Compiled comments for Draft Specification: Authorization Of Entities Guide (2018-040)

Summary of comments

Participants

Name	Summary
Malawi	Completed
Mozambique	Mozambique has no objection to the proposed guide to be developed as it will help a lot in implementing the standard
Peru	Peru supports the comments presented by COSAVE
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S (Status) - A = Accepted, C = Closed, O = Open, W = Withdrawn, M = Merged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	*Category : SUBSTANTIVE* **(58) Peru (31 Aug 2022 11:34 PM)** Peru supports the comments presented by COSAVE	O	
G	(General Comment)	C	*Category : TECHNICAL* **(57) Paraguay (31 Aug 2022 6:32 PM)** Paraguay apoya los comentarios de COSAVE. Paraguay supports COSAVE comments.	O	
G	(General Comment)	C	*Category : SUBSTANTIVE* **(52) Argentina (31 Aug 2022 3:39 AM)** We support the comments from COSAVE	O	
G	(General Comment)	C	*Category : EDITORIAL* **(51) Barbados (30 Aug 2022 9:51 PM)** This is an important guide and Barbados has no objections to it's development.	O	
G	(General Comment)	C	*Category : TECHNICAL* **(50) Mozambique (30 Aug 2022 2:40 PM)** Mozambique Welcomes the initiative to set the working group for developing the guide we fully support the idea we think that the guide will help us on how we will authorize the third parties to perform the phytosanitary actions	O	

G	(General Comment)	C	*Category : SUBSTANTIVE* **(41) China (28 Aug 2022 3:49 PM)** This draft specificaiton is well developed.	O	
G	(General Comment)	C	*Category : EDITORIAL* **(40) South Africa (26 Aug 2022 3:14 PM)** South Africa has no further comments	O	
G	(General Comment)	C	*Category : TECHNICAL* **(38) Nigeria (25 Aug 2022 9:20 PM)** Under item No. 6 sub-section 3. i would suggest that "definite work plan with specific time lines be added in the bracket" To read thus: (3) describe the mechanism to enable authorization (e.g. legal framework, memorandum of understanding, definite work plan with specific time lines)	O	
G	(General Comment)	C	*Category : SUBSTANTIVE* **(37) Guyana (25 Aug 2022 7:59 PM)** Guyana has no objections at this time.	O	
G	(General Comment)	C	*Category : SUBSTANTIVE* Mexico **(36) Mexico (25 Aug 2022 3:01 AM)** Mexico supports the 2022 ICD Draft Specification: Authorization of entities to perform phytosanitary actions, Guide (2018-040)	O	
G	(General Comment)	C	*Category : EDITORIAL* **(25) Nepal (22 Aug 2022 4:39 AM)** Nepal is okay with the "Authorization of entities to perform phytosanitary actions, Guide (2018-040)" and has no comments on it	O	
G	(General Comment)	C	*Category : SUBSTANTIVE* **(1) Malawi (28 Jul 2022 5:39 PM)** We support the guide	O	
7	Guide on the authorization of entities to perform phytosanitary actions	P	*Category : EDITORIAL* **(44) Zimbabwe (29 Aug 2022 7:58 PM)**	O	
16	**2019-03:** CPM-14 (2019) added this topic to the List of Implementation and Capacity Development Topics; priority 1	P	*Category : EDITORIAL* **(45) Zimbabwe (29 Aug 2022 7:59 PM)**	O	
3. Convention articles, ISPMs and CPM recommendations to be addressed by the proposed implementation resource					
36	~~Consider adding~~ ISPM 47: Audit in the ~~new audit ISPM, pending adoption by CPM-16~~phytosanitary context	P	*Category : EDITORIAL* **(53) Canada (31 Aug 2022 1:48 PM)** ISPM has been adopted	O	

