVE</i> (28) Zambia (24 Aug 2022 2:42 PM) Zambia has no objection to this guide.	O	
38	This IPPC Guide is designed to facilitate the implementation of relevant principles and standards of the IPPC to improve phytosanitary inspection based on risks from	P	<i>Category : TECHNICAL</i> (11) Uruguay (19 Aug 2022 2:34 PM) For consistency (global change - 62 and 64)	O	

	the international trade of plants, plant products and other regulated articles. It is limited by the agreed definition of inspection and the scope of relevant ISPMs.			
38	This IPPC Guide is designed to facilitate the implementation of relevant principles and standards of the IPPC to improve phytosanitary inspection based on risks from the international trade of plants, plant products and other regulated articles. It is limited by the agreed definition of inspection <u>of consignments</u> and the scope of relevant ISPMs.	P	<i>Category : SUBSTANTIVE</i> (3) United States of America (11 Aug 2022 4:16 PM) Connected with the title and purpose of the document.	O
38	This IPPC Guide is designed to facilitate the implementation of relevant principles and standards of the IPPC to improve phytosanitary inspection based on risks from the international trade of plants, plant products and other regulated articles. It is limited by the agreed definition of inspection and the scope of relevant ISPMs.	P	<i>Category : TECHNICAL</i> (2) COSAVE (2 Aug 2022 9:13 PM) For consistency (global change - 64)	O
5. Purpose				
40	The Guide will be designed to assist national plant protection organizations (NPPOs) to understand in understanding and apply applying best practices for risk management associated with the use of using inspection as a phytosanitary measure for imported consignments.	P	<i>Category : EDITORIAL</i> (29) United States of America (24 Aug 2022 9:21 PM) editorial	O
40	The Guide will be designed to assist national plant protection organizations (NPPOs) <u>(NPPOs, other govt agencies conducting inspection of imported consignments)</u> to understand and apply best practices for risk management associated with the use of inspection as a phytosanitary measure for imported consignments.	P	<i>Category : SUBSTANTIVE</i> (4) United States of America (11 Aug 2022 4:18 PM) Important to the countries where border inspection of consignments conducted by the governmental agencies other than NPPOs.	O
41	NPPOs are challenged to use their risk-management resources, especially staff, in the best possible ways to address the increased volume of trade and passengers in a fair and technically justified manner. The implementation of risk-based inspection should follow an approach that aims to allocate resources for inspection based on evidence of risk. With the development of data-management technologies, more detailed and precise analysis of import records is feasible. Technologies now allow systematic and automated analysis of inspection data to consider the relationship of commodities, countries, volume, exporters, seasons and other inspection variables as factors affecting risk. Risk-based inspection may be implemented within the current legal framework for plant protection in some countries but may need more legal and procedural modification in other countries.	C	<i>Category : SUBSTANTIVE</i> (58) Canada (31 Aug 2022 2:01 PM) Overarching comment. The guide should not put emphasis on such technologies as many countries are struggling with data management and analysis. In many cases, several governments departments are involved (NPPOs, Border agencies etc.). Integrated data management is not always easy or possible, thus the guide should consider other traditional means and take into account that structure, resources and capabilities are different between NPPOs	O
41	NPPOs are challenged to use their risk-management resources, especially staff, in the best possible ways to address the increased volume of trade and passengers in a fair and technically justified manner. The implementation of risk-based inspection should follow an approach that aims to allocate resources for inspection based on	P	<i>Category : TECHNICAL</i> (12) Uruguay (19 Aug 2022 2:43 PM) It is suggested to replace the term "development" by "implementation". The activity described is achieved with the	O

