

## 2022 SECOND CONSULTATION

1 July – 30 September 2022

### Compiled comments for 2022 Second Consultation: Draft Revision of ISPM 4 (2009-002)

#### Summary

#### Participants

Name	Summary
Cuba	Se aceptan los comentarios adoptados en el Taller Regional para América Latina. No hay intención de presentar otro comentario.
European Union	The comments are submitted by the European Commission on behalf of the European Union (EU) and its 27 Member States.
Ireland	No comment
Singapore	Singapore supports this and has no further comment.
United Kingdom	please ignore

**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**S** (Status) - A = Accepted, C = Closed, O = Open, W = Withdrawn, M = Merged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	Comment
G	(General Comment)	<i>Category : SUBSTANTIVE</i> <b>(334) Argentina (1 Oct 2022 12:46 AM)</b> We fully support comments from COSAVE
G	(General Comment)	<i>Category : SUBSTANTIVE</i> <b>(333) Peru (30 Sep 2022 11:04 PM)</b> PERU supports the comments and proposals agreed by the COSAVE working group
G	(General Comment)	<i>Category : SUBSTANTIVE</i> <b>(289) Antigua and Barbuda (30 Sep 2022 4:38 PM)</b> Antigua and Barbuda endorses all accepted country comments and all additional comments made by the Caribbean Agricultural Health and Food Safety Agency (CAHFSA) sub-review workgroup.
G	(General Comment)	<i>Category : TECHNICAL</i> <b>(288) Paraguay (30 Sep 2022 2:14 PM)</b> Paraguay apoya comentarios de COSAVE.
G	(General Comment)	<i>Category : SUBSTANTIVE</i> <b>(277) Cambodia (30 Sep 2022 8:21 AM)</b> Cambodia supports draft ISPM: Revision of ISPM 4 Requirements for establishing pest free areas (2009-002).
G	(General Comment)	<i>Category : EDITORIAL</i> <b>(276) Nepal (30 Sep 2022 6:58 AM)</b> Nepal has no comments on DRAFT ISPM: Revision of ISPM:4 (Requirements for the establishment of pest free areas) (2009-002) and is okay with it.
G	(General Comment)	<i>Category : SUBSTANTIVE</i> <b>(275) APPPC (30 Sep 2022 2:36 AM)</b>

		The use of the terms "Phytosanitary measures" vs. "Measures" especially in section 6 should be discussed further.
G	(General Comment)	<i>Category : EDITORIAL</i> <b>(274) APPPC (30 Sep 2022 2:36 AM)</b> Suggest the consistent use of Pest Free Area, abbreviation of NPPO and other terminologies throughout the whole text.
G	(General Comment)	<i>Category : SUBSTANTIVE</i> <b>(273) APPPC (30 Sep 2022 2:36 AM)</b> Thailand agreed with the proposed Draft ISPM: Revision of ISPM-4 (Requirements for the establishment of pest free areas).
G	(General Comment)	<i>Category : SUBSTANTIVE</i> <b>(272) APPPC (30 Sep 2022 2:36 AM)</b> PFA should be pest free area, "pest freedom" was used several time in this ISPM which is not very precise. We recommend change all the pest freedom to pest free.
G	(General Comment)	<i>Category : SUBSTANTIVE</i> <b>(271) APPPC (30 Sep 2022 2:36 AM)</b> If the pest status in a country is "Absent: pest no longer present" or "Absent: pest eradicated", regardless of the country's intention (i.e., even if the country is not established and maintained as a PFA), the country could be required to conform with ISPM4. Its demands could sometimes be excessive requirements for a country of absent pest status. This is because some countries are confused about the interpretation between the case that a PFA is established and maintained (i.e. "Absent: the entire country is pest free" based on the definition of ISPM8) and the case of the other "Absent" pest status. This is one of the reasons of "ambiguity in interpretation of countries that would normally be free from fruit flies," as pointed out in the specification of the revision of ISPM26 under consideration. Therefore, it is necessary to clarify more about the relationship between PFA and other absent pest statuses than "Absent: the entire country is pest free" and "absent: pest not recorded" are already described in ISPM4.  Add the response for the case of "Absent: pest records invalid" to para 79. Add the response for the cases of "Absent: pest no longer present" and "Absent: pest eradicated" as new para after para 94. Other absent statuses, i.e. "Absent: the entire country is pest free" and "absent: pest not recorded" have already been addressed in this draft ISPM4.
G	(General Comment)	<i>Category : EDITORIAL</i> <b>(270) APPPC (30 Sep 2022 2:36 AM)</b> India supports the proposed revision
G	(General Comment)	<i>Category : EDITORIAL</i> <b>(269) APPPC (30 Sep 2022 2:36 AM)</b> Singapore supports this and has no further comment.
G	(General Comment)	<i>Category : EDITORIAL</i> <b>(249) Barbados (29 Sep 2022 5:00 PM)</b> Barbados is of the view that this re-draft is needed at this time and is well written generally.
G	(General Comment)	<i>Category : TECHNICAL</i> <b>(248) Mali (29 Sep 2022 4:10 PM)</b> pas d'objection !
G	(General Comment)	<i>Category : SUBSTANTIVE</i> <b>(202) Australia (29 Sep 2022 7:37 AM)</b> Throughout this document the measures implemented to establish and maintain the PFA (a

		<p>phytosanitary measure) are also referred to as 'phytosanitary measures'.</p> <p>As in comments provided in the first round of country consultation, this sets up two levels of phytosanitary measures and creates some confusion. It is recommended that phytosanitary measures used to implement a PFA be simplified to a 'measure' that enables the PFA phytosanitary measure for trade.</p>
G	(General Comment)	<p><i>Category : SUBSTANTIVE</i>  <b>(201) Australia (29 Sep 2022 7:36 AM)</b>  As an overarching document describing the requirements for establishment of PFAs, existing related ISPMs (e.g. ISPM 26) and potential future documents describing the requirements for PFAs for specific pests, should be annexed to this revised ISPM 4.</p>
G	(General Comment)	<p><i>Category : SUBSTANTIVE</i>  <b>(200) Australia (29 Sep 2022 7:35 AM)</b>  Australia agrees with the comments as submitted by the PPPO for ISPM 4.</p>
G	(General Comment)	<p><i>Category : SUBSTANTIVE</i>  <b>(197) Italy (28 Sep 2022 4:24 PM)</b>  Italy would like to formally endorse the EPPO comments</p>
G	(General Comment)	<p><i>Category : EDITORIAL</i>  <b>(190) South Africa (28 Sep 2022 8:09 AM)</b>  No further comments</p>
G	(General Comment)	<p><i>Category : EDITORIAL</i>  <b>(184) Korea, Republic of (28 Sep 2022 3:20 AM)</b>  Republic of Korea support the comments made during APPPC Regional Workshop.</p>
G	(General Comment)	<p><i>Category : SUBSTANTIVE</i>  <b>(182) Belarus (27 Sep 2022 3:47 PM)</b>  Republic of Belarus would like to formally endorse the EPPO comments submitted via the IPPC Online Comment System</p>
G	(General Comment)	<p><i>Category : EDITORIAL</i>  <b>(181) United Kingdom (27 Sep 2022 2:46 PM)</b>  The United Kingdom of Great Britain and Northern Ireland would like to formally endorse the EPPO comments submitted via the IPPC Online Comment System</p>
G	(General Comment)	<p><i>Category : SUBSTANTIVE</i>  <b>(177) Guyana (26 Sep 2022 9:38 PM)</b>  Guyana has no objection at this time.</p>
G	(General Comment)	<p><i>Category : SUBSTANTIVE</i>  <b>(176) Caribbean Agricultural Health and Food Safety Agency (26 Sep 2022 7:41 PM)</b>  Guyana believes that the revision of this ISPM is timely and would assist tremendously in increasing market access.</p>
G	(General Comment)	<p><i>Category : SUBSTANTIVE</i>  <b>(175) Caribbean Agricultural Health and Food Safety Agency (26 Sep 2022 7:41 PM)</b>  The Bahamas offers no objections to the revision of this ISPM.</p>
G	(General Comment)	<p><i>Category : SUBSTANTIVE</i>  <b>(174) Caribbean Agricultural Health and Food Safety Agency (26 Sep 2022 7:41 PM)</b>  Antigua and Barbuda has no objections to this version of the draft revision of the ISPM.</p>
G	(General Comment)	<p><i>Category : TECHNICAL</i>  <b>(173) Caribbean Agricultural Health and Food Safety Agency (26 Sep 2022 7:41 PM)</b>  A more consolidated version of this standard</p>

G	(General Comment)	<i>Category : EDITORIAL</i> <b>(172) Caribbean Agricultural Health and Food Safety Agency (26 Sep 2022 7:41 PM)</b> Barbados is of the view that this re-draft is needed at this time and is well written generally.
G	(General Comment)	<i>Category : SUBSTANTIVE</i> <b>(121) Costa Rica (22 Sep 2022 12:57 AM)</b> The consensus comments of the IPPC Workshop for Latin America are supported
G	(General Comment)	<i>Category : EDITORIAL</i> <b>(109) IPPC Regional Workshop Africa (8 Sep 2022 1:58 PM)</b> ok for Burkina Faso
G	(General Comment)	<i>Category : EDITORIAL</i> <b>(108) IPPC Regional Workshop Africa (8 Sep 2022 1:58 PM)</b> Le Bénin estime que le présent projet de norme peut être transmis pour adoption Merci
G	(General Comment)	<i>Category : TECHNICAL</i> <b>(107) IPPC Regional Workshop Africa (8 Sep 2022 1:58 PM)</b> We support the draft ISPM
G	(General Comment)	<i>Category : SUBSTANTIVE</i> <b>(106) IPPC Regional Workshop Africa (8 Sep 2022 1:58 PM)</b> Malawi supports the draft revision of ISPM4
G	(General Comment)	<i>Category : EDITORIAL</i> <b>(105) IPPC Regional Workshop Africa (8 Sep 2022 1:58 PM)</b> we accept all these reviews
G	(General Comment)	<i>Category : EDITORIAL</i> <b>(104) IPPC Regional Workshop Africa (8 Sep 2022 1:58 PM)</b> we accept all these reviews
G	(General Comment)	<i>Category : TECHNICAL</i> <b>(96) Uganda (7 Sep 2022 9:29 AM)</b> draft ok
G	(General Comment)	<i>Category : SUBSTANTIVE</i> <b>(64) Brazil (30 Aug 2022 5:08 PM)</b> Brazil supports comments provided by COSAVE in this draft.
G	(General Comment)	<i>Category : TECHNICAL</i> <b>(65) Malawi (30 Aug 2022 9:46 PM)</b> We support the draft ISPM
G	(General Comment)	<i>Category : SUBSTANTIVE</i> <b>(42) China (28 Aug 2022 4:15 PM)</b> PFA should be pest free area, "pest freedom" was used several time in this ISPM which is not very precise. We recommand change all the pest freedom to pest free.
G	(General Comment)	<i>Category : SUBSTANTIVE</i> <b>(41) Thailand (25 Aug 2022 11:50 AM)</b> Thailand agreed with the proposed Draft ISPM: Revision of ISPM-4 (Requirements for the establishment of pest free areas).
G	(General Comment)	<i>Category : EDITORIAL</i> <b>(33) India (19 Aug 2022 9:04 AM)</b> India supports the proposed revision
G	(General Comment)	<i>Category : SUBSTANTIVE</i> <b>(32) Bahamas (16 Aug 2022 9:46 PM)</b> The Bahamas offers no objections to the revision of this standard.

G	(General Comment)	<p>Category : <i>SUBSTANTIVE</i></p> <p> Grenada  <b>(31) Grenada (15 Aug 2022 2:21 AM)</b>  A more refined and consolidated version</p>
1	<p><b>DRAFT ISPM: Revision of ISPM 4 (Requirements for the establishment of pest free areas) (2009-002)</b></p>	<p>Category : <i>SUBSTANTIVE</i></p> <p><b>(332) Russian Federation (30 Sep 2022 8:07 PM)</b></p> <p>The Russian Federation considers that the division of the established PFA into smaller PFAs with buffer zones using the "nested small PFAs inside one PFA area " principle shall lead to confusion and misleading application of the term "PFA" because there are already approved appropriate International Standards for Phytosanitary Measures ISPM 10 "Requirements for the establishment of pest free places of production and pest free production sites" and ISPM 4 "Requirements for the establishment of pest free areas" each of them are subjected for its own specific area of responsibility.</p> <p>It is unacceptable to withdrawn PFA status only for several infested small areas with a buffer zone within a single PFA because when any pest is found, the WHOLE PFA loses its status as a PFA, and not only a special part with found pests in it together with buffer zones demarcated around this infested area where found a pest which are located inside of this big PFA where the pest was found. Accordingly, we draw your attention that the WHOLE PFA even if the pest was found only on 5 meters of this whole PFA loses its status as a PFA until appropriate action is taken in the entire PFQ area with a lost PFA status not just in that part of the WHOLE area of the former PFA where the pest is found or present. In simple terms: Establishing demarcated small PFAs having the temporary suspended PFAs status within a single PFA where the pest is present or found with buffer zone demarcation for this small infested area is not acceptable as well as the splitting one PFA into some smaller PFAs within ONE PFA while the pest is present in this area.</p> <p>Therefore, it is considered inappropriate to split up a PFA into smaller PFAs as this would only lead to confusion and misunderstanding as to how countries would apply the definition of a "PFA". We consider it impractical to revise ISPM 4 "Requirements for the establishment of pest free areas" as a pest outbreak may occur not only in a "pest free area" but also in a "pest free place of production " and in a "pest free production site ". And if an outbreak occurs in a PFA, it is logical to withdrawn the PFA status from the whole PFA and establish "pest free production sites and pest free places of production " inside of the area which lost its PFA status and do not create smaller PFAs. inside of a single PFA according to the ISPM 10 "Requirements for the establishment of pest free places of production and pest free production sites".</p> <p>We believe that it is unacceptable to divide the PFA into small PFAs. If the IPPC still consider it possible to allocate in one PFA several small PFAs, then they should be called respectively «pest free place of production» and «pest free production site » and should be regulated by ISPM 10 and they shouldn't be called the PFA.</p> <p>ISPM 5, Glossary of Phytosanitary Terms, contains terms such as "pest free area", "pest free place of production" and "pest free production site". A PFA can be a whole country and simply ordinary PFA area, but if you split the PFA into small parts, it will be a "pest free production site" or a "pest free place of production" and these areas fragmented within the PFA can in no way be called Pest Free Areas. And then you need to call these areas not the PFA, but call them by their own names according to the terminology of ISPM 5 and ISPM 10.</p> <p>The following are excerpts from the ISPM 5 definitions:</p>

		<p>a) pest free area -An area in which a specific pest is absent as demonstrated by scientific evidence and in which, where appropriate, this condition is being officially maintained [ISPM 2, 1995; revised CPM, 2015]</p> <p>b) pest free place of production - Place of production in which a specific pest is absent as demonstrated by scientific evidence and in which, where appropriate, this condition is being officially maintained for a defined period [ISPM 10, 1999; revised CPM, 2015]</p> <p>c) pest free production site - A production site in which a specific pest is absent, as demonstrated by scientific evidence, and in which, where appropriate, this condition is being officially maintained for a defined period [ISPM 10, 1999; revised CPM, 2015]</p> <p>We would also like to draw your attention that it is impossible to regulate the number of harmful organisms or pests in the PFA, because the presence of pest is not applicable in the PFA a priori and it is nonsense to regulate the number of harmful organism in the PFA when moving goods from the PFA or to the PFA, since the PFA is created with only one purpose and under the one condition - «the whole and absolute absence of harmful organisms or pests throughout the whole PFA».</p> <p>With regard to conduct corrective actions on the outbreak in the PFA, we believe that it is impossible to carry out corrective actions to eliminate the outbreak inside the PFA, because the PFA has already lost its status of the PFA at the slightest detection of a pest. Within the PFA there can be no outbreaks of harmful organisms (pests), as the PFA creation by the State or by a country implies only one meaning - the absolute and whole absence of any pests in the PFA. It is impossible to control the outbreaks inside the PFA, because once the outbreak is discovered, the PFA loses its status as the PFA automatically and all corrective actions against a particular outbreak are not carried out in the PFA, where the outbreak was found, but in the entire area, which had already lost its PFA status. Thus, the area in which the pest was found in the PFA cannot keep the PFA status a PFA. And the PFA status loses the WHOLE PFA (or suspends the WHOLE PFA). Therefore, the paragraph 3.4. in ISPM 4 should not be called «Corrective actions plans, including response to an outbreak" but «Corrective action plans to restore the PFA status. » since corrective actions are taken not with regard to an outbreak in the PFA, but with regard to «restoration of the PFA status for the whole PFA» which was lost for a whole PFA due to this outbreak.</p>
1	<p><b>DRAFT ISPM: Revision of ISPM 4 (Requirements for the establishment of pest free areas) (2009-002)</b></p>	<p>Category : TECHNICAL  <b>(183) Cameroon (27 Sep 2022 6:26 PM)</b>                  La révision semble exhaustive. Cette norme fournit aux ONPVs de précieux outils pour l'établissement des zones exemptes de nuisibles. Nous supportons son adoption.</p>
1	<p><b>DRAFT ISPM: Revision of ISPM 4 (Requirements for the establishment of pest free areas) (2009-002)</b></p>	<p>Category : TECHNICAL  <b>(95) Kenya (6 Sep 2022 10:19 AM)</b>                  The standard is simplified, clear and precise.</p>
32	<p><b>Scope</b></p>	<p>Category : TECHNICAL  <b>(97) IPPC Regional Workshop Africa (8 Sep 2022 1:58 PM)</b>                  The standard is simplified, clear and precise.</p>
33	<p>This standard describes the requirements for initiating, establishing and maintaining pest free areas (PFAs) as a phytosanitary measure to support the phytosanitary certification of plants, plant products and other regulated articles exported from the PFA or, if technically justified, as a phytosanitary measure required by the national plant</p>	<p>Category : SUBSTANTIVE  <b>(257) APPPC (30 Sep 2022 2:36 AM)</b>                  Korea comments that the purpose of establish and maintaing PFA is not confined to importing country.</p>