36	Consider adding ~~the new audit ISPM, pending adoption by CPM-16~~ISPM 47: *Audit in the phytosanitary context.*	P	*Category : TECHNICAL* **(26) New Zealand (22 Aug 2022 7:02 AM)** The audit ISPM has been adopted by CPM-16. It would be good to have ISPM 47 cited here as audit is a critical component of third party authorisation.	O	
36	Consider adding ~~the new~~ ISPM 47 on audit ~~ISPM, pending adoption by CPM-16~~adopted in 2022.	P	*Category : EDITORIAL* **(5) United States of America (11 Aug 2022 3:46 PM)** Update.	O	
5. Purpose					
40	The guide will provide guidance to national plant protection organizations (NPPOs) and the authorized entities to understand the process, meet requirements ~~and to~~ and fulfil their roles and responsibilities during the development and implementation of authorization programmes to carry out phytosanitary actions.	P	*Category : EDITORIAL* **(46) Zimbabwe (29 Aug 2022 8:01 PM)**	O	
40	The guide will provide guidance to national plant protection organizations (NPPOs) and the authorized entities to understand the ~~process, meet requirements and to fulfil their~~ process of authorization. It will also provide guidance on the roles and responsibilities of parties and meeting requirements during the development and implementation of authorization programmes to carry out phytosanitary actions.	P	*Category : EDITORIAL* **(28) New Zealand (22 Aug 2022 7:06 AM)** Suggest making this into two sentences rather than one very long sentence to improve readability.	O	
40	The guide will ~~provide guidance to~~ assist national plant protection organizations (NPPOs) and the authorized entities to understand the process, meet requirements and to fulfil their roles and responsibilities during the development and implementation of authorization programmes to carry out phytosanitary actions.	P	*Category : EDITORIAL* **(27) New Zealand (22 Aug 2022 7:03 AM)** to improve clarity.	O	
40	The guide will provide ~~guidance~~ direction to national plant protection organizations (NPPOs) and the authorized entities ~~to understand~~ regarding the ~~process, meet requirements~~ process and ~~to fulfil their roles~~ requirements necessary for developing and ~~responsibilities during the development and implementation of~~ implementing authorization programmes to carry out phytosanitary actions.	P	*Category : EDITORIAL* **(17) United States of America (19 Aug 2022 8:14 PM)** better flow	O	
41	~~The guide~~ The guide will also provide examples and case studies to help NPPOs and authorized entities adapt their authorization process to perform phytosanitary actions while remaining consistent with the requirements of the IPPC~~.~~.	P	*Category : EDITORIAL* **(47) Zimbabwe (29 Aug 2022 8:02 PM)**	O	
41	The guide will also provide examples and case studies to help NPPOs and authorized entities adapt their authorization process to perform phytosanitary actions while remaining consistent with the requirements of the IPPC.	P	*Category : EDITORIAL* **(18) United States of America (19 Aug**	O	

			2022 8:15 PM) article		
44	describe responsibilities ~~and obligations~~ of the NPPOs related to the authorization of ~~third parties~~ entities to perform phytosanitary actions;	P	*Category : SUBSTANTIVE* **(15) Uruguay (18 Aug 2022 8:36 PM)** According to ISPM 45 "there is no obligation for NPPOs to authorize entities to perform phytosanitary actions". Use "entities" for consistency	O	
44	describe responsibilities ~~and obligations~~ of the NPPOs related to the authorization of third parties to perform phytosanitary actions;	P	*Category : TECHNICAL* **(3) COSAVE (2 Aug 2022 9:04 PM)** According to ISPM 45 "there is no obligation for NPPOs to authorize entities to perform phytosanitary actions"	O	
44	describe responsibilities and obligations of the NPPOs related to the authorization of ~~third parties~~ entities to perform phytosanitary actions;	P	*Category : TECHNICAL* **(2) COSAVE (2 Aug 2022 9:00 PM)** For consistency	O	
45	describe the types of phytosanitary actions that can be delegated to the authorized entities (including national and international entities) in line with the IPPC and the ISPMs; (3) describe which phytosanitary actions will need more specific guidance for authorizing entities;	P	*Category : SUBSTANTIVE* **(42) Australia (29 Aug 2022 4:24 AM)** Authorizing entities delegated phytosanitary actions may need specific guidance provided to complete these actions to the appropriate standard.	O	
45	describe the ~~types of~~ phytosanitary actions that ~~can be delegated~~ an NPPO may decide to ~~the authorized~~ authorize entities to perform (including national and international entities) in line with the IPPC and the ISPMs;	P	*Category : TECHNICAL* **(16) Uruguay (18 Aug 2022 8:38 PM)** To be alligned to ISPM 45	O	
45	describe the ~~types of~~ phytosanitary actions that ~~can be delegated~~ an NPPO may decide to ~~the authorized~~ authorize entities to perform (including national and international entities) in line with the IPPC and the ISPMs;	P	*Category : TECHNICAL* **(4) COSAVE (2 Aug 2022 9:09 PM)** To be alligned to ISPM 45	O	
46	describe the mechanisms to enable authorization (e.g. ~~legal~~ regulatory framework, memorandum of understanding);	P	*Category : SUBSTANTIVE* **(31) New Zealand (24 Aug 2022 12:33 AM)** Suggest replacing 'legal' with 'regulatory'. Authorisation of entities may not necessarily require a change of legal framework. It could be administrative measures etc. e.g. compliance agreements and contracts This gives countries more options to use authorised entities.	O	
46	describe the mechanisms to enable authorization of entities (e.g~~.~~., legal framework, memorandum ~~of~~ of understanding);	P	*Category : EDITORIAL* **(19) United States of America (19 Aug 2022 8:16 PM)** clarity	O	