	evidence of risk. With the <u>development-implementation</u> of data-management technologies, more detailed and precise analysis of import records is feasible. Technologies now allow systematic and automated analysis of inspection data to consider the relationship of commodities, countries, volume, exporters, <u>seasons seasons, pest interceptions</u> and other inspection variables as factors affecting risk. Risk-based inspection may be implemented within the current legal framework for plant protection in some countries but may need more legal and procedural modification in other countries.		implementation of technologies. Pest interceptions is another important variable	
41	NPPOs are challenged to use their risk-management resources, especially staff, in the best possible ways to address the increased volume of trade and passengers in a fair and technically justified manner. The implementation of risk-based inspection should follow an approach that aims to allocate resources for inspection based on evidence of risk. With the development of data-management technologies, more detailed and precise analysis of import records is feasible. Technologies now allow systematic and automated analysis of inspection data to consider the relationship of commodities, countries, volume, exporters, <u>seasons seasons, pest interceptions</u> and other inspection variables as factors affecting risk. Risk-based inspection may be implemented within the current legal framework for plant protection in some countries but may need more legal and procedural modification in other countries.	P	<i>Category : TECHNICAL</i> (38) COSAVE (25 Aug 2022 12:47 AM) Another important variable	O
41	NPPOs are challenged to use their risk-management resources, especially staff, in the best possible ways to address the increased volume of trade and passengers in a fair and technically justified manner. The implementation of risk-based inspection should follow an approach that aims to allocate resources for inspection based on evidence of risk. With the <u>development-implementation</u> of data-management technologies, more detailed and precise analysis of import records is feasible. Technologies now allow systematic and automated analysis of inspection data to consider the relationship of commodities, countries, volume, exporters, seasons and other inspection variables as factors affecting risk. Risk-based inspection may be implemented within the current legal framework for plant protection in some countries but may need more legal and procedural modification in other countries.	P	<i>Category : TECHNICAL</i> (37) COSAVE (25 Aug 2022 12:46 AM) It is suggested to replace the term "development" by "implementation". The activity described is achieved with the implementation of technologies.	O
41	NPPOs are challenged to use their risk-management resources, especially staff, in the best possible ways to address the increased <u>volume of trade and passengers passenger volumes</u> in a fair and technically justified manner. <u>The implementation of risk-based-Risk-based inspection should follow an approach that aims to methods</u> allocate resources for inspection based on evidence of risk. With the development of data-management technologies, more detailed and precise <u>analysis</u>	P	<i>Category : EDITORIAL</i> (30) United States of America (24 Aug 2022 9:24 PM) editorial	O

	<u>analyses</u> of import records is-are feasible. Technologies now allow systematic and automated analysis <u>analyses</u> of inspection data to consider the relationship of commodities, countries, volume, exporters, seasons and other inspection variables as factors affecting risk. Risk-based inspection may be implemented within the current legal framework for plant protection in some countries but may need more legal and procedural modification in other countries.			
41	Las ONPF se enfrentan a la dificultad de optimizar sus recursos de gestión de riesgos, especialmente el personal, para abordar el creciente volumen de comercio y de pasajeros de forma justa y técnicamente justificada. La aplicación de la inspección basada en el riesgo debería seguir un enfoque dirigido a asignar recursos para la inspección basándose en la evidencia de riesgo. Gracias al desarrollo de tecnologías de gestión de datos, es posible hacer un análisis más detallado y preciso de los registros de las importaciones. Actualmente, la tecnología permite <u>las tecnologías permiten</u> hacer un análisis sistemático y automatizado de los datos derivados de las inspecciones con vistas a considerar la relación de los productos, los países, el volumen, los exportadores, las estaciones y otras variables de la inspección como factores que afectan al riesgo. La inspección basada en el riesgo se puede aplicar dentro del marco <u>jurídico-legal</u> vigente relativo a la protección fitosanitaria en algunos países, pero es posible que en otros sea necesario modificar algunos aspectos <u>jurídicos-legales</u> y procedimentales.	P	<i>Category : TRANSLATION</i> (14) Uruguay (19 Aug 2022 3:06 PM) To better align with the English version	O