	protection organization (NPPO) of <del>an importing</del> country for the protection of an endangered area in its territory.	
33	This standard describes the requirements for initiating, establishing and maintaining pest free areas (PFAs) as a phytosanitary measure to support the phytosanitary certification of plants, plant products and other regulated articles exported from the PFA or, if technically justified, as a phytosanitary measure required by the national plant protection organization (NPPO) of an importing country for the protection of an endangered area in its territory.	<i>Category : SUBSTANTIVE</i> <b>(98) IPPC Regional Workshop Africa (8 Sep 2022 1:58 PM)</b> The draft standard reads well and Zambia has no objection.
33	This standard describes the requirements for initiating, establishing and maintaining pest free areas (PFAs) as a phytosanitary measure to support the phytosanitary certification of plants, plant products and other regulated articles exported from the <del>PFA or, if PFA. If</del> technically <del>justified, justified a PFA can be used</del> as a phytosanitary measure required by the national plant protection organization (NPPO) of an importing country for the protection of an endangered area in its territory.	<i>Category : EDITORIAL</i> <b>(66) PPPO (1 Sep 2022 3:38 AM)</b> This is a long sentence. Suggest breaking it up - helps with clarity.
33	This standard describes the requirements for initiating, establishing and maintaining pest free areas (PFAs) as a phytosanitary measure to support the phytosanitary certification of plants, plant products and other regulated articles exported from the PFA or, if technically justified, as a phytosanitary measure required by the national plant protection organization (NPPO) of <del>an importing</del> country for the protection of an endangered area in its territory.	<i>Category : SUBSTANTIVE</i> <b>(34) Korea, Republic of (23 Aug 2022 12:23 PM)</b> Korea comments that the purpose of establish and maintaing PFA is not confined to importing country.
39	<b>Outline of requirements</b>	<i>Category : SUBSTANTIVE</i> <b>(185) South Africa (28 Sep 2022 8:01 AM)</b> This standard mentions "initiating" which is not mentioned in other ISPMs. Proposal that this standard be aligned with other ISPMs throughout the entire text.
40	A PFA is a phytosanitary measure that may be used to facilitate safe trade and protect plant resources. National plant protection organizations should consider a PFA to be a phytosanitary measure that, when used alone, is sufficient for managing <del>the pest risk</del> <a href="#">associated with a specific pest</a> .	<i>Category : EDITORIAL</i> <b>(290) European Union (30 Sep 2022 4:43 PM)</b> More precise wording, consistent with the first sentence of paragraph 50.
40	A PFA is a phytosanitary measure that may be used to facilitate safe trade and protect plant resources. <del>National plant protection organizations-NPPOs</del> should consider a PFA to be a phytosanitary measure that, when used alone, is sufficient for managing pest risk.	<i>Category : EDITORIAL</i> <b>(191) New Zealand (28 Sep 2022 8:44 AM)</b> replace with NPPO here as the abbreviation has been introduced in paragraph 33 of the document.

40	A PFA is a phytosanitary measure that may be used to facilitate safe trade and protect plant resources. National plant protection organizations should consider a PFA to be a phytosanitary measure that, when used alone, is sufficient for managing <del>the pest risk</del> <u>associated with a specific pest</u> .	<i>Category : EDITORIAL</i> <b>(125) EPPO (26 Sep 2022 2:07 PM)</b> More precise wording, consistent with the first sentence of paragraph 50.
40	A PFA is a phytosanitary measure that may be used to facilitate safe trade and protect plant resources. National plant protection organizations should consider a PFA to be a phytosanitary measure that, when used alone, is sufficient for managing pest risk, <u>except for priority quarantine pests</u> .	<i>Category : SUBSTANTIVE</i> <b>(122) Egypt (24 Sep 2022 11:43 AM)</b> Since the measures used to establish or maintain the PFA based on an assessment of pest risk so that, further risk(s) may be identified after the establishment of a recognized PFA by e.g. the importing country (especially if the importing country is concerned about specific priority pest in its quarantine pest list).
40	A PFA is a phytosanitary measure that may be used to facilitate safe trade and protect plant resources. <u>National plant protection organizations</u> should consider a PFA to be a phytosanitary measure that, when used alone, is sufficient for managing pest risk.	<i>Category : EDITORIAL</i> <b>(43) China (28 Aug 2022 4:16 PM)</b> NPPOs
40	A <u>recognized</u> PFA is a phytosanitary measure that may be used to facilitate safe trade and protect plant resources. National plant protection organizations should consider a PFA to be a phytosanitary measure that, when used alone, is sufficient for managing pest <del>risk-risk</del> <u>unless further risks are identified by importing country/</u>	<i>Category : TECHNICAL</i> <b>(1) NEPPO (3 Aug 2022 5:36 PM)</b>
41	When initiating, establishing or maintaining a PFA, NPPOs should follow the requirements outlined in this standard. Requirements include systems to establish and maintain pest freedom, verification that pest freedom has been attained or maintained, appropriate corrective actions for pest detections, proper documentation of these activities and appropriate record-keeping, and transparency and stakeholder communication. <del>The measures used to establish or maintain the PFA should be based on an assessment of pest risk.</del>	<i>Category : SUBSTANTIVE</i> <b>(291) European Union (30 Sep 2022 4:43 PM)</b> This sentence is not really useful and fully understandable in the Outline of requirements and we suggest deleting it.
41	When initiating, establishing or maintaining a PFA, NPPOs should follow the requirements outlined in this standard. <u>Requirements include systems to establish and maintain pest freedom, verification that pest freedom has been attained or maintained, appropriate corrective actions for pest detections, proper documentation of these activities and appropriate record-keeping, and transparency and stakeholder communication.</u> The measures used to establish or maintain the PFA should be based on an assessment of pest risk.	<i>Category : EDITORIAL</i> <b>(192) New Zealand (28 Sep 2022 8:46 AM)</b> suggest using bullet points for easy reading



41	<p>When initiating, establishing or maintaining a PFA, NPPOs should follow the requirements outlined in this standard. Requirements include systems to establish and maintain pest freedom, verification that pest freedom has been attained or maintained, appropriate corrective actions for pest detections, proper documentation of these activities and appropriate record-keeping, and transparency and stakeholder communication. <del>The measures used to establish or maintain the PFA should be based on an assessment of pest risk.</del></p>	<p><i>Category : SUBSTANTIVE</i>  <b>(126) EPPO (26 Sep 2022 2:07 PM)</b>  This sentence is not really useful and fully understandable in the Outline of requirements and we suggest deleting it.</p>
41	<p>When initiating, establishing or maintaining a PFA, NPPOs should follow the requirements outlined in this standard. Requirements <del>include</del> <u>include:</u></p> <ul style="list-style-type: none"> <li>- systems to establish and maintain pest freedom;</li> <li>- verification that pest freedom has been attained or maintained;</li> <li>- appropriate corrective actions for pest detections;</li> <li>- proper documentation of these activities and appropriate record-keeping; and</li> <li>- transparency and stakeholder communication.</li> </ul> <p>The measures used to establish or maintain the PFA should be based on an assessment of pest risk.</p>	<p><i>Category : EDITORIAL</i>  <b>(67) PPPO (1 Sep 2022 3:38 AM)</b>  Improved formatting for clarity.</p>
41	<p>When initiating, establishing or maintaining a PFA, NPPOs should follow the requirements outlined in this standard. Requirements include systems to establish and maintain pest freedom, verification that pest freedom has been attained or maintained, appropriate corrective actions for pest detections, proper documentation of these activities and appropriate record-keeping, and transparency and stakeholder communication. The measures used to establish or maintain the PFA should be based on <del>an</del> assessment of pest risk.</p>	<p><i>Category : SUBSTANTIVE</i>  <b>(45) China (28 Aug 2022 4:17 PM)</b></p>
41	<p>When initiating, establishing or maintaining a PFA, NPPOs should follow the requirements outlined in this standard. Requirements include systems to establish and maintain pest freedom, verification that pest freedom has been attained or maintained, appropriate corrective actions for pest detections, proper documentation of these activities and appropriate record-keeping, and transparency and stakeholder communication. The measures used to establish or maintain the PFA should be based on an assessment of pest risk. <u>Pest status of “absent: never recorded” should not require establishing of PFA.</u></p>	<p><i>Category : TECHNICAL</i>  <b>(8) United States of America (11 Aug 2022 7:17 PM)</b>  This is an important requirement and should be also included in the Outline section.</p>

43	A PFA is recognized as <a href="#">one of the a</a> pest risk management options that contracting parties may consider implementing as a phytosanitary measure to protect the plant resources of an area for agricultural, forestry or ecological conservation purposes, facilitate safe trade, or increase the market-access opportunities for exporting countries. Pest free areas can offer a cost-effective way for NPPOs and industry in both importing and exporting countries to manage pest risk.	Category : EDITORIAL <b>(292) European Union (30 Sep 2022 4:44 PM)</b> Clearer.
43	A PFA is recognized as <a href="#">one of the a</a> pest risk management options that contracting parties may consider implementing as a phytosanitary measure to protect the plant resources of an area for agricultural, forestry or ecological conservation purposes, facilitate safe trade, or increase the market-access opportunities for exporting countries. Pest free areas can offer a cost-effective way for NPPOs and industry in both importing and exporting countries to manage pest risk.	Category : EDITORIAL <b>(127) EPPO (26 Sep 2022 2:07 PM)</b> Clearer
43	A PFA is recognized as one of the pest risk management options that contracting parties may consider implementing as a phytosanitary measure to protect the plant resources of an area for agricultural, forestry or ecological conservation purposes, facilitate safe trade, or increase the market-access opportunities for exporting countries. <del>Pest free areas</del> <a href="#">PFAs</a> can offer a cost-effective way for NPPOs and industry in both importing and exporting countries to manage pest risk.	Category : EDITORIAL <b>(46) China (28 Aug 2022 4:21 PM)</b>
44	According to Article IV.2(e) of the IPPC, the responsibility for the designation, maintenance and surveillance of PFAs lies with NPPOs. The operational principles outlined in ISPM 1 ( <i>Phytosanitary principles for the protection of plants and the application of phytosanitary measures in international trade</i> ) also require contracting parties to take into account the status of an area as a PFA when determining phytosanitary measures for imports from that area.	Category : SUBSTANTIVE <b>(91) Zambia (5 Sep 2022 6:29 PM)</b> The draft standard reads well and Zambia has no objection.
44	According to Article IV.2(e) of the IPPC, the responsibility for the designation, maintenance and surveillance of PFAs lies with NPPOs. The operational principles outlined in ISPM 1 ( <i>Phytosanitary principles for the protection of plants and the application of phytosanitary measures in international trade</i> ) also require contracting parties to take into account the status of an area <a href="#">as a PFA (e.g., PFA) or the status of the regulated pest (i.e., Absent: never recorded)</a> , when determining phytosanitary measures for imports from that area.	Category : TECHNICAL <b>(9) United States of America (11 Aug 2022 7:31 PM)</b> For clarity.

45	A PFA may be applied to an entire country or part of it. A PFA may, as appropriate, include the territory of all or parts of several countries. Within a <del>single</del> country, more than one PFA may be established for the same pest, depending on the geographical nature of the country, the distribution of the pest and its hosts and the biology of the pest.	<i>Category : TECHNICAL</i> <b>(111) Uruguay (19 Sep 2022 4:02 PM)</b> To avoid redundancy
45	A PFA may be applied to an entire country or part of it. A PFA may, as appropriate, include the territory of all or parts of several countries. Within a <del>single</del> country, more than one PFA may be established for the same pest, depending on the geographical nature of the country, the distribution of the pest and its hosts and the biology of the pest.	<i>Category : TECHNICAL</i> <b>(81) COSAVE (5 Sep 2022 4:50 PM)</b> To avoid redundancy
45	A PFA may be applied to an entire country or part of it. A PFA may, as appropriate, include <del>the territory of</del> all or parts of <del>a country or parts of</del> several <del>adjacent</del> countries. Within a single country, more than one PFA may be established for the same pest, depending on the <del>biology of the pest</del> , geographical nature of the country, <del>and</del> the distribution of the pest and its <del>hosts and the biology of the pest</del> hosts.	<i>Category : SUBSTANTIVE</i> <b>(68) PPPO (1 Sep 2022 3:38 AM)</b> Move 'biology of the pest' earlier as it is the most important consideration  PPPO suggests this change improves understanding/clarity
46	When a PFA is established it is usually for one specific pest, but a PFA may also be established for <del>a group of pests with similar biology</del> <u>a group of pests with similar biology</u> . In this standard, "pest" is used hereafter to refer to "pest or group of pests".	<i>Category : TECHNICAL</i> <b>(294) European Union (30 Sep 2022 4:47 PM)</b> Are there any criteria to decide if pests have a "similar biology"?
46	When a PFA is <del>established</del> <u>established</u> , it is usually for one specific pest, but a PFA may also be established for a group of pests with similar biology. In this standard, "pest" is used hereafter to refer to "pest or group of pests".	<i>Category : EDITORIAL</i> <b>(293) European Union (30 Sep 2022 4:45 PM)</b> improved English
46	When a PFA is established it is usually for one specific pest, but a PFA may also be established for a group of pests with similar biology. In this standard, "pest" is used hereafter to refer to "pest or group of pests".  <u>If the pest status is "absent" as defined in ISPM 8 and this is supported by current scientific evidence, the results of which are made available on request then establishing a PFA should not be required by importing countries.</u>	<i>Category : SUBSTANTIVE</i> <b>(205) Australia (29 Sep 2022 7:43 AM)</b> Paragraph moved from 2.1 Determination of pest status in the area. This is an important paragraph which provides key information about when a PFA is required and should be included in the background.  Paragraph has been simplified and shortened by removing 'pest not recorded' and '- such as from continued surveillance for pest absence in the area' from the original paragraph.  It is considered that any 'absent' pest status is enough information to not require a PFA.
46	<u>When a PFA is established it is usually for one specific pest, but a PFA may also be established for a group of pests with similar biology. In</u>	<i>Category : TECHNICAL</i> <b>(186) South Africa (28 Sep 2022 8:04 AM)</b> The group of pests with similar biology need to be defined. Group of pests infesting the same commodity or group of pests with related taxonomy.

	this standard, “pest” is used hereafter to refer to “pest or group of pests”.	
46	When a PFA is established it is usually for one specific pest, but a PFA may also be established for a <b>group of pests with similar biology</b> . In this standard, “pest” is used hereafter to refer to “pest or group of pests”.	<i>Category : TECHNICAL</i> <b>(129) Eppo (26 Sep 2022 2:07 PM)</b> Are there any criteria to decide if pests have a "similar biology"?
46	When a PFA is <del>established</del> <b>established</b> , it is usually for one specific pest, but a PFA may also be established for a group of pests with similar biology. In this standard, “pest” is used hereafter to refer to “pest or group of pests”.	<i>Category : EDITORIAL</i> <b>(128) Eppo (26 Sep 2022 2:07 PM)</b> improved English
46	When a PFA is established it is usually for one specific pest, but a PFA may also be established for a <b>defined</b> group of pests with similar biology. In this standard, “pest” is used hereafter to refer to “pest or group of pests”.	<i>Category : EDITORIAL</i> <b>(69) PPPO (1 Sep 2022 3:38 AM)</b> Adding the word "defined" helps to clarify that group does not necessarily refer to more of the same pest (plural), rather pests that are closely related and can be pooled together for the purpose of this ISPM.
47	<b>IMPACTS ON BIODIVERSITY AND THE ENVIRONMENT</b>	<i>Category : SUBSTANTIVE</i> <b>(187) South Africa (28 Sep 2022 8:04 AM)</b> Proposal for Consideration of other measures applicable besides phytosanitary procedures
48	This standard may contribute to the protection of biodiversity and the environment <b>by preventing the introduction of regulated pests into an area</b> . When establishing and maintaining PFAs, countries are encouraged to consider phytosanitary procedures that minimize impact on the environment.	<i>Category : SUBSTANTIVE</i> <b>(99) IPPC Regional Workshop Africa (8 Sep 2022 1:58 PM)</b> by preventing the introduction and establishing of regulated pests into an area
50	A PFA should be considered a phytosanitary measure that, when used alone, is sufficient for managing the pest risk associated with a <b>specific</b> pest. Where a PFA has been established and maintained in accordance with the requirements of this standard, additional phytosanitary measures in relation to the specified pest should not be imposed.	<i>Category : EDITORIAL</i> <b>(295) European Union (30 Sep 2022 4:48 PM)</b> The word 'specified' is not needed (this is noted in paragraph 46).
50	A PFA should be considered a phytosanitary measure that, when used alone, is sufficient for managing the pest risk associated with a specific pest. Where a PFA has been established and maintained in accordance with the requirements of this standard, additional phytosanitary <del>measures</del> <b>measures other than ensuring phytosanitary security of a consignment</b> in relation to the specified pest should not be imposed.	<i>Category : SUBSTANTIVE</i> <b>(258) APPPC (30 Sep 2022 2:36 AM)</b> The commodities produced in PFAs should not be imposed on additional phytosanitary measures such as testing and treatments. However, it is needed to avoid the misinterpretations that even phytosanitary security of a consignment (e.g. phytosanitary measures on preventing contamination) are not necessary as additional phytosanitary measures. The definition of “Phytosanitary security (of a consignment)” from ISPM5 State of a consignment when its integrity has been maintained and its infestation and contamination by regulated pests, prevented through the application of phytosanitary measures
50	A PFA should be considered a phytosanitary measure that, when used alone, is sufficient for managing the pest risk associated with a specific pest. Where a PFA has been established and maintained in accordance	<i>Category : SUBSTANTIVE</i> <b>(235) Japan (29 Sep 2022 11:37 AM)</b> The commodities produced in PFAs should not be imposed on additional phytosanitary