47	describe the development of procedures and processes to authorize, ~~suspend~~ suspend, revoke, and reinstate entities;	P	*Category : TECHNICAL* **(32) New Zealand (24 Aug 2022 12:35 AM)** Suggest adding revocation of authorization to this clause as ISPM 45 addresses revocation alongside suspension in sections 2, 4, 6 and 7.	O	
48	describe the ~~understanding and~~ development of management systems and ~~quality management system manuals~~documenting procedures;	P	*Category : SUBSTANTIVE* **(33) New Zealand (24 Aug 2022 12:45 AM)** If this is an implementation resource it is more logical to describe how to develop a management system rather than understanding a management system. Suggest not using terms like "Quality Management System" as ISPM 45 makes no mention of Quality Management Systems. Suggest using 'documenting procedures' instead.	O	
48	describe the understanding and development of management systems and quality management system manuals; (6) provide audit, supervision and assurance system	P	*Category : EDITORIAL* **(30) Korea, Republic of (23 Aug 2022 12:38 PM)** Korea propose to put a article to audit on the authorized entities to perform phytosanitary action.	O	
49	describe the auditing or supervision of authorized entities, including procedures for examination and assessment of competencies;	P	*Category : SUBSTANTIVE* **(34) New Zealand (24 Aug 2022 12:47 AM)** Auditing needs to be introduced into the content of this guide to link with section 4.2.1 of the ISPM.	O	
49	describe the supervision of authorized entities, including procedures for the examination and assessment of competencies;	P	*Category : EDITORIAL* **(20) United States of America (19 Aug 2022 8:17 PM)** article	O	
49	describe the supervision of authorized entities, including procedures for ~~examination and~~ examination, assessment of ~~competencies;~~competencies and the conduct of audits.	P	*Category : SUBSTANTIVE* **(7) United States of America (11 Aug 2022 3:56 PM)** Necessary part of authorization.	O	
50	provide examples of processes ~~of~~ for authorizing entities to perform phytosanitary actions;	P	*Category : EDITORIAL* **(21) United States of America (19 Aug 2022 8:17 PM)** correct preposition	O	
52	provide a more specific guidance on authorizing entities to carry out its activities such as phytosanitary ~~fumigation treatments~~fumigation treatments and laboratory tests.	P	*Category : SUBSTANTIVE* **(49) Japan (30 Aug 2022 3:59 AM)** The specific guidance should not be limited to phytosanitary fumigation treatments. It	O	