45	identificar <u>determinar</u> las prácticas habituales de inspección y las dificultades relacionadas con diferentes riesgos;	P	<i>Category : TRANSLATION</i> (15) Uruguay (19 Aug 2022 3:08 PM) To better align with the English version	O
46	describe parameters to analyse <u>analyze the</u> risk of consignments;	P	<i>Category : EDITORIAL</i> (48) China (28 Aug 2022 3:46 PM)	O
47	presentar los requisitos jurídicos-el requisito del sistema legal y <u>fitosanitarios fitosanitario</u> para establecer un sistema de inspección basada en el riesgo;	P	<i>Category : TRANSLATION</i> (16) Uruguay (19 Aug 2022 3:11 PM) To better align with the English version	O
48	describe the appropriate data and analysis system <u>systems</u> , facilities and equipment for the risk-based inspection of imported consignments;	P	<i>Category : SUBSTANTIVE</i> (59) Canada (31 Aug 2022 2:02 PM) without the coma, this sentence is not clear	O
48	describe the appropriate data and analysis system facilities and equipment <u>needed, including the criteria used by NPPOs for reviewing or updating statistical designs for</u> the risk-based inspection of imported consignments;	P	<i>Category : TECHNICAL</i> (13) Uruguay (19 Aug 2022 2:52 PM) It is not clear the term facility in this context. Statistical designs to determine the pest risk and define whether a consignment should comply with an inspection measure are not permanent, since the variables could change over time and therefore be reviewed periodically	O

48	describe the appropriate data and analysis system facilities and equipment for the risk-based inspection of imported consignments;	P	<i>Category : TECHNICAL</i> (43) COSAVE (25 Aug 2022 1:26 AM) It is not clear the term facility in this context	O	
48	describe the appropriate data and analysis system facilities and equipment <u>needed, including the criteria used by NPPOs for the reviewing or updating statistical designs, for the</u> risk-based inspection of imported consignments;	P	<i>Category : TECHNICAL</i> (42) COSAVE (25 Aug 2022 1:26 AM) Statistical designs to determine the pest risk and define whether a consignment should comply with an inspection measure are not permanent, since the variables could change over time and therefore be reviewed periodically	O	
48	describe the appropriate <u>data, data management</u> and analysis system facilities <u>facilities,</u> and equipment for the risk-based inspection of imported consignments;	P	<i>Category : TECHNICAL</i> (31) United States of America (24 Aug 2022 9:26 PM) missing info	O	
48	describe the appropriate data and analysis system-system, facilities and equipment for the risk-based inspection of imported consignments;	P	<i>Category : EDITORIAL</i> (27) New Zealand (24 Aug 2022 12:52 AM) improve clarity	O	
49	guide <u>provide guidance to</u> NPPOs on how looking at historical inspection data (including negative data) could improve risk-based inspection;	P	<i>Category : EDITORIAL</i> (49) China (28 Aug 2022 3:46 PM)	O	
49	provide guidance to NPPOs on how looking at using historical inspection data (including negative data) could to improve risk-based inspection;	P	<i>Category : EDITORIAL</i> (32) United States of America (24 Aug 2022 9:26 PM) editorial	O	
49	proporcionar orientación a las ONPF sobre el modo de mejorar cómo la <u>inspección basada en el riesgo consultando observación de</u> los datos históricos derivados de las inspecciones (incluidos los negativos) <u>datos negativos</u> podría mejorar la <u>inspección basada en riesgo</u> ;	P	<i>Category : TRANSLATION</i> (17) Uruguay (19 Aug 2022 3:15 PM) to better align with the English version	O	
50	provided <u>discuss</u> the various levels of implementation of risk-based inspection;	P	<i>Category : SUBSTANTIVE</i> (20) Korea, Republic of (23 Aug 2022 2:25 PM) "provide" is more appropriate.	O	
51	uide <u>provide guidance on</u> how to perform <u>an</u> inspection of consignments with varying levels of risk, considering factors such as sampling intensity, confidence intervals and selecting levels of detection (ISPM 31), including the concerns identified in the submission <i>Methodologies for sampling of consignments</i> (2021-015);	P	<i>Category : EDITORIAL</i> (50) China (28 Aug 2022 3:46 PM)	O	