	with the requirements of this standard, additional phytosanitary measures <u>other than ensuring phytosanitary security of a consignment</u> in relation to the specified pest should not be imposed.	measures such as testing and treatments. However, it is needed to avoid the misinterpretations that even phytosanitary security of a consignment (e.g. phytosanitary measures on preventing contamination) are not necessary as additional phytosanitary measures.  The definition of "Phytosanitary security (of a consignment)" from ISPM5 State of a consignment when its integrity has been maintained and its infestation and contamination by regulated pests, prevented through the application of phytosanitary measures.
50	A PFA should be considered a phytosanitary measure that, when used alone, is sufficient for managing the pest risk associated with a <u>specifie</u> pest. Where a PFA has been established and maintained in accordance with the requirements of this standard, additional phytosanitary measures in relation to the specified pest should not be imposed.	<i>Category : EDITORIAL</i> <b>(130) Eppo (26 Sep 2022 2:07 PM)</b> The word 'specified' is not needed (this is noted in paragaphe 46)
50	A PFA should be considered a phytosanitary measure that, when used alone, is sufficient for managing the pest risk associated with a specific pest. Where a PFA has been established and maintained in accordance with the requirements of this standard, additional phytosanitary measures in relation to <u>the</u> specified pest should not be imposed.	<i>Category : SUBSTANTIVE</i> <b>(27) Jamaica (12 Aug 2022 10:56 PM)</b> Jamaica proposes removing "the" and rephrase "specific pest" to specific pests to keep consistency
50	A PFA should be considered a phytosanitary measure that, when used alone, is sufficient for managing the pest risk associated with a specific pest. Where a PFA has been established and maintained in accordance with the requirements of this standard, additional phytosanitary measures in relation to the specified pest should not be imposed.	<i>Category : SUBSTANTIVE</i> <b>(26) Jamaica (12 Aug 2022 10:55 PM)</b> Jamaica proposes removing "a" before specific pest and adding "s" to the word pest to read "specific pests". This signifies different pests rather than a single pest.
51	The requirements that should be met for a PFA to be established and <u>to be</u> used as a phytosanitary measure for trade are detailed below. Depending on the pest concerned, an individual or a combination of measures may be used to meet each <u>requirementof these requirements</u> .	<i>Category : EDITORIAL</i> <b>(296) European Union (30 Sep 2022 4:50 PM)</b> 1) Simplification 2) More precise wording
51	The requirements that should be met for a PFA to be established and <u>to be</u> used as a phytosanitary measure for trade are detailed below. Depending on the pest concerned, an individual or a combination of measures may be used to meet each <u>requirementof these requirements</u> .	<i>Category : EDITORIAL</i> <b>(131) Eppo (26 Sep 2022 2:07 PM)</b> 1) Simplification 2) More precise wording
51	The requirements that should be met for a PFA to be <u>established, maintained</u> and to be used as a phytosanitary measure for trade are detailed below. Depending on the pest concerned, an individual or a combination of measures may be used to meet each requirement.	<i>Category : EDITORIAL</i> <b>(54) Brazil (29 Aug 2022 10:13 PM)</b> To be consistent to the next paragraph

53	<del>programmessystems_</del> to establish pest freedom;	<i>Category : SUBSTANTIVE</i> <b>(236) Japan (29 Sep 2022 11:38 AM)</b> Replace "systems" as "programmes." The requirement to maintain pest freedom on para 54 is "programmes" but the requirement to establish pest freedom on this para is "systems". It is not clear why maintaining pest freedom is "programmes" but establishing pest freedom is "systems". In the present ISPM4, "to establish pest freedom" is achieved based on general surveillance and specific surveys, which are part of the National Surveillance System, so "system" may be used. According to Section 2 of the revised ISPM4 which related to "to establish pest freedom", the requirements do not necessarily consist of surveillance only, so "system" does not seem necessary to be used here.
53	systems to establish pest freedom;	<i>Category : SUBSTANTIVE</i> <b>(100) IPPC Regional Workshop Africa (8 Sep 2022 1:58 PM)</b> Methodology to establish pest freedom;
55	verification that pest freedom has been <del>attained</del> <u>attained and maintained</u> ;	<i>Category : EDITORIAL</i> <b>(206) Australia (29 Sep 2022 7:44 AM)</b> For simplicity – Also, areas may be historically absent and therefore verification that it has been attained is not always necessary, instead all that is required is verification of maintenance.
56	<del>verification that pest freedom has been maintained</del> ;	<i>Category : EDITORIAL</i> <b>(207) Australia (29 Sep 2022 7:46 AM)</b> Point merged with point above for simplicity, see comment #206
56	verification that pest freedom has been <del>maintained</del> <u>maintained (as agreed by relevant bilateral partners)</u> ;	<i>Category : SUBSTANTIVE</i> <b>(70) PPPO (1 Sep 2022 3:38 AM)</b> Maintenance of freedom needs to be undertaken according to agreement
57	<del>corrective_</del> actions for detections of the specified pest;	<i>Category : SUBSTANTIVE</i> <b>(110) Congo (15 Sep 2022 4:15 PM)</b> If this sentence concerns to establish and to maintain PFA, it is useful to remove "corrective" because using it demonstrates that actions taken before must be corrected. This term, we think, is appropriate when it comes to the maintenance of a PFA, but not its establishment.
57	<del>corrective_</del> actions for detections of the specified pest;	<i>Category : SUBSTANTIVE</i> <b>(101) IPPC Regional Workshop Africa (8 Sep 2022 1:58 PM)</b> If this sentence concerns to establish and to maintain PFA, it is useful to remove "corrective" because using it demonstrates that actions taken before, must be corrected. This term, we think, is appropriate when it comes to the maintenance of a PFA, but not its establishment.
60	The following elements should be considered when establishing and maintaining a PFA:	<i>Category : TECHNICAL</i> <b>(124) Egypt (24 Sep 2022 11:54 AM)</b> - existence of accredited laboratory for pest detection purposes should be in place. This is as a component of PFA establishment is the availability/existence of accredited laboratory for diagnostic purposes
61	<del>the necessity to base</del> measures <del>should be based</del> on the biology of the <del>specified</del> pest, the relevant pathways and the characteristics of the PFA;	<i>Category : EDITORIAL</i> <b>(297) European Union (30 Sep 2022 4:52 PM)</b> For consistency with the other paragraphs of the list and the word 'specified' is not needed (this is noted in paragraph 46).
61	measures should be based on the biology of the specified pest, the relevant pathways and the characteristics of the PFA;	<i>Category : EDITORIAL</i> <b>(278) Viet Nam (30 Sep 2022 9:01 AM)</b> It should be considered other elements such as ecology, geography, agricultural character, and host plants.


61	measures should be based on the biology of the specified pest, the relevant pathways and the characteristics of the <del>PFA</del> area;	<i>Category : SUBSTANTIVE</i> <b>(255) Mexico (29 Sep 2022 10:05 PM)</b> At this point you should refer to the area, not to the PFA
61	<del>the necessity to base</del> measures <del>should be based</del> on the biology of the <del>specified</del> pest, the relevant pathways and the characteristics of the PFA;	<i>Category : EDITORIAL</i> <b>(132) EPPO (26 Sep 2022 2:07 PM)</b> For consistency with the other paragraphs of the list and the word 'specified' is not needed (this is noted in paragaphe 46).
61	measures should be based on the biology of the specified pest, <del>and its hosts</del> the relevant pathways and the characteristics of the PFA;	<i>Category : TECHNICAL</i> <b>(123) Egypt (24 Sep 2022 11:50 AM)</b> it is recommended to consider the biology of hosts in this aspect since it is a biological interaction between pest vs host
61	measures should be based on the biology of the specified pest, the relevant pathways and the characteristics of the <del>PFA</del> area;	<i>Category : TECHNICAL</i> <b>(112) Uruguay (19 Sep 2022 4:03 PM)</b> What should be considered are the characteristics of the area that will be established as PFA
61	measures should be based on the biology of the specified pest, the relevant pathways and the characteristics of the <del>PFA</del> area;	<i>Category : TECHNICAL</i> <b>(82) COSAVE (5 Sep 2022 4:53 PM)</b> What should be considered are the characteristics of the area that will be established as PFA
61	measures should be based on the biology of the specified pest, the relevant pathways and the characteristics of the PFA; <u>- measures should be based on climate, ecology, geography and agricultural characteristics of the PFA</u>	<i>Category : SUBSTANTIVE</i> <b>(35) Korea, Republic of (23 Aug 2022 12:30 PM)</b> Korea suggest editng this sentence because climate, ecology, geography and agricultural character also considered as one of elements.
61	measures should be based on the biology of the specified pest, the relevant pathways and the characteristics of the PFA;	<i>Category : TECHNICAL</i> <b>(10) United States of America (11 Aug 2022 7:33 PM)</b> "measures" or "phytosanitary measures"?
61	measures should be based on the biology of the specified pest, <del>the relevant pathways and the characteristics of the PFA;</del> <u>and its hosts the relevant pathways and the characteristics of the PFA;</u>	<i>Category : TECHNICAL</i> <b>(2) NEPP0 (3 Aug 2022 5:36 PM)</b>
62	the availability of appropriate surveillance tools for the <del>specified</del> pest (detection and identification);	<i>Category : EDITORIAL</i> <b>(298) European Union (30 Sep 2022 4:52 PM)</b> For consistency with the other paragraphs of the list and the word 'specified' is not needed (this is noted in paragraph 46).
62	the availability of appropriate surveillance <del>tools for the specified pest (detection tools, technology and identification)</del> resources to detect and identify specified pest;	<i>Category : SUBSTANTIVE</i> <b>(259) APPPC (30 Sep 2022 2:36 AM)</b>
62	the availability of appropriate surveillance <del>tools for the specified pest (detection tools, technology and identification)</del> resources to detect and identify specified pest;	<i>Category : SUBSTANTIVE</i> <b>(238) Japan (29 Sep 2022 11:42 AM)</b> Surveillance tools are not the only elements needed to detect and identify the specific pest. The technology and resources such as budget and staff are also necessary elements.
62	the availability of appropriate surveillance tools for the <del>specified</del> pest (detection and identification);	<i>Category : EDITORIAL</i> <b>(133) EPPO (26 Sep 2022 2:07 PM)</b> For consistency with the other paragraphs of the list and the word 'specified' is not needed (this is noted in paragaphe 46)

63	the existence of an appropriate <u>legislative-normative</u> framework to support the establishment and maintenance of the PFA;	<i>Category : TECHNICAL</i> <b>(256) Mexico (29 Sep 2022 10:07 PM)</b> More appropriate
63	the existence of an appropriate <u>legislative-normative</u> framework to support the establishment and maintenance of the PFA;	<i>Category : TRANSLATION</i> <b>(40) CA (24 Aug 2022 10:20 PM)</b> The word "normative" is more appropriate in this case.
64	the <u>support from participation of</u> relevant stakeholders, such as domestic industries and local regulatory bodies; and	<i>Category : TECHNICAL</i> <b>(3) NEPPO (3 Aug 2022 5:36 PM)</b>
69	When initiating a PFA, an NPPO should first specify the pest that is to be controlled (including its scientific name) and identify valid diagnostic methods and relevant aspects of its biology. <u>In the following sections of this standard, this pest is referred to as “the pest”.</u>	<i>Category : EDITORIAL</i> <b>(299) European Union (30 Sep 2022 4:53 PM)</b> Repetition, already covered in para 46.
69	When initiating a PFA, an NPPO should first specify the pest that is to be controlled (including its scientific <u>and common</u> name) and identify valid diagnostic methods and relevant aspects of its biology. In the following sections of this standard, this pest is referred to as “the pest”.	<i>Category : EDITORIAL</i> <b>(286) Viet Nam (30 Sep 2022 9:19 AM)</b>
69	<u>When initiating the establishment of a PFA, an NPPO should first specify the pest that is to be controlled (including its scientific name) and identify valid diagnostic methods and relevant aspects of its biology. When initiating a PFA, an NPPO should first specify the pest that is to be controlled (including its scientific name) and identify valid diagnostic methods and relevant aspects of its biology. In the following sections of this standard, this pest is referred to as “the pest”.</u>	<i>Category : SUBSTANTIVE</i> <b>(260) APPPC (30 Sep 2022 2:36 AM)</b> Revised change by Japan on 22 Aug 2022 16:09
69	When initiating <u>the establishment of</u> a PFA, an NPPO should first specify the pest that is to be controlled (including its scientific name) and identify valid diagnostic methods and relevant aspects of its biology. In the following sections of this standard, this pest is referred to as “the pest”.	<i>Category : SUBSTANTIVE</i> <b>(239) Japan (29 Sep 2022 11:44 AM)</b> to make clear the objective of “initiating” in the process until using the PFA as phytosanitary measures
69	When initiating a PFA, an NPPO should first specify the pest that is to be controlled (including its scientific name) and identify valid diagnostic methods and relevant aspects of its biology. <u>In the following sections of this standard, this pest is referred to as “the pest”.</u>	<i>Category : SUBSTANTIVE</i> <b>(209) Australia (29 Sep 2022 7:48 AM)</b> The background (fourth paragraph) contains a separate definition of ‘the pest’. It therefore suggested that this sentence be deleted to avoid repetition and confusion.
69	When initiating a PFA, an NPPO should first specify the pest that is to be controlled (including its scientific name) and identify valid <u>detection and</u> diagnostic methods and relevant aspects of its biology. In the following sections of this standard, this pest is referred to as “the pest”.	<i>Category : SUBSTANTIVE</i> <b>(208) Australia (29 Sep 2022 7:48 AM)</b> Detection should also be considered in the process of setting up a PFA.
69	When initiating a PFA, an NPPO should first specify the pest that is to be controlled (including its scientific name) and identify valid	<i>Category : EDITORIAL</i> <b>(134) Eppo (26 Sep 2022 2:07 PM)</b> Repetition, already covered in para 46



	diagnostic methods and relevant aspects of its biology. <del>In the following sections of this standard, this pest is referred to as “the pest”.</del>	
69	<del>When initiating a PFA, an NPPO should first specify the pest that is to be controlled (including relevant scientific name(s)) and implement valid detection and diagnostic methods and take into account relevant aspects of its biology. When initiating a PFA, an NPPO should first specify the pest that is to be controlled (including its scientific name) and identify valid diagnostic methods and relevant aspects of its biology. In the following sections of this standard, this pest is referred to as “the pest”.</del>	<p>Category : SUBSTANTIVE  <b>(71) PPPO (1 Sep 2022 3:38 AM)</b>  To allow for a group of pests as described in the last sentence in the background section</p> <p>PPPO considers that the diagnostic methods should have previously been identified and therefore the word implement is more appropriate. Detection is required in addition to diagnostics.</p> <p>To allow for a group of pests as described in the last sentence in the background section.</p>
69	When initiating a PFA, an NPPO should first specify the pest that is to be controlled (including its scientific name) and identify valid diagnostic methods and relevant aspects of its biology. In the following sections of this standard, this <u>specific</u> pest is referred to as “the pest”.	<p>Category : EDITORIAL  <b>(47) China (28 Aug 2022 4:22 PM)</b></p>
69	When initiating a PFA, an NPPO should first specify the pest <u>or group of pest</u> that is to be controlled (including its scientific name) and identify valid diagnostic methods and relevant aspects of its biology. In the following sections of this standard, this pest <u>or group of pest</u> is referred to as “the pest”.	<p>Category : SUBSTANTIVE  <b>(4) NEPPO (3 Aug 2022 5:36 PM)</b></p>
70	<b>1.2 <u>Delimitation</u> <del>Identification</del> of the area</b>	<p>Category : TECHNICAL   Mexico  <b>(178) Mexico (27 Sep 2022 12:00 AM)</b>  According to the text of this section</p>
71	The area being considered for pest freedom may be the entire country, a part of a country, or all or part of several countries. The area should be described specifically enough to allow it to be readily identified. This is important when <del>NPPOs are the NPPO is</del> providing evidence to support the claim that the area is free of the pest, but also when <del>NPPOs are the NPPO is</del> subsequently reporting the pest status of the PFA and when raising public awareness.	<p>Category : EDITORIAL  <b>(300) European Union (30 Sep 2022 4:54 PM)</b>  Singular, for consistency with the other paragraphs of section 1.</p>
71	The area being considered for pest freedom may be <del>the entire country,</del> a part of a country, <u>the entire country,</u> or all or part of several countries. The area should be described specifically enough to allow it to be readily identified. This is important when NPPOs are providing evidence to support the claim that the area is free of the pest, but also when NPPOs are subsequently reporting the pest status of the PFA and when raising public awareness.	<p>Category : SUBSTANTIVE  <b>(261) APPPC (30 Sep 2022 2:36 AM)</b></p>