			may include other activities such as other phytosanitary treatments and laboratory tests, so that it will be more useful guidance for NPPOs.		
52	provide a more specific guidance on authorizing entities to carry out phytosanitary ~~fumigation~~ fumigation treatments. (10) Describe and provide examples of communication needs with the importing country on audit results, consistent with any confidentiality aspect, and bilateral agreements.	P	*Category : SUBSTANTIVE* **(9) United States of America (11 Aug 2022 4:01 PM)** Connected to the requirements of ISPMs 45 & 47.	O	
52	provide a more specific guidance on authorizing entities to carry out phytosanitary fumigation treatments.	C	*Category : SUBSTANTIVE* **(8) United States of America (11 Aug 2022 3:57 PM)** Why this specific example is used in the Specification for a general guide?	O	
53	*Note:* Any overlapping topic presented in the guide on audits should be identified to ensure that both guides complement ~~one another~~ and do not repeat each other.	P	*Category : EDITORIAL* **(22) United States of America (19 Aug 2022 8:19 PM)** clarity	O	
53	*Note:* Any overlapping topic presented in the future? guide on audits should be identified to ensure that both guides complement one another and do not repeat each other.	P	*Category : EDITORIAL* **(10) United States of America (11 Aug 2022 4:03 PM)** Clarify which guide in audits.	O	
8. Selection criteria for working group experts					
58	The members of the working group will be selected based on their technical and practical expertise in the subject matter. Geographical representation of experts from both developing and developed countries will also be considered to ensure that the material developed is globally applicable and reflects best practices from all over the world.	C	*Category : SUBSTANTIVE* **(29) Zambia (22 Aug 2022 1:05 PM)** This is reading well. Zambia has no objection	O	
58	The ~~members of the~~ working group members will be selected based on their technical and practical expertise in the subject matter. Geographical representation of experts from both developing and developed countries will also be considered to ensure that the material developed is globally applicable and reflects best practices from all over the world.	P	*Category : EDITORIAL* **(23) United States of America (19 Aug 2022 8:30 PM)** better flow	O	
61	designing and ~~implementation~~ implementing of agreements with authorized entities	P	*Category : EDITORIAL* **(48) Zimbabwe (29 Aug 2022 8:04 PM)**	O	
61	~~designing~~ design and implementation of agreements with authorized entities	P	*Category : EDITORIAL* **(35) New Zealand (24 Aug 2022 12:47**	O	

			AM)		
63	inspection or treatment of plants and plant products	P	*Category : SUBSTANTIVE* **(43) Australia (29 Aug 2022 4:25 AM)** It is considered that knowledge and/or expertise in treatments for plant and plant products will be valuable in the development of a guide on the authorization of entities to perform phytosanitary actions.	O	
63	inspection of plants and plant products	C	*Category : SUBSTANTIVE* **(39) South Africa (26 Aug 2022 3:14 PM)** Suggestion to add the wording:" and other regulated articles" to ensure consistency with ISPM 23: Guidelines for inspection	O	
70	The working group is encouraged to consider inviting ~~third-party~~ experienced entities to contribute to the development of the guide, by consulting with them or inviting them to make presentations to the working group, etc.	P	*Category : SUBSTANTIVE* **(12) United States of America (11 Aug 2022 4:05 PM)** Need to specify who these third party entities would be, or delete "third party". The WG should be reaching out to experienced or authorized entities to share their experience and lessons learned…	O	
70	The working group is encouraged to consider inviting third-party entities to contribute to the development of the guide, by consulting with them or inviting them to make presentations to the working group, etc.	C	*Category : SUBSTANTIVE* **(11) United States of America (11 Aug 2022 4:04 PM)** Would industry be invited to draft sections of the document?	O	
71	In addition, it would also be ~~useful~~ beneficial for the working group to have recourse to seek the advice of FAO Legal Services on legal aspects related to the mechanisms to enable authorization.	P	*Category : EDITORIAL* **(24) United States of America (19 Aug 2022 8:31 PM)** better word	O	
71	In addition, it would also be useful for the working group to have recourse to seek the advice of FAO Legal Services on legal aspects related to the mechanisms to enable authorization. The WG is invited to review regional standards and procedures as well as documents listed in the references section related to the authorization of entities to perform phytosanitary actions	P	*Category : SUBSTANTIVE* **(13) United States of America (11 Aug 2022 4:09 PM)** Moved above references section, needs more prominence. Also some edits for clarity were added.	O	
9. References					

76	ISPM 47. 2022: Audit in the phytosanitary context. Rome, IPPC Secretariat, FAO. https://assets.ippc.int/static/media/files/publication/en/2022/05/ISPM_47_2022_En_Audit_2022-04-22.pdf **IPPC Secretariat**. 2021. *Authorizing entities to perform phytosanitary actions – An overview of the current use of authorization by national plant protection organizations*. Rome, IPPC Secretariat, FAO.	P	*Category : EDITORIAL* **(56) Canada (31 Aug 2022 1:54 PM)**	O	
86		P	*Category : SUBSTANTIVE* **(14) United States of America (11 Aug 2022 4:10 PM)** Moved above the Reference Section as a task, and for prominence.	O	