51	provide guidance on how to perform inspection of consignments with varying levels of risk, considering factors such as sampling intensity, confidence intervals and <u>selecting</u> levels of detection (ISPM 31), including the concerns identified in the	P	<i>Category : EDITORIAL</i> (33) United States of America (24 Aug 2022 9:28 PM) better wording	O	

	submission <i>Methodologies for sampling of consignments</i> (2021-015);			
51	provide guidance on how to perform inspection of consignments with varying levels of risk, considering factors such as sampling intensity, confidence intervals and selecting levels of detection (ISPM 31), including the concerns identified in the submission <i>Methodologies for sampling of consignments</i> (2021-015);	C	Category : SUBSTANTIVE (22) Korea, Republic of (23 Aug 2022 2:28 PM) unclear	O
51	<u>Barrier for implementaion</u> (9) provide guidance on how to perform inspection of consignments with varying levels of risk, considering factors such as sampling intensity, confidence intervals and selecting levels of detection (ISPM 31), including the concerns identified in the submission <i>Methodologies for sampling of consignments</i> (2021-015);	P	Category : SUBSTANTIVE (21) Korea, Republic of (23 Aug 2022 2:27 PM) Korea proposes to put in a sentence on barriers to implement	O
52	describe how risk-based sampling may reduce-affect/impact treatment on arrival (particularly methyl bromide fumigation);	P	Category : SUBSTANTIVE (60) Canada (31 Aug 2022 2:03 PM) As we are referring to post entry risk sampling by the importing country if we target high risk commodities, the probability of treatment becomes higher?? Suggest changing reduce by affect/impact.	O
52	(10) describe <u>describe</u> how risk-based sampling may reduce treatment on arrival (particularly methyl bromide fumigation);	P	Category : SUBSTANTIVE (23) Korea, Republic of (23 Aug 2022 2:29 PM) change the number of sentence.	O
52	describe how risk-based sampling may reduce treatment on arrival (particularly methyl bromide fumigation); <u>propose if we could another chemical for treatment than the used example used example of methyl bromide since it got phased out as it depletes ozon layer</u>	P	Category : TECHNICAL (1) Malawi (28 Jul 2022 5:31 PM)	O
53	<u>(11)</u> provide examples of procedures of risk-based inspection of imported consignments;	P	Category : SUBSTANTIVE (24) Korea, Republic of (23 Aug 2022 2:30 PM) change the number of sentence.	O
54	<u>(12)</u> suggest case studies that highlight NPPO experiences applying risk-based inspection to imported consignments.	P	Category : SUBSTANTIVE (25) Korea, Republic of (23 Aug 2022 2:30 PM) change the number of sentence.	O
54	suggest case studies that highlight NPPO experiences applying risk-based inspection to imported consignments. <u>(13) provide management and evaluation system of risk-based inspection</u>	P	Category : SUBSTANTIVE (26) Korea, Republic of (23 Aug 2022 2:32 PM) Korea proposes to put in a article on evaluationof risk-based inspection.	O
8. Selection criteria for working group experts				
58	The IPPC Secretariat and the Implementation and Capacity Development Committee support equity, diversity and inclusiveness, and encourage all interested	P	Category : EDITORIAL (34) United States of America (24 Aug 2022 9:28 PM)	O

	experts to submit their candidature to participate in the working group that will be tasked with developing this IPPC guide.		editorial		
60	Les membres du groupe de travail devraient être sélectionnés à l'aune des critères suivants:	C	<i>Category : TECHNICAL</i> (63) Gabon (1 Sep 2022 1:24 AM) certification à l'exportation, vérification à l'importation, expérience de la gestion des données tirées des inspections sont des activités que nous faisons déjà, c'est la maîtrise courante de l'anglais qui nous fait défaut pour intégrer le groupe d'experts.	O	
64	experience on-in management of phytosanitary inspection;	P	<i>Category : EDITORIAL</i> (51) China (28 Aug 2022 3:47 PM)	O	
64	experience on-with the management of phytosanitary inspection;	P	<i>Category : EDITORIAL</i> (35) United States of America (24 Aug 2022 9:29 PM) editorial	O	
65	experience on-in data management of inspection results	P	<i>Category : EDITORIAL</i> (52) China (28 Aug 2022 3:47 PM)	O	
65	experience on-with data management of inspection results	P	<i>Category : EDITORIAL</i> (36) United States of America (24 Aug 2022 9:30 PM) editorial	O	