71	The area being considered for pest freedom may be the entire country, a part of a country, or all or part of several countries. The area should be described specifically enough to allow it to be readily identified. This is important when NPPOs are providing evidence to support the claim that the area is free of the pest, but also when NPPOs are subsequently reporting the pest status of the <u>targeted pest in the</u> PFA and when raising public awareness.	<i>Category : SUBSTANTIVE</i> <b>(240) Japan (29 Sep 2022 11:45 AM)</b> To make clear the object of the pest status.
71	The area being considered for pest freedom may be the entire country, a part of a country, or all or part of several countries. The area should be described specifically enough to allow it to be readily identified. This is important when <del>NPPOs are the</del> NPPO is providing evidence to support the claim that the area is free of the pest, but also when <del>NPPOs are the</del> NPPO is subsequently reporting the pest status of the PFA and when raising public awareness.	<i>Category : EDITORIAL</i> <b>(135) EPPO (26 Sep 2022 2:07 PM)</b> Singular, for consistency with the other paragraphs of section 1.
71	The area being considered for pest freedom may be the entire country, a part of a country, or all or part of several countries. The area should be described specifically enough to allow it to be readily <del>identified</del> <u>identified e.g. using GPS coordinates</u> . This is important when NPPOs are providing evidence to support the claim that the area is free of the pest, but also when NPPOs are subsequently reporting the pest status of the PFA and when raising public awareness.	<i>Category : EDITORIAL</i> <b>(72) PPPO (1 Sep 2022 3:38 AM)</b> The specific area is important information for trading partners so specifics such as GPS coordinates are useful
71	The area being considered for pest freedom may be the entire country, a part of a country, or all or part of several countries. <u>Pest free areas may be delimited by natural barriers such as bodies of water, mountains, deserts or other geographical features that prevent pest movement from one area to another.</u> The area should be described specifically enough to allow it to be readily identified. This is important when NPPOs are providing evidence to support the claim that the area is free of the pest, but also when NPPOs are subsequently reporting the pest status of the PFA and when raising public awareness.	<i>Category : EDITORIAL</i> <b>(57) Brazil (29 Aug 2022 10:26 PM)</b> To improve comprehension. First you delimitate, after describe
71	The area being considered for pest freedom may be <del>the entire country</del> , a part of a country, <u>the entire country</u> , or <del>all or part</del> <u>or all</u> of several countries. The area should be described specifically enough to allow it to be readily identified. This is important when NPPOs are providing evidence to support the claim that the area is free of the pest, but also when NPPOs are subsequently reporting the pest status of the PFA and when raising public awareness.	<i>Category : SUBSTANTIVE</i> <b>(48) China (28 Aug 2022 4:24 PM)</b> logical

72	Pest free areas may be delimited by natural barriers such as bodies of water, mountains, deserts or other geographical <del>features-features,</del> <u>infrastructural conditions and political-administrative divisions</u> that prevent pest movement from one area to another.	<i>Category : SUBSTANTIVE</i>  Mexico <b>(179) Mexico (27 Sep 2022 12:05 AM)</b> Important to consider, since they can constitute barriers that restrict the movement of a pest through the free area
72	Pest free areas may be delimited by natural barriers such as bodies of water, mountains, deserts or other geographical features <u>infrastructure conditions and political-administrative division</u> that prevent pest movement from one area to another.	<i>Category : TECHNICAL</i> <b>(63) Colombia (30 Aug 2022 2:11 AM)</b> It is important to include that the delimitation of areas can also be generated by infrastructure conditions and by political-administrative division of the country, because they constitute barriers that restrict the movement of the pest towards the free area.
72	<del>Pest free areas may be delimited by natural barriers such as bodies of water, mountains, deserts or other geographical features that prevent pest movement from one area to another.</del>	<i>Category : EDITORIAL</i> <b>(56) Brazil (29 Aug 2022 10:19 PM)</b> Moved to the previous paragraph
72	Pest free areas may be delimited by natural barriers such as bodies of water, mountains, deserts or other geographical features <u>infrastructure conditions and political-administrative division</u> that prevent pest movement from one area to another.	<i>Category : SUBSTANTIVE</i> <b>(39) CA (24 Aug 2022 10:13 PM)</b> It is important to include that the delimitation of areas can also be generated by infrastructure conditions and by political-administrative division of the country, because they constitute barriers that restrict the movement of the pest towards the free area.
73	<b>1.3 Suitability of <u>ecological-environmental</u> conditions in the area</b>	<i>Category : SUBSTANTIVE</i> <b>(241) Japan (29 Sep 2022 11:47 AM)</b> This section is intended to examine, from the perspective of the targeted pest, the host susceptibility, climatic suitability, the potential for entry and establishment in the region, so the term "environmental" seems to be more appropriate than " ecological".
74	The NPPO of the country in which the area is situated should determine the presence of host plants in the area. Potential differences in host susceptibility in the <del>specified</del> area, the climatic suitability of the area, and the potential for entry and establishment of the pest in the area should also be considered.	<i>Category : EDITORIAL</i> <b>(301) European Union (30 Sep 2022 4:55 PM)</b> Deletion of "specified" before area: for consistency with the rest of the paragraph.
74	The NPPO of the country in which the area is situated should determine the presence of host plants in the area. Potential differences in host susceptibility in the specified area, <del>the climatic-suitability to the</del> <u>climate and environment</u> of the area, and the potential for entry and establishment of the pest in the area should also be considered.	<i>Category : SUBSTANTIVE</i> <b>(285) Viet Nam (30 Sep 2022 9:18 AM)</b>
74	The NPPO of the country in which the area is situated should determine the <u>presence-availability</u> of host plants in the area. Potential differences in host susceptibility in the specified area, the climatic suitability of the area, and the potential for entry and establishment of the pest in the area should also be considered.	<i>Category : SUBSTANTIVE</i> <b>(262) APPPC (30 Sep 2022 2:36 AM)</b> It is more appropriate to use the wording "availability" than "presence" in this context because of the consistency with ISPM11.
74	The NPPO of the country in which the area is situated should determine the <del>presence-availability</del> of host plants in the area. Potential differences in host susceptibility in the specified area, the climatic	<i>Category : EDITORIAL</i> <b>(242) Japan (29 Sep 2022 11:49 AM)</b> It is more appropriate to use the wording "availability" than "presence" in this context because of the consistency with ISPM11.

	suitability of the area, and the potential for entry and establishment of the pest in the area should also be considered.	
74	The NPPO of the country in which the area is situated should determine the presence of host plants in the area. Potential differences in host susceptibility in the <del>specified</del> area, the climatic suitability of the area, and the potential for entry and establishment of the pest in the area should also be considered.	<i>Category : EDITORIAL</i> <b>(136) Eppo (26 Sep 2022 2:07 PM)</b> Deletion of "specified" before area: for consistency with the rest of the paragraph.
74	The <del>NPPO-NPPO(s)</del> of the <del>country-country(ies)</del> in which the area is situated should determine the presence of host plants in the area. Potential differences in host susceptibility in the specified area, the climatic suitability of the area, and the potential for entry and establishment of the pest in the area should also be considered.	<i>Category : SUBSTANTIVE</i> <b>(49) China (28 Aug 2022 4:25 PM)</b> Because the pest free area mentioned above may involve several countries.
78	Where <del>more reliable</del> the evidence <u>provided by the general surveillance</u> is <del>needed-not sufficient or reliable</del> to demonstrate <del>pest-the</del> absence of <u>the pest in an-the area, according to ISPM 8, specific surveillance should be conducted rather than general surveillance</u> conducted. The level of specific surveillance (i.e. the type and frequency of surveys) should be based on the results of an assessment of the potential for entry and establishment of the pest in the area. <del>The</del> <u>To justify the area that is being proposed as a PFA,</u> specific surveillance should include a <u>delimiting-detection</u> survey <del>or-and, if the pest is detected in the area, a</del> <u>detection-delimiting</u> survey to <u>justify-establish</u> the <u>boundaries of the infested area that where the pest is being proposed as a PFA to be eradicated.</u>	<i>Category : SUBSTANTIVE</i> <b>(302) European Union (30 Sep 2022 5:01 PM)</b> "More" reliable than what? Reliable evidence is always needed to demonstrate pest absence in the area. The suggested wording is intended to solve these issues.  Last sentences revised for a more logical sequence and important precisions given.
78	Where more <del>reliable</del> evidence is needed to demonstrate pest absence in an area, specific surveillance should be conducted rather than general surveillance. The level of specific surveillance (i.e. the type and frequency of surveys) should be based on the results of an assessment of the potential for entry and establishment of the pest in the area. The specific surveillance should include a delimiting survey or a detection survey to justify the area that is being proposed as a PFA.	<i>Category : SUBSTANTIVE</i> <b>(198) Canada (28 Sep 2022 10:55 PM)</b> The word reliable may create confusion. Reliable evidence should always be needed.
78	Where more reliable evidence is needed to demonstrate pest absence in an area, specific surveillance should be conducted rather than general surveillance. The level of specific surveillance (i.e. the type and frequency of surveys) should be based on the results of an assessment of the potential for entry and establishment of the pest in the area. The specific surveillance should <u>include a delimiting survey</u>	<i>Category : TECHNICAL</i> <b>(189) South Africa (28 Sep 2022 8:08 AM)</b> Proposal to interchange the word "delimiting" and "detection" for correct Sequence of events

	or a detection survey to justify the area that is being proposed as a PFA.	
78	Where <del>more reliable the</del> evidence <u>provided by general surveillance</u> is <del>needed not sufficient or reliable</del> to demonstrate <del>pest the</del> absence <del>of the pest in an the</del> area, <u>according to ISPM 8</u> , specific surveillance should be <del>conducted rather than general surveillance</del> <u>conducted</u> . The level of specific surveillance (i.e. the type and frequency of surveys) should be based on the results of an assessment of the potential for entry and establishment of the pest in the area. <del>The To justify the area that is being proposed as a PFA</del> , specific surveillance should include a <del>delimiting detection</del> survey <del>or and, if the pest is detected in the area, a detection delimiting</del> survey to <del>justify establish</del> the <u>boundaries of the infested area that where the pest is being proposed as a PFA to be eradicated</u> .	<p><i>Category : SUBSTANTIVE</i>  <b>(137) Eppo (26 Sep 2022 2:07 PM)</b>  "More" reliable than what? Reliable evidence is always needed to demonstrate pest absence in the area. The suggested wording is intended to solve these issues.</p> <p>Last sentences revised for a more logical sequence and important precisions given.</p>
78	Where more reliable evidence is needed to demonstrate pest absence in an area, specific surveillance should be conducted rather than general surveillance. The <del>level methodology</del> of specific surveillance (i.e. the type and frequency of surveys) should be based on the results of an assessment of the potential for entry and establishment of the pest in the area. The specific surveillance should include a delimiting survey or a detection survey to justify the area that is being proposed as a PFA.	<p><i>Category : TECHNICAL</i>  <b>(113) Uruguay (19 Sep 2022 4:04 PM)</b>  We suggest to replace "level" because there is no levels of surveillance, there are methodologies or methods that include type, frequency of surveys, etc. Either of these terms are more consistent with ISPM 6.</p>
78	Where more reliable evidence is needed to demonstrate pest absence in an area, specific surveillance should be conducted rather than general surveillance. The <del>level methodology</del> of specific surveillance (i.e. the type and frequency of surveys) should be based on the results of an assessment of the potential for entry and establishment of the pest in the area. The specific surveillance should include a delimiting survey or a detection survey to justify the area that is being proposed as a PFA.	<p><i>Category : TECHNICAL</i>  <b>(83) COSAVE (5 Sep 2022 5:00 PM)</b>  We suggest to replace "level" because there is no levels of surveillance, there are methodologies or methods that include type, frequency of surveys, etc. Either of these terms are more consistent with ISPM 6.</p>
78	Where more reliable evidence is needed to demonstrate pest absence in an area, specific surveillance should be conducted rather than general surveillance. The level of specific surveillance (i.e. the type and frequency of surveys) should be based on the results of an assessment of the potential for entry and establishment of the pest in the area. The specific surveillance should include a delimiting <del>survey or survey</del> , a detection <u>survey, or a monitoring</u> survey to justify the area that is being proposed as a PFA.	<p><i>Category : SUBSTANTIVE</i>  <b>(50) China (28 Aug 2022 4:27 PM)</b>  Besides delimiting survey and detection survey, monitoring survey belongs to specific surveillance.</p>

79	<p><del>In cases where the pest status is present in the area and is not deemed to be transient, an eradication programme is needed to establish a PFA. If the pest status is “absent: pest not recorded” as defined in ISPM 8 and this is supported by current scientific evidence—such as from continued surveillance for pest absence in the area, the results of which are made available on request—then establishing a PFA should not be required by importing countries.</del></p>	<p><i>Category : SUBSTANTIVE</i>  <b>(303) European Union (30 Sep 2022 5:02 PM)</b>  1) We propose deleting this paragraph as it creates more confusion than value. Especially the last part of the sentence " then establishing a PFA should not be required by importing countries". Is it meant to say that no further surveillance is needed when to establish a PFA? or that the importing country should accept this pest status and not require the establish a PFA? The practical meaning is not clear – especially if the PFA is not the whole country but an area within a country.  2) Some counties need to eradicate a pest before establishing a PFA. A new paragraph is proposed for addition to clarify this specific situation.</p>
79	<p>If the pest status is “absent: pest not recorded” as defined in ISPM 8 and this is supported by current scientific evidence – such as from continued surveillance for pest absence in the area, the results of which are made available on request – then establishing a PFA should not be required by importing countries.</p>	<p><i>Category : SUBSTANTIVE</i>  <b>(199) Canada (28 Sep 2022 11:03 PM)</b>  this paragraph should be moved above the previous one for a better flow.</p>
79	<p><del>If the pest status is “absent: pest not recorded” as defined in ISPM 8 and this is supported by current scientific evidence—such as from continued surveillance for pest absence in the area, the results of which are made available on request—then establishing a PFA should not be required by importing countries.</del></p>	<p><i>Category : SUBSTANTIVE</i>  <b>(204) Australia (29 Sep 2022 7:41 AM)</b>  Suggest the key information in this paragraph be moved to Background. See background comment for more information.</p>
79	<p><del>In cases where the pest status is present in the area and is not deemed to be transient, an eradication programme is needed to establish a PFA. If the pest status is “absent: pest not recorded” as defined in ISPM 8 and this is supported by current scientific evidence—such as from continued surveillance for pest absence in the area, the results of which are made available on request—then establishing a PFA should not be required by importing countries.</del></p>	<p><i>Category : SUBSTANTIVE</i>  <b>(138) Eppo (26 Sep 2022 2:07 PM)</b>  1) We propose deleting this paragraph as it creates more confusion than value. Especially the last part of the sentence " then establishing a PFA should not be required by importing countries". Is it meant to say that no further surveillance is needed when to establish a PFA? or that the importing country should accept this pest status and not require the establish a PFA? The practical meaning is not clear – especially if the PFA is not the whole country but an area within a country.  2) Some counties need to eradicate a pest before establishing a PFA. A new paragraph is proposed for addition to clarify this specific situation.</p>
79	<p>If the pest status is “absent: pest not recorded” as defined in ISPM 8 and this is supported by current scientific evidence – such as from <del>continued</del> <u>general</u> surveillance for pest absence in the area, the results of which are made available on request – then establishing a PFA should not be required by importing countries.</p>	<p><i>Category : SUBSTANTIVE</i>  <b>(51) China (28 Aug 2022 4:29 PM)</b>  Based on general surveillance for pest can show current scientific evidence to support the pest. Continued surveillance is unnecessary for supporting evidence. However, general surveillance for pest can support the evidence of pest not recorded.</p>
79	<p>If the pest status is “absent: pest not recorded” as defined in ISPM 8 and this is supported by current scientific evidence – such as from <del>continued</del> surveillance for pest absence in the area, the results of which are made available on request – then establishing a PFA should not be required by importing countries.</p>	<p><i>Category : SUBSTANTIVE</i>  <b>(36) Korea, Republic of (23 Aug 2022 12:32 PM)</b>  Korea think that it is appropriate to prove absent of pest by surveillance in PFA, but should this surveillance be doing continuously?</p>

80	<del>In addition to its use in determining pest status, surveillance in the context of PFAs may also be used to:</del>	<i>Category : SUBSTANTIVE</i> <b>(304) European Union (30 Sep 2022 5:03 PM)</b> Paragraphs 80 to 84 can be deleted because they do not add value to the information given in section 3 (subsections 3.2, 3.4.1 and 3.4.3), section 5 (paragraph 126) and section 6 (paragraph 130). This information is redundant.
80	<del>In addition to its use in determining pest status, surveillance in the context of PFAs may also be used to:</del>	<i>Category : SUBSTANTIVE</i> <b>(139) Eppo (26 Sep 2022 2:07 PM)</b> Paragraphs 80 to 84 can be deleted because they do not add value to the information given in section 3 (subsections 3.2, 3.4.1 and 3.4.3), section 5 (paragraph 126) and section 6 (paragraph 130). This information is redundant.
81	<del>determine pest distribution and abundance;</del>	<i>Category : SUBSTANTIVE</i> <b>(305) European Union (30 Sep 2022 5:03 PM)</b> Paragraphs 80 to 84 can be deleted because they do not add value to the information given in section 3 (subsections 3.2, 3.4.1 and 3.4.3), section 5 (paragraph 126) and section 6 (paragraph 130).
81	<del>determine pest distribution and abundance;</del>	<i>Category : SUBSTANTIVE</i> <b>(140) Eppo (26 Sep 2022 2:07 PM)</b> Paragraphs 80 to 84 can be deleted because they do not add value to the information given in section 3 (subsections 3.2, 3.4.1 and 3.4.3), section 5 (paragraph 126) and section 6 (paragraph 130).
82	<del>delimit a pest population;</del>	<i>Category : SUBSTANTIVE</i> <b>(306) European Union (30 Sep 2022 5:04 PM)</b> Paragraphs 80 to 84 can be deleted because they do not add value to the information given in section 3 (subsections 3.2, 3.4.1 and 3.4.3), section 5 (paragraph 126) and section 6 (paragraph 130).
82	<del>delimit a pest population;</del>	<i>Category : SUBSTANTIVE</i> <b>(141) Eppo (26 Sep 2022 2:07 PM)</b> Paragraphs 80 to 84 can be deleted because they do not add value to the information given in section 3 (subsections 3.2, 3.4.1 and 3.4.3), section 5 (paragraph 126) and section 6 (paragraph 130).
83	<del>assess the effectiveness of eradication measures taken; or</del>	<i>Category : SUBSTANTIVE</i> <b>(307) European Union (30 Sep 2022 5:04 PM)</b> Paragraphs 80 to 84 can be deleted because they do not add value to the information given in section 3 (subsections 3.2, 3.4.1 and 3.4.3), section 5 (paragraph 126) and section 6 (paragraph 130).
83	<del>assess the effectiveness of eradication measures taken; or</del>	<i>Category : SUBSTANTIVE</i> <b>(142) Eppo (26 Sep 2022 2:07 PM)</b> Paragraphs 80 to 84 can be deleted because they do not add value to the information given in section 3 (subsections 3.2, 3.4.1 and 3.4.3), section 5 (paragraph 126) and section 6 (paragraph 130).
84	<del>provide data to report to other NPPOs.</del>	<i>Category : SUBSTANTIVE</i> <b>(308) European Union (30 Sep 2022 5:04 PM)</b> Paragraphs 80 to 84 can be deleted because they do not add value to the information given in section 3 (subsections 3.2, 3.4.1 and 3.4.3), section 5 (paragraph 126) and section 6 (paragraph 130).
84	<del>provide data to report to other NPPOs.</del>	<i>Category : SUBSTANTIVE</i> <b>(143) Eppo (26 Sep 2022 2:07 PM)</b> Paragraphs 80 to 84 can be deleted because they do not add value to the information given

		in section 3 (subsections 3.2, 3.4.1 and 3.4.3), section 5 (paragraph 126) and section 6 (paragraph 130).
86	To prevent the entry of the pest into the area, <del>it should be regulated</del> , the potential pathways <del>should be</del> identified and appropriate controls on the movement of regulated articles should be established. The movement controls should depend on the assessed pest risk, including the probability of pest establishment. Such controls should include:	<i>Category : TECHNICAL</i> <b>(114) Uruguay (19 Sep 2022 4:08 PM)</b> Concept moved from paragraph 87
86	To prevent the entry of the pest into the area, the potential pathways <del>should be</del> identified and appropriate controls on the movement of regulated articles should be established. The movement controls should depend on the assessed pest risk, including the probability of pest establishment. Such controls should include:	<i>Category : TECHNICAL</i> <b>(87) COSAVE (5 Sep 2022 5:40 PM)</b> consequential changes
86	To prevent the entry of the pest into the area, <del>it should be regulated</del> , the potential pathways should be identified and appropriate controls on the movement of regulated articles should be established. The movement controls should depend on the assessed pest risk, including the probability of pest establishment. Such controls should include:	<i>Category : TECHNICAL</i> <b>(86) COSAVE (5 Sep 2022 5:39 PM)</b> Concept moved from paragraph 87
87	<del>inclusion of the pest on a list of regulated pests;</del>	<i>Category : TECHNICAL</i> <b>(115) Uruguay (19 Sep 2022 4:09 PM)</b> The status of regulated pests is not part of the controls but a previous condition
87	inclusion of the pest on a list of regulated pests; <u>- Presentation of monitoring plan</u>	<i>Category : SUBSTANTIVE</i> <b>(102) IPPC Regional Workshop Africa (8 Sep 2022 1:58 PM)</b>
87	<del>inclusion of the pest on a list of regulated pests;</del>	<i>Category : TECHNICAL</i> <b>(85) COSAVE (5 Sep 2022 5:38 PM)</b> The status of regulated pests is not part of the controls but a previous condition
89	imposition of domestic <del>restrictions</del> <u>restrictions, phytosanitary import requirements</u> or other measures to control the movement of regulated articles into or through the area;	<i>Category : SUBSTANTIVE</i> <b>(309) European Union (30 Sep 2022 5:05 PM)</b> The pest may be introduced not only from the country itself but also from other countries.
89	imposition of domestic <del>restrictions</del> <u>restrictions, phytosanitary import requirements</u> or other measures to control the movement of regulated articles into or through the area;	<i>Category : SUBSTANTIVE</i> <b>(144) EPPC (26 Sep 2022 2:07 PM)</b> The pest may be introduced not only from the country itself but also from other countries
90	inspection <u>and testing</u> of regulated articles, examination of the relevant documentation and, where necessary for cases of non-compliance, the application of appropriate measures.	<i>Category : SUBSTANTIVE</i> <b>(287) APPPC (30 Sep 2022 11:57 AM)</b> If pathogens and nematodes are the targeted pests, testing may also be required.
90	inspection <u>and testing</u> of regulated articles, examination of the relevant documentation and, where necessary for cases of non-compliance, the application of appropriate measures.	<i>Category : SUBSTANTIVE</i> <b>(244) Japan (29 Sep 2022 11:52 AM)</b> If pathogens and nematodes are the targeted pests, testing may also be required.



90	inspection of regulated articles, examination of the relevant documentation and, where necessary for cases of non-compliance, the application of appropriate measures. <u>- potential testing of regulated articles where targeted pests may not be found through a visual inspection, for example pathogens and nematodes.</u>	<i>Category : SUBSTANTIVE</i> <b>(210) Australia (29 Sep 2022 7:50 AM)</b> Testing may be required to inspect for targeted pests unable to be identified through an inspection and should be considered.
90	inspection of regulated articles, examination of the relevant documentation and, where necessary for cases of non-compliance, the application of appropriate <u>phytosanitary</u> measures.	<i>Category : TECHNICAL</i> <b>(5) NEPPO (3 Aug 2022 5:36 PM)</b>
91	<b>2.3 Establishment of buffer zones</b>	<i>Category : EDITORIAL</i> <b>(282) Viet Nam (30 Sep 2022 9:11 AM)</b> A detailed procedure and steps are needed to set up the buffer zone in this section
92	Where the geographical isolation of the area is not adequate to prevent the natural spread of the pest into it, the establishment of a buffer zone should be considered. The population of the pest in the buffer zone should be maintained at or below a specified level, which should be verified by surveillance. The <u>buffer zone should be free from the targeted pest hots. The</u> extent of the buffer zone should be determined by the NPPO, based on the distance over which the likely natural spread of the pest population to the area could not occur during the season when hosts are present. The NPPO should describe, with the use of supporting maps, the boundaries of the buffer zone.	<i>Category : TECHNICAL</i> <b>(6) NEPPO (3 Aug 2022 5:36 PM)</b>
93	<b>2.4 Official declaration of pest freedom</b>	<i>Category : SUBSTANTIVE</i> <b>(263) APPPC (30 Sep 2022 2:36 AM)</b> Korea think that It is necessary to state where the declaration should be made(e.g. website of NPPO or NRO, etc).
93	<b>2.4 Official declaration of pest freedom</b>	<i>Category : SUBSTANTIVE</i> <b>(37) Korea, Republic of (23 Aug 2022 12:33 PM)</b> Korea think that It is necessary to state where the declaration should be made(e.g. website of NPPO or NRO, etc).
94	When the pest status is determined as absent ( <del>according to (see ISPM 8),-8)</del> or eradication of the pest from the target area is achieved ( <del>according to (see ISPM 9 (Guidelines for pest eradication programmes))</del> ), the NPPO should make an official declaration that the area is free from the pest. All internal management procedures and phytosanitary measures to maintain the PFA (see section 3) should be in place before this declaration is made.	<i>Category : EDITORIAL</i> <b>(310) European Union (30 Sep 2022 5:07 PM)</b> 1) Replacement of "according to" with "see" (twice): More appropriate wording. 2) Deletion of an unnecessary comma.
94	When the pest status is determined as absent (according to ISPM 8), or eradication of the pest from the target area is achieved (according to	<i>Category : EDITORIAL</i> <b>(214) Australia (29 Sep 2022 7:59 AM)</b>

	ISPM 9 ( <i>Guidelines for pest eradication programmes</i> )), the NPPO should make an official declaration that the area is free from the pest. All internal management procedures and phytosanitary measures to maintain the PFA (see section 3) should be in place before <del>this</del> <u>any</u> declaration is made.	In the case that a PFA is declared, procedures and measures to maintain the PFA should be in place prior to being declared.
94	When the pest status is determined as absent (according to ISPM 8), or eradication of the pest from the target area is achieved (according to ISPM 9 ( <i>Guidelines for pest eradication programmes</i> )), the NPPO should make an official declaration that the area is free from the pest. All internal management procedures and <del>phytosanitary</del> measures to maintain the PFA (see section 3) should be in place before this declaration is made.	<i>Category : TECHNICAL</i> <b>(213) Australia (29 Sep 2022 7:59 AM)</b> As mentioned in the general comment at the start of the document, removing the word 'phytosanitary' removes the issue of two levels/tiers of 'phytosanitary measures' and aligns the terminology with the rest of the document for 'measures' used to maintain a PFA.
94	When the pest status is determined as absent (according to ISPM 8), or eradication of the pest from the target area is achieved (according to ISPM 9 ( <i>Guidelines for pest eradication programmes</i> )), the NPPO should make <del>an official</del> <u>a</u> declaration <u>or notification</u> that the area is free from the pest. All internal management procedures and phytosanitary measures to maintain the PFA (see section 3) should be in place before this declaration is made.	<i>Category : EDITORIAL</i> <b>(212) Australia (29 Sep 2022 7:57 AM)</b> It is not considered that the declaration for freedom from a pest to declare a PFA must be official.
94	When <del>the pest status of an area</del> is determined as <del>absent (according to ISPM 8)</del> <u>pest free</u> , or eradication of the pest from the target area is achieved (according to ISPM 9 ( <i>Guidelines for pest eradication programmes</i> )), the NPPO should make an official declaration that the area is free from the pest. All internal management procedures and phytosanitary measures to maintain the PFA (see section 3) should be in place before this declaration is made.	<i>Category : EDITORIAL</i> <b>(211) Australia (29 Sep 2022 7:55 AM)</b> To prevent confusion of terms (pest status and pest free area) it is suggested that references to pest status and ISPM 8 be deleted. Note the relationship between pest status and declaring a pest free area is described in the background (or section 2.1).
94	When the pest status is determined as absent ( <del>according to (see ISPM 8), 8</del> ) or eradication of the pest from the target area is achieved ( <del>according to (see ISPM 9 (Guidelines for pest eradication programmes))</del> ), the NPPO should make an official declaration that the area is free from the pest. All internal management procedures and phytosanitary measures to maintain the PFA (see section 3) should be in place before this declaration is made.	<i>Category : EDITORIAL</i> <b>(166) Eppo (26 Sep 2022 2:24 PM)</b> 1) Replacement of "according to" with "see" (twice): More appropriate wording. 2) Deletion of an unnecessary comma.
94	When the pest status is determined as absent (according to ISPM 8), or eradication of the pest from the <del>target</del> area is achieved (according to ISPM 9 ( <i>Guidelines for pest eradication programmes</i> )), the NPPO should make an official declaration that the area is free from the pest. All internal management procedures and phytosanitary measures to	<i>Category : TECHNICAL</i> <b>(116) Uruguay (19 Sep 2022 4:10 PM)</b> For consistency throughout the draft

	maintain the PFA (see section 3) should be in place before this declaration is made.	
94	When the pest status is determined as absent (according to ISPM 8), or eradication of the pest from the <del>target</del> -area is achieved (according to ISPM 9 ( <i>Guidelines for pest eradication programmes</i> )), the NPPO should make an official declaration that the area is free from the pest. All internal management procedures and phytosanitary measures to maintain the PFA (see section 3) should be in place before this declaration is made.	<p>Category : TECHNICAL  <b>(88) COSAVE (5 Sep 2022 5:44 PM)</b>  For consistency along the draft</p>
96	<p><u>The NPPO of the country in which the PFA is situated should set up a programme to ensure maintenance of the PFA. This programme should be risk-based and should incorporate at least the following elements: a regulatory framework to control the movement of regulated articles; continued surveillance and collection of relevant data to inform the management of the PFA, including outbreak management; a framework for reporting pest detections; and a corrective action plan in the event of an outbreak, with associated provisions for suspension and reinstatement of the PFA status.</u><del>The NPPO of the country in which the PFA is situated should set up a programme to ensure maintenance of the PFA. This programme should be risk-based and should incorporate at least the following elements: a regulatory framework to control the movement of regulated articles; routine surveillance and collection of relevant data to inform the management of the PFA, including outbreak management; a framework for reporting pest detections; and contingency plans for corrective action in the event of an outbreak, with associated rules for suspension and reinstatement of the PFA.</del></p>	<p>Category : TECHNICAL  <b>(311) European Union (30 Sep 2022 5:08 PM)</b>  1) For consistency, "continued surveillance" being the term used in paragraph 79.  3) Deletion of 'contingency plans' to fit ISPM 5 definition and title of section 3.4.  2) For consistency, "provisions" being the term used in the title of section 3.5 (paragraph 117).  4) addition of 'PFA status', please see the technical comment made on paragraph 111.</p>
96	<p><u>The NPPO of the country in which the PFA is situated should set up a programme to ensure maintenance of the PFA. This programme should be risk-based and should incorporate at least the following elements: a regulatory framework to control the movement of regulated articles; continued surveillance and collection of relevant data to inform the management of the PFA, including outbreak management; a framework for reporting pest detections; and a corrective action plan in the event of an outbreak, with associated provisions for suspension and reinstatement of the PFA status.</u><del>The NPPO of the country in which the PFA is situated should set up a programme to ensure maintenance of the PFA. This programme should be risk-based and should incorporate at least the following elements: a regulatory framework to control the</del></p>	<p>Category : TECHNICAL  <b>(145) Eppo (26 Sep 2022 2:07 PM)</b>  1) For consistency, "continued surveillance" being the term used in paragraph 79.  3) Deletion of 'contingency plans' to fit ISPM 5 definition and title of section 3.4.  2) For consistency, "provisions" being the term used in the title of section 3.5 (paragraph 117).  4) addition of 'PFA status', please see the technical comment made on paragraph 111.</p>

	<del>movement of regulated articles; routine surveillance and collection of relevant data to inform the management of the PFA, including outbreak management; a framework for reporting pest detections; and contingency plans for corrective action in the event of an outbreak, with associated rules for suspension and reinstatement of the PFA.</del>	
98	The regulation of the pest through the controls of the movement of regulated articles (see section 2.2) should be sufficient to prevent its entry into the PFA. Where appropriate, buffer zones may be established with rules for intensified surveys to ensure early detection of the spread of the pest into the vicinity of the PFA. The phytosanitary measures should also allow traceability of regulated articles introduced into the PFA or moving within the PFA, so that the appropriate corrective actions can be taken in a timely manner. <u>The regulatory framework may also include domestic pest reporting system in outbreaks, response to an outbreak, corrective actions and condition for reinstatement.</u>	<i>Category : SUBSTANTIVE</i> <b>(264) APPPC (30 Sep 2022 2:36 AM)</b> Revised change by Korea, Republic of on 24 Aug 2022 13:38
98	The regulation of the pest through the controls of the movement of regulated articles (see section 2.2) should be sufficient to prevent its entry into the PFA. Where appropriate, buffer zones may be established with rules for intensified surveys to ensure early detection of the spread of the pest into the vicinity of the PFA. The phytosanitary measures should also allow traceability of regulated articles introduced into the PFA or moving within the PFA, so that the appropriate corrective actions can be taken in a timely manner. <u>The regulatory framework may also include domestic pest reporting systems in outbreaks, corrective actions and conditions of reinstatement.</u>	<i>Category : SUBSTANTIVE</i> <b>(216) Australia (29 Sep 2022 8:01 AM)</b> Accommodates countries which contain many smaller states/provinces or islands but which are governed by the one government.
98	The regulation of the pest through the controls of the movement of regulated articles (see section 2.2) should be sufficient to prevent its entry into the PFA. Where appropriate, buffer zones may be established with rules for intensified surveys to ensure early detection of the spread of the pest into the vicinity of the PFA. The <del>phytosanitary</del> measures should also allow traceability of regulated articles introduced into the PFA or moving within the PFA, so that the appropriate corrective actions can be taken in a timely manner.	<i>Category : EDITORIAL</i> <b>(215) Australia (29 Sep 2022 8:00 AM)</b> As mentioned in the general comment at the start of the document, removing the word 'phytosanitary' removes the issue of two levels/tiers of 'phytosanitary measures' and aligns the terminology with the rest of the document for 'measures' used to maintain a PFA.
98	The regulation of the pest through the controls of the movement of regulated articles (see section 2.2) should be sufficient to prevent its entry into the PFA. Where appropriate, buffer zones may be established with rules for intensified surveys to ensure early detection of the spread	<i>Category : EDITORIAL</i> <b>(193) New Zealand (28 Sep 2022 8:47 AM)</b>

	of the pest into the vicinity of the PFA. The phytosanitary measures should also allow traceability of regulated articles introduced into the PFA or moving within the <del>PFA, PFA</del> , so that the appropriate corrective actions can be taken in a timely manner.	
98	The regulation of the pest through the controls of the movement of regulated articles (see section 2.2) should be sufficient to prevent its entry into the PFA. Where appropriate, <u>rules to intensify surveys in buffer zones may should be established with rules for intensified surveys set up</u> to ensure early detection of the spread of the pest into the vicinity of the PFA. The phytosanitary measures should also allow traceability of regulated articles introduced into the PFA or moving within the PFA, so that the appropriate corrective actions can be taken in a timely manner.	<i>Category : TECHNICAL</i> <b>(117) Uruguay (19 Sep 2022 4:13 PM)</b> Section 2.3 already says that buffer zones may be established
98	The regulation of the pest through the controls of the movement of regulated articles (see section 2.2) should be sufficient to prevent its entry into the PFA. Where appropriate, <u>rules to intensify surveys in buffer zones may should be established with rules for intensified surveys set up</u> to ensure early detection of the spread of the pest into the vicinity of the PFA. The phytosanitary measures should also allow traceability of regulated articles introduced into the PFA or moving within the PFA, so that the appropriate corrective actions can be taken in a timely manner.	<i>Category : TECHNICAL</i> <b>(89) COSAVE (5 Sep 2022 5:57 PM)</b> Section 2.3 already says that buffer zones may be established
98	The regulation of the pest through the controls of the movement of regulated articles (see section 2.2) should be sufficient to prevent its entry into the PFA. Where appropriate, buffer zones may be established with rules for intensified surveys to ensure early detection of the spread of the pest into the vicinity of the PFA. The phytosanitary measures should also allow traceability of regulated articles introduced into the PFA or moving within the PFA, so that the appropriate corrective actions can be taken in a timely manner. <u>The regulatory framework should also include domestic pest reporting system in outbreaks, response to an outbreak, corrective actions and condition for reinstatement.</u>	<i>Category : SUBSTANTIVE</i> <b>(38) Korea, Republic of (23 Aug 2022 12:34 PM)</b> Korea think that internal reporting system, response to an outbreak, corrective actions should be included in regulatory framework.
100	Surveillance should be conducted on a <u>technical and</u> regular basis to verify that the absence of the pest from the PFA is maintained.	<i>Category : TRANSLATION</i> <b>(103) IPPC Regional Workshop Africa (8 Sep 2022 1:58 PM)</b>
101	The decision about whether general surveillance for the pest is sufficient or specific surveillance is needed should be based on the risk	<i>Category : TECHNICAL</i> <b>(118) Uruguay (19 Sep 2022 4:14 PM)</b> To avoid redundancy

	of the pest's entry and establishment in the PFA and depends on the biology of the pest, the relevant <del>entry</del> pathways and the characteristics of the PFA.	
101	The decision about whether general surveillance for the pest is sufficient or specific surveillance is needed should be based on the risk of the pest's entry and establishment in the PFA and depends on the biology of the pest, the relevant <del>entry</del> pathways and the characteristics of the PFA.	<i>Category : TECHNICAL</i> <b>(90) COSAVE (5 Sep 2022 6:23 PM)</b> To avoid redundancy
102	<del>General surveillance may be sufficient in cases where the pest has never been introduced into the PFA, nor into the surrounding areas, and there have been no records of the pest's presence in the PFA.</del>	<i>Category : TECHNICAL</i> <b>(11) United States of America (11 Aug 2022 7:36 PM)</b> This is inconsistent with the section 2, para 79: establishing a PFA is not required if the pest is absent and never recorded.
103	Specific surveillance to detect possible outbreaks of the pest at an early stage should be the standard procedure in all other cases. The type and frequency of the <u>detection</u> surveys should be based on an assessment of the potential for pest entry and establishment in the PFA and should allow detection of the pest with an appropriate level of confidence.	<i>Category : TECHNICAL</i> <b>(312) European Union (30 Sep 2022 5:09 PM)</b> More precise wording.
103	Specific surveillance to detect possible outbreaks of the pest at an early stage should be the standard procedure in all other cases. The type and frequency of the <u>detection</u> surveys should be based on an assessment of the potential for pest entry and establishment in the PFA and should allow detection of the pest with an appropriate level of confidence.	<i>Category : TECHNICAL</i> <b>(146) EPP0 (26 Sep 2022 2:07 PM)</b> More precise wording.
105	A reporting framework should be established to ensure that <del>detections</del> <u>detections, or cases of suspected presence, of the pest in the area</u> are immediately notified to the NPPO (or other competent authority delegated by the NPPO) and officially confirmed.  <u>When an outbreak occurs, the NPPO should immediately notify trading partners of the incident and the measures that are being taken to eradicate the pest or bring the programme back to compliance.</u>	<i>Category : SUBSTANTIVE</i> <b>(313) European Union (30 Sep 2022 5:11 PM)</b> 1) Important element to add. 2) Precision given. 3) We propose this new paragraph to state what an NPPO should notify when an outbreak occurs in a PFA.
105	A reporting framework should be established to ensure that <del>detections</del> <u>detections, or cases of suspected presence, of the pest in the area</u> are immediately notified to the NPPO (or other competent authority delegated by the NPPO) and officially confirmed.	<i>Category : SUBSTANTIVE</i> <b>(147) EPP0 (26 Sep 2022 2:07 PM)</b> 1) Important element to add. 2) Precision given. 3) We propose this new paragraph to state what an NPPO should notify when an outbreak occurs in a PFA.

	<u>When an outbreak occurs, the NPPO should immediately notify trading partners of the incident and the measures that are being taken to eradicate the pest or bring the programme back to compliance.</u>	
106	<b>3.4 Corrective action <del>plans</del>plan, including response to an outbreak</b>	<i>Category : EDITORIAL</i> <b>(314) European Union (30 Sep 2022 5:11 PM)</b> Better fits in singular.
106	<b>3.4 Corrective action <del>plans</del>plan, including response to an outbreak</b>	<i>Category : EDITORIAL</i> <b>(148) EPP0 (26 Sep 2022 2:07 PM)</b> Better fits in singular.
107	In the event of the pest being detected in the PFA, the NPPO should determine, based on <del>ISPM 6 and ISPM 8</del> survey results, the <del>type of</del> corrective <del>action</del> actions to be <del>taken</del> taken through the development of a <u>corrective action plan</u> . An eradication programme should be initiated <del>unless for an outbreak of a pest, but not for an interception when the consignment containing the pest can be eradicated immediately, immediately destroyed or where</del> evidence indicates that there is no risk of the pest <del>establishing or no risk of it being</del> establishing spread outside the PFA by infested or contaminated regulated articles.	<i>Category : TECHNICAL</i> <b>(315) European Union (30 Sep 2022 5:15 PM)</b> 1) Deletion of 'ISPM 6 and ISPM 8'. Please see paragraph 111, not relevant to corrective actions. Then other improvements suggested for better clarity.  2) Further clarity is required. Depending on the definition of an eradication programme, this could constitute something that can be eradicated immediately or something that requires months/years to eradicate. We propose to say that an eradication programme is required for an outbreak of a pest, but is not required for an interception or where evidence indicates that there is no risk of the pest establishing.
107	In the event of the pest being detected in the PFA, the NPPO should determine, based on ISPM 6 and ISPM 8, the type of corrective action to be taken. An eradication programme should be initiated unless the pest can be eradicated immediately, or evidence indicates that there is no risk of the pest establishing or no risk of it being spread <del>outside the PFA</del> by infested or contaminated regulated articles.	<i>Category : SUBSTANTIVE</i> <b>(265) APPPC (30 Sep 2022 2:36 AM)</b> If there is a risk of the pest being spread within the PFA by infested or contaminated regulated articles even if there is no risk of the pest being spread outside the PFA, an eradication programme is usually required.
107	In the event of the pest being detected in the PFA, the NPPO should determine, based on ISPM 6 and ISPM 8, the type of corrective action to be taken. An eradication programme <del>should be initiated unless the pest can be eradicated immediately, or evidence indicates that there is no risk of the pest establishing or no risk of it being spread outside the PFA by infested or contaminated regulated articles.</del>	<i>Category : SUBSTANTIVE</i> <b>(250) Barbados (29 Sep 2022 5:04 PM)</b> An eradication programme should be initiated if the pest can be eradicated immediately, or evidence indicates that there is a risk of the pest establishing or spreading outside the PFA by infested or contaminated regulated articles.
107	In the event of the pest being detected in the PFA, the NPPO should determine, based on ISPM 6 and ISPM 8, the type of corrective action to be taken. An eradication programme should be initiated unless the pest can be eradicated immediately, or evidence indicates that there is no risk of the pest establishing or no risk of it being spread <del>outside the PFA</del> by infested or contaminated regulated articles.	<i>Category : SUBSTANTIVE</i> <b>(245) Japan (29 Sep 2022 11:53 AM)</b> If there is a risk of the pest being spread within the PFA by infested or contaminated regulated articles, an eradication programme is usually required, even if there is no risk of the pest being spread outside the PFA.
107	In the event of the pest being detected in the PFA, the NPPO should determine, based on ISPM 6 and ISPM 8, the type of corrective action	<i>Category : EDITORIAL</i> <b>(231) Australia (29 Sep 2022 8:37 AM)</b>

	to be taken. An eradication programme should be initiated unless the pest can be eradicated immediately, or evidence indicates that there is no risk of the pest establishing or <del>spreading or</del> no risk of it being spread outside the PFA by infested or contaminated regulated articles.	Eradication is required if there is a risk of pest spread as the pest may spread to an area where establishment is feasible.
107	In the event of the pest being detected in the PFA, the NPPO should determine, based on ISPM 6 and ISPM 8, the type of corrective action to be taken. An eradication programme should be initiated unless the pest can be eradicated immediately, or evidence indicates that there is no risk of the pest establishing or no risk of it being spread <del>outside within</del> the PFA by infested or contaminated regulated articles.	<i>Category : SUBSTANTIVE</i> <b>(218) Australia (29 Sep 2022 8:03 AM)</b> Establishment or spread in areas outside of the PFA does not impact the PFA.
107	In the event of the pest being detected in the PFA, the NPPO should determine, based on ISPM 6 and ISPM 8, the type of corrective action to be taken. An eradication programme should be initiated unless <del>the pest can be eradicated immediately, or</del> evidence indicates that there is no risk of the pest establishing or no risk of it being spread outside the PFA by infested or contaminated regulated articles.	<i>Category : SUBSTANTIVE</i> <b>(217) Australia (29 Sep 2022 8:02 AM)</b> Simplification of text, if the pest can be eradicated at entry, there is no risk of pest spread and establishment.
107	In the event of the pest being detected in the PFA, the NPPO should determine, based on ISPM 6 and ISPM 8, the type of corrective action to be taken. <del>An eradication programme should be initiated unless the pest can be eradicated immediately, or evidence indicates that there is no risk of the pest establishing or no risk of it being spread outside the PFA by infested or contaminated regulated articles.</del>	<i>Category : SUBSTANTIVE</i> <b>(167) Caribbean Agricultural Health and Food Safety Agency (26 Sep 2022 7:41 PM)</b> An eradication programme should be initiated if the pest can be eradicated immediately, or evidence indicates that there is a risk of the pest establishing or spreading outside the PFA by infested or contaminated regulated articles.
107	In the event of the pest being detected in the PFA, the NPPO should determine, based on <del>ISPM 6 and ISPM 8 survey results</del> , the <del>type of corrective action</del> <del>actions</del> to be <del>taken</del> <del>taken through the development of a corrective action plan</del> . An eradication programme should be initiated <del>unless for an outbreak of a pest, but not for an interception when the consignment containing the pest can be eradicated immediately, immediately destroyed or where</del> evidence indicates that there is no risk of the pest <del>establishing or no risk of it being</del> <del>establishing, spread outside the PFA by infested or contaminated regulated articles.</del>	<i>Category : TECHNICAL</i> <b>(149) EPPO (26 Sep 2022 2:07 PM)</b> 1) Deletion of 'ISPM 6 and ISPM 8'. Please see paragraph 111, not relevant to corrective actions. Then other improvements suggested for better clarity.  2) Further clarity is required. Depending on the definition of an eradication programme, this could constitute something that can be eradicated immediately or something that requires months/years to eradicate. We propose to say that an eradication programme is required for an outbreak of a pest, but is not required for an interception or where evidence indicates that there is no risk of the pest establishing.
107	In the event of the pest being detected in the PFA, the NPPO should determine, based on ISPM 6 and ISPM 8, the type of corrective action to be taken. An eradication programme should be initiated unless the pest can be eradicated immediately, or evidence indicates that there is no risk of the pest <del>establishing or no risk of it being</del> <del>establishing, spread outside the PFA by infested or contaminated regulated articles.</del>	<i>Category : TECHNICAL</i> <b>(119) Uruguay (19 Sep 2022 4:16 PM)</b> Actions should be taken into the PFA, so spreading outside the PFA should not be considered



107	In the event of the pest being detected in the PFA, the NPPO should determine, based on ISPM 6 and ISPM 8, the type of corrective action to be taken. An eradication programme should be initiated unless the pest can be eradicated immediately, or evidence indicates that there is no risk of the pest <del>establishing or no risk of it being</del> <u>establishing spread outside the PFA by infested or contaminated regulated articles.</u>	<i>Category : SUBSTANTIVE</i> <b>(92) COSAVE (5 Sep 2022 6:39 PM)</b> Actions should be taken into the PFA, so spreading outside the PFA should not be considered
107	In the event of the pest being detected in the PFA, the NPPO should determine, based on ISPM 6 and ISPM 8, the type of corrective action to be taken. <del>An eradication programme should be initiated unless the pest can be eradicated immediately, or evidence indicates that there is no risk of the pest establishing or no risk of it being spread outside the PFA by infested or contaminated regulated articles.</del>	<i>Category : EDITORIAL</i> <b>(73) PPPO (1 Sep 2022 3:38 AM)</b> The way this sentence is worded is confusing and does not help to clarify when an eradication program should be initiated. We suggest deleting this sentence because the concept is covered under action plans in the following sentence.
107	In the event of the pest being detected in the PFA, the NPPO should determine, based on ISPM 6 and ISPM 8, the type of corrective action to be taken. <u>An eradication programme should be initiated unless the pest can be eradicated immediately, or evidence indicates that there is no risk of the pest establishing or no risk of it being spread outside the PFA by infested or contaminated regulated articles.</u>	<i>Category : SUBSTANTIVE</i> <b>(28) Jamaica (12 Aug 2022 11:04 PM)</b> Jamaica proposes rephrasing this sentence to read "Corrective action should be determined by whether the pest can be eradicated immediately or evidence indicates that there is no risk of the pest establishing or no risk of it being spread outside the PFA by infested or contaminated regulated articles".  Jamaica proposes the addition of a follow up sentence that reads "if evidence indicates that the above factors cannot be met, an eradication programme should be initiated."  or  An eradication programme should be initiated where the pest cannot be eradicated immediately or evidence indicates there is risk of the pest establishing or risk of it being spread outside the PFA by infested or contaminated regulated articles.  These options allow for a better read and gives better clarity.
108	Preparedness for rapid intervention may be ensured by developing a corrective action plan in <del>advanc</del> <u>advance (i.e. a contingency plan)</u> , including plans for rapid technical assessment of the situation, availability of financial and human resources, the roles and responsibilities of decision makers, and the operational activities that are likely to be <del>needed (in the form of a draft action plan)</del> <u>needed</u> . To assist in preparedness, regular simulation exercises may be used to review the effectiveness of the <del>contingency</del> <u>corrective action</u> plan.	<i>Category : SUBSTANTIVE</i> <b>(316) European Union (30 Sep 2022 5:17 PM)</b> Contingency plans are developed in advance and correction action plans are developed for specific outbreaks.  In addition to the proposed changes, we suggest to move paragraph 108 before paragraph 107, for a more logical sequence (to have first the contingency plan, and then the corrective action plan and eradication programme which are described in paragraphs 107 and 109).
108	Preparedness for rapid intervention may be ensured by developing a corrective action plan in advance, including plans for rapid technical assessment of the situation, availability of financial and human resources, the roles and responsibilities of decision makers, and the operational activities that are likely to be needed <del>(in the form of a draft</del>	<i>Category : SUBSTANTIVE</i> <b>(251) Barbados (29 Sep 2022 5:08 PM)</b> The action plan is already mentioned in the first line.

	<del>action plan</del> ). To assist in preparedness, regular simulation exercises may be used to review the effectiveness of the corrective action plan.	
108	Preparedness for rapid intervention may be ensured by developing a corrective action plan in advance, including plans for rapid technical assessment of the situation, availability of financial and human resources, the roles and responsibilities of decision makers, and the operational activities that are likely to be needed <b>(in the form of a draft action plan)</b> . To assist in preparedness, regular simulation exercises may be used to review the effectiveness of the corrective action plan.	<i>Category : SUBSTANTIVE</i> <b>(168) Caribbean Agricultural Health and Food Safety Agency (26 Sep 2022 7:41 PM)</b> Jamaica proposes the removal of this phrase as it seems redundant. The action plan is already mentioned in the first line.
108	Preparedness for rapid intervention may be ensured by developing a corrective action plan in <del>advance</del> <b>advance (i.e. a contingency plan)</b> , including plans for rapid technical assessment of the situation, availability of financial and human resources, the roles and responsibilities of decision makers, and the operational activities that are likely to be <del>needed (in the form of a draft action plan)</del> <b>needed</b> . To assist in preparedness, regular simulation exercises may be used to review the effectiveness of the <del>corrective action contingency</del> plan.	<i>Category : SUBSTANTIVE</i> <b>(150) EPP0 (26 Sep 2022 2:07 PM)</b> Contingency plans are developed in advance and correction action plans are developed for specific outbreaks.  In addition to the proposed changes, we suggest to move paragraph 108 before paragraph 107, for a more logical sequence (to have first the contingency plan, and then the corrective action plan and eradication programme which are described in paragraphs 107 and 109).
108	Preparedness for rapid intervention may be ensured by developing a corrective action plan in advance, including plans for rapid technical assessment of the situation, availability of financial and human resources, the roles and responsibilities of decision makers, and the operational activities that are likely to be needed <b>(in the form of a draft action plan)</b> . To assist in preparedness, regular simulation exercises may be used to review the effectiveness of the corrective action plan.	<i>Category : SUBSTANTIVE</i> <b>(29) Jamaica (12 Aug 2022 11:06 PM)</b> Jamaica proposes the removal of this phrase as it seems redundant. The action plan is already mentioned in the first line.
109	<del>An eradication programme should follow ISPM 9 and include the following steps: The eradication programme should follow ISPM 9 and include the following steps.</del>	<i>Category : EDITORIAL</i> <b>(74) PPPO (1 Sep 2022 3:38 AM)</b> Improved grammar to flow into following points
111	<del>As soon as the detection of the pest has been officially confirmed in the PFA, a delimiting survey should be conducted to determine the boundary of the infested area. Based on this determination and an assessment of the pest biology, As soon as the detection of the pest outbreak has been officially confirmed in the PFA, a delimiting survey should be conducted to determine the boundary of the infested area. Based on this determination and an assessment of the pest biology,</del> the relevant pathways and the characteristics of the PFA, an outbreak area within the PFA should be demarcated and the PFA <u>status</u> should be temporarily suspended therein. This <del>demarcated</del> outbreak area should consist of the infested area surrounded by a buffer zone, the size of which should	<i>Category : TECHNICAL</i> <b>(317) European Union (30 Sep 2022 5:19 PM)</b> 1) Addition of pest 'outbreak', to clarify that a delimiting survey would be carried out when an outbreak is detected, not an interception. The first line could read "As soon as the detection of a pest outbreak has been officially confirmed in the PFA....."  2) addition of 'status', please see the title and content of section 2.4 (Suspension, reinstatement or revocation of an FF-PFA status) of ISPM 26 (Establishment of PFAs for FFs (Tephritidae)).  3) Deletion of 'demarcated' as this is explained in the previous sentence of the paragraph. It is not necessary to repeat "demarcated" before "outbreak area".


	depend on the biology of the pest, the presence of host plants and the ecological conditions.	
111	As soon as the detection of the pest has been officially confirmed in the PFA, a delimiting survey should be conducted <u>by NPPO</u> to determine the boundary of the infested area. Based on this determination and an assessment of the pest biology, the relevant pathways and the characteristics of the PFA, an outbreak area within the PFA should be demarcated and the PFA should be temporarily suspended therein. This demarcated outbreak area should consist of the infested area surrounded by a buffer zone, the size of which should depend on the biology of the pest, the presence of host plants and the ecological conditions.	<i>Category : SUBSTANTIVE</i> <b>(284) Viet Nam (30 Sep 2022 9:16 AM)</b>
111	As soon as the detection of the pest has been officially confirmed in the PFA, a delimiting survey should be conducted to determine the boundary of the infested area. Based on this determination and an assessment of the pest biology, the relevant pathways and the characteristics of the PFA, an outbreak area within the PFA should be demarcated and the PFA should be temporarily suspended therein. This demarcated outbreak area should consist of the infested area surrounded by a buffer zone, the size of which should depend on the biology of the pest, the <u>presence-availability</u> of host plants and the ecological conditions.	<i>Category : SUBSTANTIVE</i> <b>(266) APPPC (30 Sep 2022 2:36 AM)</b> It is more appropriate to use the wording "availability" than "presence" in this context because of the consistency with ISPM11.
111	As soon as the detection of the pest has been officially confirmed in the PFA, a delimiting survey should be conducted to determine the boundary of the infested area. Based on this determination and an assessment of the pest biology, the relevant pathways and the characteristics of the PFA, an outbreak area within the PFA should be demarcated and the PFA should be temporarily suspended therein. This demarcated outbreak area should consist of the infested area surrounded by a buffer zone, the size of which should depend on the biology of the pest, the <u>presence-availability</u> of host plants and the ecological conditions.	<i>Category : EDITORIAL</i> <b>(243) Japan (29 Sep 2022 11:51 AM)</b> It is more appropriate to use the wording "availability" than "presence" in this context because of the consistency with ISPM11.
111	<u>As soon as the detection of the pest outbreak has been officially confirmed in the PFA, a delimiting survey should be conducted to determine the boundary of the infested area. Based on this determination and an assessment of the pest biology, As soon as the detection of the pest has been officially confirmed in the PFA, a delimiting survey should be conducted to determine the boundary of</u>	<i>Category : TECHNICAL</i> <b>(151) EPP0 (26 Sep 2022 2:07 PM)</b> 1) Addition of pest 'outbreak', to clarify that a delimiting survey would be carried out when an outbreak is detected, not an interception. The first line could read "As soon as the detection of a pest outbreak has been officially confirmed in the PFA....."  2) addition of 'status', please see the title and content of section 2.4 (Suspension,

	<del>the infested area. Based on this determination and an assessment of the pest biology,</del> the relevant pathways and the characteristics of the PFA, an outbreak area within the PFA should be demarcated and the PFA <del>status</del> should be temporarily suspended therein. This <del>demarcated</del> outbreak area should consist of the infested area surrounded by a buffer zone, the size of which should depend on the biology of the pest, the presence of host plants and the ecological conditions.	reinstatement or revocation of an FF-PFA status) of ISPM 26 (Establishment of PFAs for FFs (Tephritidae)).  2) Deletion of 'demarcated' as this is explained in the previous sentence of the paragraph. It is not necessary to repeat "demarcated" before "outbreak area".
115	<b>3.4.3 Increased surveillance in the <del>demarcated</del> outbreak area</b>	<i>Category : EDITORIAL</i> <b>(318) European Union (30 Sep 2022 5:20 PM)</b> Simplification (please see the editorial comment made on paragraph 111).
115	<b>3.4.3 Increased surveillance in the <del>demarcated</del> outbreak area</b>	<i>Category : EDITORIAL</i> <b>(152) EPP0 (26 Sep 2022 2:07 PM)</b> Simplification (please see the editorial comment made on paragraph 111).
116	An intensive survey should be used in the <del>demarcated</del> outbreak area to determine and record the distribution of the pest and its population dynamics, and to assess the effectiveness of the eradication measures. This intensive survey should be maintained until the pest is eradicated from the outbreak area.	<i>Category : EDITORIAL</i> <b>(319) European Union (30 Sep 2022 5:20 PM)</b> Simplification (please see the editorial comment made on paragraph 111).
116	<del>An intensive</del> A survey should be used in the demarcated outbreak area to determine and record the distribution of the pest and its population dynamics, and to assess the effectiveness of the eradication measures. This <del>intensive</del> survey should be maintained until the pest is eradicated from the outbreak area.	<i>Category : EDITORIAL</i> <b>(219) Australia (29 Sep 2022 8:12 AM)</b> Suggest removing 'intensive' since this term is not defined and does not provide any specific instruction to the NPPO.
116	An intensive survey should be used in the <del>demarcated</del> outbreak area to determine and record the distribution of the pest and its population dynamics, and to assess the effectiveness of the eradication measures. This intensive survey should be maintained until the pest is eradicated from the outbreak area.	<i>Category : EDITORIAL</i> <b>(153) EPP0 (26 Sep 2022 2:07 PM)</b> Simplification (please see the editorial comment made on paragraph 111).
116	An <del>intensive</del> monitoring survey should be used in the demarcated outbreak area to determine and record the distribution of the pest and its population dynamics, and to assess the effectiveness of the eradication measures. This intensive survey should be maintained until the pest is eradicated from the outbreak area.	<i>Category : SUBSTANTIVE</i> <b>(52) China (28 Aug 2022 4:30 PM)</b> As for pest population dynamics, the monitoring survey is more suitable than intensive survey, there is a definition for "monitoring survey" in ISPM5.
117	<b>3.5 Provisions for suspension, reinstatement or withdrawal of the pest free <del>area</del> area status</b>	<i>Category : TECHNICAL</i> <b>(320) European Union (30 Sep 2022 5:21 PM)</b> Please see the technical comment made on paragraph 111.
117	<b>3.5 Provisions for suspension, reinstatement or withdrawal of the pest free <del>area</del> area status</b>	<i>Category : TECHNICAL</i> <b>(154) EPP0 (26 Sep 2022 2:07 PM)</b> Please see the technical comment made on paragraph 111.

118	<p><a href="#">Criteria for successful eradication in accordance with ISPM 9 should be established before the start of the eradication programme, including the intensity of the survey in the demarcated outbreak area and Criteria for successful eradication in accordance with ISPM 9 should be established in advance of the need to eradicate an outbreak including the intensity of the survey in the outbreak area and</a> the minimum period that the outbreak area needs to be free from the pest before lifting the suspension of the PFA.</p>	<p><i>Category : EDITORIAL</i>  <b>(321) European Union (30 Sep 2022 5:22 PM)</b>  The eradication measures should not be delayed, therefore criteria should be established in advance, not at the beginning of the eradication programme. New wording proposed to make clear that the criteria should be developed in advance.</p> <p>Deletion of 'demarcated': Simplification (please see the editorial comment made on paragraph 111). Addition of 'status', please see the technical comment made on paragraph 111.</p>
118	<p><a href="#">Criteria for successful eradication in accordance with ISPM 9 should be established in advance of the need to eradicate an outbreak including the intensity of the survey in the outbreak area and Criteria for successful eradication in accordance with ISPM 9 should be established before the start of the eradication programme, including the intensity of the survey in the demarcated outbreak area and</a> the minimum period that the outbreak area needs to be free from the pest before lifting the suspension of the PFA.</p>	<p><i>Category : EDITORIAL</i>  <b>(155) Eppo (26 Sep 2022 2:07 PM)</b>  The eradication measures should not be delayed, therefore criteria should be established in advance, not at the beginning of the eradication programme. New wording proposed to make clear that the criteria should be developed in advance.</p> <p>Deletion of 'demarcated': Simplification (please see the editorial comment made on paragraph 111). Addition of 'status', please see the technical comment made on paragraph 111.</p>
118	<p>Criteria for successful eradication in accordance with ISPM 9 should be established before the start of the eradication programme, including the intensity of the survey in the demarcated outbreak area and the minimum period that the outbreak area needs to be free from the pest before lifting the suspension of the PFA. <a href="#">The timeframe for meeting the criteria should be agreed by the relevant NPPOs at this time.</a></p>	<p><i>Category : EDITORIAL</i>  <b>(75) PPPO (1 Sep 2022 3:38 AM)</b>  Additional sentence links with timeframe specified lower down.</p>
119	<p>If the criteria are fulfilled, then eradication may be officially declared successful and the temporary control and eradication measures may be lifted. The <a href="#">status of the</a> full PFA may then be reinstated.</p>	<p><i>Category : TECHNICAL</i>  <b>(322) European Union (30 Sep 2022 5:23 PM)</b>  Please see the technical comment made on paragraph 111.</p>
119	<p>If the criteria are fulfilled, then eradication may be officially declared successful and the temporary control and eradication measures may be lifted. The <a href="#">status of the</a> full PFA may then be reinstated.</p>	<p><i>Category : TECHNICAL</i>  <b>(156) Eppo (26 Sep 2022 2:07 PM)</b>  Please see the technical comment made on paragraph 111.</p>
120	<p>If the criteria for eradication within the demarcated outbreak area cannot be fulfilled within a reasonable timeframe to be determined by the NPPO, then either the PFA <a href="#">status</a> should be withdrawn or the delimitation of the PFA should be reviewed.</p>	<p><i>Category : TECHNICAL</i>  <b>(323) European Union (30 Sep 2022 5:24 PM)</b>  Please see the technical comment made on paragraph 111.</p>
120	<p>If the criteria for eradication within the demarcated outbreak area cannot be fulfilled within a reasonable timeframe <del>to be as</del> determined by the NPPO, then either the PFA should be withdrawn or the delimitation of the PFA should be reviewed.</p>	<p><i>Category : EDITORIAL</i>  <b>(220) Australia (29 Sep 2022 8:14 AM)</b>  For clarity</p>

120	If the criteria for eradication within the demarcated outbreak area cannot be fulfilled within a reasonable timeframe to be determined by the NPPO, then either the PFA <u>status</u> should be withdrawn or the delimitation of the PFA should be reviewed.	<i>Category : TECHNICAL</i> <b>(157) Eppo (26 Sep 2022 2:07 PM)</b> Please see the technical comment made on paragraph 111.
120	If the criteria for eradication within the demarcated outbreak area cannot be fulfilled within a reasonable timeframe <del>to be</del> (as determined by the <del>NPPO</del> relevant NPPOs), then either the PFA should be withdrawn or the delimitation of the PFA should be reviewed.	<i>Category : EDITORIAL</i> <b>(76) PPPO (1 Sep 2022 3:38 AM)</b> To account for importing and exporting country NPPO agreement
121	<b>4. <del>Verification of pest freedom and regular</del> Regular review <u>and verification of implementation</u></b>	<i>Category : EDITORIAL</i> <b>(324) European Union (30 Sep 2022 5:25 PM)</b> Consistency with the order and content of paragraphs 122 to 124.
121	<b>4. <del>Verification of pest freedom and regular</del> Regular review <u>and verification of implementation</u></b>	<i>Category : EDITORIAL</i> <b>(158) Eppo (26 Sep 2022 2:07 PM)</b> Consistency with the order and content of paragraphs 122 to 124.
122	Once the PFA is established, the performance of the PFA maintenance <del>programme-programme, including the administrative activities,</del> should be regularly <del>reviewed</del> reviewed by the NPPO to verify correct <del>implementation of the maintenance programme.</del> This review should allow the NPPO to find and correct deficiencies, incorporate any new and relevant information on the pest or associated pathways, and adjust and improve the maintenance programme accordingly.	<i>Category : SUBSTANTIVE</i> <b>(267) APPPC (30 Sep 2022 2:36 AM)</b> Revised change by Japan on 23 Aug 2022 9:47
122	Once the PFA is established, the performance of the PFA maintenance <del>programme-programme, including the administrative activities,</del> should be regularly <del>reviewed</del> reviewed by the NPPOs to verify correct <del>implementation of the maintenance programme.</del> This review should allow the NPPO to find and correct deficiencies, incorporate any new and relevant information on the pest or associated pathways, and adjust and improve the maintenance programme accordingly.	<i>Category : SUBSTANTIVE</i> <b>(233) Japan (29 Sep 2022 11:35 AM)</b> For para 123, it is not clear how and who should verify the correct implementation. Suggest that para 123 be integrated to para 122 as there is some duplication between two sentences.
122	Once the PFA is established, the performance of the PFA maintenance <del>programme-programme, including administrative activities,</del> should be regularly <del>reviewed</del> reviewed by the NPPO to verify correct <del>implementation of the maintenance programme.</del> This review should allow the NPPO to find and correct deficiencies, incorporate any new and relevant information on the pest or associated pathways, and adjust and improve the maintenance programme accordingly.	<i>Category : EDITORIAL</i> <b>(221) Australia (29 Sep 2022 8:16 AM)</b> Merging information from paragraph 123 (below) to avoid duplication of information and provide a description for how a PFA maintenance programme is verified.
122	<u>Pest freedom is attained or maintained based on verification from conducting specific surveillance.</u> Once the PFA is established, the performance of the PFA maintenance programme should be regularly reviewed. This	<i>Category : TECHNICAL</i> <b>(7) NEppo (3 Aug 2022 5:36 PM)</b> Revised change by Egypt on 31 Jul 2022 11:14 PM

	review should allow the NPPO to find and correct deficiencies, incorporate any new and relevant information on the pest or associated pathways, and adjust and improve the maintenance programme accordingly.	
123	The correct implementation of the <a href="#">PFA</a> maintenance programme, including the administrative activities, should be verified.	<i>Category : EDITORIAL</i> <b>(325) European Union (30 Sep 2022 5:26 PM)</b> For consistency with the term used in paragraph 122 (first sentence).
123	<del>The correct implementation of the maintenance programme, including the administrative activities, should be verified.</del>	<i>Category : SUBSTANTIVE</i> <b>(234) Japan (29 Sep 2022 11:35 AM)</b> See the comment for para 122.
123	<del>The correct implementation of the maintenance programme, including the administrative activities, should be verified.</del>	<i>Category : EDITORIAL</i> <b>(222) Australia (29 Sep 2022 8:17 AM)</b> Text has been inserted into the above paragraph.
123	The correct implementation of the <a href="#">PFA</a> maintenance programme, including the administrative activities, should be verified.	<i>Category : EDITORIAL</i> <b>(159) Eppo (26 Sep 2022 2:07 PM)</b> For consistency with the term used in paragraph 122 (first sentence).
126	<del>The data from the surveillance (e.g. time of surveillance, number and type of plants inspected, number of samples taken for inspection, number of samples taken for laboratory analysis, analytical methods used, results of the analyses, and other relevant information as required by ISPM 6) should be stored and kept available for a sufficient time to ensure the possibility of traceability and verification. The data from the surveillance (e.g. time of surveillance, number and type of plants inspected, number of samples taken for inspection, number of samples taken for laboratory analysis, analytical methods used, results of the analyses, and other relevant information as required by ISPM 6) should be stored and kept available as long as the PFA is based on these data to ensure the possibility of traceability and verification.</del>	<i>Category : TECHNICAL</i> <b>(326) European Union (30 Sep 2022 5:27 PM)</b> Not clear. We suggest „as long as the PFA is based on these data“ instead.
126	The data from the surveillance (e.g. time of surveillance, number and type of plants inspected, number of samples taken for inspection, number of samples taken for laboratory analysis, analytical methods used, results of the analyses, and other relevant information as required by ISPM 6) should be stored and kept available for a sufficient time to ensure the <del>possibility of ability for</del> traceability and verification.	<i>Category : EDITORIAL</i> <b>(224) Australia (29 Sep 2022 8:25 AM)</b> More concise language
126	The data from the surveillance (e.g. time of surveillance, number and type of plants inspected, number of samples taken for inspection, number of samples taken for laboratory analysis, analytical methods used, results of the analyses, and other relevant information as required by ISPM 6) should be stored and kept available for <del>a sufficient an</del> <u>appropriate period of</u> time to ensure the possibility of traceability and verification.	<i>Category : EDITORIAL</i> <b>(223) Australia (29 Sep 2022 8:18 AM)</b> Rephrased to ensure understanding that data must be stored for a period of time to allow verification.

126	<p><u>The data from the surveillance (e.g. time of surveillance, number and type of plants inspected, number of samples taken for inspection, number of samples taken for laboratory analysis, analytical methods used, results of the analyses, and other relevant information as required by ISPM 6) should be stored and kept available as long as the PFA is based on these data to ensure the possibility of traceability and verification.</u>  <del>The data from the surveillance (e.g. time of surveillance, number and type of plants inspected, number of samples taken for inspection, number of samples taken for laboratory analysis, analytical methods used, results of the analyses, and other relevant information as required by ISPM 6) should be stored and kept available for a sufficient time to ensure the possibility of traceability and verification.</del></p>	<p>Category : <i>TECHNICAL</i>  <b>(160) EPP0 (26 Sep 2022 2:07 PM)</b>          Not clear. We suggest „as long as the PFA is based on these data“ instead.</p>
126	<p>The data from the surveillance (e.g. time of surveillance, number and type of plants inspected, number of samples taken for inspection, number of samples taken for laboratory analysis, analytical methods used, results of the analyses, and other relevant information as required by ISPM 6) should be stored and kept available for a sufficient time to ensure the possibility of traceability and <del>verification</del><u>verification and reviewed regularly.</u></p>	<p>Category : <i>SUBSTANTIVE</i>  <b>(53) China (28 Aug 2022 4:31 PM)</b>          This facilitates traceability and review.</p>
127	<p>The measures used to establish and maintain the PFA should be adequately documented. The documentation should be reviewed regularly, updated as needed, and include any <del>amendments</del><u>amendments to the PFA maintenance programme.</u> Records of the procedures to establish, maintain and implement corrective actions should be kept for a minimum of 24 months, or longer depending on the biology of the pest.</p>	<p>Category : <i>EDITORIAL</i>  <b>(327) European Union (30 Sep 2022 5:28 PM)</b>          Please see paragraphs 96 and 122.</p>
127	<p>The measures used to establish and maintain the PFA should be adequately documented. The documentation should be reviewed regularly, updated as needed, and include any amendments. Records of the procedures to establish, maintain and implement corrective actions should be kept <del>for a minimum of as needed or at least</del> 24 months, <del>or longer</del> depending on the biology of the pest.</p>	<p>Category : <i>SUBSTANTIVE</i>   Mexico  <b>(254) Mexico (29 Sep 2022 10:01 PM)</b>          It must be kept for the period of time according to the legislation of each country, or it should be kept for at least one year.</p>
127	<p>The measures used to establish and maintain the PFA should be adequately documented. The documentation should be reviewed regularly, updated as needed, and include any amendments. Records of the procedures to establish, <del>maintain and</del> implement <u>and maintain</u> corrective actions should be kept for a minimum of 24 months, or longer depending on the biology of the pest.</p>	<p>Category : <i>SUBSTANTIVE</i>  <b>(252) Barbados (29 Sep 2022 5:11 PM)</b>          Implement and maintain should be the correct flow.</p>



127	The measures used to establish and maintain the PFA should be adequately documented. The documentation should be reviewed regularly, updated as needed, and include any amendments. Records of the procedures to establish, maintain and implement corrective actions should be <u>stored and kept available for a minimum an appropriate period of 24 monthstime, or longer</u> depending on the biology of the pest.	<i>Category : SUBSTANTIVE</i> <b>(225) Australia (29 Sep 2022 8:28 AM)</b> To make this requirement consistent with paragraph 1 of Part 5. The proposed text requires the maintenance of records for an "appropriate amount of time" and is sufficient for the purpose of this ISPM. A prescribed time period is not required or backed by any reasoning for the time frame.
127	The measures used to establish and maintain the PFA should be adequately documented. The documentation should be reviewed regularly, updated as needed, and include any amendments. Records of the procedures to establish, <u>maintain and implement</u> corrective actions should be kept for a minimum of 24 months, or longer depending on the biology of the pest.	<i>Category : SUBSTANTIVE</i> <b>(169) Caribbean Agricultural Health and Food Safety Agency (26 Sep 2022 7:41 PM)</b> Jamaica proposes switching the position of these words to read "implement and maintain".
127	The measures used to establish and maintain the PFA should be adequately documented. The documentation should be reviewed regularly, updated as needed, and include any <u>amendmentsamendments to the PFA maintenance programme</u> . Records of the procedures to establish, maintain and implement corrective actions should be kept for a minimum of 24 months, or longer depending on the biology of the pest.	<i>Category : EDITORIAL</i> <b>(161) EPPO (26 Sep 2022 2:07 PM)</b> Please see paragraphs 96 and 122.
127	The measures used to establish and maintain the PFA should be adequately documented. The documentation should be reviewed regularly, updated as needed, and include any amendments. Records of the procedures to establish, <u>maintain and implement</u> corrective actions should be kept for a minimum of 24 months, or longer depending on the biology of the pest.	<i>Category : SUBSTANTIVE</i> <b>(30) Jamaica (12 Aug 2022 11:07 PM)</b> Jamaica proposes switching the position of these words to read "implement and maintain".
127	The measures used to establish and maintain the PFA should be adequately documented. The documentation should be reviewed regularly, updated as needed, and include any amendments. Records of the procedures to establish, maintain and implement corrective actions should be kept for a minimum of 24 months, or longer depending on the biology of the <u>pestpest and for the duration of the commodity moved from the area</u> .	<i>Category : TECHNICAL</i> <b>(12) United States of America (11 Aug 2022 7:39 PM)</b> to clarify the limitations on movements of the commodity that could be infested.
129	Individuals, groups or organizations other than the NPPO of the country in which the PFA is situated can also affect, or be <u>affectedaffected by, by</u> the actions to establish and maintain the PFA.	<i>Category : EDITORIAL</i> <b>(328) European Union (30 Sep 2022 5:30 PM)</b> Typo.

	The NPPO may establish partnerships with stakeholders, which may include seeking contributions of resources.	
129	Individuals, groups or organizations other than the NPPO of the country in which the PFA is situated can also affect, or be <del>affected</del> <del>affected by</del> , by the actions to establish and maintain the PFA. The NPPO may establish partnerships with stakeholders, which may include seeking contributions of resources.	Category : EDITORIAL <b>(162) EPPO (26 Sep 2022 2:07 PM)</b> Typo
130	Information about the establishment and maintenance of the <del>PFA-PFA</del> , including information about the methodology, results of surveys and pest diagnostics, and other relevant information supporting the claim of pest freedom, should be made available on request to <del>relevant stakeholders and</del> other <del>NPPOs</del> <del>NPPOs and, if appropriate, relevant stakeholders</del> .	Category : SUBSTANTIVE <b>(329) European Union (30 Sep 2022 5:32 PM)</b> Typo (a space to deleted before the comma).  First and foremost, the information should be communicated between the NPPOs, so we propose changing the order. If it makes sense, this information could also be made available to stakeholders, but this should be optional, not mandatory, and at the discretion of the NPPO of the country in which the PFA is located.
130	Information about the establishment and maintenance of the <del>PFA-PFA</del> , including information about the methodology, results of surveys and pest diagnostics, and other relevant information supporting the claim of pest freedom, should be made available on request to relevant stakeholders and other NPPOs.	Category : EDITORIAL <b>(226) Australia (29 Sep 2022 8:29 AM)</b> Removal of space
130	Information about the establishment and maintenance of the <del>PFA-PFA</del> , including information about the methodology, results of surveys and pest diagnostics, and other relevant information supporting the claim of pest freedom, should be made available on request to relevant stakeholders and other NPPOs.	Category : EDITORIAL <b>(194) New Zealand (28 Sep 2022 8:48 AM)</b>
130	Information about the establishment and maintenance of the <del>PFA-PFA</del> , including information about the methodology, results of surveys and pest diagnostics, and other relevant information supporting the claim of pest freedom, should be made available on request to <del>relevant stakeholders and</del> other <del>NPPOs</del> <del>NPPOs and, if appropriate, relevant stakeholders</del> .	Category : SUBSTANTIVE <b>(163) EPPO (26 Sep 2022 2:07 PM)</b> Typo (a space to deleted before the comma).  First and foremost, the information should be communicated between the NPPOs, so we propose changing the order. If it makes sense, this information could also be made available to stakeholders, but this should be optional, not mandatory, and at the discretion of the NPPO of the country in which the PFA is located.
131	Maps and information about the phytosanitary measures applied to maintain the PFA <del>should</del> <del>may</del> be communicated to relevant stakeholders.	Category : SUBSTANTIVE <b>(330) European Union (30 Sep 2022 5:32 PM)</b> It is not always necessary to communicate such information to stakeholders.
131	Maps and information about the <del>phytosanitary</del> measures applied to maintain the PFA should be communicated to relevant stakeholders.	Category : SUBSTANTIVE <b>(246) Japan (29 Sep 2022 11:54 AM)</b> Delete "phytosanitary" because measures to maintain PFAs are not always for the purpose of phytosanitary.
131	Maps and information about the <del>phytosanitary</del> measures applied to maintain the PFA should be communicated to relevant stakeholders.	Category : TECHNICAL <b>(227) Australia (29 Sep 2022 8:30 AM)</b> As mentioned in the general comment at the start of the document, removing the word

		'phytosanitary' removes the issue of two levels/tiers of 'phytosanitary measures' and aligns the terminology with the rest of the document for 'measures' used to maintain a PFA.
131	Maps and information about the phytosanitary measures applied to maintain the PFA <del>should</del> <u>may</u> be communicated to relevant stakeholders.	<i>Category : SUBSTANTIVE</i> <b>(164) EPPO (26 Sep 2022 2:07 PM)</b> It is not always necessary to communicate such information to stakeholders.
131	<del>Maps Information (e.g. maps and information-GPS coordinates)</del> about the phytosanitary measures applied to maintain the PFA should be communicated to relevant stakeholders.	<i>Category : EDITORIAL</i> <b>(77) PPPO (1 Sep 2022 3:38 AM)</b> Maps and GPS coordinates included as examples because there is a 'should' in this sentence. So examples included to maintain some flexibility where required.
132	To achieve the support of the community, NPPOs are encouraged to raise public awareness about PFAs in their territory, including the framework for reporting <del>sightings-detections or cases of suspected presence of the pest</del> <u>pest in the PFA</u> , the phytosanitary measures applied to <del>establish in</del> <u>maintain</u> the <del>PFAs, PFAs</del> and the importance of maintaining the PFAs.	<i>Category : SUBSTANTIVE</i> <b>(331) European Union (30 Sep 2022 5:35 PM)</b> More precise wording, and please see the substantive comment made on paragraph 105.  Editorials: more correct English and unnecessary comma.  Finally, it seems more appropriate here to focus on the maintenance of the PFA ('maintain' instead of 'establish').
132	To achieve the support of the community, NPPOs are encouraged to raise public awareness about PFAs in their territory, including the framework for reporting sightings of the pest, the <del>phytosanitary</del> measures applied to establish in the PFAs, and the importance of maintaining the PFAs.	<i>Category : SUBSTANTIVE</i> <b>(247) Japan (29 Sep 2022 11:54 AM)</b> Delete "phytosanitary" because measures to establish PFAs are not always for the purpose of phytosanitary.
132	To achieve the support of the community, NPPOs are encouraged to raise public awareness about PFAs in their territory, including the framework for reporting sightings of the pest, the phytosanitary measures applied to establish <del>in</del> the PFAs, and the importance of maintaining the PFAs.	<i>Category : EDITORIAL</i> <b>(229) Australia (29 Sep 2022 8:32 AM)</b> Removal of word for readability
132	To achieve the support of the community, NPPOs are encouraged to raise public awareness about PFAs in their territory, including the framework for reporting sightings of the pest, the <del>phytosanitary</del> measures applied to establish in the PFAs, and the importance of maintaining the PFAs.	<i>Category : TECHNICAL</i> <b>(228) Australia (29 Sep 2022 8:31 AM)</b> As mentioned in the general comment at the start of the document, removing the word 'phytosanitary' removes the issue of two levels/tiers of 'phytosanitary measures' and aligns the terminology with the rest of the document for 'measures' used to maintain a PFA.
132	To achieve the support of the community, NPPOs are encouraged to raise public awareness about PFAs in their territory, including the framework for reporting sightings of the pest, the phytosanitary measures applied to establish <del>in</del> the PFAs, and the importance of maintaining the PFAs.	<i>Category : EDITORIAL</i> <b>(195) New Zealand (28 Sep 2022 8:50 AM)</b>
132	To achieve the support of the community, NPPOs are encouraged to raise public awareness about PFAs in their territory, including the framework for reporting <del>sightings-detections or cases of suspected presence of the pest</del> <u>pest in the PFA</u> , the phytosanitary measures applied	<i>Category : SUBSTANTIVE</i> <b>(165) EPPO (26 Sep 2022 2:07 PM)</b> More precise wording, and please see the substantive comment made on paragraph 105.  Editorials: more correct English and unnecessary comma.

	to <del>establish in</del> <u>maintain</u> the <del>PFA</del> s, <u>PFA</u> s and the importance of maintaining the PFAs.	Finally, it seems more appropriate here to focus on the maintenance of the PFA ('maintain' instead of 'establish').
132	To achieve the support of the community, NPPOs are encouraged to raise public awareness about PFAs in their territory, including the framework for reporting <del>sightings</del> <u>suspect cases</u> of the pest, the phytosanitary measures applied to establish <del>in</del> the PFAs, and the importance of maintaining the PFAs.	<i>Category : TECHNICAL</i> <b>(120) Uruguay (19 Sep 2022 4:18 PM)</b> More appropriate term
132	To achieve the support of the community, NPPOs are encouraged to raise public awareness about PFAs in their territory, including the framework for reporting sightings of the pest, the phytosanitary measures applied to establish <u>in</u> the PFAs, and the importance of maintaining the PFAs.	<i>Category : EDITORIAL</i> <b>(94) COSAVE (5 Sep 2022 6:50 PM)</b>
132	To achieve the support of the community, NPPOs are encouraged to raise public awareness about PFAs in their territory, including the framework for reporting <del>sightings</del> <u>suspect cases</u> of the pest, the phytosanitary measures applied to establish in the PFAs, and the importance of maintaining the PFAs.	<i>Category : TECHNICAL</i> <b>(93) COSAVE (5 Sep 2022 6:49 PM)</b> More appropriate term
132	To achieve the support of the community, NPPOs are encouraged to raise public awareness about PFAs in their territory, including the framework for reporting sightings of the pest, the phytosanitary measures applied to establish <del>in</del> the PFAs, and the importance of maintaining the PFAs.	<i>Category : EDITORIAL</i> <b>(78) PPPO (1 Sep 2022 3:38 AM)</b> wording correction
134	<del>Official Bilateral</del> recognition of PFAs should take place in accordance with ISPM 29 ( <i>Recognition of pest free areas and areas of low pest prevalence</i> ).	<i>Category : SUBSTANTIVE</i> <b>(268) APPPC (30 Sep 2022 2:36 AM)</b> Revised change by New Zealand on 23 Aug 2022 4:03
134	<del>Official Bilateral</del> recognition of PFAs should take place in accordance with ISPM 29 ( <i>Recognition of pest free areas and areas of low pest prevalence</i> ).	<i>Category : SUBSTANTIVE</i> <b>(230) Australia (29 Sep 2022 8:33 AM)</b> It is considered that the word "official" is less restrictive for the recognition of PFAs
134	Bilateral <u>or multilateral</u> recognition of PFAs should take place in accordance <del>with</del> <u>with, or based on</u> ISPM 29 ( <i>Recognition of pest free areas and areas of low pest prevalence</i> ).	<i>Category : SUBSTANTIVE</i> <b>(196) New Zealand (28 Sep 2022 8:55 AM)</b> Other ISPMs such as the draft annex to ISPM 38: systems approaches for seed movement will include multilateral recognition of PFA so should this be included here for future alignment of ISPMs, and capture the current regional practices?
134	Bilateral <u>and multilateral</u> recognition of PFAs should take place in accordance with ISPM 29 ( <i>Recognition of pest free areas and areas of low pest prevalence</i> ).	<i>Category : SUBSTANTIVE</i> <b>(80) PPPO (1 Sep 2022 3:38 AM)</b> ISPM 38 allows for multilateral recognition

134	Bilateral recognition of PFAs should take place in accordance with ISPM 29 ( <i>Recognition of pest free areas and areas of low pest prevalence</i> ).	<p><i>Category : SUBSTANTIVE</i>  <b>(79) PPPO (1 Sep 2022 3:38 AM)</b>  Other ISPMs such as ISPM 38 for systems approaches for seeds (currently under development) is proposing multilateral recognition of measures such as PFAs so should this be included here? Noting that ISPM 29 only refers to bilateral recognition, it is proposed that multilateral recognition should also be included here and be based on ISPM 29. The proposed revision will ensure future alignment of the ISPMs and may capture current regional practices.</p>
136	This section is not part of the standard. The Standards Committee in May 2016 requested the secretariat to gather information on any potential implementation issues related to this draft. Please provide details and proposals on how to address these potential implementation issues.	<p><i>Category : SUBSTANTIVE</i>  <b>(253) Barbados (29 Sep 2022 5:12 PM)</b>  There will need to be training done(on an ongoing basis) in order to have NPPOs sufficiently confident in meeting the demands of this ISPM.</p>
136	This section is not part of the standard. The Standards Committee in May 2016 requested the secretariat to gather information on any potential implementation issues related to this draft. Please provide details and proposals on how to address these potential implementation issues.	<p><i>Category : EDITORIAL</i>  <b>(171) Caribbean Agricultural Health and Food Safety Agency (26 Sep 2022 7:41 PM)</b>  There will need to be training done(on an ongoing basis) in order to have NPPOs sufficiently confident in meeting the demands of this ISPM.</p>
136	This section is not part of the standard. The Standards Committee in May 2016 requested the secretariat to gather information on any potential implementation issues related to this draft. Please provide details and proposals on how to address these potential implementation issues.	<p><i>Category : EDITORIAL</i>  <b>(170) Caribbean Agricultural Health and Food Safety Agency (26 Sep 2022 7:41 PM)</b>  Jamaica accepts this revision. As a developing Island state, Jamaica will need assistance in implementing this ISPM</p>
136	This section is not part of the standard. The Standards Committee in May 2016 requested the secretariat to gather information on any potential implementation issues related to this draft. Please provide details and proposals on how to address these potential implementation issues.	<p><i>Category : EDITORIAL</i>  <b>(25) Jamaica (12 Aug 2022 10:52 PM)</b>  Jamaica accepts this revision. As a developing Island state, Jamaica will need assistance in implementing this ISPM</p>